



COUNCIL OF CANADIANS WITH DISABILITIES
CONSEIL DES CANADIENS AVEC DEFICIENCES

Council of Canadians with Disabilities
Submission to the
Canada Post Corporation Strategic Review
29 August 2008

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The Council of Canadians with Disabilities (CCD) is pleased to have the opportunity to share its views with the Canada Post Corporation Strategic Review (CPCSR), regarding how Canada's postal service should function. An accessible and inclusive postal service free from systemic discrimination against persons with disabilities is a key component of an accessible and inclusive Canada.

The Council of Canadians with Disabilities (CCD) is a national human rights organization that brings together national and provincial organizations of people with disabilities. CCD's members are: BC Coalition of Persons with Disabilities (BCCPD), Alberta Committee of Citizens with Disabilities (ACCD), Saskatchewan Voice of People with Disabilities (SVOPD), Manitoba League of Persons with Disabilities (MLPD), Confédération des Organismes de Personnes Handicapées du Québec (COPHAN), Nova Scotia League for Equal Opportunities (NSLEO), PEI Council of the Disabled (PEICDP), Coalition of Persons with Disabilities—NFLD and Labrador (CODNL), Canadian Association of the Deaf (CAD), DisAbled Women's Network Canada (DAWN Canada), National Educational Association of Disabled Students (NEADS), National Network for Mental Health (NNMH), Thalidomide Victims Association of Canada (TVAC), People First

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Canada (PFC), Citizens with Disabilities–Ontario (CWDO), Alliance for Equality of Blind Canadians (AEBC), NWT Council of Persons with Disabilities (NWTCPD).

CCD has been involved in many of the landmark cases that helped to bring down barriers that were preventing the full and equal participation of Canadians with disabilities. For example, CCD has used the Canadian legal system to advance jurisprudence on the following issues: the accommodation of people with disabilities in employment (Bhinder, O'Malley, and Grismer cases), access to long term disability benefits (Gibbs case), how equality is defined under the Charter of Rights and Freedoms (Andrews case, Lovelace case), inclusive education (Eaton case), right of deaf people to have interpreters in medical settings (Eldridge case), the application of the proscribed legal penalties when the victim of a killing is a person with a disability (Genereux and Latimer cases), no undue obstacles to mobility in passenger rail transportation (VIA Rail).

CCD and its member groups exist because discrimination continues to be a very real factor in the lives of persons with disabilities. For example:

Canadians with disabilities are almost twice as likely to live in poverty compared to other Canadians.

Over two million Canadian adults with disabilities lack one or more of the educational, workplace, aids, home modification or other supports they need to participate fully in their communities.

Over 55% of working-age adults with disabilities are currently unemployed or out of the labour market. For women with disabilities the rate is almost 75%.

Rates of violence and abuse against people with disabilities, in particular women with disabilities, are among the highest for any group in Canadian society. We know that for Aboriginal Canadians with disabilities these rates are even higher.

While progress has been made over the past 25 years, many Canadians with disabilities and their families continue to experience daily barriers to their full and equal participation in Canadian society. The personal, social and economic costs of exclusion are too high to be ignored. Immediate action is needed to address the high rates of poverty facing Canadians with disabilities and its causes and the lack of access to disability supports that perpetuate barriers and exclusion and keep people with disabilities and their families invisible and marginalized. (End Exclusion 2007)

Postal services are important to persons with disabilities

The barriers and exclusion faced by people with disabilities make postal service very important to the disability community. People with disabilities require both the goods and services that all people use as well as specialized goods and services that address disability-related needs. In many instances, the postal service has a

role to play in connecting people with disabilities to the goods and services that they need and want.

The following are a few examples of how the postal service assists people with disabilities participate in community life and acquire disability-related supports. (A disability-related support is any good or service that a person with a disability uses for the purpose of independent living.)

- Transportation barriers and public spaces which are not designed in accordance with the principles of universal design make it difficult for some people with disabilities to shop at their neighborhood stores or at the malls in the community. Shopping on-line, purchasing goods from televised shopping networks and catalogue shopping are some alternatives that rely on the postal service to transport purchased goods to the consumer.
- People for whom traditional print is a barrier may need to obtain their reading materials from centralized alternate media libraries that rely on the postal service to ship their materials to users.
- Some disability-related supports are very specialized and not readily available in every community. The postal service can be a vital link that people with disabilities depend upon in order to access disability-related supports.

Adherence to the principles of universal design

CCD is making a submission to the Review because we are anxious to see Canada's postal service provide accessible and inclusive

services that meet the needs of postal service users with disabilities. For people with disabilities, it cannot be said that Canada's postal service is truly universal because in all instances it does not conform to the principles of universal design.

CCD has been promoting a Canada where all goods and services are developed in accordance with the principles of universal design. By following universal design principles, goods and services are made usable, without specialized adaptations to people with the widest possible range of functional abilities. Clearly, Canada Post's services and facilities are not yet fully in compliance with the principles of universal design.

