# CNIB Service Ontario Accessibility Report 2023



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Contents

[Executive Summary 1](#_Toc136270937)

[Identifying Barriers 1](#_Toc136270938)

[Process Barriers 2](#_Toc136270939)

[Physical Barriers 4](#_Toc136270940)

[Digital Barriers 4](#_Toc136270941)

[Attitudinal Barriers 5](#_Toc136270942)

[Conclusion 6](#_Toc136270943)

[Future Work 7](#_Toc136270944)

[Appendix A: Methodology 8](#_Toc136270945)

[Appendix B: Semi Structured Interview Guide 9](#_Toc136270946)

## Executive Summary

People with disabilities are at heightened risk for adverse safety, health, and wellbeing outcomes due to lack of accessibility supports in society. The presence of significant social and environmental barriers that hinder the accessibility of government services is a growing trend across Canada. Ontarians who are blind or partially sighted have long expressed the need for change so that they have equal access to necessary Service Ontario services that enable them to receive healthcare, transportation, or meet other daily needs. These are rights protected under the Accessibility for Ontarians with Disabilities Act (AODA), which recognizes the history of discrimination against people with disabilities in Ontario, and requires measures, policies, and practices for the identification and removal of barriers according to accessibility standards.

The purpose of this project was to investigate the accessibility of Service Ontario. Originally, this was spurred by a need to investigate the system whereby [online health card renewal required a driver’s license as ID verification](https://www.cnib.ca/en/news/provincial-government-responds-cnib-foundation-about-accessibility-issues-ontario-health-card?region=on). This forced many people with sight loss who do not possess a driver’s license to go to a Service Ontario location to complete their request(s), which raised their risk during the COVID-19 pandemic and exposed them to other accessibility challenges surrounding receiving provincial services. Although the [online system has recently been modified to allow Ontario photo identification as verification](https://www.cnib.ca/en/news/ontarians-can-now-renew-their-health-card-online-without-drivers-licence?region=on), CNIB recognizes this issue indicates a concern around the accessibility of Service Ontario services as a whole. Moreover, it reflects a normative attitude showing how people with a disability are often an afterthought in in service planning, and most recently, pandemic preparedness and protocols.

To address the accessibility of Service Ontario systems, CNIB wanted to understand the ways that current Service Ontario processes impact people with sight loss. This report provides a broad summary of the results from focus groups that CNIB carried out with people with sight loss to ask and understand their experiences of Service Ontario services. To do this, we conducted qualitative focus groups ([Appendix A](#_Appendix_A:_Methodology)) as this method of research can integrate first-hand knowledge into policy and practice.

## Identifying Barriers

Service Ontario provides necessary services to the Ontario population, including services to renew health cards and Ontario identification (ID) cards, obtain certificates (i.e., marriage or birth), update addresses, apply for (accessibility) parking permits, and others. However, people with sight loss have reported several existing processes that lead to process, physical, digital, and attitudinal barriers to obtaining these services.

### Process Barriers

### Issue

Line-up systems at Service Ontario locations are not accessible to people with sight loss.

### Impact

Some take-a-ticket systems only use visual cues to signal who is “next in line”. Virtual line-up indicators (i.e., screens or signs) are not clear or are displayed in low contrast. In some cases, it was not possible to request accessibility supports (such as a greeter/assistant) online or over the phone before arriving at offices. Moreover, if such supports were available, they were only available to assist people with mobility needs. Physical line-up systems (such as ropes) were especially challenging for people using a white cane or with a guide dog to navigate. These impacts were compounded during the pandemic as physical-distancing protocols (such as separation stickers on the ground and plexiglass which decreases visibility) made it difficult to navigate line-up systems.

“The ticket system, it’s a visual number that they display. It’s not like at a Walmart where they’ll say the serving number, they’ll show the number and they’ll do an audio [announcement] also. I mean if [Service Ontario] is going to put a number up on the screen to tell you who’s served next, being visually impaired- it’s not going to help you”

-Participant

“[Service Ontario] had those big screens with the numbers rolling down and there was no speech or anything like that. And you had to pick a number. And when your number came up, then you would go to a particular counter. And I don’t know if I would have had help if I went there on my own…I think that they could make the whole process a lot more accessible though.”

