



# **iTel Accessibility Plan**

**2023 – 2026**

# Table of Contents

- 1.0 General Application**..... 3
- 2.0 Definitions**..... 3
  - Accessibility**..... 3
  - Barrier**..... 3
  - Disability**..... 4
- 3.0 Executive Summary**..... 4
- 4.0 Progress Status in Key Areas**..... 4
  - A) Employment**..... 5
    - Actions and Timelines..... 5
  - B) The Physical Environment** ..... 6
    - Actions and Timelines:..... 6
  - C) Information and Communication Technologies**..... 6
    - Actions and Timelines..... 7
  - D) Communication, other than ICT** ..... 7
    - Actions and Timelines..... 7
  - E) The Design and Delivery of Programs and Services** ..... 8
    - Actions and Timelines..... 8
- 5.0 Regulatory Conditions**..... 8
  - Conditions under section 24 or 24.1 of the Telecommunications Act**..... 8
  - Provisions of any Regulations made under the Telecommunications Act** ..... 8
- 6.0 Conclusion** ..... 8
- 7.0 Appendices** ..... 8
  - Appendix A – ACA Section 6, Principles** ..... 9
  - Appendix B – *Telecommunications Act* Requirements**..... 9

## 1. General Application

This Accessibility Plan has been prepared in accordance with the requirements of the *Accessible Canada Act* (S.C. 2019, c. 10) and its regulations (ACA). This Accessibility Plan applies to iTel Networks Inc. (“iTel”)

iTel has a process for receiving and responding to feedback, including feedback on how services are delivered to persons with disabilities.

Our Accessibility Plan and a description of our accessibility feedback process are available in the following alternate formats: print, large print, braille, audio format, electronic format, or other agreed-upon formats.

You can provide accessibility feedback (including feedback on this plan) or request an alternate format of our Accessibility Plan or description of our feedback process in a number of ways, including by:

Completing our online form available here: <https://itel.com/accessibility-feedback/>

Phone: 1.800.899.4835 Ext. 6002

Email: [accessibility@itel.com](mailto:accessibility@itel.com)

For more information visit: <https://itel.com/accessibility/>

Feedback will go directly to our Manager of People & Culture, who is responsible for receiving the accessibility feedback at iTel. If you wish to remain anonymous when submitting your feedback, please use our on-line Web Form and leave out your identifying information. All personal information will remain confidential.

## 2. Definitions

The following terms are used throughout this plan. These key terms are defined in the Accessible Canada Act.

- I. **Accessibility:** The design of products, devices, services, environments, technologies, policies and rules in a way that allows people, including people with a variety of disabilities, to access them.
- II. **Barrier:** Means anything including physical, architectural, technological, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or practice that hinders the full and equal participation in of persons with an impairment including physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation

III. **Disability:** Means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment, or a functional limitation whether permanent or temporary in nature whether evident or not, that in interaction with a barrier, hinders a person's full and equal participation in society.

### 3. Executive Summary

When it comes to accessibility, every action counts. This includes how we engage with our team members, customers, and business partners.

We live in a diverse nation, serve a diverse customer base and work with a diverse group of people. That is why we are committed to fostering an inclusive, equitable and accessible workplace where all team members feel valued, respected and supported.

We strive to foster a working environment that increases knowledge and awareness on important topics such as diversity and accessibility, with an emphasis on creating positive change.

We also strive to improve service for our customers, including persons with disabilities.

To help create this Accessibility Plan, iTel has considered the needs of persons with disabilities, including our customers and employees. This has allowed us to outline opportunities to identify, remove and prevent barriers in:

- employment practices,
- built environment,
- information communication and technology (ICT),
- communication, other than ICT,
- procurement of goods, services and facilities,

### 4. Progress Status in Key Areas

To maintain a balanced and targeted approach across all key areas, responsibilities for taking action and addressing accessibility barriers are distributed among different operational teams within iTel to ensure that we are meeting our accessibility goals. This approach provides more coverage and flexibility to consult persons with accessibility needs for direct feedback on how iTel can improve in each area.

