

eastlink

Eastlink Accessibility Plan

2023 - 2026

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GENERAL

Driven by a philosophy of listening, learning, and innovating, Eastlink has been connecting Canadians to communications and TV services for more than 50 years. We have grown from a small cable provider to a national telecommunications company that delivers high speed internet, phone, data services, security, and smart home solutions, to residential, business, and public sector customers, including government, universities, hospitality, healthcare, and education facilities to seven provinces across Canada. We have more than 1,300 team members from coast to coast who share our commitment to care and excellence in everything we do to meet the needs and expectations of our customers and employees and keep them connected.

Eastlink is committed to improving accessibility across all aspects of the organization, to reflect an equitable and inclusive environment for all customers and employees.

Developing our Accessibility Plan is among the first steps on the road to achieving a barrier-free organization. This plan provides an opportunity to create awareness and outlines how we intend to make changes to our policies and procedures to ensure that all employees and customers are treated with dignity and respect.

Eastlink's Accessibility Plan is guided by the [Accessible Canada Act](#) (ACA) Accessibility Principles (Appendix A) and outlines our plan to identify, remove and prevent accessibility barriers in the following priority areas:

- Employment
- The Built Environment
- Information and Communication Technologies (ICT)
- Communication, other than ICT
- Procurement of Goods, Services and Facilities
- Design and Delivery of Programs and Services

The Director of Customer Experience and Continuous Improvement receives all feedback, builds action plans to address feedback, and updates Eastlink's Accessibility Plan. To provide feedback, request accessible versions of Eastlink's Accessibility Plan and progress reports, or receive a description of Eastlink's feedback mechanism, please contact us in one of the following ways:

- | | |
|--------------|--|
| (a) By email | accessible@corp.eastlink.ca |
| (b) By phone | 1-888-888-4030 |
| (c) Online | eastlink.ca/about/accessibility-services |
| (d) By mail | Accessibility
Eastlink
PO Box 8660 Station A
Halifax, NS
B3K 5M3 |

CONSULTATIONS

Eastlink consulted persons with disabilities, including employees and disability advocacy organizations in the preparation of our Accessibility Plan. We participated in virtual consultations sessions, conducted an online employee survey, and distributed letters to advocacy groups requesting feedback.

Our approach to consultation included the following:

- In August 2022, Eastlink participated in industry consultations facilitated by the Canadian Telecommunications Association (formerly Canadian Wireless Telecommunications Association) to identify barriers that persons with disabilities experience when accessing our telephone, mobile, internet and TV services. These consultations included surveying persons with disabilities and advocacy groups to collect information and examples on their experience interacting with service providers, and a virtual session to discuss what was learned.
- Participants were invited to complete the multiple-choice survey in English or French, and were provided the option for submissions in written, audio, and video format including American Sign Language (ASL) and Langue des Signes Québécoise (LSQ). The virtual sessions were held in English and French with simultaneous interpretation as well as ASL/LSQ interpretation and CART services available.
- In January 2023, Eastlink conducted an anonymous employee survey which invited employees to identify barriers they have encountered or observed in the workplace. Employees were surveyed on their experiences within the workplace (treatment, management, equal opportunity), on software and tools, support tools and accommodations, education, and awareness. Alternate formats or ways of providing information were made available upon request.
- In January 2023, Eastlink sent letters to disability advocacy groups requesting feedback on barriers encountered in our retail spaces and offices, as well as interactions with any of our team members.

As a result of these consultations, Eastlink has a better understanding of the barriers that currently exist in accessing our services and in our workplace as well as insights into how to reduce barriers in the future. More detail can be found in the priority area sections below.

EMPLOYMENT

The identification and removal of employment-related barriers will help Eastlink ensure that everyone has the same employment opportunities. We are committed to providing and maintaining a welcoming and inclusive workplace where all employees can participate.

Current State

Eastlink strives to ensure a diverse workforce and partners with various organizations to proactively eliminate barriers to employment and increase the hiring of persons with disabilities.