-Participant

“[Service Ontario] don’t call out the number when you’re in line, it just displays on the wall. And I had to speak to the greeter to let me know when my number comes up because they don’t call it out...My issue was the accessibility. They should have a voice call-out: they tell you what your number is, and then they call it out so you don’t miss it. You’re sitting there for sometimes hours”.

-Participant

### Recommendations

* Create queueing systems that meet the requirements of CNIB's [Clearing our Path for Queueing Systems](https://www.clearingourpath.ca/5.5.0-queuing-systems_e.php). CNIB has also created a [video that demonstrates how queueing systems can be improved](https://www.youtube.com/watch?v=9IUZBsX7O7g) through more accessible customer service.
* Have designated greeters/assistants to help people navigate and enter/exit the office. These personnel may also read out the ticket number to people with sight loss, when needed. If not permanently, this service should be possible to request online or by phone in advance of arriving at Service Canada offices.
* Train service workers to give auditory cues (i.e., “call outs”) to signal “next in line” in addition to visual cues (i.e., screens and signs).
* When physical distancing is needed, service workers should be understanding and accommodate to the needs of people with vision/hearing loss, recognizing that distancing may not always be possible or that plexiglass and masks create additional challenges to communicating or navigating spaces. In these cases, a separate line-up or service processing area for people with disability is recommended to ensure both safety and accessibility.

### Issue

The process to fill and sign documents using pen and paper is often not accessible to people with sight loss.

### Impact

At Service Ontario locations, people with sight loss were not able to fill and sign documents independently, especially if the form had small print or boxes. Online forms were not always available on Service Ontario web pages or the format of forms were not compatible with assistive technology.

“I went for my health card, and they handed me a form and said, ’you need to fill this out.’ So I said, ‘okay, I’m going to need help. Can someone help me fill this out?’ And they said, ’no, we’re not allowed to do that.’”-Participant

“[Parking permit pass application] was PDF, that’s why my screen reader didn’t read it…They don’t come in Word. They use PDFs for almost everything now so it’s difficult for me.” -Participant

“I requested the forms in a Word file. And [Service Ontario] basically told me I was asking a lot from them during COVID and that it’s against the law. That’s an accommodation I require and they should jump on it when I request it. I don’t understand why they can’t post them as either a PDF that are accessible and provide an alternate Word file document. You can password protect it.” -Participant

“[Service Ontario] had a PDF [marriage license application] that was supposedly fillable. And I was able to fill most of it. And then you had to go in-person to drop it off. And then I got yelled at because it wasn’t filled completely. It’s like, ’well, it’s because your PDF isn’t accessible’.” -Participant

“For me, it’s more convenient to [fill forms] online because I don’t drive…I would have to fill out the paper handwritten and I don’t do well with forms that have the little boxes in it. My vision’s too poor to do that.” -Participant

### Recommendations

* Implement accessibility training for front-line staff on how to effectively support people with sight loss to fill out physical forms.
* Ensure print materials meet [CNIB's Clear Print Accessibility Guidelines](https://www.cnib.ca/sites/default/files/2020-08/Clear%20Print%20Guidelines%202020.pdf). For example, physical forms can be made more accessible through increasing the size of font(s) or incorporating braille on existing forms.
* Implement policies that allow frontline staff to support people with sight loss fill out physical forms in a safe way when physical-distancing measures are needed.
* Make signature guides available at Service Ontario locations, especially in instances where it is important to sign a form within a certain area.
* Make forms available online so people can review and fill them out in advance digitally.
* Ensure online forms are available in an accessible format(s), such as in both Word and PDF formats which may be compatible with certain digital readers.
* [Watch CNIB’s video](https://www.youtube.com/watch?v=ZbXfMo8ap38) to learn how accessible customer service can help overcome accessibility barriers relating to written material.

## Physical Barriers

### Issue

Service Ontario offices are not accessible because of low visibility or hidden signage, unclear instructions for finding the unit, or being in an obscure location.