Our initial actions will focus on the areas outlined in the sections below. We will provide updates on our progress annually and adapt our plans as we identify new barriers and learn from our progress.

## A) Employment

During the COVID epidemic, iTel shifted largely to a remote working environment with approximately 95% of our employees working from home. This ratio is not expected to change in the immediate future.

Resolving employment-related barriers helps ensure everyone has the same employment opportunities at iTel. We are committed to a safe and supportive workplace and promoting a culture that values diversity, equity, inclusion and belonging.

### Actions and Timelines:

#### Short-Term:

- Begin rollout of enhanced accessibility training.
- Promote forums for collaboration, information sharing, and discussion.
- Increase awareness of iTel's accommodation process for applicants, team members, and leaders.

#### Medium-Term:

- Continue rollout of enhanced accessibility training.
- Review and evaluate the effectiveness of training.
- Review and adjust current processes to support an improved candidate experience. Processes must provide more information and guidance to recruiters, hiring managers, and candidates to support accessibility and accommodation requirements.

#### Long-Term:

- Further elevate leaders' familiarity with accommodation processes and practical ways to increase inclusion and accessibility in the workplace.
- Create a consolidated inventory of resources used to support accommodation.
- Use internal feedback and consultations and collaborate with persons with disabilities to ensure that accessibility standards are integrated across our business – including workplace policies, employment standards, programs, and work environments.

#### Ongoing:

- Continue to create awareness of accessibility to foster a more inclusive workplace.
- Continue to support hiring managers and recruitment teams to broaden their perception and provide them with the information and resources they need to support a more inclusive and accessible workplace.
- Continue to enhance our accommodation processes.
- Continue to evaluate how well our processes for workplace accommodation are performing.

- Continue to improve how we engage and collaborate with persons with disabilities.
- Increased engagement, promotion, and communication efforts are required to bolster accessibility by fostering self-disclosure and cultivating a workplace culture and community that are supportive.
- Enhanced awareness among employees regarding available accommodations and the barriers experienced by individuals with disabilities, educating employees of our accommodation processes.

## **B) The Physical Environment**

Addressing barriers related to the office environment helps us ensure that people using our offices have barrier-free access. We will continue our efforts to retrofit existing spaces. We will work with our team members to better understand, and address barriers experienced by persons with disabilities.

### **Actions and Timelines:**

#### **Short-Term:**

- Ensure team members know all spaces must be clear of physical barriers to enable employee mobility.
- Refer employees and leaders to the accommodation process if physical barriers are identified in the workplace.

#### **Long-Term:**

- Develop and include accessible signage standards when renovating workspaces.

#### **Ongoing:**

- Continue efforts to include accessibility upgrades as part of office retrofits and renovation of workspaces.
- Ensure that remote workers have the necessary tools and equipment to accommodate workers with physical disabilities.

## **C) Information and Communications Technologies**

By addressing information and communication technology-related barriers, we can achieve a high standard for digital accessibility. We apply a continuous improvement approach that endeavours to keep pace with technological advancements in our society. Our actions include plans to identify and resolve barriers found in our websites, networks, and telecommunication systems used by customers and computers used by team members.

## Actions and Timelines:

### Short-Term:

- Adopt accessibility guidelines for information and communication technology.
- Make accessibility central in developing and buying devices and equipment.
- Standardize digital accessibility guidelines, policies and practices.
- Adopt universal design principles and best practices in digital accessibility.

### Ongoing:

- Continue to improve websites and applications to enhance accessibility.
- Develop an audit program to monitor the accessibility of information and communication technology.
- Work with content providers, partners, manufacturers and vendors to improve accessibility features and ensure they are maintained.
- Continue to simplify our processes and use language that is concise and easy to understand.
- Continue to evaluate the accessibility of the information and communications technologies we use when addressing both internal and external audiences.
- Continuously improve training, tools, and support materials for team

## **D) Communication, other than ICT**

By addressing communication-related barriers, we will improve the accessibility of the documents that we create at iTel. Our brand guidelines will provide direction on how to create documents and advertising that promote our products and services in a way that meets accessibility requirements.

