

Blackburn Media Inc.
Accessibility Plan Progress Report
(the “Progress Report”)

Published June 1st, 2024

General

Introduction

This Progress Report is in compliance with the Accessible Canada Regulations: SOR/2021-241 under the *Accessible Canada Act* (“**ACA**”).

The Accessible Canada Regulations under the ACA require that Blackburn Media Inc. (“**BMI**”) establish, implement, maintain and document its accessibility plan (the “**Accessibility Plan**”). BMI must also publish a Progress Report with respect to the implementation of its Accessibility Plan on a yearly basis.

This Progress Report, dated June 1st, 2024, will be publicly available, including in an accessible format upon request.

Our Commitment

In fulfilling our mission, BMI strives to treat all individuals in a manner that allows them to maintain their dignity and independence. BMI promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the ACA. This Progress Report sets out BMI’s development with respect to achieving accessibility in all areas of BMI’s operations through its Accessibility Plan.

Designated Accessibility Representative

BMI has a designated accessibility representative. The representative is designated to:

- receive feedback relating to accessibility and accessibility barriers on behalf of BMI;
- receive requests for a copy of this Progress Report in an accessible format; or
- receive requests for a description of BMI’s feedback process in print, large print, Braille, audio format or an electronic format that is compatible with adaptive technology that assists persons with disabilities.

BMI’s Designated Accessibility Representative is as follows:

Marian George
Human Resources Administrator

You can provide feedback and/or communicate with BMI and the Designated Accessibility Representative in any of the following manners:

Mail: 700 Richmond St, London, ON N6A 5C7

Telephone: 519-679-8680

E-mail: hr@blackburnmedia.ca

On-line: <https://blackburnmedia.ca/accessibility-feedback-form>

Consultation

As part of developing BMI's Progress Report, BMI engaged in consultations with the public, its employees, the union (where applicable), and accessibility experts. In particular, BMI sought feedback from persons with disabilities regarding its operations in order to identify remove and prevent accessibility barriers.

BMI has engaged in ongoing consultations and sought feedback from the public through our corporate web portal, which has been live since BMI published its Accessibility Plan. Additionally, BMI has engaged in regular consultations with employees through an on-line accessibility survey to gather feedback on accessibility at the workplace. Further, informal employee feedback and employee feedback during any return to work / accommodation process is considered.

During our consultations, the feedback we gathered identified as follows:

- The need for ongoing training for new and existing employees of BMI that has a focus of accessibility including areas like workplace accessibility and inclusiveness in all the areas of the BMI Accessibility Plan.
- The consultations substantiated the importance to consult employees with disabilities when developing policies and procedures.
- The necessity of reviewing on a consistent basis a collaborative and cohesive plan to address accessibility in branches.

Feedback

In its Accessibility Plan, BMI identified accessibility goals in the following areas:

1. Employment
2. The Built Environment
3. Information and Communication Technologies
4. Communication, Other than Information and Communication Technologies
5. The Procurement of Goods, Services and Facilities
6. The Design and Delivery of Programs and Services
7. Transportation

The following sets out what feedback BMI has received with respect to each of the areas noted above, and how that feedback has been taken into consideration by BMI in the implementation of its Accessibility Plan:

1. Employment

BMI is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective team members with disabilities.

Feedback Received in the Area of Employment:

- The public feedback mechanism has not garnered any relevant feedback in this area. This public feedback mechanism remains live and BMI is committed to evaluating any feedback received.
- The employee feedback process has been supportive of the processes in place around Employment accessibility. BMI is committed to receiving employee feedback on an ongoing basis, whether formally or informally, including during return to work or accommodation processes.

Consideration of Feedback:

While BMI has not received public feedback or constructive feedback from employees / applicants as of present, BMI continues to follow the BMI Accessibility plan around Employment to do the following:

- **Recruitment:** BMI continues to notify the public of the availability of accommodations for applicants with disabilities in the recruitment process. This includes notice in all job postings and on BMI's website. This has been implemented and will remain in place going forward. BMI remains committed to reviewing, and as necessary, modifying existing recruitment policies, procedures, and processes.

