

NEWFOUNDLAND BROADCASTING COMPANY

ACCESSIBILITY

PLAN



Executive Summary

Newfoundland Broadcasting Company is pleased to present their Accessibility Plan. This plan will further our commitment to improving communication and access to our facilities for citizens with disabilities with the goal of eliminating barriers by 2040 as outlined by the Accessibility Canada Act.

Newfoundland Broadcasting Company's headquarters is in St. John's, Newfoundland & Labrador and we operate CHOZ-FM or OZFM and CJON-DT or NTV.

Below you will find the details of our accessibility plan under the headings and sections:

- General
- Accessibility Plan Introduction
- Accessibility Policies
- Consultations
- Training
- Priority Areas
- Regulatory Conditions
- Conclusion

Through our multi-year accessibility plan, we aim to become barrier free. This includes identifying and removing barriers, and preventing new barriers in the following areas:

- Employment
- The Built Environment
- Information and Communication Technologies
- Communication, other than ICT
- The procurement of Goods, Services and Facilities
- The design and delivery of Programs and Services

Newfoundland Broadcasting Company is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner and shall do so by preventing and removing barriers to accessibility and meeting the accessibility requirements.

General

Newfoundland Broadcasting Company is open to receive feedback from employees and the public on our accessibility plan. Alternative formats of this report are also available upon request, such formats include: print, large print, braille, audio, electronic format, or other agreed-upon formats. Please note our contact info below.

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Accessibility Plan Introduction

This accessibility plan was developed and produced through working with People Stuff Inc. and was published in June 2024. A progress report will be published in June 2025 and June 2026. The overall accessibility plan will be updated in June 2027 while consulting persons with disabilities. Below is a list of our policies.

Accessibility Policies

1. Purpose

This policy is intended to provide the overarching framework to guide the review and development of other Newfoundland Broadcasting Company policies, standards, procedures, By-laws and guidelines to comply with the Accessible Canada Act which were established to identify, remove and prevent barriers and increase accessibility for persons with disabilities in the areas of customer service, information and communications and employment.

2. Application

This Policy applies to all employees, volunteers, and to any individual or organization that provides goods, services or facilities to the public or other third parties on behalf of Newfoundland Broadcasting Corporation.

3. Definitions

For the purposes of this Policy:

Assistive Device: any tool, technology, or equipment that facilitates the performance of everyday tasks by a person with a disability. Examples of assistive devices include, but are not limited to, wheelchairs, walkers, hearing aids, oxygen tanks, and communication boards.

Barrier: means anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation. (obstacle)

Disability: means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society. (handicap)

Guide Dog: a dog trained as a guide for a blind person that also meets the conditions and qualifications prescribed by the Canadian Human Rights Code.

Service Animal: any animal accompanying a person with disability, so long as:

- It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- 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: a person who accompanies a person with disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

4. Guiding Principles

The provision of accessible customer service at Newfoundland Broadcasting Company will be guided by the fundamental principles governing the ACA.

This Act is to be carried out in recognition of, and in accordance with, the following principles:

- all persons must be treated with dignity regardless of their disabilities;
- 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;
- all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- 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;
- persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- 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.

5. Commitment to Accommodations

Newfoundland Broadcasting Company is committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause Newfoundland Broadcasting Company undue hardship.

6. Service Animals and Guide Dogs

Employees, volunteers and third party contractors shall accommodate the use of service animals by people with disabilities who are accessing Newfoundland Broadcasting Company services or goods unless the animal is otherwise excluded by law, such as food preparation areas.

Service animals and guide dogs accompanying persons with disabilities are welcome on Newfoundland Broadcasting Company premises that are open to the public unless the animal is otherwise excluded by law. For example, certain dog breeds may be excluded by the provincial Dog Owners' Liability Act or by municipal by-laws.

Additionally, there may be circumstances where allowing a service animal to accompany a person with a disability on Newfoundland Broadcasting Company premises might compromise the health and safety of another person. A common example would be allowing a guide dog near a person with a severe allergy to dogs. In such circumstances, Newfoundland Broadcasting Company will consider all relevant information to come up with a solution that meets the needs of both parties.

