



NUCLEAR WASTE MANAGEMENT ORGANIZATION SOCIÉTÉ DE GESTION DES DÉCHETS NUCLÉAIRES

Accessibility Plan 2023-26

Annual progress report



JUNE 2024

Land acknowledgment

The NWMO acknowledges that we have worked in many different Indigenous territories since the inception of the organization. We are grateful to the Indigenous and municipal communities that have worked with us over the past 20 years.

We further acknowledge that today we are working in northwestern Ontario in the traditional territory of Wabigoon Lake Ojibway Nation with the community of Wabigoon Lake Ojibway Nation and the Township of Ignace.

In southern Ontario, we are working in the traditional territory of Saugeen Ojibway Nation (SON) with the two SON communities – Chippewas of Nawash Unceded First Nation and Chippewas of Saugeen First Nation – and the Municipality of South Bruce.

We further acknowledge that in both the northwest and the south, we have the privilege of working with other First Nations and organizations, with Métis communities and the Métis Nation of Ontario, and with many municipal communities that have all expressed an interest in learning about our work.

As part of our commitment to Reconciliation, we recognize both the historic and current injustices far too many Indigenous communities endure. We pledge to do our part to encourage well-being in the communities with which we work.

General

The Accessible Canada Regulations under the *Accessible Canada Act (ACA)* require that the Nuclear Waste Management Organization (NWMO) establish, implement, maintain and document an accessibility plan. In compliance with this requirement, the NWMO developed our first accessibility plan, [Accessibility Plan 2023-26](#), which was submitted to the Accessibility Commissioner and made available to employees and the public on the NWMO's website on June 1, 2023.

The accessibility plan outlines the NWMO's strategy for preventing and removing barriers for persons with disabilities, and meets the organization's obligations under the Accessible Canada Regulations and the ACA.

The NWMO must also publish a progress report with respect to the implementation of our accessibility plan on a yearly basis. This progress report, dated June 1, 2024, will be publicly available, including in an accessible format upon request. This progress report is in compliance with the Accessible Canada Regulations: SOR/2021-241 under the ACA.

Application of the accessibility plan

The accessibility plan applies to all employees, as defined in the Accessible Canada Regulations, as well as the public with whom the NWMO interacts.

The NWMO'S head office is located in Toronto, Ont., at:

» TORONTO OFFICE

22 St. Clair Avenue East, Fourth Floor, Toronto, ON M4T 2S3

Email: contactus@nwmo.ca

Tel.: 416.934.9814

Toll free: 1.866.249.6966

Fax: 416.934.9526

The NWMO also has offices located in Dryden, Ignace and Teeswater, and a facility in Oakville. The contact information for each is listed below.

» DRYDEN OFFICE

33 King Street
Dryden, ON P8N 1B4
1.807.223.2023

» TEESWATER OFFICE

12B Clinton Street South, PO Box 570
Teeswater, ON N0G 2S0
1.519.392.6966

» OAKVILLE FACILITY

2009 Wyecroft Road
Oakville, ON L6L 5V6

» IGNACE OFFICE

304 Main Street
Ignace, ON P0T 1T0
1.807.934.2472

» TEESWATER OFFICE

64 Clinton Street
Teeswater, ON N0G 2S0

Background: The *Accessible Canada Act (ACA)*

The *ACA* was given royal assent in June 2019, with the purpose of making Canada barrier-free for persons with disabilities by Jan. 1, 2040. A key requirement of the *ACA* is for organizations under federal responsibility to prepare accessibility plans that describe how they will identify, remove and prevent barriers in the priority areas identified below:

- » Employment;
- » The built environment (buildings and public spaces);
- » Information and communication technologies (ICT);
- » Communication (other than ICT);
- » The procurement of goods, services and facilities;
- » The design and delivery of programs and services; and
- » Transportation.

The *ACA* defines a *barrier* as the following:

“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.”

The *ACA* defines a *disability* as the following:

“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.”

Designated accessibility representative

The NWMO has a designated accessibility representative to receive feedback relating to accessibility and accessibility barriers on behalf of the NWMO, requests for copies of this progress report in an accessible format, or requests for a description of the NWMO's feedback process in print, large print, Braille, audio format or an electronic format that is compatible with adaptive technology that assists persons with disabilities.