These organizations provide supportive and accessible programs that build capacity for inclusion and equalize the playing field for people facing barriers.

Eastlink makes every effort to ensure our hiring practices are accessible to people of all backgrounds and needs. We encourage job applicants to self-identify as a person with a disability or having an accessibility need during the job application process. Applicants selected for interviews are informed that accommodations are available upon request and Eastlink arranges for the provision of a suitable accommodation.

Eastlink offers an Employee and Family Assistance Program for all our employees, which provides confidential assistance from skilled professionals that can offer support on a broad range of personal and work-related concerns which may affect our employees and their families.

Barriers and Opportunities

There is currently a lack of education and awareness on the availability of support tools and accommodations to support accessibility in the workplace. This highlights the need to strengthen education and awareness.

Employment Actions

- Develop a dedicated section on our internal website to highlight our Accessibility Plan along with tools and resources for employees with disability or accessibility needs, including the ability to provide anonymous feedback on barriers in the workplace and potential solutions to help overcome these barriers.
- Increase awareness at all levels of management, through mandatory training and workshops for 100% of all people leaders, to ensure employees with disabilities are and feel supported in their work, performance, and career aspirations.
- Increase communication of our Employment and Family Assistance Program to ensure employees are aware of the resources available to them.
- Develop and provide annual training and education to our Talent Acquisition team and hiring managers to promote inclusive and accessible hiring practices.
- Build on existing partnerships and broaden outreach activities to promote recruitment of persons with disabilities.
- Reassess our hiring and onboarding processes and systems to ensure they provide equal opportunity for candidates facing barriers with input from our Employment Equity Committee and based on feedback from Eastlink's employee survey and industry consultations.

THE BUILT ENVIRONMENT

Eastlink's built environment refers to our physical workspaces (corporate offices and Eastlink community TV spaces), as well as our retail spaces. Eastlink is committed to ensuring that our customers and employees have barrier free access to our facilities.

Workspaces

Eastlink's workspaces are designed to facilitate various business functions across the country and include our offices and Community TV stations.

Current State

As Eastlink has several physical workspaces, the existing accessibility features of each building varies depending on a number of factors including age, whether it has been recently renovated, and building ownership.

Barriers and Opportunities

Inaccessibility of workspaces, including entrances to washrooms, parking lot maintenance, boardroom access, employee kitchens and common areas were identified as barriers.

Workspace Actions

- Further identify building and workplace issues in consultation with facilities and building managers and prioritize requests for improved accessibility.
- Ensure boardrooms and common spaces are clear of physical barriers and are easy to access.
- Incorporate accessibility best practices in any new workspaces or renovations to existing workspaces.

Retail Stores

Eastlink has over 25 retail locations across seven provinces. Our retail stores allow customers to inquire, purchase or make changes to services as well as seek support with current services.

Current State

Eastlink has recently upgraded some of our retail store locations. The renovations were designed with accessibility needs in mind and include open-concept barrier free spaces.

Barriers and Opportunities

A lack of adequate seating for customers with mobility issues was identified as a barrier in our retail store locations. In addition, service counter and digital pads used for signing agreements tend to be too high and some stores feel cramped.

Retail Actions

- Conduct a review of each retail location to ensure appropriate and adequate seating is available.
- Review older retail spaces to adjust where necessary to meet the accessibility needs of our customers.

- Continue to build in accessibility requirements and needs to new location designs considering learnings from previous new builds.

INFORMATION AND COMMUNICATIONS TECHNOLOGIES (ICT)

Eastlink has multiple ways our customers can communicate with us using ICT. We are committed to meeting the communication needs of our customers and employees with accessibility needs.

External ICT

Eastlink's external ICT includes the ways in which we communicate with our customers and the public on our website, online chat, e-mail, electronic documents, telephone, and text message.

Current State

Eastlink's website has a dedicated page which provides information on the accessibility services available ([Accessibility Services](#)). Our web content team is trained in accessibility for web design and ensures that our website conforms with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA.

In the event alternative formats are requested for persons with disabilities, Eastlink will arrange for the alternative formats to be available in a timely manner.