If it is not apparent that an animal accompanying a person with a disability is a service animal, Newfoundland Broadcasting Company may require the person to produce a letter from a physician or a nurse to verify the animal's role.

7. Support Persons

Where a person with a disability accessing Newfoundland Broadcasting Company goods or services is accompanied by a support person, Newfoundland Broadcasting Company employees, volunteers and third party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

Support persons accompanying people with disabilities are welcome at all Newfoundland Broadcasting Company's premises that are open to the public.

Generally, the presence of a support person will only be required in situations where there is a significant health and safety risk that cannot be mitigated by other means.

8. Notice of Temporary Disruption

Newfoundland Broadcasting Company will promptly notify all customers about any disruptions to services or facilities for people with disabilities. This notice will be posted in a conspicuous place and will include information about the reason for the disruption and its anticipated length, as well as information on available alternative services or facilities.

9. Establishment of Accessibility Plans and Policies

Newfoundland Broadcasting Company shall produce a multi-year Accessibility Plan. The plan will be posted on its website and shall be made available in an accessible format and with communication support, upon request.

Progress on the plan will be provided annually. The Accessibility Plan shall be reviewed and, if necessary, updated at least once every three (3) years.

Newfoundland Broadcasting Company maintains policies governing how it shall meet its requirements under the ACA, and Newfoundland Broadcasting Company will provide policies in an accessible format, upon request.

10. Accessible Formats and Communications Supports

Except as otherwise provided by the ACA, Newfoundland Broadcasting Company shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication support for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons, in accordance with the Accessible Formats and Communication Supports Procedures.

This does not apply to products and product labels, unconvertible information or communications and information that Newfoundland Broadcasting Company does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the department shall provide the person requesting the information or communication with:

- An explanation as to why the information or communications are unable to convert;
- A summary of the unconvertible information or communications.

Available formats include: print, large print, braille, audio, electronic format, or other agreed-upon formats.

11. Employee Training

Newfoundland Broadcasting Company will train employees who deal with the public or other third parties on the provision of accessible customer service to people with disabilities, as well as all individuals who participate in the development of policies, practices, and procedures governing customer service.

Training will be held during the release of our Accessibility Plan and during employee orientation for new hires.

Employee training will include the following elements:

- Newfoundland Broadcasting Company's accessible customer service plan;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use on-site equipment and devices to provide accessible customer service for people with disabilities; and
- What to do if a person with a disability is having difficulty in accessing Newfoundland Broadcasting Company's facilities.

Training will also be provided following any changes to the accessible customer service plan.

12. Recruitment

Newfoundland Broadcasting Company shall post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. Newfoundland Broadcasting Company shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants shall be notified about Newfoundland Broadcasting Company's policies for accommodating employees with disabilities as part of their offer of employment

13. Employee Supports

Newfoundland Broadcasting Company will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. Newfoundland Broadcasting Company will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

14. Accessible Formats and Communication Supports for Employees

Upon an employee's request, Newfoundland Broadcasting Company shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job; and
- Information that is generally available to employees in the workplace.

Newfoundland Broadcasting Company will consult with the employee making the request in determining the suitability of an accessible format or communication support.

15. Workplace Emergency Response Information

If an employee's disability is such that workplace emergency response information is necessary and Newfoundland Broadcasting Company is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when Newfoundland Broadcasting Company reviews its general emergency response plan.

16. Documented Individual Accommodations Plans

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communications support. If requested, the plans shall include individualized workplace emergency response information.

17. Return to Work Process

Newfoundland Broadcasting Company shall have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process shall outline the steps that Newfoundland Broadcasting Company shall take to facilitate the return to work.

18. Performance Management and Career Development and Redeployment

Newfoundland Broadcasting Company shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

Consultations

We have partnered and worked with People Stuff a HR Service provider based in Newfoundland and Labrador and InclusionNL based in Newfoundland and Labrador that provides support, services, and information to businesses in Newfoundland and Labrador on accessibility, inclusion, disability confidence, and inclusive employment. They both provide insight, guidance and recommendations on our website and building to be more accessible.

