



Newfoundland and Labrador Hydro

2024 – 2026 Accessibility Plan



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Letter from our Executive Sponsor

Here at Hydro, we are committed to supporting a workplace that is safe and inclusive with Equity, Diversity and Inclusion (EDI) engrained throughout our organization, in our Strategic Plan, and in our corporate values. Our Accessibility Plan is an extension of this commitment, marking a continuation of our EDI journey and the first phase of a multi-year plan to improve accessibility at Hydro.

We have a responsibility to foster an environment where all our employees have the tools to bring their expertise to the table and, as the people's utility, we need to be responsive and accessible to the people of Newfoundland and Labrador as well. I look forward to implementing the strategic elements of this plan to ensure that we deliver on these commitments.

Our Accessibility Committee consists of employees from all across our organization with the skills to identify and implement policies, processes and practices that can support accessibility, as well as to identify unintended barriers to access and how we can eliminate these barriers.

While I am proud of our progress to date, and the efforts of the individuals and teams across our organization who are working to help make Hydro more inclusive and accessible, I know there is always more to do, and I look forward to continuing this work, together.



Gerard Dunphy

VP Churchill Falls & Muskrat Falls
Newfoundland and Labrador Hydro

Hydro is committed to Equity, Diversity, Inclusion and Accessibility

One of Newfoundland and Labrador Hydro's (Hydro) fundamental values is to be inclusive and collaborative in that we commit to continuing to seek diversity and we understand its value.

We have been on a journey of providing an equitable, diverse, inclusive and accessible workplace for over a decade.

Most recently, we reaffirmed our commitment in this space by embedding it into our [Strategic Plan](#) through goals and objectives. We aim to build on a culture of inclusion to encourage belonging by providing opportunities for employees to reach their full potential.

Our Accessibility Plan (the Plan) is fundamental to this journey as we seek to identify, mitigate and remove barriers to make our workplace inclusive and accessible.

Our **Accessibility Statement of Commitment** highlights our plans and expectations.

Accessibility Statement of Commitment

At Hydro we strive for a safe and inclusive work environment where everyone has equitable access and opportunity. We are committed to identifying, preventing and removing barriers for persons with disabilities who work with us and for those who interact with our company.

Accessibility Goals

Our goals related to accessibility align with our broader equity, diversity and inclusion (EDI) work and are as follows:

Employee Experience

Accessibility is integral to the total employee experience and will be strategically embedded throughout our business as we work toward creating a barrier-free environment and a culture of inclusion and belonging.

Ownership and Integration Across the Business

Accessibility will become further embedded into various areas of our business, ensuring ownership across Hydro.

Partnerships and External Engagement

We will seek and integrate voices of lived experience to enhance our strategy and further improve accessibility here at Hydro.

Accessibility Plan Development

Our Accessibility Plan was developed through a consultative process as part of our overarching commitment to EDI and in response to the Accessibility Act.

An Accessibility Committee (the Committee) was established through both a targeted invitation and an open call for participation. The Committee is comprised of individuals who self-identify as having a disability, business leads who have accountability for specific focus areas, individuals who expressed an interest to be involved, and our community partner, [Empower NL](#).

Employees were invited to provide feedback and input to the Plan which helped us better understand and clarify barriers we may face regarding accessibility and the actions taken to date.

Focus areas

This initial phase of our Plan spans 2024-2026 and will be built upon in future plans. Our focus areas were developed by reviewing the Accessibility Act and the Accessibility Plan Guide, researching best practices, looking to others in similar industries and by seeking feedback and input from our employees and the Accessibility Committee.

The focus areas and associated actions are all subject to review and revision as we progress through the Plan, learn more and receive additional input and feedback.

Our focus areas include:

Employment

We will review and plan to reduce barriers for accessing employment at Hydro. We are committed to making an accessible workplace and helping to create a barrier-free recruitment process so all people can have equal access to meaningful employment.

Customer Service

We will seek to understand and mitigate the barriers customers may face when interacting with us.

Information and Communication

We will continue to pursue barrier-free communication both for those who work with us and for those external to our organization.

Information Technology

The technology landscape is rapidly evolving which can be beneficial to removing barriers to ensure persons with disabilities have greater opportunities to participate in the workforce. We are committed to accessing existing and new technologies to move towards a barrier-free technology environment.

