



Canadian Centre for Occupational Health and Safety 🍁 Centre canadien d'hygiène et de sécurité au travail

# **Accessibility Plan Progress Report**

**June 2024**

# Table of Contents

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|                                                       |    |
|-------------------------------------------------------|----|
| INTRODUCTION .....                                    | 1  |
| GENERAL .....                                         | 2  |
| The Accessible Canada Act .....                       | 2  |
| Feedback.....                                         | 3  |
| Alternate Formats .....                               | 3  |
| Executive Summary .....                               | 3  |
| An Overview of CCOHS .....                            | 4  |
| ACCESSIBILITY PLAN PROGRESS REPORT .....              | 5  |
| EMPLOYMENT.....                                       | 5  |
| BUILT ENVIRONMENT .....                               | 7  |
| INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)..... | 8  |
| COMMUNICATIONS (other than ICT) .....                 | 9  |
| PROCUREMENT OF GOODS, SERVICES AND FACILITIES .....   | 10 |
| DESIGN AND DELIVERY OF PROGRAMS AND SERVICES .....    | 10 |
| TRANSPORTATION .....                                  | 11 |

# INTRODUCTION

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As a centre for excellence serving the total well-being of workers in Canada, the Canadian Centre for Occupational Health and Safety (CCOHS) is committed to accessibility in all facets of our reach as a service provider and employer. More than 6.2 million of the people we serve are living with a disability and facing barriers in access to programs, services, facilities, and employment.

In our commitment to fulfilling our mandate for all Canadians, and our alignment with the overarching vision of the Accessible Canada Act last year, we created our first Accessibility Plan (the Plan) after a review of our products, services, building, and practices as an employer and service provider, and in consultation with those who are directly impacted by what we do. Through those consultations, we collected valuable information to inform our Accessibility Plan.

Over the next three years, we committed to take meaningful actions to gain momentum and fulfill the commitments of our Plan, invite feedback and consultation on our progress, and report on how far we've come.

I am pleased to present our first annual Accessibility Plan Progress Report. The report highlights the steps we have taken since publishing our initial Accessibility Plan. We will look to continuously improve as we incorporate feedback from future consultations and as new developments arise, and will post another update in December 2024. Because of this commitment to create a barrier-free organization, we believe we will make even greater strides to improve the total well-being of all working Canadians.



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Anne Tennier  
President and CEO

Anne Tennier, P.Eng., EP  
President and Chief Executive Officer  
Canadian Centre for Occupational Health and Safety

# GENERAL

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## The Accessible Canada Act

The [Accessible Canada Act \(the Act\)](#) came into force in 2019 with a vision to achieve a barrier-free Canada by 2040. The Act requires that regulated entities, including the federal government, parliament and the federally regulated private sector, proactively identify, remove, and prevent barriers to accessibility for persons with disabilities in seven priority areas:

- employment
- the built environment
- information and communication technologies
- communication
- the procurement of goods, services, and facilities
- the design and delivery of programs and services; and
- transportation.

The Act defines a 'barrier' as:

*anything — including anything physical, architectural, technological, or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation. (obstacle)*

The Act defines a 'disability' as:

*any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.*

Regulated entities are required to:

- create three-year Accessibility Plans, informed by consultations with persons with disabilities, that set out how they will identify, remove, and prevent barriers to accessibility.
- publish annual progress reports that describe how they are delivering their Accessibility Plans; and
- implement processes to collect, manage, and respond to feedback on Accessibility Plans and progress reports.

## Feedback

We welcome feedback about the implementation of our Accessibility Plan, our progress, and barriers you may have encountered or observed whether you are an employee, client, customer, member of the public, or member of a group representing the interests of persons with disabilities.

Our Director of Human Resources is responsible for receiving accessibility feedback and coordinating with internal experts who oversee each of the priority areas. You can provide your feedback in any of the following ways:

- Accessibility feedback form
- E-mail: [accessibility@ccohs.ca](mailto:accessibility@ccohs.ca)
- Phone: 1-800-668-4284
- Mail: 135 Hunter Street East  
Hamilton, Ontario L8N 1M5

We will acknowledge receipt of feedback in the same manner as the feedback was provided unless it is requested using a different format. If feedback is provided anonymously, we will not be able to issue acknowledgement of receipt.

## Alternate Formats

We will provide any information relating to our Accessibility Plan Progress Report and/or feedback process in alternate formats, upon request, including print, large print, Braille, audio (French and English) or electronic formats compatible with adaptive technology that assists persons with disabilities. Requests for documentation in Braille or audio format will be fulfilled within 45 business days of the request. All other requests will be fulfilled within 15 business days.