## Actions and Timelines:

### Short-Term:

- Develop accessibility guidelines for creating documents.
- Improve customer awareness of the services provided by our Accessibility Service Centre.

### Ongoing:

- Promotion of accessibility products, services, and alternate options and methods of communications to increase awareness and usage.
- Continuous refinement of communication guidelines to create content that is simple, concise, and easy to understand.
- Ensure accessibility needs receive consideration in the development of marketing and advertising materials.

## E) The Design and Delivery of Programs and Services

By addressing the design and delivery of programs and service-related barriers, we aim to ensure persons with disabilities have meaningful options. We want to ensure they are free to make their own choices, with support if they desire, regardless of their disabilities. This includes improving the accessibility of our systems and networks and improving our efforts to provide great customer experiences.

### Actions and Timelines:

#### Ongoing:

- Continue to monitor customer surveys and feedback to identify areas for improvement.
- Continue to coach and train team members on best practices in customer service.
- Explore ways to further increase customer awareness of iTel's accessibility products and services.

## 5. Regulatory Conditions

As required by section 42(1) and section 51(1) of the ACA, we have set out the following applicable conditions and provisions:

**Conditions under section 24 or 24.1 of the Telecommunications Act** Conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix B

## 6. Conclusion

We believe we can make a real difference for persons with disabilities by addressing the barriers described in our Accessibility Plan. Our products and services are powerful tools that can advance how all Canadians connect with each other and the world. We are motivated by the opportunity to improve accessibility for our customers and team members, and to do our part to realize a barrier-free Canada.

As we implement our plan, we will continue to work and consult with persons with disabilities. We will publish an updated Accessibility Plan every three years and communicate updates by publishing interim progress reports every year in between, in accordance with the ACA.

## 7. Appendices

### Appendix A – ACA Section 6, Principles



In preparing this Accessibility Plan, we have taken into account the principles set out in section 6 of the ACA.

- (a) all persons must be treated with dignity regardless of their disabilities;
- (b) all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- (c) all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- (d) all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- (e) laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;
- (f) persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- (g) the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

## **Appendix B – Telecommunications Act Requirements**

As required by section 51(1) of the ACA, this Appendix sets out:

- 51(1)(b) - the conditions imposed under section 24 or 24.1 of the *Telecommunications Act* to which some or all of iTel is subject that relate to the identification and removal of barriers and the prevention of new barriers; and
- 51(1)(c) - the provisions of any regulations made under the *Telecommunications Act* that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all of iTel

This Appendix does not include requirements that have not been in force for at least three months before the day on which the Accessibility Plan must be published<sup>55</sup> or expectations/encouragements, which do not rise to the level of imposed conditions.

### **1. Offering and Promotion of Accessible Products and Services**

- Wireless Service Providers (WSPs) must offer mobile wireless service plans that meet the needs of Canadians with disabilities.
- WSPs must promote and publicize their disability-specific products and services on their websites and using other methods.

- WSPs must offer at least one type of wireless mobile handset that will provide access for persons who are blind and/or have moderate-to-severe mobility or cognitive disabilities.
- Telecommunications Service Providers (TSPs) must make general call centres accessible to the point of providing a reasonable accommodation by training customer service representatives to handle questions from persons with disabilities and familiarizing customer service representatives with accessible products and services.
- Internet Service Providers (ISPs) subject to the Internet Code must ensure that customer service representatives receive training on rights and responsibilities under the Internet Code, including accessibility needs.
- TSPs must make their interactive voice response (IVR) systems accessible. A service provider with a disability call centre could meet this requirement by developing and implementing a process for the appropriate transfer of calls to that call centre.
- A Critical Information Summary, provided under either the Internet Code or the Wireless Code, must set out information, including about the extended trial period for customers who self-identify as having a disability.
- ISPs subject to the Internet Code must file compliance reports including a description of how they are ensuring that their customer service representatives are knowledgeable about rights and responsibilities under the Internet Code, including those related to persons with disabilities.
- Certain WSPs must create and promote videos in American sign language (ASL) or langue des signes québécoise (LSQ) to promote the Wireless Code and explain common terminology.
- ISPs subject to the Internet Code must create and promote videos in ASL/LSQ to promote the Internet Code, including the extended trial period for persons with disabilities, and explain common terminology.
- TSPs that will transition to ten-digit local dialing in order to implement 9-8-8 must provide information about the transition to ten-digit local dialing in ASL and LSQ.
- WSPs must engage in regular, at least yearly, consultations with persons with disabilities and groups representing their interests.
- WSPs must file annual reports in an accessible format regarding accessible plans and ongoing consultations. These annual reports must include certain types of information specified by the Commission.

