

Ontario Power Generation Standard

TITLE
INTEGRATED ACCESSIBILITY AND CUSTOMER SERVICE STANDARD

AUTHORIZATION
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DOCUMENT RELATIONSHIP	
Applicability:	OPG Wide
Receives Authority from:	OPG-POL-0013, Code of Business Conduct Policy

Document is Related to Pressure Boundary <input type="checkbox"/>	Document Requires CNSC Notification <input type="checkbox"/>
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PURPOSE
The purpose of the Integrated Accessibility and Customer Service Standard is to develop, implement, and enforce accessibility standards to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises in accordance with the Accessibility for Ontarians with Disabilities Act (AODA).

DATES (YYYY-MM-DD)	
PDF Creation Date:	2024-08-19
Compliance Date:	Immediate

EXCEPTIONS

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OPG Proprietary		
Document Number:	OPG-STD-0074	Revision: R007
Usage Classification:	Information	Sheet Number: N/A Page: 2 of 14

Title:

INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD**TABLE OF CONTENTS**

	Page
1.0 DIRECTION.....	4
1.2 Integrated Accessibility Standard.....	4
1.2.1 Multi-year Accessibility Plan	4
1.2.2 Self-Service Kiosks.....	4
1.2.3 Training Employees and Volunteers	4
1.2.4 Modifications to This Standard or Other Policies.....	5
1.3 Information and Communications Standards	5
1.3.1 Questions About this Standard and Feedback.....	5
1.3.2 Accessible Formats and Communication Supports	5
1.3.3 Accessible Websites and Web Content	5
1.4 Employment Standards	6
1.4.1 Recruitment	6
1.4.2 Recruitment, Assessment or Selection Process.....	6
1.4.3 Notice to Successful Applicants	6
1.4.4 Informing Employees of Supports	6
1.4.5 Accessible Formats and Communication Supports for Employees	6
1.4.6 Documented Individual Accommodation Plans	6
1.4.7 Workplace Emergency Response Information	7
1.4.8 Return to Work Process.....	7
1.4.9 Performance Management, Career Development , Advancement and Redeployment.....	7
1.5 Customer Service Standard for Persons With Disabilities	7
1.5.1 Customer Service Questions About this Standard and Feedback	7
1.5.2 Providing Services to People with Disabilities	8
1.5.3 Communication.....	8
1.5.4 Telephone Services	8
1.5.5 Assistive Devices.....	8
1.5.6 Billing.....	8
1.5.7 Use of Service Animals and Support Persons.....	9
1.5.8 Notice of Temporary Disruption	9
1.5.9 Training for Staff related to Customer Service Standard	9
2.0 ROLES AND ACCOUNTABILITIES.....	10
2.1 Directors and Officers	10
2.2 Managers and Supervisors	10
2.3 Employees.....	10
2.4 Ethics Office	11
2.5 Site Human Resources	11
2.6 Training	11
2.7 Law Division	11
2.8 Accounts Receivable	11
2.9 Supply Chain	12
2.10 Brand Management	12

Ontario Power Generation Standard

OPG Proprietary		
Document Number:	Revision:	
OPG-STD-0074	R007	
Usage Classification:	Sheet Number:	Page:
Information	N/A	3 of 14
Title: INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD		

3.0	DEFINITIONS AND ACRONYMS.....	12
3.1	Definitions.....	12
3.2	Abbreviations and Acronyms	13
4.0	RECORDS AND REFERENCES.....	13
4.1	Records	13
4.2	References	14
	4.2.1 Performance References.....	14
	4.2.2 Developmental References.....	14
5.0	REVISION SUMMARY	14

OPG Proprietary		
Document Number:	Revision:	
OPG-STD-0074	R007	
Usage Classification:	Sheet Number:	Page:
Information	N/A	4 of 14

Title:	INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD
--------	-----------------------------------------------------------------

1.0 DIRECTION

1.1 OPG is committed to fostering an inclusive workplace where all employees are treated with dignity and respect. OPG will act in a manner consistent with its obligations under the Canadian Human Rights Act, the Employment Equity Act, the Ontario Human Rights Code, the Accessibility for Ontarians with Disabilities Act (AODA) and the Accessible Canada Act as applicable. This includes creating an accessible organization by removing barriers for people with disabilities.

