

# **ACCESSIBILITY PLAN**

2023-2026



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The NSLC acknowledges that the land on which we operate is located in Mi'kma'ki, the ancestral and unceded territory of the Maliseet and Mi'kmaq People. This territory is covered by the Treaties of Peace and Friendship. The NSLC's employees, customers, and suppliers are honoured to live and be on this land and are committed to the reconciliation, decolonization, healing, and building of relationships in our communities and spaces.

**Cover Image:** Nicholle Warren, Store Manager, with NSLC Accessibility Advisory Committee community representative John Smith at the NSLC Bridgetown Store, Province of Nova Scotia photo.



# Message from Greg Hughes, President & CEO

We are pleased to share the NSLC's first Accessibility Plan (2023–2026).

Nova Scotia's *Accessibility Act* recognizes accessibility as a basic human right and sets a target of becoming a fully accessible province by 2030. The NSLC's plan is designed to support this goal by creating inclusive and accessible environments across the organization and building awareness of these new requirements for our employees and customers.

As a Crown Corporation, we are responsible for beverage alcohol and cannabis sales and distribution in Nova Scotia. We look forward to removing barriers to our products and services and to creating more accessible spaces. Accessibility presents us with an opportunity not only to innovate our service offering for our customers, but also to enhance our connection with our employees.

In 2022, the NSLC's Accessibility Committee, led by Jen Green, our Manager, Inclusivity & Accessibility, was formed to guide the development of this plan. The Committee has both employee and customer representation, and more than 50% of the participants are persons with disabilities. On behalf of the NSLC's Board of Directors and Executive Team, I thank the Committee for their commitment and contribution to the development of this plan.

The NSLC's Accessibility Plan outlines a collaborative approach to how we will meet our goals with a focus on the following areas:

- Goods & Services
- Physical Environment & Transportation
- Information & Communication
- Employment
- Capacity Building & Awareness
- Accountability & Evaluation

Action plans to support each area have been developed and will guide our work. We will weave accessibility into our corporate priorities and strategic plans. This will make the NSLC a better place to work for our employees, it will improve the shopping experience for our customers, and it will help contribute to a stronger Nova Scotia.

Accessibility is a responsibility shared by all of us. We understand there is work to do and we are committed to working together to achieve the goals outlined in this plan.

Greg Hughes

# Formatting & Language

Throughout the development of this plan, our intention has been to use person-first language and to represent persons with disabilities with respect and dignity.

We have done our best to ensure the plan is accessible to everyone. If the language, format, or messaging in the plan is inaccessible to you please contact the NSLC's Manager, Inclusivity & Accessibility at DiversityAndInclusion@myNSLC.com.

## **Terms & Definitions**

AAC Accessibility Advisory Committee

Accessibility The inclusive and intentional practice of ensuring

> and advocating for equitable access to physical spaces, resources, websites and opportunities

**Accessibility Audit** A formal environmental scan of virtual and physical

> environments that highlight barriers to accessibility and showcase opportunities to improve inclusivity. Audits are often associated with the initial phases of

resource and project planning

Assistive Technology Technology that can be adapted to support,

> maintain and improve the functional access to information and processes (e.g., screen readers)

**Barrier** Nova Scotia's Accessibility Act defines a barrier

> as "anything that hinders or challenges the full and effective participation in society of persons with disabilities, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice"

**Barrier-Free** A reactive approach to removing existing barriers,

typically within the physical environment

**Blindness** Being unable to see due to disease, injury or a

genetic condition



Deaf Severe hearing loss resulting in little to no

functional hearing

Decentralized To disperse efforts to support a structure that is

collaborative and has many leading stakeholders

with equal or comparative accountability

Disability Nova Scotia's Accessibility Act defines disability as

> "a physical, mental, intellectual, learning or sensory impairment, including an episodic disability that, in interaction with a barrier, hinders an individual's

full and effective participation in society"