A report was presented to us on our website www.ntv.ca in December 2023. It was noted in the report that our website was in a good place of accessibility and the report has made recommendations and improvements on how to make our website even more accessible. This was reviewed and changes have already been made to make improvements.

A report was also presented to us in February 2024 on our app, NTV+. This report has made recommendations and improvements on how to make the app more accessible. This was reviewed and changes have already been made to make improvements.

In July 2023 InclusionNL produced a report on all campus buildings which include interior and exterior assessments. The report also included recommendations on how to improve accessibility. Since that time we have made many improvements and changes and will continue to do so into the future (Please see the section below on the Accessibility Improvement Plan for more details).

Training

As part of our ongoing commitment to fostering an inclusive workplace, we partnered with InclusionNL to conduct six comprehensive training sessions for all our employees. These sessions, titled Accessibility Confidence Training, were designed to empower us and our employees to develop accessible, equitable, and an inclusive culture within our workspace. InclusionNL, driven by their mission to create a barrier-free province, believes that spreading knowledge and education is key to achieving this goal. As of May 2024 all of our staff are trained.

Each training session provided us with the tools and insights needed to put Accessibility Confidence into action. We focused on exploring barriers present in their workplace and created strategies to create a more inclusive work environment. The sessions covered a range of topics, including understanding various types of disabilities, knowledge of disability rights, legislative obligations and commitments, accessible policy development, communication dynamics, and the importance of accessible technology in removing digital divides. Through these training sessions, we have created and will continue to cultivate a more inclusive and welcoming environment for all our employees.

Priority Areas

1. Employment

Addressing obstacles related to employment is crucial to guaranteeing equal employment opportunities at Newfoundland Broadcasting Company. We are dedicated to fostering a workplace that is both safe and supportive, while actively cultivating a culture that prioritizes diversity, equity, inclusion, and a sense of belonging for all.

Identified Barriers

- Heightened engagement, promotion, and communication efforts are essential to bolster accessibility, foster self-disclosure, and cultivate a supportive workplace culture.
- Team members require greater awareness of company policies and available accommodations, as well as an understanding of the barriers faced by individuals with disabilities.
- The process for accommodating disabilities lacks clarity, with employees and managers often unaware of available support resources.
- There is a notable lack of clarity among job applicants and hiring managers regarding the types of accommodations available for individuals with disabilities throughout the application, interview, and qualification processes.

Actions and Timelines

- Ensure during out new hire onboarding process that all new employees receive our accessibility training.
- Provide a copy of our Accessibilities Polices to all current and new hires to increase awareness of programs and support available for individuals with disabilities.
- Increase awareness of accommodation process for applicants, team members, and leaders.
- Further elevate leaders' familiarity with accommodation processes and practical ways to increase inclusion and accessibility in the workplace.
- Use internal feedback and consultations and collaborate with persons with disabilities to ensure that accessibility standards are integrated across our business – including workplace policies, employment standards, programs, and work environments.

2. The Built Environment

Taking steps to overcome obstacles in the built environment is crucial for ensuring that individuals using our offices and buildings, encounter seamless, barrier-free access. We remain steadfast in our commitment to retrofitting existing spaces.

Collaborating closely with our team members and external partners, we aim to gain deeper insights into the challenges faced by persons with disabilities and take proactive measures to address them effectively.

Identify Barriers

- Overall our campus buildings have many upgrades needed to be more accessible
- In our main older building there is no elevator to access the top floors
- Doors, washrooms and some hallways do not meet requirements

Actions and Timelines

Our commitment to accessibility, guided by our collaboration with InclusionNL, has already led to significant improvements across our facilities. We have made significant investments to accessibility upgrades, demonstrating our dedication to inclusivity. The following is a list of what we implemented so far.