## Executive Summary

Through our consultations and considerations of our current policies, procedures, practices, and other indicators, CCOHS identified the following overarching goals for our first Accessibility Plan:

- Our goal for employment is to address barriers in the recruitment and selection (hiring) process, and the employee experience related to the inclusivity of our policies, procedures, and practices as an employer.
- Our goal for the built environment is to partner with property management and Public Services and Procurement Canada to improve the accessibility of our building and continue to reinforce a scent free environment.
- Our goal for information and communications technology is to provide all users, including those with disabilities, with modern tools that enhance productivity and improve efficiency, while providing a supportive and inclusive technology environment.
- Our goal for communications is to provide credible informational assets and services in clear language that are easily accessible and inclusive to persons with disabilities.
- Our goal for procurement is to modernize our procurement practices so that the goods and services we procure are accessible.
- Our goal for the design and delivery of products and services is to review each product and service to determine how we can identify, remove, and prevent barriers.

Our Plan describes the barriers identified through our consultations, and the specific objectives CCOHS will undertake to achieve these goals and our progress on the items above is described in this Progress Report.

## An Overview of CCOHS

The Canadian Centre for Occupational Health and Safety (CCOHS) is a federal departmental corporation reporting to the Parliament of Canada through the Minister of Labour and is governed by a Council of Governors representing governments (federal, provincial, and territorial), employers, and workers; a structure that ensures a balanced, impartial approach.

The CCOHS mandate is to promote health and safety in the workplace and the physical and mental health of working people in Canada, by

- facilitating consultation and cooperation among federal, provincial, and territorial jurisdictions and participation by labour and employers
- offering credible guidance and resources and innovative products and services that are easy to access to help prevent work-related injury and illness, and
- serving as a national centre for statistics and other information related to occupational health and safety.

CCOHS is located in Hamilton, Ontario and has 110 full time equivalent employees.

For more than 40 years, CCOHS has been motivated and inspired by the guiding principle that everyone has a fundamental right to a healthy and safe working environment. Through our programs and services, built on our knowledge, fueled by our commitment, and realized through our actions, CCOHS advocates for the total physical and psychological health and well-being of working people in Canada by providing workplaces and working people with the information they need to make workplaces healthier and work safe.

# ACCESSIBILITY PLAN PROGRESS REPORT

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## EMPLOYMENT

The goal of the Employment pillar of the *Accessible Canada Act* is to ensure access to employment opportunities and accessible workplaces.

### **The objectives we identified for our Accessibility Plan under the employment pillar include:**

- enhance our hiring policy and procedure with an accessibility lens, make information available and accessible to job seekers, internal and external candidates, and be ready to respond to needs for accommodation. Make the process seamless, supporting them to compete for positions to their full potential.
- enhance our employment policies, procedures and practices with an accessibility lens and make information available and accessible to employees, supporting them to achieve their full potential.
- train employees on neurodiversity, review our existing practices for inclusivity and make the necessary changes to fight stigma and fully leverage the talents and contributions of neurodiverse people.
- continue to seek input from our knowledgeable workforce about our efforts and practices, respond to and action feedback.

### **Our progress on the employment pillar as of June 2024 includes:**

#### ***Hiring Policy and Process Enhancements***

- Human Resources has undergone a review of the CCOHS Hiring Policy and Process through an accessibility lens and made the necessary modifications to ensure that the documents are written in plain language and accessible format.
- The document was enhanced to include language that provides clarity regarding the process for requesting and receiving accommodations.
- This includes a statement that CCOHS is committed to providing an inclusive and barrier-free work environment, starting with the hiring process, and will endeavour to ensure the participation of disabled internal and external applicants in the hiring process is conducted in a manner that fulfills our responsibilities to accommodate persons with disabilities.
- Each job posting/interview invitation now specifies that the candidate is invited to request an accommodation to support them in the hiring process.
- The new assessment accommodations include accommodations made during the interview and/or any other type of candidate assessment (e.g., testing).
- Assessment accommodation will not modify the nature or level of the qualification being assessed but resembles, as much as possible, the accommodation that would be provided in the workplace to perform similar tasks.
- Human Resources will determine the accommodation on a case-by-case basis in collaboration with the applicant/candidate.

- Assessment accommodation options are classified into the categories of:
  - ◆ Modifications in the testing environment
  - ◆ Modifications to the test format
  - ◆ Modifications to the response format
  - ◆ Modifications in scheduling/timing
  - ◆ Other modifications requested.
- Internal and external applicants who need to be accommodated during any phase of the application and/or assessment process will be accommodated to the point of undue hardship.
- The accommodation process will be handled by Human Resources and all information received in relation to accommodation will be kept strictly confidential.
- Our new hiring policy and process will be launched in the Summer, 2024.