1.2 Integrated Accessibility Standard

1.2.1 Multi-year Accessibility Plan

OPG shall develop, maintain, and document a Multi-year Accessibility Plan outlining the company's accomplishments and strategy to prevent and remove barriers from its workplace to improve opportunities for persons with disabilities.

The Multi-year Accessibility Plan will be publicly available in an accessible format, and will be reviewed and updated every five years.

1.2.2 Self-Service Kiosks

OPG shall consider accessibility for people with disabilities when designing, procuring or acquiring new self-serve kiosks.

1.2.3 Training Employees and Volunteers

OPG shall ensure that training is provided on accessibility requirements referenced in the AODA and provide training on the Human Rights Code as it pertains to persons with disabilities, to:

- (a) all its employees and volunteers;
- (b) all persons who participate in developing OPG's policies; and,
- (c) all other persons who provide goods, services or facilities on behalf of the company.

The training shall be appropriate to the duties of the employees, volunteers and other persons.

Employees shall be trained when changes are made to the AODA. New employees shall be trained within three months of their first day.

OPG shall keep a record of the training it provides.

OPG Proprietary		
Document Number:	OPG-STD-0074	Revision:
Usage Classification:	Information	Page:
	Sheet Number:	
	N/A	5 of 14
Title: INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD		

1.2.4 Modifications to This Standard or Other Policies

OPG is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes shall be made to this standard or other governing policy without considering the impact on people with disabilities.

Any governance or process of OPG that does not respect and promote the dignity and independence of people with disabilities shall be modified or removed in accordance with OPG's governance review process.

1.3 Information and Communications Standards

1.3.1 Questions About this Standard and Feedback

OPG shall ensure that the process for receiving and responding to feedback is accessible to persons with disabilities, including but not limited to providing accessible formats and communications supports. As well, questions about this Standard or feedback regarding OPG's provision of services to people with disabilities may be made:

- (a) by e-mailing AODA@opg.com;
- (b) by telephoning 416-592-3700 or toll free at 1-855-592-3700,
- (c) in person directly to the service provider at the time service is provided;
- (d) by visiting <https://www.opg.com/about-us/governance-regulation/accessibility/>;
- (e) in writing to Ontario Power Generation, Ethics Office, 1600 Stellar Ave, Unit 1, Whitby, Ontario, L1N 9B2.

All feedback will be directed to the Ethics Office. A member of the Ethics Office should disposition the feedback in consultation with the Senior Manager, Ethics & Equity. Members of the public and other Third Parties may expect a response to their feedback within ten business days.

1.3.2 Accessible Formats and Communication Supports

Upon request, OPG shall provide accessible formats and communication supports for persons with disabilities in a timely manner that considers the person's accessibility needs due to disability. OPG shall consult with the person making the request in determining the suitability of an accessible format or communication support and shall ensure the cost is no more than the regular cost charged to anyone else.

1.3.3 Accessible Websites and Web Content

OPG shall ensure that www.OPG.com, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA. This includes ensuring all content is available in an accessible format.

OPG Proprietary		
Document Number:	OPG-STD-0074	Revision:
Usage Classification:	Information	Page:
	Sheet Number:	
	N/A	6 of 14

Title:
INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD

1.4 Employment Standards

1.4.1 Recruitment

OPG shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

1.4.2 Recruitment, Assessment or Selection Process

OPG shall notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodation is available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, OPG shall consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

1.4.3 Notice to Successful Applicants

When making offers of employment, OPG shall notify the successful applicant of its policies for accommodating employees with disabilities.

1.4.4 Informing Employees of Supports

OPG shall inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that considers an employee's accessibility needs due to disability. This information shall be provided to new employees as soon as practicable after commencing employment.

1.4.5 Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, OPG shall consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, OPG shall consult with the employee making the request.

1.4.6 Documented Individual Accommodation Plans

OPG shall maintain a written process for the development of documented individual accommodation plans for employees with disabilities that is assessed on an individual basis. This process shall ensure employees requesting accommodation can participate in the development of the individual accommodation plan. More information is available in OPG's Accommodation Policy Statement.

If requested, information regarding accessible formats and communications supports provided shall also be included in individual accommodation plans.

In addition, the plans shall include individualized workplace emergency response information if required.