**Episodic** Discrete, often brief, periods or episodes.

The activity of buying and selling products online E-Commerce

Equitable/Equity A commitment to fairness. Equitable access is

> different from equal access. Equality means everybody is treated the same. Equity means everybody is treated fairly, based on their needs

and abilities

Environmental

Scan

An informal process used to assess and analyze situations, environments and processes to gather

baseline data and trends

Hard of Hearing A loss of hearing that, when combined with assistive

technology, such as a hearing aid, may provide

adequate support to process speech

**IDEA** Inclusivity, Diversity, Equity, Accessibility

The intentional practice of providing equitable Inclusivity

> access to resources, opportunities, and interactions that, when combined, support a sense of belonging

and fairness

Interdepartmental More than one department

Intersectional The ways in which systems, processes and identities

overlap and meet at varying points. A term often

used within diversity and equity structures

**NSLC** Nova Scotia Liquor Corporation



Plain Language Language a reader or listener can understand

easily and completely without the use of complex

statements and jargon

**RHFAC** Rick Hansen Foundation Accessibility Certification

Learn more at: www.rickhansen.com/become-

accessible/rating-certification

**Universal Design** A proactive process that includes inclusivity and

> accessibility in the early design phases therefore reducing the need for accommodations or retrofitting

**Vision Impairment** A decrease in eyesight that cannot be supported

through usual means, such as eyeglasses



### **Overview**

The NSLC is committed to its obligations under Nova Scotia's Accessibility Act with the goal of achieving an accessible Nova Scotia by 2030. As a Crown Corporation, the NSLC was required to establish an Accessibility Advisory Committee and to develop an accessibility plan by April 1, 2023. Nova Scotia's Accessibility Act outlines six focus areas in which standards are presently being developed:

- **Built environment**
- Education
- **Employment**
- Delivery and receipt of goods and services
- Information and communication
- Public transportation and transportation infrastructure

The NSLC will collaborate with Nova Scotia's Accessibility Directorate in order to stay up-to-date on developing standards. As new standards are released, we will adjust our plan as required.

The NSLC used a top-down, intersectional and collaborative approach to identify barriers to inclusion and accessibility across the organization. This included a thorough analysis and discussion of our retail stores, Distribution Centre, office space environments, communication and web accessibility practices and platforms, and overall organizational policies, programs, and practices as they pertain to accessibility. The Accessibility Advisory Committee, as well as key internal stakeholders and leaders, helped to inform the discussions within these areas.

## **Consultations**

In the initial stages of the development of this plan, NSLC employees were surveyed on their attitudes and levels of awareness toward accessibility. Of those who responded, the survey revealed the following:

94% OF RESPONDENTS either agreed or strongly agreed that accessibility was important

96% OF RESPONDENTS agreed or strongly agreed that accessibility was a shared responsibility across the NSLC and not the responsibility of someone else

80% OF RESPONDENTS agreed or strongly agreed that they were aware that the NSLC was required to develop an accessibility plan





Jen Green, Manager, Inclusivity & Accessibility with NSLC Accessibility **Advisory Committee** community representative John Smith at the NSLC Bridgetown Store

Province of Nova Scotia

From June to September 2022, 105 NSLC store visits were conducted to discuss accessibility issues and identify barriers, using an accessibility assessment tool. Persons with lived experience with a physical disability were consulted in the development of the assessment tool and were present for store visits.

In developing this Accessibility Plan, the NSLC was proud to collaborate with ReachAbility and The Society of Deaf and Hard of Hearing Nova Scotians. This provided valuable perspective on how to improve accessibility in our retail stores and create a more inclusive shopping experience for our customers.

From December 2022 to February 2023, we facilitated feedback sessions with both organizations to learn about the NSLC customer shopping experience from diverse perspecives. Others consulted included caregivers and those having identified with learning, physical, mental health and various vision related disabilities. Two participants either had a guide dog currently supporting them or had one support them in the past. This feedback was used to influence the direction of our plan.







# THE NSLC'S FOCUS AREAS

# **Goods & Services: Beverage Alcohol** and Cannabis

#### COMMITMENT

Review, assess, implement and monitor methods and operations to ensure equitable access to goods and services for persons with disabilities and other disadvantaged groups are prioritized.