- We have relocated a number of employees from an inaccessible area within our building to a newly renovated space, now equipped with accessibility features, while repurposing the former area for storage needs.
- We have completely renovated one of our buildings, transforming it into a fully accessible workspace. This renovation included the installation of updated doors, accessible washroom, and a new accessible entrance, facilitating a seamless transition for employees, guests and clients.
- We have a second building that is currently undergoing renovations. This building is set to receive an accessible entrance, along with an accessible washroom. More employees are slated to move into this updated space, which is expected to be fully accessible upon completion.
- In our main building, we plan to upgrade the newsroom area to feature an accessible washroom and improve entrances to facilitate ease of access.
- Additionally, we are diligently assessing the feasibility and costs associated with making the entire building accessible. This involves obtaining quotes for upgrades and evaluating options such as elevators and layout enhancements. By spring of 2025, we aim to have a clear understanding of costs and decide on renovation or relocation to other campus buildings.
- Concurrently, we will continue to improve accessibility in our two other buildings. As part of these efforts, we will be installing push bars and automated door openers on all upgraded doors, further promoting inclusivity and convenience for all employees and visitors.

3. Information and Communication Technologies

Through tackling barriers associated with information and communication technology, we strive to establish a benchmark of excellence in digital accessibility. Embracing a philosophy of continual enhancement, we endeavor to stay abreast of technological advancements in our ever-evolving society.

Our strategy involves proactive measures to identify and rectify barriers present in our websites, mobile applications, networks, and computer systems utilized by both customers and team members.

Identify Barriers

- Our websites need improvement to meet accessibility standards and improvements
- NTV+ app need improvements to meet accessibility standards and improvements

Actions and Timelines

A report was presented to the Newfoundland Broadcasting Company on our website www.ntv.ca in December 2023. It was noted in the report that our website was in a good place of accessibility and the report has made recommendations and improvements on how to make our website even more accessible. This was reviewed and changes have already been made to make improvements.

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- Persist in refining our websites and applications to elevate accessibility standards.
- Establish an audit program designed to systematically assess the accessibility of our information and communication technology.
- Collaborate with content providers, partners, manufacturers, and vendors to enhance accessibility features and ensure their sustained effectiveness.
- Regularly assess the accessibility of the information and communication technologies utilized for both internal and external communications.
- Enhance training, tools, and support materials for team members to align with information and technology accessibility guidelines, fostering continuous improvement.

4. Communication, Other Than ICT

It is our objective to ensure that our communication standards not only meet but exceed the best practices in accessibility. We strive to create an inclusive work environment where every individual, including those with disabilities, can actively engage and fully participate, empowering them to thrive and succeed.

Identify Barriers

- We're dedicated to identifying and dismantling barriers that hinder inclusive communication norms. By seizing these opportunities for improvement, we aim to enhance how information is conveyed and foster better engagement among employees.

Actions and Timelines

- Implementing a streamlined procedure for employees to request accommodations ahead of training sessions and meetings, with a targeted completion date of Spring 2025.
- Crafting a comprehensive best-practices manual to guide the creation and distribution of essential communications, guaranteeing accessibility through strategies like plain language usage, appropriate formatting, and inclusion of alt-text for images, slated for completion by Spring 2025

5. The Procurements of Goods, Services & Facilities

We are committed to refining our procurement practices to effectively tackle accessibility barriers in procurement. Emphasizing inclusion, we prioritize suppliers who are actively engaged in our supplier diversity program. In our interactions with both new and established suppliers, we transparently communicate our expectations and requirements regarding accessibility, fostering a collaborative approach towards ensuring inclusivity throughout our supply chain.

Identify Barriers

- Our current procurement methods may sometimes fall short of meeting the necessary accessibility standards consistently.

Actions and Timelines

- Create and implement a procurement policy and process to better engage and improve accessibility by December 2024

6. The Design and Delivery of Programs and Services

We're dedicated to creating programs and services that cater to the diverse abilities of all Canadians. Our approach to content delivery is fundamental to captivating stories and disseminate information, empowering our audiences to lead fuller, more enriching lives.

Identify Barriers

We have an ongoing commitment to provide Closed Captioning ensuring we comply with live closed captioning NER standards, keeping an accuracy rate of ninety-eight percent (98%) on live programs. We also ensure reports on live closed captioning are reported and submitted to the Canadian Radio-Television and Telecommunications Commission (CRTC).

- There are opportunities to expand the availability of video content with consistent and accurate Closed Captions (CC) on our website.