Built Environment

We will primarily focus on the proactive mitigation of barriers in areas where our customers or the public can interact with or access our facilities. We will be proactive, or respond on an as-needed basis, to areas reserved for employee-only access.

Our Plan and associated requirements will be communicated to all employees, and will highlight our accommodation policy and procedures. Over the next three years we will focus on increasing employees' understanding of accessibility, matters related to inclusion of persons with disabilities and our requirements to adhere to the Plan.

Ad hoc reviews and response to items that are brought forward will occur as required.

For more detail and action items related to any of these focus areas please see the [Focus Area Plans](#) within this document.

Timelines

Generally, our timeline for the initial phase of our Accessibility Plan is as follows:

Year 1 - 2024

In year one we will focus on reviewing our processes and discovering the associated best practices. During this time we will also be soliciting additional feedback on how people interact with our business to help inform future plans.

Year 2 - 2025

In year two we will take what we learned through our best practice reviews, research and feedback to plan and begin to budget required work.

Year 3 - 2026

In year three we will begin implementing the action items that were established and approved in year two. The current Accessibility Plan will be reviewed and updated for the following three years, from 2027 to 2029.

Of course, as we are able to implement ahead of schedule we will seek to do so.

Barriers

We recognize that we have barriers to accessibility and are committed to continuous improvements to help remove those barriers. Specific examples related to our focus areas are details in the [Focus Area Plans](#) section of this document.

We fully recognize that there are further barriers to be understood. Barriers unknown to us will be identified as we review our processes, consult with our partners, like Empower NL, identify best practices and hear more from our employees. Our initial plan begins to

address those barriers already known and further mitigation plans will be assessed in years two and three of the implementation plan.

Keeping the Plan Up-to-Date

As we progress through the Plan we know there will be more we learn, uncover and are expected to respond to. Therefore, this is a living document which will continue to be updated as appropriate. The Committee will meet semi-annually, or on demand as required, to review the Plan, ensure actions within focus areas are progressing and update the Plan as appropriate.

Updates to the Plan will factor in external and internal feedback as well as any factors that come up from best practice reviews and the development of provincial standards.

Provide Your Feedback

If, upon review of this document, or through your interactions with Hydro, you are interested in providing feedback on the Plan or work in this space, please reach out to us via email or telephone. Both of these options are confidential and only accessible by a small number of individuals directly leading and supporting this work.

Email: accessibility@nlh.nl.ca

Telephone: 709-737-1796

Final Remarks

This Plan is a key step in our ongoing journey to creating a safe and inclusive work environment where everyone has equitable access and opportunity. We welcome the opportunity to build upon work that has been done and continue to identify, prevent and remove barriers for those who work with us and interact with us.

This work will evolve over time. As we learn more, we will be able to respond as necessary, and as we can, to improve accessibility and remove barriers.

Focus Area Plans

General

One of the key features of this Plan is to convey the importance and requirements of the Plan to those throughout our organization. Working towards making Hydro barrier-free is imperative as we work to support EDI for all.

Through this lens, we will also ensure we are regularly reviewing the available standards.

Barriers

- Employees may be uncertain on the availability of accommodations.
- While self-identification is in place, it is voluntary and therefore it has not been fully utilized. As a result, we are unclear on all the diverse needs and representation we have within our organization.

Actions to Date

- We already have a strong commitment to EDI and therefore has a good foundation to build upon.
- A self-identification survey was implemented in 2016 which allows employees to self-identify on a number of diverse grounds, including if they have a disability.
- All employees and supervisors complete diversity and inclusion training upon hire and this is renewed regularly.
- We have existing partnerships with external organizations who are of and for people with disabilities to assist us on our EDI journey.
- Each year we recognize a variety of EDI related events by sharing resources or through educational sessions to help employees learn more and be more inclusive. Recently the Learning Disabilities Association of NL presented a virtual session to our employees.
 - International Day for Persons with Disabilities is one of these calendar days we recognize and we share resources with employees.
- A Quiet Room is available in Hydro Place for those with diverse needs or for those who need a quiet place for reflection or personal reasons.
- Corporately employed Occupational Health Nurses can assist with any medical needs or accommodations.
- Our Psychological Safety Policy is especially supportive of mental health.
- Our Occupational Hygiene department is embedded within the organization to emphasize our focus on important health items such as Hearing Conservation.