The NWMO's designated accessibility representative is the Vice-President of Human Resources and Chief Ethics Officer (the "designated accessibility representative"). You can provide feedback and/or communicate with the NWMO and the designated accessibility representative using the contact information below:

Mail: 22 St. Clair Avenue East, Fourth Floor, Toronto, ON M4T 2S3

Email: accessible@nwmo.ca

Tel.: 416.934.9814

Toll free: 1.866.249.6966

The Vice-President of Human Resources and Chief Ethics Officer (or delegate) can answer any questions on how to receive the NWMO's accessibility plan in an accessible format, as well as provide an accessible description of the NWMO's feedback process for the accessibility plan. Responses to feedback will be returned in the format in which the feedback was received. The NWMO is unable to respond directly to anonymous feedback, but such feedback will still be considered in our efforts to improve accessibility.

Progress on the NWMO's accessibility plan

The NWMO embraces the vision articulated in the *Accessible Canada Act (ACA)* and has taken steps in our journey to foster accessibility within the organization. This progress report demonstrates our dedication to implementing our first accessibility plan for 2023-26, in compliance with the *ACA*.

The NWMO's accessibility plan aligns with our strategic plan, including commitments outlined in the *Employment Equity Plan*. The NWMO's *Employment Equity Plan* supports the commitment to maintaining a workforce free of direct, indirect and systemic discrimination, and meets the requirements of the *Employment Equity Act*. The *Employment Equity Plan* includes short-term hiring and promotion goals to eliminate under-representation, long-term goals to achieve full representation, measures to remove any barriers identified in employment system review, and special measures to increase the representation of under-represented designated groups (women, Indigenous people, persons with disabilities and members of visible minorities). In 2023, the NWMO saw overall representation in three of the four designated groups. Persons with disabilities remain under-represented in all employment occupational groups; however, a positive trend has been noted in that year-over-year data shows growth in all represented groups.

This progress report takes a measured approach, taking stock of initiatives currently underway and planned, and identifying areas for action that will help inform ongoing work, longer-term plans and continued improvement. Actions identified in the accessibility plan and progress report have been prioritized to ensure that goals are achievable and realistic, and that efforts are aligned across the organization. With numerous initiatives already in motion, there is ample potential for further advancements.

This report will provide an overview of the steps taken thus far, with a focus on foundations and future endeavors. The NWMO acknowledges that there is still substantial work to be done to attain our goals. The NWMO will continue to adapt and adjust where needed based on consultations, new regulations and feedback received from persons with disabilities in order to provide an inclusive, barrier-free workplace.

Consultations

The NWMO values input from internal and external stakeholders, particularly individuals with disabilities, in shaping our accessibility initiatives. To develop our progress report, the NWMO engaged in consultations with diverse stakeholders, including employees, advocacy groups and subject matter experts. In particular, we sought feedback from employees regarding our operations in order to identify, remove and prevent accessibility barriers. Consultation occurred through various methods including online surveys, formal and informal conversations, meetings and townhalls. External consultations included meetings with advocacy groups and subject matter experts, as well as sessions on topics related to accessibility.

Feedback

In our accessibility plan, the NWMO identified accessibility goals in the following areas:

1. Employment;
2. The built environment;
3. Information and communication technologies (ICT);
4. Communication, other than ICT;
5. The procurement of goods, services and facilities;
6. The design and delivery of programs and services; and
7. Transportation.

The following outlines what feedback the NWMO has received with respect to each of the areas noted above, and how that feedback has been taken into consideration by the NWMO in the implementation of our accessibility plan.

Progress in priority area 1: Employment

The NWMO has made strides in the area of employment for people with disabilities, aligning our efforts with the goals in our *Employment Equity Plan* and with our *Recruitment Procedure*, which ensures recruitment activities are fair and equitable and maintain employee diversity. This section provides an account of the progress made in employment.

The NWMO continues to be committed to fair and accessible employment practices in all stages of the employment cycle, and to respecting the dignity and independence of current and prospective employees with disabilities. We are dedicated to incorporating inclusive practices that will enable our employees to fully participate in the workforce. We are committed to hiring people with disabilities as part of our ongoing efforts to attract, grow and retain diverse talent that is representative of Canadian labour market availability.

The foundation of these efforts lies in recognizing the existing representation gaps in our workforce. The NWMO's employment equity workforce analysis for 2020 revealed a notable under-representation of people with disabilities, standing at 0.5 per cent compared to a labour market availability of 7.6 per cent. To address this under-representation, the NWMO has implemented several measures.