Actions and Timelines

- Expand our closed captioning offering for content on our websites by Spring 2025

7. Transportation

Transportation does not apply to the Newfoundland Broadcasting Company

Regulatory Conditions

As required by ACA, we have set out the following applicable conditions and provisions

CRTC CJON-DT St. John's – Licence renewal, 2023-286 25 August 2023 (See Appendix A below)

Conclusion

We're dedicated to creating meaningful change for individuals with disabilities by tackling the obstacles outlined in our Accessibility Plan. Our range of products and services serve as potent instruments that can revolutionize how people across Canada connect with one another and the global community. Our drive stems from the opportunity to enhance accessibility for both our customers and team members, contributing to the realization of an inclusive Canada.

As we put our plan into action, we'll persist in collaborating and seeking input from individuals with disabilities. Additionally, we commit to releasing an updated Accessibility Plan every three years and keeping everyone informed through annual interim progress reports, as mandated by the ACA.

Appendix A

As part of the **CRTC CJON-DT St. John's – Licence renewal, 2023-286 25 August 2023**, the Commission set out as a condition of service the following:

Described Video

1. The licensee shall adhere to the conditions of service set out in Appendix 1 in Standard requirements for television stations, discretionary services, and on-demand services, Broadcasting Regulatory Policy CRTC 2016-436, 2 November 2016, with the exception of condition 14, which is replaced by the following:

The licensee shall provide described video for all English- and French-language programming that is broadcast during prime time (i.e., from 7 p.m. to 11 p.m.) and that is drawn from program categories 2(b) Long-form documentary, 7 Drama and comedy, 9 Variety, 11(a) General entertainment and human interest and 11(b) Reality television, and/or is programming targeting preschool children (0-5 years of age) and children (6-12 years of age) with the exception of U.S. programming received without described video less than 24 hours prior to air. Such programs will be broadcast with described video for any repeat airings scheduled greater than 24 hours from delivery.

The licensee shall keep reports (including the following: air date, start and end time, duration, program title, episode title/number, first airing, U.S. airdate, delivery date, repeat airing date, and details on whether or not the episode included described video) of all U.S. programs received without described video and broadcast in prime time, including U.S. programming received without described video prior to the 24 hours exemption threshold that the licensee is required to describe. This report must be submitted upon request.

Closed Captioning

As a condition of license, CJON-DT also adheres to CRTC policies of Closed Captioning.

Quantity of closed captioning

When it comes to closed captioning quantity, the CRTC requires :

- Caption 100% of programs over the broadcast day (from 6 AM to midnight)
- Ensure that 100% of advertising, sponsorship messages, and promotional content is captioned
- Provide viewers with closed captioning for all programming aired overnight (from midnight to 6 AM) if captions are available

Quality of closed captioning

CRTC standards also regulate the accuracy of closed captioning, which is the level of exactness between captions and the audio content of a program. For pre-recorded programming, accuracy includes correct spelling.

For pre-recorded programs, broadcasters must target a captioning accuracy rate of 100%. For live programming, For English-language live captioning, broadcasters must reach an accuracy rate of at least 98, as measured by the method described in the Canadian NER Evaluation Guidelines.

The Canadian NER Evaluation Guidelines, are set out in Appendix 2 to English-language closed captioning mandatory quality standards relating to the accuracy rate for live programming, Broadcasting Regulatory Policy CRTC 2019-308, 30 August 2019.

CRTC policies also address:

- Minimizing caption lag time for pre-recorded and live programming;
- Correcting errors before re-broadcasting a program;
- Providing proper positioning of captions to avoid blocking on-screen information;
- Controlling various aspects of formatting, including the use of hyphens and, for French-language programming, chevrons; and
- Ensuring the captioning of emergency alerts.



Feedback Process

We welcome customer feedback on our efforts to ensure accessible customer service to people with disabilities. We invite customers to speak to any of our employees or managers or to contact us by completing our online Accessibility Feedback Form. The online Accessibility Feedback Form may also be completed anonymously.

All customer feedback will be acknowledged and reviewed by the General Manager and replies will be provided within 30 days. This will not apply to any anonymous feedback.

We thank you for your continued support in our efforts to contribute to our Accessibility Plan.

Contact

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