Accessibility Plan

2026-2028

December 2025

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INTRODUCTION

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. Our Accessibility Plan is prepared to meet our legislative requirements under the *Accessible Canada Act*, however, more importantly, it enables our commitment to ensuring that our programs, services and employment practices put accessibility at the forefront of our thinking.

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

The Plan will continuously improve as we incorporate feedback from future consultations and as new developments arise. In this commitment to create a barrier-free organization, we make even greater strides to improve the total well-being of all working Canadians.

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

GENERAL

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 Human Resources Manager 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
  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 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 second Accessibility Plan:

- Our goal for employment is to provide persons with disabilities with access to career and advancement opportunities and an employment experience free of physical and psychosocial barriers.
- Our goal for the built environment is to continue 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 continue to review each product and service to determine how we can further integrate accessibility features.

This plan describes the barriers identified through our consultations, and the specific objectives CCOHS will undertake to achieve these goals.

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

EMPLOYMENT

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

Being a diverse and inclusive employer is a priority of the Canadian Centre for Occupational Health and Safety (CCOHS). CCOHS has made meaningful progress on the objectives of our first three-year Accessibility Plan (2022) by:

- enhancing our hiring policy and procedure with an accessibility lens, making information available and accessible to job seekers, internal and external candidates. Candidates are supported to compete for positions to their full potential.
- several of our other key employment policies, procedures and practices have been enhanced with an accessibility lens and information is made available and accessible to employees, supporting them to achieve their full potential.
- employees were trained on neurodiversity and awareness campaigns supported efforts to leverage the talents and contributions of neurodiverse people.
- we have and continue to seek input from our knowledgeable workforce about our efforts and practices, respond to and action feedback.

The goal of CCOHS for this pillar for this three-year Plan is to provide persons with disabilities with access to career and advancement opportunities and an employment experience free of physical and psychosocial barriers.

This goal is informed by consultations which told us that:

- employees want to feel confident in raising their need for accommodation or support in any stage of the employment life cycle
- managers want to feel equipped with tools and resources to engage in these conversations effectively

The objectives for this pillar for this three-year Plan are to:

- continue our focus toward supporting neurodiverse employees by promoting inclusive leadership practices and providing training to all people managers.
- consult with employees and stakeholders to refine policies and practices, ensuring they remain responsive and effective.
- embed accessibility into all stages of the employee lifecycle, from recruitment, onboarding, training, performance and talent management, where inclusion is consistently prioritized and practiced.

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.

Our physical building is a leased space managed by a third-party organization, in conjunction with Public Services and Procurement Canada (PSPC), and intended to meet or exceed current accessibility standards. CCOHS has made meaningful progress on the objectives of our first three-year Accessibility Plan (2022) by partnering with PSPC on our building accessibility audit and action plans.

The goal of CCOHS for this pillar for this three-year period is to continue 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.

This goal is informed by consultations which told us that:
- accessibility of parking spots and outside walkways can be hindered at times.
- building entrances are not accessible to people with mobility challenges.
- building navigation can be challenging.
- there are lighting issues in areas of our building.

The objectives for this pillar are to:

- work with Public Services and Procurement Canada to ensure that all new facility fit-ups/construction are accessible.
- assess existing facilities to identify potential accessibility upgrades to be incorporated into planned/future projects.
- continuously engage internal and external stakeholders to identify and remove barriers to the built environment and use innovative or novel technologies to support accessibility.

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.

CCOHS has historically made consistent efforts to address accessibility in our technology by way of proactive software accessibility standards training and accessibility reviews of newly released products. CCOHS has made meaningful progress on the objectives of our first three-year Accessibility Plan (2022) by

consistently integrating accessibility into our digital platforms and services. Each project is approached with a clear commitment to ensuring compliance with WCAG 2.1 AA standards, so that websites and applications are inclusive and usable for all. Rather than treating accessibility as a one-time initiative, this work is embedded into the design and development process on a project-by-project basis, ensuring that every deliverable meets established accessibility requirements.

To verify compliance, industry-standard tools are employed throughout the testing process. Screen readers such as NVDA and JAWS remain central to accessibility evaluations, complemented by trusted browser extensions and manual checking to validate usability across diverse scenarios. This combination of automated and manual methods ensures that accessibility is not only technically compliant but also practically effective for end users.

Upgrades and enhancements have been implemented across existing CCOHS systems to improve accessibility. These include updates to the Business Safety Portal, CANManage, the CCOHS website, the Psychological Safe Team Assessment (PSTA), E-Commerce platforms, and WHMIS.org. Each of these systems has undergone accessibility improvements to better support users with varying needs and to align with WCAG requirements.