Self-identification education

Recognizing the need for accurate identification of employees belonging to under-represented groups, the NWMO held a self-identification information session. This session allowed for employees to understand the importance of completing the self-identification forms. Employees were encouraged to voluntarily and confidentially disclose their identification as a woman, Indigenous person, member of a visible minority and/or person with a disability. This effort resulted in a number of employees updating their self-identification. In early 2024, a refresh of the self-identification form was undertaken to better support employee understanding and completion. A rollout of new information sessions will be completed before the end of 2024.

The NWMO's employment equity workforce analysis indicates an increase in representation of persons with disabilities year over year since 2020. In 2023, the proportion of the NWMO workforce identifying as persons with disabilities stands at 2.2 per cent compared to the labour market availability of 7.3 per cent.

Progress in hiring processes

The NWMO has identified short-term hiring and promotion goals to eliminate under-representation, long-term goals to achieve full representation, measures to remove any barriers identified in the NWMO's employment systems, and special measures to increase the representation of under-represented designated groups. Some of these measures include:

- » **Plain and inclusive language on postings:** To ensure postings are approachable to the widest pool of candidates possible, postings (internal and external) are reviewed and vetted for inclusive language and to avoid subtle gender-biased language. Job postings are also reviewed for plain language and explanations of acronyms. This initiative seeks to eliminate barriers for individuals with neurological or cognitive disabilities who may face challenges with overly complex language.
- » **Partners in recruitment:** Through the vendor request-for-proposal process, the NWMO requires all recruitment agencies to demonstrate a commitment to seeking qualified candidates from under-represented groups as identified by the NWMO. Vendor partners receive the NWMO's representation data and information on our employment equity goals on an annual basis.

Feedback received from consultation with NWMO employees indicated that expanding our network and partnering with organizations, job boards and agencies that support people with disabilities in recruitment was important. Building on existing networks, we have sourced additional resources in the broader community to support the recruitment of persons with disabilities. Additionally, the NWMO plans to resume our partnership with the Community Integration through Cooperative Education (CICE) program which was on hold due to the COVID-19 pandemic. CICE is a program offered at Humber College for students with various disabilities which provides access to academic and hands-on work experience in the community on a volunteer basis. The NWMO plans to offer a work placement for one student through this program in the next few years.

Human Resources training

In the realm of employment, the NWMO Human Resources (HR) team has played a key role in advancing the NWMO's commitment to hiring people with disabilities in alignment with the ACA. The focus has been on making the hiring process more fair and inclusive for people with disabilities. To assist in this, and recognizing that we are not subject matter experts, the HR lead on Diversity, Equity, Inclusion and Accessibility and other members of the HR team have attended several training and development forums and have consulted with experts on the topic of inclusive hiring practices.

Training and development activities have included:

- » Access Studio: Engage Program by AccessNow
- » Neurodivergent Inclusion: Understanding Neurodivergence in the Workplace by the Canadian Centre for Diversity and Inclusion (CCDI)
- » 4th National Summit on Episodic Disabilities and Employment by Realize
- » Incorporating Mental Health into DEI/IDEA Frameworks by CCDI
- » 2024 UnConference by CCDI
- » Intercultural Competency Assessment for HR team by Susan Hunter Consulting

Progress in workplace accommodations

In the realm of workplace accommodations, feedback from NWMO employees indicated that enhanced communication on accommodations would be beneficial for the greater employee population.

- » **Hybrid/flexible work arrangements:** The NWMO implemented a hybrid workplace model following the pandemic. The hybrid model supported an increased level of flexibility that may not have existed naturally before the pandemic. The hybrid workplace model continues today, with employees able to work from home up to two days per week. Employees who require additional support due to personal circumstances, medical conditions and/or family responsibilities are able to request a flexible work arrangement. Flexible work arrangements may be requested related to hours of work, teleworking work schedules and work sharing.

NWMO employees have access to an Occupational Health Nurse and a confidential Employee and Family Assistance Program to discuss any medical, physical or mental health-related issues that may require a medical accommodation either temporary or permanent in nature.