OPG Proprietary		
Document Number:	OPG-STD-0074	Revision: R007
Usage Classification:	Information	Sheet Number: N/A Page: 7 of 14

Title:
INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD

1.4.7 Workplace Emergency Response Information

OPG shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if OPG is aware of the need for accommodation due to the employee's disability. OPG shall provide this information as soon as practicable after becoming aware of the need for accommodation.

OPG shall review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

Where the employee requires assistance, OPG shall, with the consent of the employee, provide the workplace emergency response information to the person designated by OPG to provide assistance to the employee.

1.4.8 Return to Work Process

OPG shall maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations to return to work.

The return to work process outlines the steps OPG shall take to facilitate the return to work and shall include documented individual accommodation plans as part of the process.

This return to work process shall not replace or override any other return to work process created by or under any other statute.

1.4.9 Performance Management, Career Development, Advancement and Redeployment

OPG shall consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

1.5 Customer Service Standard for Persons With Disabilities

OPG is committed to providing its services in a way that respects the dignity and independence of people with disabilities. OPG is also committed to giving people with disabilities the same opportunity to access its services and allowing them to benefit from the same services, in the same place, and in a similar way as other members of the public and Third Parties unless an alternate measure is necessary. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

1.5.1 Customer Service Questions About this Standard and Feedback

OPG shall ensure that the process for receiving and responding to feedback is accessible to persons with disabilities, including but not limited to providing accessible formats and communications supports. As well, questions about this Standard or feedback regarding OPG's provision of services to people with disabilities may be made:

- (a) by e-mailing AODA@opg.com;

OPG Proprietary		
Document Number:	OPG-STD-0074	Revision: R007
Usage Classification:	Information	Sheet Number: N/A Page: 8 of 14

Title:
INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD

- (b) by telephoning 416-592-3700 or toll free at 1-855-592-3700,
- (c) in person directly to the service provider at the time service is provided;
- (d) by visiting <https://www.opg.com/about-us/governance-regulation/accessibility/>;
- (e) in writing to Ontario Power Generation, Ethics Office, 1600 Stellar Ave, Unit 1, Whitby, Ontario, L1N 9B2.

All feedback will be directed to the Ethics Office. A member of the Ethics Office should disposition the feedback in consultation with the Senior Manager, Ethics & Equity. Members of the public and other Third Parties may expect a response to their feedback within ten business days.

1.5.2 Providing Services to People with Disabilities

OPG is committed to serving all members of the public and Third Parties including people with disabilities and shall carry out its functions and responsibilities in the following areas:

1.5.3 Communication

OPG shall communicate with people with disabilities in ways that considers their disability.

OPG shall provide training on how to interact and communicate with people with various types of disabilities to all employees.

1.5.4 Telephone Services

OPG is committed to providing fully accessible telephone service to members of the public and other Third Parties. OPG shall train staff to communicate with members of the public and other Third Parties over the telephone in clear and plain language and to speak clearly and slowly.

OPG shall offer to communicate with members of the public and other Third Parties by alternate means if telephone communication is not suitable to their communication needs or is not available.

1.5.5 Assistive Devices

OPG is committed to serving people with disabilities who use assistive devices to obtain, use, or benefit from its services. People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

1.5.6 Billing

OPG is committed to providing accessible invoices to customers. Customers requiring invoices in an alternate format should communicate this requirement to OPG together with the different format options accessible to them. OPG shall then provide this customer with the invoices in the agreed upon alternate format.

OPG Proprietary		
Document Number:	OPG-STD-0074	Revision: R007
Usage Classification:	Information	Sheet Number: N/A Page: 9 of 14

Title:
INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD

1.5.7 Use of Service Animals and Support Persons

OPG is committed to welcoming people with disabilities who are accompanied by a service animal on the parts of its premises where OPG provides services that are open to the public and other Third Parties unless the animal is otherwise excluded by law from the premises.

OPG is committed to welcoming people with disabilities who are accompanied by a support person on the parts of its premises where OPG provides services that are open to the public and other Third Parties. Any person with a disability who is accompanied by a support person shall be allowed to enter OPG's premises where OPG provides services that are open to the public and other Third Parties with his or her support person unless the person is otherwise excluded by law from the premises.

1.5.8 Notice of Temporary Disruption

OPG shall provide members of the public and other Third Parties with notice of a planned or unexpected disruption in the OPG facilities or customer services used by people with disabilities. This notice shall include information about the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available.