### Impact

Service Ontario office building signage is often lacking, or signs are small and difficult to read. In cases where the office was housed within a larger building complex, a lack of signage for specific units or entrances is an additional barrier. A lack of appropriate signage and instructions is especially difficult for people travelling via conventional public transport or paratransit when stops were not close to obscured Service Ontario entrances or when it required crossing a busy road.

“Our [Service Ontario] is in the middle of a parking lot. So if someone wasn’t with me, it would be a little more challenging because there are several entrances and you don’t know which one the correct one is. Because when I asked [the app] Soundscape, it gave me the address, and it just kept repeating the address no matter which door I tried to go to.” -Participant

“There was a sign, but I could only see it when I got right up close to the place.” -Participant

### Recommendations

* Increase the accessibility of signage through a redesign of physical signs at Service Ontario locations (i.e., increase size and number of signs). All signage designs should follow accessibility guidelines outlined in CNIB's [Clearing our Path](https://www.clearingourpath.ca/3.7.0-signage_e.php).
* Install [tactile signage](https://www.clearingourpath.ca/3.7.5-tactile-signs_e.php) where relevant and following [Braille Literacy Canada guidelines](https://www.brailleliteracycanada.ca/storage/standards/AccessibleSignageGuidelines2016.pdf) to print signage that follows [CNIB's Clear Print Accessibility Guidelines.](https://www.cnib.ca/sites/default/files/2020-08/Clear%20Print%20Guidelines%202020.pdf)
* Include instructions on the Service Ontario website for finding and navigating the office for people to view before coming. This includes specific instructions for those arriving via public transportation or paratransit.
* Employ accessible wayfinding technology that connects with accessibility apps used by people who have a disability.

## Digital Barriers

### Issue

Although the Service Ontario website is [WCAG 2.0AA](https://www.w3.org/WAI/WCAG2AA-Conformance) compliant according to the AODA, people with sight loss report certain features are not accessible or user-friendly enough to allow them to complete some requests.

### Impact

While the Service Ontario website may be technologically accessible, people with sight loss report functions of the website to find information, forms, or bookings rely heavily on visual cues, rendering them less user-friendly.

This includes colored buttons or small buttons, and a lack of “magnify” and “find” functions on some pages. Additionally, completing CAPTCHA security to access some pages is not always possible for people using assistive devices, and fonts and font sizes on some pages were challenging for people with sight loss. These impacts were especially significant during the pandemic, as it was a barrier for some to booking vaccination or testing appointments or accessing their online vaccination QR codes.

“When you go online to apply for things, their website’s not very speech-friendly. You can’t navigate it. It’s not very helpful.” -Participant

“[Service Ontario Website] is very cluttered. They have too much information on one page, and when you go down to the subheadings…it should say ‘health card’ with all the forms or whatever you need and all the information under there. But, it’s all pushed on one page and you have to decipher it…put it on a separate page. There must be a better way to set up a website, a more user-friendly website.” -Participant

“I do find their website is not very accessible. Because I can see a little bit if the contrast is right and the font is right and it’s all customizable to my liking. I would love to see the ability to customize with Service Ontario. And even with the Smart Invert setting on my IPhone, I can’t navigate that website.” -Participant

“I know for sure [Service Ontario website] has not been tested on screen readers. The colors that they’ve chosen are not appropriate. They don’t follow the guidelines.” -Participant

“For me, I need an Arial black, in about a 22 or 24 [point] font. That’s way far away from a size 10 font in a Calibri or Verdana on some Service Ontario pages. It would be very nice to have a click button on your websites which would allow me to change the fonts or the colour of the background so that it’s visible.” -Participant

### Recommendations

* Develop an enhanced search feature compatible with most assistive technologies and ensure that web pages can be magnified on desktop and smart devices.
* Include further accessibility features that rely less on visual cues, to make navigating the site more user-friendly.
* Conduct website usability testing with people with sight loss to understand their accessibility needs and barriers.

## Attitudinal Barriers

### Issue

Service workers for Service Ontario did not demonstrate an awareness of accessibility needs.