Recently, revisions to the current *Medical Absence Report* form were conducted to be more inclusive of illnesses (mental and physical) as well as episodic disabilities, while providing a more comprehensive report on any workplace accommodations. A communications strategy to support understanding the revised form will be established by the end of 2024.

While progress has been made, the NWMO acknowledges the continuous nature of the journey towards full accessibility and inclusivity. Additional measures underway include:

- » **Data collection:** The ability to track gaps in representation, establish baselines, set goals and measure progress begins with good data collection. Continued evaluation of recruitment metrics, along with consultation with applicants, will help determine if applicants feel comfortable disclosing their identification at any stage of the recruitment process and if current measures are effective.
- » **Communication and transparency:** Recognizing the importance of transparent communication, the NWMO is committed to providing information about the accommodation process and the accessibility measures of our facilities on our intranet and job postings. This initiative seeks to promote inclusivity, attract diverse talent and ensure potential employees are well-informed about the accessibility of the NWMO and our facilities.

The organization remains dedicated to addressing systemic barriers, refining recruitment processes and cultivating a workplace culture that fully supports people with disabilities.

Progress in priority area 2: The built environment

The NWMO is dedicated to creating an inclusive and accessible built environment, prioritizing both our office spaces and future public spaces. Where the NWMO is limited in the physical changes that can be made to certain spaces due to restrictions on modifications to leased properties, we will continue our commitment to raising awareness of the importance of the physical space in advancing the goal of inclusivity. This section provides an account of progress made in our built environment.

» **Accessibility enhancements:** Following the publishing of the NWMO's accessibility plan, employees from one of the community offices noted the building did not have accessible features. As it is an historic building leased by the NWMO, temporary ramps were installed. This small modification allows for employees, visitors and members of the public of all abilities to enter into the space.

With regard to future spaces, the municipalities of Ignace and South Bruce, as well as the general public and NWMO employees, were asked to provide feedback on the [Centre of Expertise](#), which is to be constructed at the future site of Canada's deep geological repository for used nuclear fuel. The resulting report, [Centre of Expertise: Report on Initial Municipal Visioning](#), captures what was heard through the visioning exercises. Participants noted that the future facility should be fully accessible and inclusive to account for the demographics of the municipality and current and future NWMO employees, in addition to being an aesthetically pleasing and environmentally-friendly facility.

The NWMO plans to continue to review our facilities and office equipment to identify areas for improvement with respect to accessibility.

Progress in priority area 3: Information and communication technologies (ICT)

While some progress has been made, our ongoing commitment to accessibility warrants a comprehensive assessment of external ICT services as well as current digital platforms. Our journey involves aligning with national standards, leveraging existing features and addressing barriers.

- » **Leveraging Microsoft Office accessibility for enhanced inclusivity:** Recognizing the underutilization of existing accessibility features within the Microsoft Office Suite, the NWMO aims to promote awareness and use of these built-in functionalities. While these features have the potential to significantly enhance accessibility, the lack of awareness among employees poses a challenge. Efforts are underway to bridge this knowledge gap and ensure that all employees can benefit from these tools.
- » **Advancing ICT accessibility using government standards:** A goal under the NWMO's accessibility plan is to ensure our newly redesigned corporate website complies with the standards of the Web Content Accessibility Guidelines. The project is currently in the technical review phase, assessing current internal services for accessibility to identify gaps and enable accessibility features in existing systems, programs and technology.
- » **Monitoring of digital products and services that will improve accessibility:** As part of our commitment to staying at the forefront of accessibility, the NWMO will monitor the industry for advancements in accessibility tools.

The NWMO will ensure that ICT initiatives are aligned with national standards and that our ICT services are accessible to everyone.

Progress in priority area 4: Communication (other than ICT)

The NWMO is committed to enhancing communication accessibility. As outlined in our accessibility plan, the NWMO will incorporate any new accessibility requirements to ensure that our information, communications systems and platforms are accessible. Additionally, upon request, we will ensure communications are available in accessible formats to meet the needs of D/deaf persons in Canada as well as those who are visually impaired or with neurological or cognitive disabilities.

» **Monitoring of products and services that will improve accessibility:** As per the *Accessible Canada Act*, communication needs to be available in alternate formats such as large print (larger and clearer font), braille, audio and/or electronic formats that are compatible with adaptive technology. In addition to alternate forms of written communication or text-to-voice technology, the NWMO is looking into other forms of communication that support the needs of D/deaf persons. Consultations are currently being held with representative organizations about services within these areas.