Barriers and Opportunities

The following barriers to communicating with service providers were identified:

- Websites are difficult to navigate and are not fully accessible making it hard to effectively research options, particularly with screen-readers. Some noted that websites are too busy, and information and language can be complex.
- Contact centre phone systems often have complex Interactive Voice Response (IVR) telephone menus that do not work well for people with intellectual or communication disabilities.
- It can often take more time for a person with a cognitive disability to compose a message for online chat and as a result the chat may end prematurely. Some noted that bots and agents using chat may use complicated language or require a reading level that the user may not have and sometimes the platforms are not flexible enough to fully facilitate the interaction.

External ICT Actions

- Work with vendors to launch new bill management tools for customers to access their accounts and commit to ensuring these are accessible.
- Review our IVR telephone system to improve accessibility for our customers.
- Consider ways to improve and simplify navigation on our website.

Internal ICT

Eastlink communicates with our employees using an internal intranet, learning platforms, as well as Microsoft products such as Teams and Outlook.

Current State

Eastlink utilizes internal software platforms that include a variety of accessibility features, and we will continue to ensure platforms and applications used by employees are accessible.

Barriers and Opportunities

Our employee survey identified barriers related to some of our internal communication systems. These include:

- The font size used in our internal communications is too small.
- Some of our internal software platforms are complex, making them difficult to navigate.
- Lack of awareness of accessibility options available in current software.
- Employees purchasing their own equipment to meet their accessibility needs.

Internal ICT Actions

- Continue to monitor internal communication platforms to adjust where necessary to ensure accessibility for all.
- Take steps to review the accessibility of our intranet pages inclusive of WCAG Level 2.0 AA.
- Create awareness of accessibility options available in our software/tools.

COMMUNICATION, other than ICT

Communication, other than ICT includes the ways we communicate and interact with the public. This includes one-on-one interactions in our retail stores as well as communication with our customer care and support teams.

Current State

Eastlink uses plain language in its Terms of Service, correspondence with our customers, and our service agreements.

Barriers and Opportunities

The following barriers to communicating with service providers were identified:

- Employees are often unaware of how to approach and communicate with persons who have accessibility needs. This includes in the context of individuals using intervenors or interpreters, as well as use of relay services including video relay service (VRS).

- Technicians performing installs may be unaware of how to communicate with someone with accessibility needs and explain how to use the devices, which can result in a frustrating and time-consuming process.
- Some individuals who prefer to communicate in a specific way to address their accessibility needs may feel that we are not prepared to accommodate. For example, customers who prefer to communicate in store, because it provides more flexibility in communication, may be told they need to call in to perform a certain task.

Communication other than ICT Actions

To help overcome some of the communication barriers that currently exist, Eastlink will:

- Develop accessible communication training materials (specialized for frontline agents, retail and field operations and general awareness training for all others) by December 2023.
- Implement the training by March 2024.

PROCUREMENT OF GOODS, SERVICES AND FACILITIES

The procurement of goods and services refers to the ways Eastlink incorporates accessibility considerations into our procurement processes. Eastlink will continue to ensure that accessibility requirements are taken into consideration throughout the procurement process.

Current State

Eastlink procures a wide range of internal technology and software, as well as devices and equipment that power and support the telecommunications services we provide to the public.

Barriers and Opportunities

We recognize that barriers exist in our current procurement processes, and we may not meet all accessibility requirements.

Procurement of Goods and Services Actions

- Review internal procurement processes to identify and ensure accessibility requirements are part of the process.
- When interacting with new and existing suppliers Eastlink will include accessibility awareness and requirements.

DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

Eastlink provides a variety of services across our serving areas and strives to ensure they are accessible to all Canadians. We will continue to address any barriers and work to improve the accessibility of our programs and services.

Current State

Eastlink's TV services and equipment have a number of accessibility features including:

- Described video.
- A remote control that can turn on described video with one button.
- Our Maestro DVR has a feature that enables spoken guide.
- Our TiVo DVR has one button voice guidance and described video available.
- Pulse remote is available which is a simple set up and easy to use remote with fewer-buttons and features and enlarged print.