### ***Other Policy and Procedure Enhancements***

- Human Resources has identified nine other priority policies and procedures for review and enhancement, and begun the process of converting those policies into plain language and accessible format, and including accessibility language where needed, these priority policies include the:
  - ◆ Disability Management Program
  - ◆ Family Care Accommodation Guideline
  - ◆ Workload Management Program
  - ◆ Hybrid Work Policy
  - ◆ Discipline Policy
  - ◆ Code of Conduct
  - ◆ Whistleblower Policy
  - ◆ Accessing Pregnancy Loss Leave Procedure
  - ◆ Health and Safety Policy

### ***Neurodiversity in the Workplace***

- Human Resources has also identified partners in neurodiversity in the workplace and developed a comprehensive education and awareness program for neurodiversity training for employees that will begin in the Fall, 2024.
- This will include the Neurodiversity in the workplace program developed internally by CCOHS (see Communications, other than ICT).

## BUILT ENVIRONMENT

The goal of the Built Environment pillar of the *Accessible Canada Act* is to ensure all people can move freely around federal buildings and public spaces.

**The objectives we identified for our Accessibility Plan under the built environment pillar include:**

- plan and acquire accessibility aids including signage that includes tactile and auditory capabilities.
- adapt and update our existing building to support new requirements and improvements.
- develop documentation and training for new employees and/or visitors to the physical building to allow them to understand and easily navigate the building.
- identify people with specific accessibility needs and provide appropriate training and documentation to meet their requirements.
- develop multiple accessible formats of training that accommodate the range of needs of individuals who may need them, to facilitate a positive experience within the physical building.
- ongoing consultation, as we rely on the existing cadence of accessibility reviews conducted by Public Services and Procurement Canada to alert facility services to additional changes and improvements that may be recommended or required.

**Our progress on the built environment pillar as of June 2024 includes:**

- Public Works has conducted an accessibility review of the building inside and out and has prepared a comprehensive accessibility report that involves many updates to the exterior, parking lot and interior of the building.
- CCOHS will be working with and complying with Public Works on the project and is currently awaiting further information as to the timeline to better support it.
- CCOHS will also be working with the landlord following that implementation to address any gaps that were identified.
- Each point listed in our objectives under this pillar will be completed upon implementation of the recommendations of the comprehensive accessibility report.

## INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

The goal of the Information and Communication Technologies pillar of the *Accessible Canada Act* is to ensure the accessibility of digital content and technologies.

### **The objectives we identified for our Accessibility Plan under the information and communication technologies pillar include:**

- plan, design and/or acquire new technology solutions aligned and compliant with mandatory accessibility standards. Continuously research emerging technologies that easily allow for integration or implementation of accessibility standards.
- adapt and update existing programs and technology, from researching emerging technologies, integrating applicable upgrades within existing systems, allocating cycles within upcoming projects for retrofitting systems as it relates to accessibility, and retiring and replacing existing systems/legacy technology that cannot be adapted or upgraded.
- provide user training and guidance. Create a catalogue of CCOHS technologies with accessibility functions and assistive technology that is available and implement regular training for solution design specialists and technical architectures who are accountable for developing and designing CCOHS systems. Implement regular training for system design subject matter experts within CCOHS business functions.
- have ongoing consultation and regular retraining staff on accessibility standards with respect to software design and user interface.
- Conduct accessibility scans on new internally developed applications using third party tools as an additional reference for compliance over and above the design decisions that have already been implemented.

### **Our progress on the information and communication technologies pillar as of June 2024 includes:**

- In all technology work going forward, we review our products for accessibility and make updates as needed. To support that, we have provided the latest in accessibility training for software design to two of our development staff, which contribute to design of the user experience that supports accessibility.
- IT employees have undergone training on how to perform accessibility reviews.
- As resources allow for us to perform upgrades to legacy products, these staff will be performing accessibility reviews.
- A number of upgrades to existing CCOHS systems have been implemented, including an upgrade to CANManage, OSH Answers, and a future deployment of a health and safety portal for small businesses.
- We have acquired software that has hands-free capabilities.

## COMMUNICATIONS (other than ICT)

The goal of the Communications pillar of the *Accessible Canada Act* is to ensure barrier-free services and spaces for persons with disabilities.

### **The objectives we identified for our Accessibility Plan under the communications pillar include:**

- educate all staff on plain language principles.
- implement the CCOHS Style Guide across the organization.
- evaluate the website for compliance with web accessibility guidelines and create a plan to address key areas of concern.
- continue to offer sign language options in our hosted events.