#### PROGRESS TO DATE



The NSLC has a network of 109 beverage alcohol stores. Supported by our Agency store network, research and data shows that 96% of Nova Scotians live within 10 km of an NSLC store to shop for beverage alcohol.



When cannabis was legalized in 2018, the NSLC opened 12 cannabis locations, primarily in existing beverage alcohol stores, along with an e-commerce offering to support our commitment to offer a safe and secure supply of cannabis. Since then, we have opened an additional 36 locations across the province for a total of 48 locations.

#### **SIGNAGE**

In planning for the opening of the NSLC store in Eskasoni, we worked with local community members to ensure our signage was available in Mi'kmaq.

#### HOME DELIVERY PROGRAM

In 2022, the NSLC launched a province-wide beverage alcohol home delivery program, which improved overall access to products. Currently, we reach 93% of Nova Scotians through home delivery and the NSLC continues to evaluate the program, including the assortment of products available online.



#### BARRIERS

Signage, product information, the physical layout of stores and product placement present challenges for customers or employees with disabilities to access our products easily and with independence. In addition, cannabis is not available in all NSLC stores and not all beverage alcohol products are available through home delivery.

> "Even when I'm shopping with a sighted guide ... I would be taking their elbow. Sometimes it's very difficult to get through a narrow aisle, particularly this time of the year when there are so many special promotions and products that are at the end of the aisles or special little baskets in the middle. It's just really important to keep those aisles free and clear for people to get through."

FEEDBACK SESSION PARTICIPANT

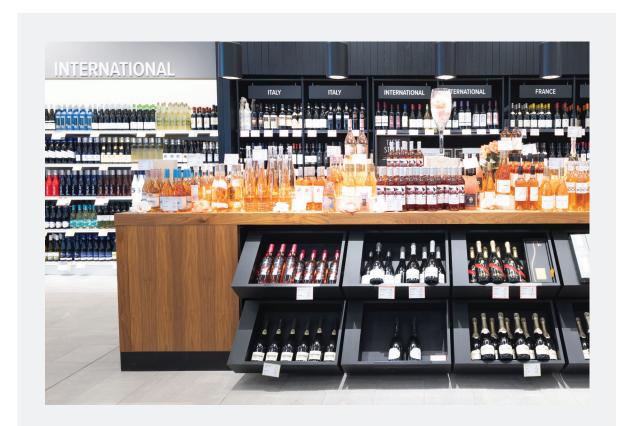
#### **ACTIONS**

- 1. Evaluate the addition of new cannabis locations as part of overall store network planning.
- 2. Further promote e-commerce/home delivery as an option for those who are not able to access a store for beverage alcohol or cannabis and evaluate the overall online experience.
- 3. Review and, if necessary, adjust the beverage alcohol assortment available online.
- 4. Explore opportunities for new signage that supports inclusion and that makes it easier to find products, where possible, in stores.
- 5. Identify and explore relevant assistive technologies to support accessibility features for customers with various disabilities.
- 6. Review cannabis and beverage alcohol shopping areas to identify opportunities to improve accessibility in the NSLC shopping experience.
- 7. Review the NSLC's operational practices around merchandising and product placement. Identify potential opportunities to implement a more accessible strategy.



"If you're going to use signage, it is very important to use accessible signage following accessible standards, with the size of the font and the contrast of the colours used on the signage." FEEDBACK SESSION PARTICIPANT

- 8. Explore aligning the NSLC's accessibility priorities and fulfilment strategy to support increased access to a selection of products across Nova Scotia, particularly in remote or isolated areas.
- 9. Review key contracts with NSLC partners to assess if accessibility requirements need to be considered.



NSLC Portland Street Store, Dartmouth





John Smith, NSLC Accessibility Advisory Committee community representative, at the NSLC Bridgetown Store

Province of Nova Scotia

# **Physical Environment & Transportation**

"As a visually impaired person I try to frequent the same establishments because I want [employees] to be familiar with me."