To strengthen internal expertise, online courses have been purchased and provided to Web Developers and UX/UI designers. This training ensures that accessibility principles are embedded directly into the design and development process, equipping staff with the knowledge and skills to maintain and advance accessibility across all ICT initiatives.

The goal of CCOHS for this pillar for this three-year period 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.

This goal is informed by consultations which told us that:

- some systems are incompatible with assistive technology.
- legacy systems are not built with native accessibility features, making them difficult to use without assistive technology..

Our objectives for this pillar are to:

- strengthen accessibility by continuing to ensure that internally developed or acquired systems, hardware and software meet modern accessibility standards.
- develop and communicate policies and procedures for accessible digital services technology.
- continue to consistently integrate accessibility into our digital platforms and services during the design and development process on a project-by-project

basis, ensuring that every deliverable meets established accessibility requirements.

- professional development continues to reinforce these practices; training and continuing education courses for Digital Services employees will further strengthen expertise and ensure that accessibility efforts remain aligned with evolving standards and best practices.

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.

CCOHS is committed to accessible communications and produces materials in multiple accessible formats. CCOHS has made meaningful progress on the objectives of our first three-year Accessibility Plan (2022) by:

- Embedding accessibility and plain language principles across all organizational communication channels.
- Visual communications have also advanced, with 86.7% of posters updated to meet accessibility standards, and work underway to apply the same standards to infographics. Improvements to the CCOHS website continue as a direct result of the accessibility audit conducted in March 2024, ensuring that digital content remains compliant and responsive to user needs.
- Our national Spell it Out campaign continues to be executed through social media, newsletters, and events, raising awareness about the importance of using plain language when communicating health and safety information. This initiative reinforces our commitment to clarity and inclusiveness in all public-facing communications.
- All new communication products, including documents, posters, infographics, podcasts, and videos—are now produced to meet accessibility requirements. This includes the provision of alt descriptions, transcripts, and text-only formats, ensuring that content is accessible to all audiences. In addition, we continue to offer sign language options for hosted events, including national Safety and Health Week webinars and the CCOHS Forum, further expanding accessibility for participants.
- Together, these efforts demonstrate meaningful progress in ensuring that communication practices are inclusive, accessible, and aligned with best practices in plain language and accessibility standards.

The goal of CCOHS for this pillar for this three-year period is to continue to provide credible informational assets and services in clear language that are easily accessible and inclusive to persons with disabilities.

This goal is informed by consultations which told us that:

- some communications are too long, complex, and academic in nature.
- internal communications not always clear, and often too long.
- more clear and inclusive language in employee communication.
- larger font sizes could be used.
- navigation of our website could be improved.
- website is not "accessibility-reader" friendly.
- too many acronyms are used in communications.
- inconsistent look and feel on website can cause confusion.

Our objectives for this pillar are to:

- perform a comprehensive content review of the CCOHS Style Guide, available on the myCCOHS intranet for easy access by all staff, to align with evolving plain language communication guidance. This ensures that our materials remain clear, inclusive, and user-friendly.
- continue to promote the CCOHS Spell-it-Out campaign to raise awareness about the importance of communicating in plain language.
- ensure that internal and external digital content is accessible.
- provide communications products and events in accessible formats.

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.

CCOHS is committed to procurement of accessible goods and services and being accessible to those who procure services from us. CCOHS has made meaningful progress on the objectives of our first three-year Accessibility Plan (2022) by:

- Embedding accessibility considerations into our financial and procurement practices. Those in Finance responsible for procurement have successfully completed a course designed to strengthen inclusive procurement processes. This achievement ensures that accessibility requirements are consistently applied when evaluating vendors, products, and services, and that procurement decisions align with organizational accessibility goals.

The goal of CCOHS for this pillar is to continue to modernize our procurement practices so that the goods and services we procure are accessible.

This goal is informed by consultations which told us that:

- Accessibility is not sufficiently contemplated in procurement process.

Our objectives for this pillar are to:

- incorporate accessibility into our procurement and contracting documents, templates, and guidance.

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.

