GBTEL
Accessibility Plan

GENERAL

Driven by a philosophy of listening, learning, and innovating, GBTEL has been connecting Canadians to the internet via its fixed wireless and fiber solutions for more than 15 years. We have grown from a small fixed wireless provider to a regional telecommunications company that delivers high speed internet, phone, and data services. We have more than 30 team members 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.

GBTEL 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.

GBTEL'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 GBTEL's Accessibility Plan. To provide feedback, request accessible versions of GBTEL's Accessibility Plan and progress reports, or receive a description of GBTEL's feedback mechanism, please contact us in one of the following ways:

(a)	By email	accessible@gbtel.ca
(b)	By phone	1-866-840-2858, extension 101
(c)	Online	GBTEL.ca/legal
(d)	By mail	Accessibility
		GBTEL
		PO Box 10032 Keeling Place PO
		Owen Sound, ON
		N4K 0B3

Feedback can be provided anonymously by calling our phone number or by mailing GBTEL at the providing mailing address. Feedback provided by anonymously will not be acknowledge by an official receipt, however, all non-anonymous feedback will be acknowledge by an emailed or mailed receipt.

All personal information will remain confidential unless the person consents to the disclosure of their personal information.

CONSULTATIONS

GBTEL consulted persons with disabilities, including employees and disability advocacy organizations in the preparation of our Accessibility Plan. We participated in virtual consultations sessions and have various employee discussion sessions.

Our approach to consultation included the following:
- Virtual and in-person meetings and conversations with employees over the past 5-7 years
- Communication with our customer base pertaining to challenges with accessibility

As a result of these consultations, GBTEL 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 GBTEL 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

GBTEL 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.

GBTEL 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 GBTEL arranges for the provision of a suitable accommodation – as necessary.

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.
- 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 GBTEL's employee survey and industry consultations.

THE CORE ENVIRONMENT

GBTEL's core environment refers to our physical workspaces (corporate offices). GBTEL is committed to ensuring that our customers and employees have barrier free access to our facilities, as necessary.

Workspaces

GBTEL's workspaces are designed to facilitate various business functions across Grey/Bruce Counties.

Current State

As GBTEL 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

GBTEL does not provide retail stores and it typically is not open to the public. As such retail stores do not need to be considered with respect to the discussion about accessibility.

INFORMATION AND COMMUNICATIONS TECHNOLOGIES (ICT)

GBTEL 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

GBTEL'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

GBTEL'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, GBTEL 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 staff to update billing systems to make them more accessibility-friendly for customers that require this
- Review our IVR telephone system to improve accessibility for our customers.
- Consider ways to improve and simplify navigation on our website.

Internal ICT

GBTEL communicates with our employees using an internal intranet, learning platforms, as well as various products such as Slack and email.

Current State

GBTEL 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

GBTEL 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.

- 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.

Communication other than ICT Actions

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

- Develop accessible communication training materials (specialized for frontline agents and field operations and general awareness training for all others) by December 2024.
- Implement the training by March 2025.

PROCUREMENT OF GOODS, SERVICES AND FACILITIES

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

Current State

GBTEL 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 GBTEL will include accessibility awareness and requirements.

TRANSPORTATION

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

REGULATORY REQUIREMENTS

GBTEL is subject to the following regulatory requirements under the *Telecommunications Act* related to the identification and removal of barriers. These requirements are current as of May 31, 2024.

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

General

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 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:
    o training customer service representatives in handling inquiries from persons with disabilities.
    o familiarizing customer service representatives with the products and services we offer for persons with disabilities; and
    o 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.

Internet
Customer Service

- Communicate with customers using plain language.
- Upon request, provide customers with disabilities a free copy of their monthly consumer agreement and related documents

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

GBTEL'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.