FEEDBACK SESSION PARTICIPANT

#### COMMITMENT

Move away from the concept of barrier-free, and instead apply the principles of universal design to the planning and renovation processes for the NSLC's stores, head office and Distribution Centre.



#### RENOVATION PLANNING

Recently, the NSLC has renovated up to 12 stores per year and accessibility has been considered in the design and layout of the stores. To help inform the Accessibility Plan, we visited 105 stores to conduct a preliminary environmental scan of the physical spaces and collect feedback from store teams on accessibility and barriers in their stores. Our Accessibility Advisory Committee community representative, who is a person in a wheelchair, was present to provide feedback during the visits near the end of the preliminary scan. Based on the stores visited:

- 76% OF STORE WAREHOUSE SPACES have washrooms with accessible features
- 83% OF STORE AISLES AND CHECK-OUT LANES exceed the minimum 39-inch standard for width
- 86% OF STORES VISITED have a primary entrance that was distinctly clear to customers for ease of entry
- 78% OF THOSE ENTRANCES are well-lit and visible from a distance

#### RICK HANSEN CERTIFICATION

The NSLC recently hired a new Program Manager - Facilities who is in the process of obtaining the Rick Hansen Foundation Accessibility Certification (RHFAC). This certification will be used in support of our Accessibility Plan to support a universal design strategy for our stores.

> "I love using tap because it is much easier for me, and I notice at the NSLC the card reader, or keypad, always seems to be very prominently placed on the counter. It's almost always right in front of me, which I appreciate."

FEEDBACK SESSION PARTICIPANT

#### BARRIERS

Although many NSLC stores meet the present Canadian Standard Accessibility requirements physically, some locations and spaces are still inaccessible for various persons with disabilities. Product volume has also placed constraints on available and accessible space in our warehouses.



#### **ACTIONS**

- 1. Complete an RHFAC audit of all NSLC facilities.
- 2. Explore opportunities to implement a low-sensory shopping hour.
- 3. Assess store warehouse areas to ensure that accessible washrooms are usable and that spaces are fully accessible.
- 4. Continue to include an accessibility lens in the planning and execution of new store development and store renovations.
- 5. Leverage Rick Hansen guidelines to identify accessibility requirements in NSLC stores, Distribution Centre and offices for purposes of planning and execution.
- 6. Identify opportunities for increased education and provide physical environment-focused universal design training for those involved in the store development and facilities planning process.
- 7. Develop resources, training and support material on accessible store features and best practices.
- 8. Review emergency management, preparedness, and training programs with an accessibility lens.
- 9. Engage in ongoing discussion and evaluation of the usability of our physical spaces, including store hallways and aisles. Where possible, implement separate entry and exit points for increased accessibility.



## Information & Communication

#### COMMITMENT

Applying the principles of accessible communication, use an inclusive lens to modify, enhance and create accessible communication practices and strategies that reflect the NSLC's commitment to Inclusion, Diversity, Equity, and Accessibility for our customers and employees.

#### PROGRESS TO DATE

#### ACCESSIBILITY FEATURES ON THE NSLC'S WEBSITES

The NSLC's websites are a prominent source of information for customers. We are working to apply accessibly practices to all new and existing content, in keeping with Web Content Accessibility Guidelines, such as:

- Ensuring that all images on the website have alternate text applied
- Using live text where possible on assets instead of embedded text within images
- Maintaining sufficient colour contrast for all text on the websites and images
- Through a virtual accessibility audit process, the NSLC is making continuous improvements to our websites, ensuring simplicity of content navigation, including clear descriptions of link destinations, descriptive page names and using plain language. We are also changing images to be more reflective of our teams, always keeping diversity in mind when selecting images

#### **RECOGNITION EFFORTS**

The NSLC is working on a corporate calendar to highlight diversity events throughout the year. In 2022, we recognized the International Day of Persons with Disabilities for the first time at the NSLC.

#### POLICY DEVELOPMENT

In October 2020, the NSLC introduced an Engagement Policy to support significant policy and program issues that may impact local industry. This policy contains nine key principles, including inclusiveness and accessibility.



