

# **Board of Commissioners of Public Utilities Accessibility Plan**

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Newfoundland and Labrador

**Board of Commissioners of Public Utilities**

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## Letter from the Executive Sponsor

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I am pleased to present the Board of Commissioners of Public Utilities (“the Board”) 2023-2026 Accessibility Plan. We are committed to supporting a workplace that is safe and inclusive with Equity, and Inclusion engrained throughout our organization.

We are committed to fostering an environment where all our employees have the tools to bring their expertise to the table. As the provincial regulator for all electricity, automobile insurance rates and petroleum products pricing to consumers in Newfoundland and Labrador, we need to be responsive and accessible to the people of the province. I look forward to implementing the strategic elements of this plan to ensure we deliver on these commitments.

While I am proud of our progress to date, towards making the Board inclusive and accessible, I know there is always room for improvement. I look forward to continuing this work together.



Kevin Fagan  
Chairperson and Chief Executive Officer  
Board of Commissioners of Public Utilities

## Statement of Commitment

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The Board is committed to establishing a barrier-free environment that is considerate of Stakeholder and Employee human rights and privacy.

In fulfilling its mandate, the Board strives to ensure that all people have equitable and barrier-free access to its premises, as well as any employment opportunities.

The Board is committed to ensuring its hiring and employment practices meet the accessibility needs of job applicants and employees with disabilities.

To deliver on these commitments, the Board shall identify, remove and prevent future barriers to accessibility such that persons with accessibility concerns can:

- Access the Board's premises;
- Obtain Board services in a timely manner;
- Work productively with dignity in the Board's workplace; or
- Interact with the Board in any other applicable manner.

## Advancements to Date

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The Board has long established an accessibility policy which it continues to refine as new guidelines are issued. For example, in 2012, all official Board documents adopted special formatting requirements to ensure compliance with accessibility standards (i.e., special formatting: no italics; use bold where you would once use italics (e.g. when referencing Acts).

In addition, the Board has established a number of procedures to ensure that its office and public hearings spaces are accessible and can accommodate special requests.

### **Accessible Stakeholder Service**

The Board makes reasonable efforts to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Allowing stakeholders to do things in their own way and at their own pace when accessing services, provided this does not pose a safety risk;
- Using alternative methods and taking into account individual needs, to ensure that stakeholders with disabilities have access to services, and in a similar setting and manner; and communicating in a manner that is considerate of the target audience/stakeholder.

Employees and service providers who provide services on the Board's behalf are encouraged to be proactive in seeking solutions and removing barriers, as well as alerting all stakeholders to the range of available accommodations.

### **Use of Support Persons**

If an individual is accompanied by a support person, the Board shall ensure that both persons are able to enter its premises together, and that the supported individual maintains access to their support person at all times.

### **Use of Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing the Board's services.

The Board shall ensure that its employees and service providers are familiar with the use of assistive devices, as appropriate to their duties, and inform persons with disabilities of the available assistive devices.

### **Alternate Formats Available Upon Request**

The Board shall provide stakeholders with appropriate accessible formats and/or communication supports upon request. Such formats and/or supports shall be provided in a timely manner and take into account the accessibility needs of the person with a disability.

The Board shall notify the public about the availability of accessible formats and communication supports through its website and shall engage in an ongoing process of identifying additional formats and supports that it may offer.

Where the Board determines that information or communications cannot be converted into an accessible format, the Board shall provide the person requesting the information or communication with:

- An explanation as to why the information or communications cannot be changed into an accessible format; and
- A summary of the information or communication that could not be changed into an accessible format;

### **Availability of Accessibility Documents**

All documents shall be available upon request, subject to the *Access to Information and Protection of Privacy Act, 2015*.

When providing these documents to a person with a disability, the Board shall endeavor to provide the document, or the information contained in the document, in a format that is considerate of the target audience.

### **Accessibility Feedback Process**

Accessible formats and communication supports shall be made available upon request to anyone wishing to provide feedback. Privacy shall be respected throughout the feedback process.

When criticisms or suggestions related to accessibility are received, stakeholders can expect the following:

- All feedback responses shall be made timely through the stakeholder's selected communication channel or through the format requested by the stakeholder. Additional time may be required depending on the nature and format of the response required. If conversion to a certain format or communication support is not possible, the Board shall inform the requestor and provide rationale. The Board shall then summarize the information for the requestor.

## **Focus Areas, Actions and Goals**

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Our two long-term focus areas align with our mandate to help ensure that our services and policies are accessible, and that we consult with community partners and those with lived experience as we develop or change.

- 1. Accessibility of Information and Communication Technology**
- 2. Continuous Innovation and Education**

Within these focus areas, we have specific goals and annual actions to ensure we continually work to identify, remove and prevent existing and future barriers and address issues related to equitable access. These goals and actions also help ensure we pay attention to aspects of our operations that continue to evolve as we modernize and innovate.

### **Focus Area One: Accessibility of Information and Communication Technology**

The Board has a broad mandate which can have significant impacts on electricity and automobile insurance rates and petroleum products pricing in the province. Given this, effective communication is essential so that stakeholders can understand the work of the Board and its impact. Clear and concise communication of Board matters can be challenging due to the often-technical nature and complexity of the issues.

In addition, expectations of the public as to the accessibility of information may be evolving and the Board needs to consider how to meet these expectations. Over the next three years, the Board will review its communications strategy and implement new approaches to ensure effective communication which engenders trust and confidence in the work of the Board. The strategic issue of strengthening Board communications will be prioritized during this planning cycle.