Within the disability community, there is the perception that Canada Post functions on the assumption that all Canadians are physically fit, young and able to reach mailboxes, regardless of height or what type of terrain the boxes are placed on. **CCD urges the Review to be mindful of the principles of Universal Design when making all its recommendations and to specifically address these principles in its final report.** For example, should its report recommend deregulation, then it should address in detail how a deregulated service would follow these principles.

There are universal design consultants in the disability community with the skills to assist Canada Post improve its services to persons with disabilities. CCD would be pleased to share contact information with Canada Post.

Accessible services

There are still instances of inaccessible post offices in Canada. CCD believes that counters and other amenities in a Post Office should be designed according to the principles of universal design. Another concern that has been expressed to CCD by people with disabilities is about cluster boxes that have not been designed according to the principles of universal design. There are difficulties regarding: getting to the boxes by wheelchair during the winter months, lack of Braille signage, and lack of adequate color contrast.

Information and communication technology is an important component of modern day life. Public services, like Canada Post, have an obligation to ensure that their web sites and telephone systems are accessible to both customers with disabilities and employees with disabilities. Canadians who are deaf need to be able to communicate with Canada Post via telephone. Thus Canada Post needs to ensure that all Canada Post outlets have a TTY and the staff are knowledgeable on how to use this technology. Web sites also need to follow the principles of Universal Design.

The Super Mail box presents some disability-related concerns, which people with disabilities have brought to CCD's attention. The Super Mail box is not ideal for people whose disabilities make it difficult for them to leave the house. The following types of disabilities may make it difficult for a person to leave their home: various mental health disabilities, disabilities involving fatigue, disabilities that affect mobility and agility, visual disabilities. Household delivery is the preferred option for many people with disabilities.

Where Super Mail boxes are in use, they need to be located within an easily reached distance for every resident served by a particular installation. Difficult terrain (i.e. hilly areas) may require more installations of Super Mail boxes than easy terrain (i.e. flat areas). The terrain surrounding each Super Mail box installation needs to be developed in accordance with the principles of universal design to ensure independent, dignified way-finding by all persons. There need to be cues that alert people to the fact that they are approaching their Super Mail box.

For persons with visual impairments, Super Mail boxes, and the keys used to access parcels, need to have signage usable by persons with visual impairments.

Concerns with deregulation

CCD is always concerned when it learns that deregulation is being considered for some form of service in Canada, because our history with deregulation has not been positive. With deregulation, we frequently find the assumption that a market-driven approach will deliver what consumers need and want. In the areas of transportation and telecommunications, CCD has not found that the market has delivered accessible services and products, guided by the principles of universal design. On the contrary, we have seen an erosion of access. As a point of principle, CCD holds that because people with disabilities are already a disadvantaged group in Canada, the disability community should not be made any worse off by reform.

In Canada, the *Canadian Human Rights Act* and the *Charter of Rights and Freedoms* promise to persons with disabilities equality

rights and freedom from discrimination. If deregulation were to proceed, it would need to do so in a manner that did not put postal service users with disabilities at a disadvantage, experiencing inequality and discrimination. Regardless of the business model that is followed, Canada Post has an obligation to provide accessible services to persons with disabilities.

Affordable postal service

Poverty continues to be a concern for many Canadians with disabilities. Postal service must be affordable to Canadians who are at the low-end of Canada's income levels. Similarly organizations of people with disabilities are primarily non-profit community organizations with limited budgets. These organizations use the postal service to communicate with their members and educate the general public through the distribution of newsletters and other types of educational material. CCD believes that one of the positive attributes of the existing system is that Canada has one of the lowest standard postage rates in the industrial world. Affordability is a characteristic of the postal service which should continue. If affordability can only be accomplished by the exclusive privilege, then the exclusive privilege should continue.

The current postal service accommodates users who are disabled by print and use alternate media. This material does not require postage. For example, a standard one volume print novel when produced in Braille may be many volumes in size. Braille books tend to be distributed from centralized libraries, so they are sent to users through the mail. Some users would not be able to afford to use the service if they had to pay postage on all their reading material. This

is an essential accommodation which needs to continue in Canada's postal service.

"Postage Free" materials need to be delivered to the consumer's home, rather than requiring the consumer to pick up the material at his/her postal outlet, because in some communities there are significant barriers to travel for persons with disabilities.

Conclusion

CCD has a strong belief in the value of consultation. By consulting with people with disabilities, service providers can work to ensure that their services and products do not have barriers that prevent their use by people with disabilities. CCD recommends on-going consultation with people with disabilities, drawn from the representative organizations of people with disabilities. CCD is committed to assisting organizations in Canadian society, such as Canada Post, receive the input that they need from people with disabilities. We are hopeful that the Strategic Review will recommend that Canada Post undertake on-going consultation with the disability community as the Corporation evolves its services.

CCD is pleased to have had this opportunity to share with Canada Post the concerns about postal service that we have received from people with disabilities in our network.

Sources

End Exclusion. 2007. National Action Plan.

http://www.endexclusion.ca/english/plan_final2007.asp (Date of retrieval 29 August 2008).