The notice shall be placed at all public entrances and service counters on OPG's premises that are accessible to the public and other Third Parties as well as on www.OPG.com.

1.5.9 Training for Staff related to Customer Service Standard

OPG shall provide training to all employees and volunteers, and others who deal with the public or other Third Parties on OPG's behalf, and all those who are involved in the development and approvals of policies, practices, and procedures on providing services to members of the public and other Third Parties.

This training should be provided within three months after staff commence their duties.

Training shall include the following:

- (a) The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard regulations
- (b) How to interact and communicate with people with various types of disabilities
- (c) How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- (d) How to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities
- (e) How to interact with people with disabilities who are accompanied by a service animal or support person
- (f) What to do if a person with a disability is having difficulty in accessing OPG's services
- (g) OPG's governance relating to the accessibility standards for customer service

OPG Proprietary		
Document Number:	OPG-STD-0074	Revision:
Usage Classification:	Information	Page:
	Sheet Number:	
	N/A	10 of 14
Title: INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD		

2.0 ROLES AND ACCOUNTABILITIES

2.1 Directors and Officers

Directors and officers of OPG are accountable for:

- (a) Taking all reasonable care to prevent OPG from contravening AODA legislation;
- (b) Demonstrating commitment by showing an active interest in and recognizing the workplace accommodation efforts of employees and managers.

2.2 Managers and Supervisors

Managers and supervisors are accountable for:

- (a) Ensuring those employees who identify a disability are accommodated reasonably as outlined in this standard and or any other governing documents (i.e. Collective Agreements);
- (b) Fostering an environment where all workplace parties are supportive of accommodation efforts;
- (c) Conducting all aspects of the accommodation process in such a way that dignity is preserved and business needs are met;
- (d) Completing the initial training on the AODA and any updated training on the AODA if OPG's governance is revised;
- (e) Ensuring new staff members required to complete AODA training do so within three months of having joined OPG;
- (f) Posting notices of temporary disruption in facilities or services used by people with disabilities locally at all public entrances and service counters;
- (g) OPG's premises that are accessible to the public and other Third Parties, and;
- (h) Posting notices of temporary disruption in facilities or services used by people with disabilities for locations that are accessible to the public and other Third Parties locally.

2.3 Employees

Employees are accountable for:

- (a) Identifying their need for accommodation;
- (b) Co-operating in finding a solution and discussing alternatives to meet their accommodation needs;
- (c) Notifying local site management of any disruption in the OPG facilities or customer services used by people with disabilities such that notice of such disruption can be posted on www.OPG.com and locally at all public entrances and service counters on OPG's premises that are accessible to the public and other Third Parties;

OPG Proprietary		
Document Number:	OPG-STD-0074	Revision:
Usage Classification:	Information	Page:
	N/A	11 of 14

Title:
INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD

- (d) Complete required training on AODA as required, and;
- (e) Directing feedback regarding OPG's provision of services to people with disabilities requiring action to the Ethics Office.

2.4 Ethics Office

The Ethics Office is accountable for co-ordinating AODA compliance including:

- (a) Preparing and updating, as required, governance, training materials, reports, and other documentation required by the AODA;
- (b) Co-ordinating the training required under the AODA;
- (c) Preparing and disseminating the communications required under the AODA;
- (d) Filing the Accessibility Report required under the AODA to confirm compliance with the accessibility standards for customer service;
- (e) Facilitating relationships with external vendors providing accessible format services for documents and content, and;
- (f) Receiving feedback regarding OPG's provision of services to people with disabilities under the feedback process required under the AODA and dispositioning such feedback.

2.5 Site Human Resources

Site Human Resources are accountable for:

- (a) Including AODA training materials in new employee orientation materials, and,
- (b) Supporting employees, managers and supervisors as required.

2.6 Training

Training is accountable for:

- (a) Maintaining training records including the dates on which training is provided and the number of individuals to whom it is provided, and,
- (b) Producing training records, as required.

2.7 Law Division

Law Division is accountable for staying abreast of AODA legislative developments and informing the Senior Manager Ethics & Equity of such developments in a timely manner.

2.8 Accounts Receivable

Accounts Receivable is accountable for ensuring that accessible invoices are available to OPG customers upon request, as described in Section 3.1.4 above.