### Impact

People with sight loss reported many Service Ontario employees did not help them navigate physical spaces or provide accommodations, especially if the employees did not have awareness of disability needs and abilities. For example, some Service Ontario employees assumed/expected people with sight loss to find specific counters, enter certain spaces, or fill forms independently. In some cases, the attitudes of some Service Ontario workers were of impatience or frustration.

“The person serving us, she wasn’t actually looking at us, and she was waving. And she actually got upset at me because she was like, ‘I was waving’. I said, ’Well, I’m visually impaired'.” -Participant

“[Service Ontario employees] did not show any real knowledge about accessibility because a lot of the directions they were giving me in regards to navigating their website was based on visual cues -whether it was a green button, clicking, locating a certain text item on the page- which can be time consuming for someone who is using a screen reader.” -Participant

### Recommendations

* Increase job-specific education and training on accessibility for Service Ontario employees so they may be more aware of ways to support people with sight loss in-person, online, and over the telephone. This training can include awareness of different levels of sight loss and levels of support for each, and impact training for non-discriminatory ways of interacting with people with sight loss.
* Ensure Service Ontario workers are ready to assist people with sight loss through having knowledge on alternative ways of completing requests. For example, employees should be aware of and able to help people with sight loss to read and fill out documents.
* Ensure that Service Ontario workers providing phone support can assist people with sight loss in navigating web pages and finding information online, especially demonstrating knowledge on the use of assistive devices and accessibility features of websites without expecting people with sight loss to follow visual cues.
* Ensure Service Ontario can supply its employees with clear masks (when masks are required) as this can accommodate the communication needs of people who are deafblind.

## Conclusion

This project provides evidence that Service Ontario is inadequately prepared to ensure provincial services are accessible, user-friendly, and non-discriminatory for people with sight loss. Improvements have been made to remedy certain issues, such as recent adjustments to allow identification other than a driver’s license to be used as verification for health card renewal. The pandemic magnified the importance of taking such measures to ensure the health and safety of people with sight loss.

However, more work needs to be done to improve Ontario services to ensure people with sight loss are not left behind. This work involves identifying barriers to inclusion that hinder disability-inclusive provincial systems, an aim of this project. We now call on the Ontario government to take action to address suggestions from people with sight loss to remove such barriers and to implement disability-inclusive practices within Service Ontario.

Future Work

In this report, we convey the experiences of barriers to accessing Service Ontario services of people with sight loss. However, we were unable to fully explore the impacts of barriers on people with disabilities unrelated to sight loss. Service Canada and Elections Ontario have created advisory groups comprised of people with different disabilities and related professionals who are able to advise further on improving accessibility.

We support future and concurrent work investigating accessibility needs of individuals with different abilities and disabilities, so that this insight can stimulate innovation in policy re-design.

## Appendix A: Methodology

We recruited participants if they:

a) identified as someone who is blind, partially sighted or Deafblind

b) could provide written consent to participating in the study, including consent to be audio recorded,

c) had access to a device that supported the Zoom videoconferencing application.

Participants were recruited through outreach to people who are blind or partially sighted and reside in Ontario through CNIB’s networks.

Participants were interviewed between April and May 2022. We conducted seven focus groups virtually over Zoom. Each focus group was comprised of two to eight participants, depending on their availabilities. In total, 39 individuals participated in the focus groups.

During focus groups, study investigators followed a semi-structured interview guide (see [Appendix B](#_Appendix_B:_Semi)). Topics of discussion included the frequency and reason to access a Service Ontario service, experiences of Service Ontario telephone or TTY services, experience of the Service Ontario website, experience of Service Ontario offices, and experiences of accessing services during the COVID-19 pandemic. Following the focus groups, our research team used qualitative coding techniques and the NVivo 12 software to code segments of transcripts for themes in barriers to accessibility and recommendations for improved accessibility of Service Ontario. After the focus groups were completed, we provided an honorarium to each participant to thank them for their contributions.