#### **BARRIERS**

NSLC meetings and events, virtual and in-person, are not always accessible to persons with disabilities and planning resource guides are not widely available. Additionally, there are varying levels of comfort and knowledge of appropriate language and virtual accessibility practices.

"There's nothing worse than non-communication... acknowledge that you see me-just say, 'Can I help you?' It's very simple." FEEDBACK SESSION PARTICIPANT

#### ACTIONS

- 1. Provide employees with learning opportunities focused on accessible communications and web accessibility guidelines for social media.
- 2. Use plain language in communication materials, including on social media platforms, in public documents and in presentations.
- 3. Assess the use of assistive technologies and external accessibility support for NSLC meetings and events.
- 4. Create a toolkit for accessible communication for employees to use and leverage within current operating practices.
- 5. Continue to assess and implement content accessibility improvements across the NSLC's websites, social media and intranet.



## **Employment**

#### COMMITMENT

Identify and adopt an overall inclusive employment approach. Ensure that efforts are being made to prioritize the equitable advancement of employees with disabilities at the NSLC.

#### PROGRESS TO DATE

#### HIRING INITIATIVES

The NSLC recently adopted a new approach to inclusive hiring and recruiting. This approach includes a new equity and diversity statement and provides notice that accommodation options are available earlier in the hiring process.

Efforts toward creating a more accessible culture at the NSLC began with the hiring of the Manager, Inclusivity & Accessibility, a new leadership position developed to support the accessibility plan and overall diversity strategy. This position is intended to champion the NSLC's ongoing goals and efforts to be an accessible employer.

#### LEARNING FROM THE COVID-19 PANDEMIC

Based on the success of remote work arrangements during the COVID-19 pandemic, the NSLC has since implemented a formal On Premise & Remote Hybrid Work Arrangement. This arrangement, where operationally feasible, allows office employees to access their work from either a physical or virtual space.

#### ONGOING SUPPORT

Developed in collaboration with the Workers' Compensation Board of Nova Scotia, the NSLC offers a Stay-at-Work/Return-to-Work (SAW/RTW) program designed to assist an employee's transition back to work following an injury or illness in a positive and respectful manner. This program has been a critical component of the NSLC's operational practices since 2012.

#### BARRIERS

 Accommodation needs have expanded beyond historical operating practices and now require formal and proactive support for mental health and other invisible disabilities, including neurodiversity. Awareness levels of existing NSLC resources and accessibility supports are varied across the organization, resulting in teams not being confident in supporting or working with persons with disabilities.



#### ACTIONS

- 1. Develop an organization-wide Accommodations Policy and support mechanisms for persons with disabilities who work or are applying to work at the NSLC.
- 2. Engage external support to ensure the human rights aspects of accommodations and best practices for the workplace are adequately considered.
- 3. Review the hiring and onboarding process to create proactive opportunities and a set of guidelines on how employees can safely and confidentially ask for accommodations at the start of their employment.
- 4. Develop an accessible interview checklist for hiring managers. Provide support to managers to facilitate conversations on how to formally respond to requests for accommodations and incorporate meaningful accommodations in support of inclusive hiring initiatives.
- 5. Increase awareness of the NSLC's Employee Family Assistance Program, the Stay at Work/Return to Work program and the process to request ergonomic furniture or office support.
- 6. Create purposeful ways to discuss and challenge negative stereotypes of disability and accommodations among employees and leaders.
- 7. Collaborate with community organizations to create and identify opportunities for diverse and inclusive hiring.
- 8. Ensure that relevant new initiatives and accessibility-related advancements at the NSLC are connected to upcoming overall diversity strategies and aligned with all IDEA values.



## **Capacity Building & Awareness**

#### COMMITMENT

Through collaboration and strategic planning, create inclusive learning spaces and increase awareness on topics of accessibility and disability.

#### PROGRESS TO DATE

#### THE NSLC ACADEMY

The NSLC currently offers employees two learning opportunities focused on inclusion: *Diversity and Inclusion in the Workplace* and *Five Strategies for Creating an Inclusive Environment*. These foundational courses are part of the NSLC Academy and have been used to provide a general overview of inclusion.