Set-top box and remote options are available to all TV customers, regardless of their package subscription.

Individuals with accessibility needs are eligible for accessible wireless plans. Further, customers with accessibility needs who pre-register with Eastlink, can use the T9-1-1 service which allows a customer to text with a 911 operator for assistance.

Barriers and Opportunities

The following barriers in the design and delivery of programs and services with telecommunications service providers were identified:

- Frontline employees are often unaware of accessibility plans, features, and services that are available. It was explained that it is not uncommon to be required to go through several departments or individuals to get information about accessibility plans that are available.
- Employees may have a lack of understanding about what services or features may be of interest to customers with accessibility needs, which makes it difficult for them to help to choose services that best meet their needs.
- Some technicians are unfamiliar with available accessibility features and therefore cannot show the customer how to use those features during installations.
- Equipment with small print or buttons can be difficult for people with dexterity or visual impairments.

Design and Delivery of Programs and Services Actions

- Develop and implement training for frontline agents to create greater awareness of our accessible service offerings.
- Develop marketing materials to educate our customers on accessibility options and features of our products and services.
- Consult annually with people with disabilities on our accessible mobile offerings and the effectiveness of our promotion and training efforts to support awareness of our mobile service offerings. This will begin in 2023-2024.

TRANSPORTATION

Eastlink does not offer transportation services and have nothing to report regarding transportation.

REGULATORY REQUIREMENTS

Eastlink is subject to the following regulatory requirements under the *Broadcasting Act* and the *Telecommunications Act* related to the identification and removal of barriers. These requirements are current as of May 1, 2023.

TV Services - CRTC conditions of license regulating Eastlink's Sudbury-based TV services

TV Services

Product

- File annual returns with the Canadian Radio-television and Telecommunications Commission (CRTC) with information regarding:
 - the availability of accessible set-top boxes and remote controls and their accessibility features.
 - the penetration of accessible set-top boxes and remote controls; and
 - the number of accessibility-related queries received and resolved.
- Provide one or more simple means of accessing described video (DV) that requires little or no visual acuity.

Eastlink Community TV Channel

- Close caption 100% of new Eastlink-produced English and French language community channel programs by August 31, 2025.
- Provide audio description for all the key elements of information programs (i.e., voice over of key textual, graphic design and still image elements, such as phone numbers, stock information or weather maps that are posted on the screen).
- Provide necessary training to host and access producers concerning the provision of audio description.

Website

- Promote information about our disability-specific services and products in an accessible manner.
- Incorporate an easy-to-find home page link to the accessibility services section of our website.
- Make information on our website accessible.
- Make accessible any customer service functions that are available solely over our website.

Customer Service

- Where customer service functions on our website are not accessible, ensure that persons with disabilities will not incur a charge or otherwise be disadvantaged if they use an alternate avenue of customer service.

- Make our call centre accessible to customers with disabilities by:
 - training customer service representatives in handling inquiries from persons with disabilities.
 - familiarizing customer service representatives with the products and services we offer for persons with disabilities; and
 - making our IVR accessible.
- Communicate with customers using plain language.
- Upon request, provide customers with disabilities a free copy of their consumer contract in an alternative format.
- Offer a 30-calendar day trial period for customers who self-identify as a person with a disability or who indicates that a member of the household to which the service is to be provided has a disability. During the trial period, customers may cancel their agreement without penalty, installation fees or early cancellation fees if they have returned any gift with purchase and equipment provided by the service provider in near-new condition, including the original packaging, if applicable.

Video-On-Demand (VOD) Services

Product

- Close caption 100% of English and French language programs on our VOD service (except for Eastlink Community TV).
- Adhere to CRTC closed captioning quality standards.
- Implement a monitoring system to ensure closed captioning is passed through correctly.