OPG Proprietary		
Document Number:	OPG-STD-0074	Revision:
Usage Classification:	Information	Page:
	Sheet Number:	
	N/A	12 of 14

Title:
INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD

2.9 Supply Chain

Supply Chain is accountable for giving consideration of accessibility when designing, procuring or acquiring self-serve kiosks to better serve persons with disabilities.

2.10 Brand Management

Brand Management is accountable for:

- (a) Posting notices of temporary disruption in facilities or services used by people with disabilities for locations that are accessible to the public and other Third Parties on www.OPG.com;
- (b) Providing a feedback process regarding the way OPG provides services to people with disabilities on www.OPG.com and providing feedback received to the Ethics Office, and;
- (c) Ensuring all web content available on www.OPG.com is available in alternate formats that consider a person's disability.

3.0 DEFINITIONS AND ACRONYMS

3.1 Definitions

Accommodation: Under the Ontario Human Rights Code, people identified by human rights grounds are entitled to the same opportunities and benefits as everybody else. In some cases, they may need special arrangements or "accommodations" to take part equally in the social areas the Human Rights Code covers, such as employment. Employers, are responsible under the Code have a legal obligation to accommodate Human Rights Code-identified needs, unless they can prove it would cause them undue hardship. Undue hardship is based on cost, outside sources of funding and health and safety factors.

Accessible Format: Sometimes called alternate formats, are ways of presenting printed, written, or visual material so that people who do not read print can access it. People who do not read print may:

- (a) Be blind or visually impaired
- (b) Have a learning disability that affects reading
- (c) Have a physical disability and be unable to hold or turn pages

Assistive Device: Devices used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations. Assistive devices include but are not limited to, wheelchairs, reading machines, recording machines, hearing devices, and devices for grasping. Dignity: Means treating people with disabilities as customers and clients who are as valued and as deserving of effective and full service as any other customer and/or client.

Disability:

- (c) Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect, or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis,

OPG Proprietary		
Document Number:	Revision:	
OPG-STD-0074	R007	
Usage Classification:	Sheet Number:	Page:
Information	N/A	13 of 14

Title:

INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD

amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal, or on a wheelchair or other remedial appliance or device.

- (d) A condition of mental impairment or a developmental disability.
- (e) A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- (f) A mental disorder.
- (g) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Independence: Freedom from control or influence of others, freedom to make your own choices.

Service Animal: An animal is a service animal for a person with a disability:

- (a) If it is readily apparent that the animal is used by the person for reasons relating to his or her disability.
- (b) If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person: In relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, or medical needs or with access to goods or services.

Third Party: Any person who works for or acts on behalf of another business, organization or the government including, without limitation, consultants, contractors, suppliers, and providers of other business and professional services.

3.2 Abbreviations and Acronyms

AODA	Accessibility for Ontarians with Disabilities Act
OPG	Ontario Power Generation

4.0 RECORDS AND REFERENCES

4.1 Records

The following records listed in the records table may be generated by use of this document and users are required to follow the filing information.

Record Created	Associated Form or Template Number	QA Record? Y/N	Filing Information/Retention (AIMS Type/Sub-Type)
CALs 76744, 77632 and 69847 training records	N/A	N	Indexed in AIMS Document Number: N/A RRC: TRN-0010

Ontario Power Generation Standard

OPG Proprietary		
Document Number:	Revision:	
OPG-STD-0074	R007	
Usage Classification:	Sheet Number:	Page:
Information	N/A	14 of 14

Title:	INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD	
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			Retention: T15E - EMPLOYEE TERMINATION +15 YEARS
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4.2 References

4.2.1 Performance References

OPG-GUID-08500-0001, Guideline for Interacting with People with Disabilities

OPG-POL-0013, Code of Business Conduct Policy

OPG's Accommodation Policy Statement

Accessibility for Ontarians with Disabilities Act

World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0

Canadian Human Rights Act

Employment Equity Act

Ontario Human Rights Code

4.2.2 Developmental References

None

5.0 REVISION SUMMARY

This is an **intent** revision.

- Removed AODA in the standard title
- Removed reference to OPG-POL-0033 as per DCR 138880.
- Updated Accountabilities to reflect changes in service disruption process updated in the Multi-year Accessibility Plan
- Changed Corporate Affairs to Brand Management
- Revised Single Point of Contact and Owner information
- Updated accessible format web content information
- Added Accessible format and accommodation definitions
- Updated records section