#### IN THE COMMUNITY

The NSLC was proud to be featured in the second phase of the Nova Scotia Accessibility Directorate's *Access Includes Everyone* campaign in December 2022.

"When you are providing customer service to someone who is blind or visually impaired the words that are used are very important and that can be part of the training. Use words that mean something to me. If I cannot see you, let's not say, 'Okay, follow me over here,' or those types of words that mean nothing to me."

**FEEDBACK SESSION PARTICIPANT** 

#### BARRIERS

Education and awareness of accessibility in the retail industry can be improved. Generally, employees and leaders are not aware of the basics of disability or the importance and need for inclusion within the workplace.



#### ACTIONS

- 1. Using an intersectional approach, ensure that accessibility is viewed from a holistic community perspective.
- 2. Research and identify leading customer service models that support the dignity and various needs of persons with disabilities in retail settings.
- 3. Develop new employee training on accessible customer service and the fundamentals of accessibility.
- 4. Provide all retail stores with a checklist to ensure that our customer-facing spaces are accessible to persons with disabilities and provide training to teams on how to implement this checklist.
- 5. Provide resources for leaders to support and teach the value of inclusion.
- 6. Develop and implement a feedback tool to assess learning needs and progress.
- 7. Explore tools that support improved professional administrative skills. Ensure the information on how to access these tools can be found on Swizzle, the NSLC's intranet and/or the NSLC Academy, or supplied to an employee if they request it.
- 8. Incorporate an inclusive lens in the planning and design of our responsibility and marketing materials.
- 9. Explore opportunities for the NSLC's suppliers to learn of our commitment to accessibility.

"It's not a situation where stores need to reinvent the wheel...Canada has all sorts of information related to training and guide dog advocacy that we can all certainly collaborate on. It's important that all service providers have the same consistent messaging." FEEDBACK SESSION PARTICIPANT



# **Accountability & Evaluation**

Working closely with key business units across the NSLC, the Manager, Inclusivity & Accessibility will lead the relevant project planning, implementation and evaluation of the Accessibility Plan. As the key liaison with Nova Scotia's Accessibility Directorate, the Manager will provide regular updates as needed. The Manager will also support all business units in meeting their accessibility goals, provide resources required, and promote a decentralized commitment to success.

The Accessibility Advisory Committee will meet twice a year to review progress.

Progress and action will be incorporated into our formal business planning process. Our existing prioritization process will help ensure resources are designated appropriately to meet our goals.

Baseline demographic employee survey data collected in 2023 will be used to assess the effectiveness of our inclusive hiring initiatives.

Internally, we will keep records that outline our progress and completion dates.



# **Appendix A**

## The NSLC's Accessibility Advisory Committee

The NSLC's Accessibility Advisory Committee was officially formed in October 2022. The majority of the committee meetings were conducted through five working groups, representing each of the mandatory standards outlined in Nova Scotia's Accessibility Act: Awareness and Capacity Building, Information and Communication, The Built Environment, Transportation, Employment, and Delivery of Goods and Services.

#### CHAIR

#### Jen Green

Manager, Inclusivity & Accessibility

#### WORKING GROUPS

#### AWARENESS AND CAPACITY BUILDING

Staci Latham-Murphy, Michael Haley, Christy Pippy, Erin Sheppard, Corey Stewart

#### INFORMATION AND COMMUNICATION

Allison Himmelman, Charmaine Millaire, Marley MacDonald, Dillan Rigby

#### THE BUILT ENVIRONMENT AND TRANSPORTATION

Tracy Walker, Devin Peterson, Leo Hanlon, Caleb Patton, John Smith

#### **EMPLOYMENT**

Amanda Ash, Ryan Embrett, Nadine Watson, Karen Matthews **Extra support from:** Kate Palmer and Mark Dorey

#### **DELIVERY OF GOODS AND SERVICES**

Chris Mitton, Rachel MacNally, Courtney Jones, Rob Edwards, Riley Pilapil, Kelli Dahl Extra support from: Chrissy Leonard