Planned Actions

Action	Responsible	Timeline
Refresh self-identification survey to include more dimensions for greater understanding of our work population.	Engagement and Culture	2024
Educate Executive on the requirements of the Accessibility Act.	Engagement and Culture	2024
Clearly define and communicate the accommodations process.	People and Business Services	2024
Ensure our People and Culture department are up to date on our duty to accommodate.	People and Culture	2024
Continue building relationships and engaging with external organizations and partners who are of and for persons with disabilities.	Engagement and Culture	Ongoing
Hold semi-annual meetings for the Accessibility Committee to check in on planned actions and update accordingly. This will keep in view the federal and provincial accessibility standard development.	Accessibility Committee	Ongoing
Update our standard diversity and inclusion training to ensure we are sharing current information, inclusive of accessibility considerations.	Engagement and Culture	2024
Roll out updated employee and supervisor diversity and inclusion training.	Engagement and Culture	2025
Continue offering ad hoc information sessions related to inclusion of persons with disabilities.	Engagement and Culture	Ongoing
Renew employee resources groups to enhance support and to entrench EDI across our business.	Engagement and Culture	2024

Employment

We will review and plan to reduce barriers for accessing employment at Hydro. We are committed to making an accessible workplace and helping to create a barrier-free recruitment process so all people can have equal access to meaningful employment.

Barriers

- The varied geographical nature of our work, as well as the types of positions we have, can present challenges associated with accessibility.
- Potential applicants may be unclear on the accessible features in our current job application process and we are uncertain of all existing barriers in this process.
- There is a potential for bias in the hiring process.
- We do not have a full picture of labour market availability.
- Many people are involved in the screening and hiring process which can open the process to possible inconsistency.
- New hire and new supervisor orientation is currently embedded in our intranet and accessibility features are unclear.

Actions to Date

- Each of our job ads include a statement that our company values diversity and inclusion and encourages applications from diverse candidates.
- Through our partnership with Inclusion NL our job ads also note that should candidates with disabilities require an alternative format, they can reach out to Kathy Hawkins at Inclusion NL who can assist them in the process. Kathy then notifies us of any barriers that were experienced.
- There is a Recruitment Standard in place which guides recruiters through a consistent process in recruitment and has considerations for accommodations embedded in the process.
- Candidates are notified that accommodations can be requested in the interview process.
- Upon hire, candidates and supervisors are both informed of the availability of accommodations.
- Reviews of our onboarding processes are underway with consideration for accessibility.
- Feedback sessions have been held with those who have recently completed the onboarding process, both new employees and new supervisors, to understand their experience with the process and how it can be improved.
- A review of our benefits plan has been undertaken with an EDI lens to consider how the plan serves diverse groups, including those with disabilities.

- Employees can apply for flexible working arrangements which includes working full time from the office/work site, full time from home, or hybrid options. All requests are considered in light of operational needs and position.

Planned Actions

Action	Responsible	Timeline
Review recruitment process to identify barriers to accessibility.	Recruitment	2024
Update recruitment process and standard to ensure mitigation of barriers.	Recruitment	Ongoing
Ensure there is clarity throughout process on the availability of accommodations.	Recruitment	Ongoing
Begin training for those involved in the job screening process on considerations of bias in hire.	Engagement and Culture / Recruitment	2025
Update both employee and supervisor onboarding processes to ensure they are inclusive of accessibility considerations.	Engagement and Culture	2024
As changes are being implemented in the onboarding process, ensure accessibility is considered.	Engagement and Culture	Ongoing
Continue to increase confidence of our recruitment team in providing appropriate accommodations during the recruitment process.	Engagement and Culture and People and Business Services	Ongoing

Customer Service

We will seek to understand and mitigate the barriers customers may face when interacting with us.

Barriers

- Limitations exist with some customers' limited access to high speed internet.
- There is varied ability for some individuals to be able to perform certain transactions, such as proof of payment.
- Various demographics are uncomfortable or unfamiliar with some technology.

Actions to Date

- We have increased the formats through which customers can access important information - including paper mail outs and electronic bills.
- Our teams are responsive to the communication needs of our customers and adjust, where possible, to accommodate various preferences and needs (telephone, electronic, etc.).
- Accessibility questions have been added to our Customer Service Satisfaction Survey.