## **2. Message Relay Service (MRS)**

- All local exchange carriers (LECs) must provide teletypewriter (TTY) and Internet protocol (IP) Relay services to their telephone customers 24 hours a day, 7 days a week.
- WSPs must provide IP Relay to their retail customers 24 hours a day, 7 days a week.
- MRS Providers providing IP Relay and MRS Providers with an obligation to provide

TTY must meet the minimum requirements set out in Appendix 1 to TRP 2018-466.

- Certain TSPs must file annual reports on quality-of-service data, as set out in Appendix 2 to TRP 2018-466.
- TSPs must fund video relay service (VRS) via the National Contribution Fund.
- WSPs must take steps to ensure that Deaf and Hard of Hearing sign language users are able to make and receive calls through VRS in a comparable way to hearing users accessing voice services.

### **3. Trial Periods**

- If a customer self-identifies as a person with a disability, then ISPs subject to the Internet Code must offer an extended trial period of at least 30 days, and the permitted usage amounts must be at least double the service provider's usage limits for the standard trial period.
- If a customer self-identifies as a person with a disability, then WSPs must offer a 30-day extended trial period, and the permitted usage amounts must be at least double the service provider's usage limits for the standard trial period. WSPs must also promote the extended trial period in the accessibility section of their website.

### **4. 9-1-1**

- MRS providers must provide access to 9-1-1 service.
- WSPs and incumbent local exchange carriers (ILECs) must provide Text with 9-1-1 service.

### **5. Alternative Formats**

- TSPs must provide paper bills upon request at no charge to customers who self-identify as a person with a disability.
- Canadian carriers must provide bills, bill inserts, and information setting out the rates, terms and conditions in alternative accessible formats, such as in braille or large print, for people with a visual disability.
- ISPs subject to the Internet Code must provide a copy of the contract, related documents, and Critical Information Summary in an accessible format for persons with disabilities upon request, at no charge.
- WSPs must provide a copy of the contract, related documents, and Critical Information Summary in an accessible format for persons with disabilities upon request, at no charge.
- ILECs/TSPs, as applicable, must provide the following documents in alternative formats to persons with visual impairments, upon request: information on the National Do Not Call List, information on Bill Management Tools, retail quality of service information, notification of the removal of the last payphone in a community, the incumbent local exchange carriers' communications plans on local forbearance, and information on dialing plan changes.
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print,

braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated entity agree upon and for which there is proof of the agreement.

## **6. Website Accessibility**

- TSPs must make the information on telecommunications and broadcasting services and products on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.
- TSPs must make customer service functions that are available solely over the service providers' websites accessible. If a customer service function on the service providers' website is not accessible, then persons with disabilities cannot be charged or disadvantaged for using an alternate channel to access those functions
- TSPs must have an easy-to-find home page link to the accessibility section of their websites, if their websites include such sections.
- If a service provider subject to the Internet Code applies overage fees, the service provider must offer tools, at no charge, to help a customer monitor and manage their data usage and any additional fees incurred during a monthly billing cycle. These tools must be accessible to customers with disabilities.
- MRS providers must ensure that any IP Relay related web and mobile interfaces meet W3C Web Content Accessibility Guidelines (WCAG).
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.

## **7. Passing On Obligations**

- Canadian carriers, as a condition of offering and providing telecommunications services to non-carriers, must include in their tariffs and in service contracts or other arrangements with these non-carriers, the requirement that the non-carriers and all of their wholesale customers and subordinate wholesale customers, abide by certain obligations, including those set out in the Appendix to TRP 2017-11 related to accessibility and the removal of barriers.