TV services – CRTC exemption orders applicable to Eastlink’s TV Services outside of our Sudbury-based services

Product

- Anglophone systems with over 2,000 subscribers must carry AMI-TV and AMI-audio. Francophone systems with over 2,000 subscribers must carry AMI-Télé and Canal M.

Customer Service

- Communicate with customers using plain language.
- Upon request, provide customers with disabilities a free copy of their consumer contract in an alternative format.
- Offer a 30-calendar day trial period for customers who self-identify as a person with a disability or who indicates that a member of the household to which the service is to be provided has a disability. During the trial period, customers may cancel their agreement without penalty, installation fees or early cancellation fees if they have returned any gift with purchase and equipment provided by the service provider in near-new condition, including the original packaging, if applicable.

TV services – CRTC regulations applicable to Eastlink’s Sudbury-based TV services

Product

- Provide equipment, software, or other technology that will allow an individual who is blind, visually impaired, or who has fine motor skill disabilities to identify and have access to Eastlink’s TV services.
- Carry AMI-audio on an audio channel and AMI-Télé and AMI-TV on our basic services.

Telecommunications services – Conditions of service & CRTC regulations under the Telecommunications Act

General

Financial

- Contribute annually to fund video relay services (VRS).

Website

- Promote information about our disability-specific services and products in an accessible manner.
- Incorporate an easy-to-find home page link to the accessibility services section of our website.
- Make information on our website accessible.
- Make accessible any customer service functions that are available solely over our website.
- Make available ASL and LSQ videos promoting the Wireless Code and Internet Code and explaining common terminology.

Customer Service

- Where customer service functions on our website are not accessible, ensure that persons with disabilities will not incur a charge or otherwise be disadvantaged if they use an alternate avenue of customer service.
- Make our call centre accessible to customers with disabilities by:
 - training customer service representatives in handling inquiries from persons with disabilities.
 - familiarizing customer service representatives with the products and services we offer for persons with disabilities; and
 - making our IVR systems accessible.
- Provide paper bills to any customer who self-identifies as a person with a disability for whom e-billing represents a barrier upon request at no charge.

Wireless

Product

- Make available Message Relay Service including IP Relay Services to our customers including standards for the service. Must report annually on MRS quality of service data.
- Offer accessible wireless plans that meet the need of Canadians with disabilities.

- Offer at least one type of wireless mobile handset that will provide access to wireless service by persons who are blind and/or have moderate-to-severe mobility or cognitive disabilities.
- Take steps to ensure that Deaf and Hard of Hearing Sign language users can make use of VRS in a comparable way to hearing users using voice services.
- Engage in yearly consultations with persons with disabilities and groups representing their interests regarding our accessible wireless plans and the promotion of these plans.
- File annual reports regarding accessible wireless plans and services, consultations with persons with disabilities and groups representing their interests, and promotion and training efforts related to accessible wireless plans and services.

Customer Service

- Communicate with customers using plain language.
- Offer an extended trial period of at least 30 days to individuals who self-identify as having a disability. The permitted usage during the trial period must be at least double of permitted usage available under the standard trial period.
- Include a Critical Information Summary with the consumer contract with information about the extended trial period for individuals who self-identify as having a disability.
- Upon request, provide customers with disabilities a free copy of their consumer contract and related documents, including Critical Information Summary, in an alternative format.

Internet

Customer Service

- Communicate with customers using plain language.
- Offer an extended trial period of at least 30 days to individuals who self-identify as having a disability. The permitted usage during the trial period must be at least double of permitted usage available under the standard trial period.
- Include a Critical Information Summary with the consumer contract with information about the extended trial period for individuals who self-identify as having a disability.
- Upon request, provide customers with disabilities a free copy of their consumer contract and related documents, including Critical Information Summary, in an alternative format.
- Ensure bill management tools to monitor and manage data usage are accessible to customers with disabilities.

Telephone

Product

- Make available Message Relay Service including TTY and IP Relay Services to our customers including standards for the service.

Appendix A

ACCESSIBILITY PRINCIPLES

Eastlink's Accessibility Plan considers the Accessibility Principles outlined in the 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.