### **Our progress on the communications pillar as of June 2024 includes:**

- Nearly half of our employees attended the Plain Language Helps Workplace Health and Safety webinar during Safety and Health Week, in which they heard from a plain language writing and design expert who demonstrated the connections between plain language and effective health and safety communication. Employees learned about resources and practical tips make sure our communications are understood by all.
- This webinar was offered to the public by CCOHS, and it was our highest attended Safety and Health Week webinar with over 1,000 people in attendance and 175 questions (highest in both the number of attendees as well as the highest engagement in terms of participation and questions).
- This year CCOHS released podcasts on “How Plain Language Improves Workplace Health and Safety.”
- “Embracing Neurodiversity in the Workplace”
- An accessibility audit of our website was completed in March 2024, and we are now creating a plan to make improvements in this fiscal year.
- We are executing our national Spell it Out campaign, which aims to spread awareness about the importance of using plain language when communicating health and safety information.
- Communications specialists have undergone training on plain language principles. Designers have undergone training on advanced accessible InDesign, checking document accessibility, complex PDF tables, and accessible PDF forms.
- All PDF documents, posters, infographics, podcasts, and videos are produced to meet accessibility requirements (alt descriptions, transcripts, text only formats, etc.)

## PROCUREMENT OF GOODS, SERVICES AND FACILITIES

The goal of the Procurement pillar of the *Accessible Canada Act* is to ensure the purchasing of goods, services and facilities is accessible.

**The objectives we identified for our Accessibility Plan under the procurement of goods, services and facilities pillar include:**

- incorporate accessibility into our procurement and contracting documents, templates, and guidance.
- provide training and guidance to increase awareness amongst staff who handle procurement and managers to consider accessibility in the process.

**Our progress on the procurement of goods and services pillar as of June 2024 includes:**

- CCOHS is evaluating training on accessibility in procurement and assessing procurement practices to be described further in our December 2024 progress report.

## DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

The goal of the Design and Delivery of Programs and Services pillar of the *Accessible Canada Act* is to ensure Canadians receive services that are accessible to all.

**The objectives we identified for our Accessibility Plan under the design and delivery of products and services pillar include:**

- use customer surveys focused on accessibility of products and services and determine if the users encounter barriers to accessibility.
- consult with various subject matter experts to determine if the accessibility meets their clients' needs.
- review results for upgrades to existing products and services.
- incorporate accessibility feedback into our e-courses and implement changes.
- provide accessibility training for those developing and designing products and services.
- add sign language to various products and procedures where possible.
- review neurological, speech, visual and auditory accessibility.
- ensure that new products and services comply with the Accessibility Plan.

**Our progress on the design and delivery of products and services pillar as of June 2024 includes:**

- CCOHS is actively testing the functionality of screen readers on all of our courses and providing closed captions on our courses.
- Transcripts/text versions of all of our courses are available.
- Employees in Education Services are trained on the requirements of Web Content Accessibility Guidelines (WCAG) standards for contrast and motion within the screen.
- Enhancements were made to our courses enabling that any animations are supported with descriptive audio for the visually impaired.

- Legacy technology that does not allow screen readers to be used is being discontinued and CCOHS is transferring over to a new platform to enable screen reading technology.
- CCOHS is using different accessibility functions and assistant technology to implement design solutions.
- CCOHS has performed an Internal accessibility scan to determine what we can use going forward and is looking to embed coding into our software that allows us to collect data about the user experience with our courses to assess the experience and any changes necessary that would improve accessibility.
- CCOHS is adding an accessibility survey into the end of courses, to ensure that we are complying with the requirements of WCAG for the government.
- We are actively moving content into our CCOHS app for users to have access and accessibility everywhere they go, if someone cannot work at a traditional desk/work environment it will enable their access to everything on our website/app which is screen reader accessible.
- The Client Services and Inquiries employees now undergo a curriculum of training that includes plain language writing and plain language principles.
- For our publications, all PDF publications that were updated or released since July 2023 are accessible, alt text is provided for all non-decorative images, and plain language applied to tables and content wherever possible.
- Safety InfoLine responses are written using plain language principles.
- There is a project underway to enable the Inquiries Satisfaction Survey to be read by a screen reader within this fiscal year.
- The OSH Answers area of our website is accessible, and content is written using plain language principles.

## TRANSPORTATION

The goal of the Transportation pillar of the *Accessible Canada Act* is to ensure a barrier-free federal transportation network.

CCOHS is not engaged in any transportation related work. The pillar is listed here as a requirement of the Act, but there are no activities applicable to CCOHS.