Planned Actions

Action	Responsible	Timeline
Keep the progress and direction of the provincial Customer Service Standards Committee on accessibility in view.	Customer Service	Ongoing
Review feedback from our Commercial Customer Survey to understand existing barriers to accessibility faced by our customers and begin a plan to address.	Customer Service	Ongoing
Begin educating staff on accessible customer service.	Customer Service	2024
Begin tracking any items related to accessibility that are raised by customers.	Customer Service	2024
Through feedback from customers, continue to seek and assess alternative formats for customer interaction.	Customer Service	Ongoing
Consider addition of accessibility questions to our Residential Customer Survey to help understand the barriers faced by residential customers	Customer Service	2024

Information and Communication

We will continue to pursue barrier-free communication, both for those who work with us and for those external to our organization.

Barriers

- Multiple means and channels of communications exist for our organization.
- There are a wide variety of individuals and groups who are responsible for/sending these communications.
- A certain degree of complexity or technical jargon exists for this information due to the nature of our work.
- In some circumstances, rapid response is required on communications which may impede the ability to assess for accessibility.

Actions to Date

- Implemented alt text into our social media for graphics and images.
- #CamelCase is used in our social posts to help clearly communicate any hashtags.
- Our communications team has been trained in the use of smart brevity, which reduces content length and considers how people take in information.
- We have provided a guide/recommendations to make virtual sessions more accessible, including promoting the embedded closed captioning feature.
- Our teams assess the use of colour contrast in our visuals for readability.
- Our corporate font has shifted to Open Sans – a more accessible font.

Planned Actions

Action	Responsible	Timeline
Survey Electricity Feedback Panel (public survey) to help us better understand the experience of those who interact with us, from an accessibility perspective.	Engagement and Culture	2024
Continue to progress our website so it is barrier-free, including updating a glossary of terms.	Engagement and Culture	Ongoing
Ensure accessible formats for all the PDFs used on our website including enabling accessibility features on new documents and having alternate formats available, on request, for existing PDF documents.	Engagement and Culture	Ongoing

Action	Responsible	Timeline
Inventory the types of communications that are used across the business (ex. social, website, email, videos, infographics, etc).	Engagement and Culture	2024
Inventory the audience and senders of these communications (ex. TakeCharge, Customer Service, etc.)	Engagement and Culture	2024
Begin to research and develop guidelines for accessible formats.	Engagement and Culture	2024
Use easy to understand, plain language in communication materials wherever possible.	Engagement and Culture	Ongoing
Develop internal guidelines for accessible communications to create a standard process across Hydro.	Engagement and Culture	2025
Share these internal guidelines for accessible communication internally.	Engagement and Culture	2025
Develop meeting etiquette guidelines which include accessibility considerations (ex. cameras on, closed captioning, etc.).	Engagement and Culture	2024
Share these meeting etiquette guidelines internally.	Engagement and Culture	2025
Plan how to receive regular feedback from employees on matters related to accessibility in communication.	Engagement and Culture	2024
Review the results of our Electricity Feedback Panel to further inform our actions in this and other focus areas.	Engagement and Culture	2024
Develop an inclusive language guide for employees.	Engagement and Culture	2024

Information Technology

The technology landscape is rapidly evolving which can be beneficial to removing barriers to ensure persons with disabilities have greater opportunities to participate in the workforce. We are committed to accessing existing and new technologies to move towards a barrier-free technology environment.

Barriers

- Certain technology may not be permitted in our environment due to cyber security and privacy concerns.
- There are a wide range of needs and there are many possible assistive technology options available which can make it difficult to account for them all.
- We may not be made aware of all requests for assistive technologies.
- The rapidly changing nature of technology can make it difficult to 'keep up'.
- Some assistive technologies may not be able to work within our internal technology environment:
 - Alternative texts to describe images, graphs and tables are not available and/or used across all platforms.
 - Some software may not be accessible and therefore cannot be used with assistive devices like screen readers.
 - Some of our internal technologies may not allow different ways to enter information, like using speech or keyboard.

Actions to Date

- Flexibility in work formats to allow for more mobile options has been increased.
- The technology associated with remote working has improved.
- Our teams are responding to needs as they are identified.