Progress in priority area 5: The procurement of goods, services and facilities

The NWMO continues to increase opportunities for diverse suppliers and seek inclusive business opportunities where possible. Goals identified in the accessibility plan for this priority area include reviewing the procurement process for ways to further support accommodations. A longer-term goal is promoting our commitment to accessibility externally through procurement processes and governance, ensuring that all goods, services and facilities consider and address accessibility needs.

Progress in priority area 6: The design and delivery of programs and services

A priority outlined in the accessibility plan is to ensure accessibility is considered in programs and services at the design stage. To assist with this priority, the NWMO has undertaken a few measures.

- » **Human resources policy review:** The NWMO's human resources policies, procedures and practices are reviewed regularly in accordance with established review cycles to identify barriers which may exist for designated groups, with a particular focus on groups that are under-represented and/or where known barriers exist. As part of the review cycle, efforts are underway to enhance policies, procedures and tools to further support the use of plain language in both internal and external communications.

A goal for 2023-24 is the formalization of current accommodation practices into a written accommodation procedure accessible to all employees. A key component of this work is consulting with those who have self-identified as persons with disabilities, as well as external consultation with appropriate representative organizations, to ensure the NWMO is addressing barriers while avoiding inadvertently creating new barriers for persons with disabilities when formalizing such a policy.

To support a thorough policy review, an Equity Assessment Tool has been developed. The tool is designed to be used for all governance, new and existing. It includes a set of questions to help identify and address unintended barriers, bias and impacts, and to help ensure that fairness, equity, diversity, accessibility and inclusion are part of all NWMO policies. The tool will be piloted as part of the HR policy and procedures review process.

The NWMO will continue a comprehensive review of HR-related policies through a lens of equity, diversity, inclusion and accessibility.

- » **Training and awareness:** Addressing biases and stigma encountered by persons with disabilities through training and raising awareness of accessibility issues will help ensure a workplace culture of belonging that is inclusive of everyone. Internal employee consultation indicates this is a priority area that could benefit from more awareness and education.
- » **Future program design with accessibility in mind:** Recognizing that addressing accessibility issues requires accurate data, the NWMO has committed to improving our datasets, including maintaining initiatives to encourage employees to self-identify. This commitment ensures that the organization can better address accessibility challenges faced by individuals with disabilities and incorporate accessibility considerations into the design of future programs and services.

Progress in priority area 7: Transportation

The NWMO does not provide transportation, but does rely on it. Headquartered in Toronto, the NWMO has community offices in other parts of Ontario, and some employees are required to travel between these offices and other places as part of their role.

The NWMO is committed to regularly reviewing our travel policies and processes to ensure that any barriers to accessibility are identified and solutions are put in place where possible.

Summary

This progress report aims to identify necessary steps towards achieving a barrier-free workplace. This is a long-term organizational effort, and meaningful change can only come from continuous individual and systemic improvement, both of which take time, resources and a willingness to engage.

In the upcoming year, our primary focus will revolve around the following key initiatives:

- » **The integration of accessibility in policies and processes:** The NWMO is dedicated to integrating accessibility considerations into updated policies and processes. This involves a comprehensive review and revision of new and existing policies to ensure they align with the latest accessibility standards and best practices. By embedding accessibility into foundational documents, the NWMO aims to prioritize inclusivity.
- » **Advancements in the employment of people with disabilities:** The hiring, promotion and retention of people with disabilities at the NWMO will continue to be a talent management focus. Building on the progress made thus far, the NWMO is committed to expanding our efforts to create a workforce that is representative of the diverse talents and capabilities of individuals with disabilities. This includes focused initiatives to promote career development opportunities, support promotion pathways through succession planning, and foster an inclusive workplace culture that encourages the long-term retention of employees with disabilities.
- » **Continued accessibility training initiatives:** Continued training on accessibility remains a priority. The NWMO recognizes the importance of ensuring that all employees are well-versed in accessibility principles.

The NWMO will monitor the progress of the goals outlined in our accessibility plan and this progress report. We will submit our next progress report for publication by June 1, 2025. The NWMO also welcomes feedback on our accessibility plan, which will contribute to the development of future progress reports and ultimately help guide us on the path towards a barrier-free NWMO, and Canada, by 2040.

For more information,
please contact:

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