Our published activity plan for 2023-2026 is located on our website here:

<http://www.pub.nl.ca/AnnualReports/ActivityPlan2023-2026.pdf>

## **Actions**

Enhancing our communications is critical to our overall strategy and our accessibility goals. We have hired an external firm to audit existing documents and materials related to the Board's activities to grasp stakeholder perspectives and determine how best to communicate our mandate to the general public. This might include the use of visuals, videos, and interactive tools which will all contribute to more effective messaging, better public understanding, more meaningful public engagement and greater accessibility.

## **Goals**

- Incorporate plain language into all Board correspondence.
- Increase the use of visuals, videos, and interactive tools to improve public understanding.
- The Board shall continue to work towards increasing the accessibility of its existing web content.

## **Focus Area Two: Continuous Innovation and Education**

The purpose of the continuous innovation and education focus area is to ensure the Board is proactive and stays current with best practices and standards for accessibility by engaging those representing persons with lived experiences.

## **Actions**

The Board intends to consult with groups representing persons with disabilities to identify barriers and update the Board's existing accessibility plan and policies.

## **Goals**

- Engage with community partners, stakeholders and employees to identify and remove barriers.
- Assess technologies and identify areas for short- and long-term improvement.
- Propose solutions and processes for implementation in both policy and the workplace.



**Timelines:**

We are on track to meet our first-year objective to review our current communications and engagement approach.

<b>Objective Year 1</b>	<b>By March 31, 2024 the Board will have reviewed its Communications Strategy and Plan</b>
<b>Indicators:</b>	
<ul style="list-style-type: none"> <li>• Communications firm hired.</li> <li>• GAP analysis determining desired outcomes for the Communications Strategy and Plan completed.</li> <li>• Communications Strategy and Plan reviewed.</li> </ul>	
<b>Objective Year 2</b>	<b>By March 31, 2025 the Board will have determined its Communications Strategy and Plan approach</b>
<b>Objective Year 3</b>	<b>By March 31, 2026 the Board will have implemented the key components of its Communications Strategy and Plan</b>

**Promoting Accessibility Awareness**

The Board shall make reasonable efforts to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- The Board shall provide stakeholders with appropriate accessible formats and/or communication supports upon request. Such formats and/or supports shall be provided in a timely manner and take into account the accessibility needs of the person with a disability.

## Glossary of Terms

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**Accessibility** means giving opportunities to people of all abilities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, program, product or environment.

**Accessible design** refers to products, devices, information, services, facilities or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility-related disabilities. The concept of accessible design ensures both “direct access” (i.e. unassisted) and “indirect access,” referring to compatibility with a person’s assistive technology.

**Accessible formats** may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

**Accommodation (or disability-related support) refers to** any technical aid or device, personal support or disability-related support or other accommodation a person may require. This can include, but is not limited to: accessible meeting rooms; accessible formats such as Braille and plain language; mobility supports to attend a meeting; and, sign language interpreters, captioning or ensuring space has sensory sensitive features.

**Assistive devices** are any technical aids, communication devices or medical aids that are used to increase, maintain or improve the experience of individuals with disabilities. Assistive devices include, but are not limited to, wheelchairs, walkers, white canes, prosthetic limbs, note taking devices, portable magnifiers, recording machines and electronic communication devices.

**Barriers** means anything that keeps a person with a disability from participating in all aspects of society. Examples of barriers include:

- **Physical and architectural barriers:** occur in the environment and prevent access for people with disabilities. Examples include narrow doorways, stairs, dim lighting or high glare surfaces.
- **Information or communications barriers:** arise when a person with a disability cannot easily receive and/or understand information that is available to others (e.g. publications that are not available in large print, digitally, Braille or other accessible formats)
- **Technological barriers:** occur when technology or the way it is used does not meet the needs of people with disabilities (e.g., a website that does not support screen-reading software)

- **Attitudinal barriers:** may result in people with disabilities being treated differently than people without disabilities (e.g., a receptionist who talks to an individual's support person rather than the individual with a disability)
- **Systemic barriers** in policies, practices and procedures result in people with disabilities being treated differently than others or sometimes excluded altogether.

**Communication supports** may be used to access information or increase communication effectiveness. These supports include, but are not limited to, captioning, alternative and augmentative communication supports (i.e. methods used to supplement or replace speech or writing for those with impairments in the production or comprehension of spoken or written language), plain language, sign language, and other supports that facilitate effective communication.

**Disability**, as defined by the Act, 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.

**Employees** include all individuals hired under employment contracts for an indeterminate or a predetermined period of time and includes appointees to the Board, but does not include independent contractors working for the Board.

**Information** means data, facts, and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

**Plain language** means clear, conversational communication that makes sense to the intended audience. The goal of plain language is to communicate so clearly that the intended audience can easily find what they need, understand what they find, and use the information.

**Public spaces** refer to an area or place, such as a parking lot or a service counter, which must be open and accessible to all people.

**Service Animal** means an animal trained to provide assistance to a person with a disability and having the qualifications prescribed by the regulations and used by a person with a disability

**Stakeholders** means the individuals, corporations, and governmental agencies with whom the Board interacts in the ordinary course of its business.

**Support Persons** means any person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

## Conclusion

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We are committed to offering accessible and inclusive services to our stakeholders. We will continue to work with community partners to identify, remove and prevent existing and future barriers to accessibility. We are looking forward to continuing to learn and change. We will regularly monitor and report on progress, and will update our plan every three years as required by the **Accessibility Act**.