Planned Actions

Action	Responsible	Timeline
Publish more accessible external website (nlhydro.com) with view to continuous progress to being barrier free and WCAG compliant.	Engagement and Culture	2024
Audit existing websites and critical technologies to determine accessibility features.	Information Systems	2024
Complete an industry scan on accessible standards and assistive technologies that could be utilized in our environment.	Information Systems and website owners	2024
Plan and begin implementation of current WCAG standards for public facing websites.	Information Systems and website owners	2024

Action	Responsible	Timeline
Begin communication of accessibility features within our existing technology.	Information Systems	2024
Develop a process for acquiring and standardizing Assistive Technology, including how we consider new requests.	Information Systems	2025
Identify a list of approved assistive technologies that will be supported in our environment.	Information Systems	2025
Begin to design and acquire new technology aligned with accessibility standards.	Information Systems	2026

Built Environment

We will primarily focus on the proactive mitigation of barriers in areas where our customers or the public can interact with or access our facilities. We will be proactive, or respond on an as-needed basis, to areas reserved for employee-only access.

Barriers

- The cost to update all required areas will be significant.
- The age of our infrastructure causes barriers as the requirements when they were built would be different from what they are currently.
- All people may not be aware of the requirements of accessibility related to the original built environment.

Actions to Date

- As projects are being planned or built our teams are factoring in current legislation and codes to ensure we are bringing them up to date.
- The Health, Safety and Environment plans for new projects include a check related to accessibility.
- The Engineering Basis of Estimate documents for capital project planning include a check for diversity and inclusion considerations.
- Within the Town of Churchill Falls:
 - Town residents bring forward barriers they face and our facilities/associated town services teams work with them for mitigation.
 - Any new projects, renovations or modifications always go through an accessibility lens.
 - The main floor of the hotel has been updated for wheelchair access ramps and accessible doors.
 - A Site Accommodations Committee has been formed and meets regularly.
- At Hydro Place:
 - Accessibility considerations are in place for emergency plans.
 - Physical assessments for accessibility have been completed for our headquarter location.
 - Our parking lot identifies accessible parking spaces, aligning with legislation.
 - A washroom on level 3 has been renovated for accessibility.

Planned Actions

Action	Responsible	Timeline
Review engineering best practices and standards to determine applicable engineering considerations for accessibility in design. Refer to and keep abreast of application legislation and codes.	Engineering	2024/2025
Gain Executive approval on approach to incorporating accessibility considerations (both legislated and best practice) into long term asset plans for our facilities.	Engineering/Executive	2025/2026
Begin clarifying and educating the engineering teams on what it means to consider accessibility in design.	Engineering	2026
Begin updating the appropriate internal engineering documents to ensure visibility and to ensure consideration of accessibility in future projects and design.	Engineering / IS	2026
Complete a physical site inspection of Churchill Falls public facing areas.	CF Town Services/LTAP	2024
Begin the development of our Capital plan based on the results from the physical site inspection in Churchill Falls.	CF Town Services/LTAP	2025
Consider how to adjust for accessibility as projects or modifications are being made to relevant physical locations.	CF Town Services / Facilities Management and Fleet Support	Ongoing
Begin curb stop and crosswalk updates at Hydro Place for improved accessibility.	Facilities Management and Fleet Support	2024
Begin washroom updates at Hydro Place and adjust for accessibility (ex. Updating to automatic fixtures).	Facilities Management and Fleet Support	2025
Re-review the accessibility assessment for Hydro Place and create a plan to address various items within.	Facilities Management and Fleet Support	2024

Glossary of Terms

Many of our definitions come from the Accessibility Act. If, on review, you determine there are terms which could benefit from more definition please provide your feedback to accessibility@nlh.nl.ca.

Accessibility Act

The provincial law enacted to achieve accessibility by preventing and removing barriers for people with disabilities. The Accessibility Act defines the role and responsibilities of the Disability Policy Office and the Accessibility Standards Advisory Board, and addresses standards, compliance, and enforcement.

Accessibility Plan

A plan to address the prevention, identification and removal of barriers in the policies, programs, practices and services of a public body.

Accommodation

Any technical aid or device, personal support or disability-related support or other support or modification a person may require. This can include, but is not limited to: accessible meeting rooms, accessible document formats, mobility supports, and captioning.

Barrier

Anything that prevents a person with a disability from fully participating in society, including: a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, or a barrier that is established or perpetuated by an Act, regulations, a policy or a practice.

Built Environment

Includes: facilities, buildings, structures and premises; and public transportation and transportation infrastructure.

Disability

As defined by the Accessibility Act, a disability includes a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation that is permanent, temporary or episodic in nature that, in interaction with a barrier, prevents a person from fully participating in society.