## Appendix B: Semi Structured Interview Guide

### Introduction

As you may know, Service Ontario provides services related to driving licenses, health cards, birth/marriage/death/name certificates, vehicle registration, fishing/hunting/camping, and housing/property.

However, Service Ontario provides different services than Service Canada, which include Employment Insurance (EI), Canada Pension Plan (CPP), Old Age Security (OAS), Guaranteed Income Supplement (GIS) benefits, Social Insurance Numbers (SIN), immediate request for a Passport Service, Veterans Affairs Canada Services.

In the interview today, I would like to learn about your experiences accessing Service Ontario. If you do have comments about your experiences with Service Canada, it will not appear in our final report to Service Ontario, however, we can make note of it in our future advocacy work.

### General

What Service Ontario services have you used? (i.e., accessible parking permit/ vehicle services/ health card/ birth marriage or death/Ontario Photo ID Card /Fishing hunting or camping licenses/land registration/ security guard and private investigation license)

* When did you use/have these?

How have you been able to access Service Ontario? (i.e., Online, in-person, telephone, virtual)

### Telephone and TTY services

Have you used telephone or TTY services?

* If so, when?

Why did you choose to call and or use TTY services? (i.e., don’t have access to computer/internet, couldn’t find information online, prefer to speak to a live operator)

* Was it necessary for you to use telephone or TTY services in order to receive the service (i.e., can’t access physical buildings or use online services)
* What was positive about that experience?
* What could have improved your experience?

How was the quality of the service?

* What was your experience getting connected to a person/speaking to a person?

In the future, for what reasons might you use telephone or TTY services?

* (or: why would you not use telephone or TTY services in the future?)

### Online services

Have you used or been on the Service Ontario website?

* When?
* If more than once, how frequently?

Did you use online services to get information (i.e., telephone number for a specific office; hours of operation), or, did you use it to complete a request (i.e., renew health card)

Did you find the Service Ontario website user friendly?

* Were you able to navigate the site easily?
* What difficulties might you have had navigating the site?
* Did you find what you were looking for on the site?

Overall, how accessible did you find the Service Ontario website?

* What was positive about that experience?
* What could have improved accessibility?

Were you able to complete your request online?

* If not, why not?
* What did you do instead when you could not complete request online?

### In-person services

Why have you needed to travel to a Service Ontario location?

* Was it necessary to go in-person in order to process your request (i.e., have a photo taken for health card)

How do you normally travel to a Service Ontario location? (i.e., privately owned vehicle, taxi/uber, public transportation, walking, etc.)

* Would you travel there in a similar or different way if you were to travel there again in the future?
* Did the pandemic change how you travel to a Service Ontario location? (i.e., walk rather than take public transport)

How accessible is your local service Ontario to get to? (i.e., close to public transportation; how easy is it to get from the nearest public transportation stop to the building (do you have to cross a dangerous road, a busy parking lot, etc.)

How easy is it to identify a Service Ontario office location when you arrive? (i.e., is it a unit within a larger office building, is the signage clear, is there a clear path of travel that identifies the entranceway and path of travel)

Did you request an accessibility accommodation before arriving in-person?

* Was that request met?
* How did you learn about accessibility accommodations?
* How were they able/not able to accommodate you?

When you first entered the Service Ontario office entryway, were you greeted by someone (i.e., greeter or receptionist)?

* What was your experience like?

What were your experiences with the queueing/lineup/”take a ticket” system?

What were the overall attitudes of the Service Ontario employees?

* Did you feel that they were able to accommodate people with disabilities?
* Did they help you meet your needs?
* Did they demonstrate an awareness of accessibility?

Is there anything that has been a barrier to accessing Service Ontario services? Please explain.

Is there anything that has helped you access Service Ontario services? Please explain. (i.e., had someone who helped you physically get to locations; certain devices to navigate online services, etc.)

What do you think Service Ontario can do to improve accessibility in the future?

### Final

Has COVID-19 changed the ways you are able to access services?

* If so, please explain why.
* If not, in what ways did your experience stay the same?

Is there anything(s) that could have improved your experiences of accessing Service Ontario during the pandemic?

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