CCOHS prioritizes accessibility in the design and delivery of our products are services. CCOHS has made meaningful progress on the objectives of our first three-year Accessibility Plan (2022) by:

- Our team has completed a comprehensive curriculum of training focused on plain language writing and principles, reinforcing our commitment to clear and inclusive communication. All current and new PDF publications are now fully accessible, with alt text provided for all non-decorative images and plain language applied to tables and content wherever possible.
- Accessibility has also been embedded into our evaluation tools. The Inquiries Satisfaction Survey is now fully compatible with screen readers in both English and French, with correct language attributes applied when toggling between languages. The survey can be navigated using keyboard-only commands and remains functional with Windows Magnifier enabled, ensuring usability for individuals with diverse needs. To further strengthen our practices, both our team and the Communications Team participated in the *Writing Alt Text for Accessibility* course offered by Accessibility Services Canada.
- In the area of e-learning, new CCOHS courses undergo evaluation using the NVDA screen reader, and all new courses now include closed captioning. The Learning Management System has been updated to support closed captioning functionality, and all employees in Education Services have been trained on WCAG standards for contrast. Training on motion accessibility is scheduled for completion in 2025. Enhancements have also been introduced to support learners with visual impairments, including the capacity to add descriptive audio and text to animations. While this capability has not yet been fully implemented, we plan to provide dual video options—one with

descriptive text and one without—to balance accessibility with instructional clarity.

- Legacy technology that did not support screen readers has been discontinued, and all courses have been migrated to Rise, a platform that enables screen reading technology.
- New initiatives have further expanded our accessibility efforts. We have consulted with subject matter experts to ensure that accessibility features meet client needs, incorporating feedback to improve subsequent courses. Standard upgrades have been implemented in Rise to better meet accessibility requirements, such as providing accessible alternatives to drag-and-drop activities. We are also exploring the integration of sign language, beginning with ASL in our *Violence in the Workplace* course, with potential expansion to other courses in the future.
- Accessibility has been reviewed across neurological, speech, visual, and auditory dimensions. For neurodiverse and anxious learners, changes such as replacing the red "X" with a faded grey symbol for incorrect answers, removing background music to reduce cognitive overload, and providing answer-specific feedback have improved usability. Auditory accessibility has been enhanced by removing in-course audio to avoid duplication with screen readers, while visual accessibility has been strengthened through adjustments to course colour palettes, increased opacity on image overlays, and more careful classification of images as informative versus decorative.

The goal of CCOHS for this pillar for this three-year period is to continue to review each product and service to determine how we can further integrate accessibility features.

This goal is informed by consultations which told us that:

- not all our e-learning courses are fully accessible.
- products and software we use can create limitations regarding accessibility.
- greater involvement of accessibility groups in review of our products is needed.
- more in-house expertise trained in accessibility to produce our courses, content.

Our objectives for this pillar are to:

- explore the addition of accessibility surveys at the end of courses to ensure compliance with WCAG requirements and to gather valuable feedback from learners.
- 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.

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.

CONSULTATIONS AND CONSIDERATIONS

Consultations and considerations to help us identify barriers and inform our plan included:

- Employment Equity Indicators
- Employee Survey on Accessibility
- Employee Feedback
- Survey of Clients
- Employee Engagement Survey Indicators
- Review of Policies, Procedures and Practices
- External Subject Matter Experts/Organizations

Employment Equity Indicators

Persons with disabilities represents more than 9.3% of the workforce at CCOHS, exceeding the labour market availability of 6.1% based on employment equity workforce data.

This is an indicator of positive efforts in organizational culture where existing employees can self-identify, and an opportunity to enhance our inclusivity as an employer and service provider through consultation with, and contributions of our workforce, including on this Accessibility Plan.

Employee Survey on Accessibility

An accessibility survey was launched to all employees and available for voluntary completion between [date] and [date], with the option to submit anonymously. Approximately 60% of CCOHS employees responded to help inform our Accessibility Plan.

Employee Feedback

Over the course of the year, Human Resources considered the feedback of employees who accessed our accommodation and disability management services.

Survey of Clients

CCOHS ran a web survey of public users of our services related to accessibility needs and received six survey submissions.

Employee Engagement Survey Indicators

We considered our 2023 Employee Engagement Survey results, particularly in the areas of diversity and inclusion, safety, mental health, work/life balance, organizational culture, information and communication.

Review of Policies, Procedures and Practices

We reviewed our relevant policies, procedures, and practices as an organization to identify key areas of focus to improve our accessibility.

External Subject Matter Experts/Organizations

- Public Services and Procurement Canada was consulted on the accessibility of our building.
- CCOHS consulted and shared internally the resources, training, and networking opportunities with Infinity – The Network for Neurodivergent Public Servants
- Experts have been consulted for e-Learning to enhance accessibility of e-Learning courses.