- **Assessment and Selection:** BMI continues to notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process.
- **Notice to Successful Applicants:** BMI notifies successful applicants of its policies for accommodating employees with disabilities.
- **Informing Current Employees of Supports and Provisions of Communication Supports / Accessible Formats:** BMI notifies all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that consider an employee's accessibility needs due to a disability. BMI endeavours to provide employees with all relevant information on accommodations and engages in a case-by-case accommodation plan when a request for accommodation is raised. In each circumstance, BMI consults with the requesting employee in determining the suitability of an accessible format or communication support.
- **Documented Individual Accommodation Plans/Return to Work Process:** BMI incorporates new accessibility requirements under the Accessible Canada Regulations to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.
- **Performance Management, Career Development and Redeployment:** BMI will continue to consider accessibility needs when using performance management processes, in career development and when redeploying employees with disabilities.

2. The Built Environment

BMI is committed to removing barriers in public spaces and buildings that will uphold the dignity and independence of persons with disabilities.

Feedback Received in the Area of the Built Environment:

- While the public feedback mechanism has not garnered any relevant feedback in this area, the employee feedback process has identified some areas to consider around accessibility concerning the built environment. This ranges from accessible parking identification to accessible entrance signage. This public feedback mechanism remains live and BMI is committed to evaluating any feedback received from the public or its employees.

Consideration of Feedback:

- BMI has heard the feedback and updated or educated the public, clients/customers and employees on the procedures to accommodate access for

those that need it. This includes retraining staff to help ensure anyone can be granted access to the building for the purposes of the visit or work shift.

BMI continues to seek feedback from the public, clients/customers, accessibility expert(s) and staff regarding progress of barrier removal.

We continue to educate and train BMI staff with emphasis on accessibility for the built environment with the goal to remove identified barriers that are not new construction or significant redevelopment in the short term.

As stated in our plan, BMI has no current plans to engage in new construction or significant redevelopment of its facilities at present; BMI is committed to meet the ACA for all built obligations should any such construction take place in the future.

BMI has procedures in place to prevent service disruption to its accessible parts of public spaces. In the event of a service disruption, BMI will notify the public of the service disruption and alternatives available.

3. Information and Communication Technologies

BMI is committed to making company information and communications accessible to persons with disabilities.

Feedback Received in the Area of Information and Communication Technologies

- The public feedback mechanism has not garnered any relevant feedback in this area, the employee feedback process has identified some areas to consider around Information and Communications Technologies accessibility such as web features for visually and hearing impaired, ranging from audio prompts to text scaling. These range from This public feedback mechanism remains live and BMI is committed to evaluating any feedback received from the public or its employees.

Consideration of Feedback:

- This continues to be a two (2) year implementation plan for BMI as the current level of accessibility around Information and Communication Technologies is not sufficient to ensure that all information and communications technology products, services and digital content are accessible with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.1.

The feedback received has reiterated BMI's accessibility goals in this area to:

- Produce an inventory of IT systems to measure accessibility capabilities.
- Train IT employees to augment knowledge and understand of accessibility requirements to adapt services and interactions accordingly. ensuring that accessibility is tested through the lifecycle of the use of any new tool.

- Provide training to use accessibility features on all available programs. progressively introduce and adapt IT systems to new accessibility functionality.
- Review Web presence with a goal of improving user experience for persons with disabilities. Engaging persons with disabilities to test accessible compatibility of Web/mobile sites.
- BMI is committed to considering future feedback in working towards its accessible formats and communication supports as well as accessible web sites and web content goals.

4. Communication, Other than Information and Communication Technologies

BMI is committed to making company information and communications accessible to deaf persons in Canada.

Communication, other than information and communication technologies ("ICT") includes the use of American Sign Language, Quebec Sign Language and Indigenous sign languages. American Sign Language, Quebec Sign Language and Indigenous sign languages are recognized as the primary languages for communication by deaf persons in Canada.

Feedback Received in the Area of Communication, Other than ICT:

- The public feedback mechanism has not garnered any feedback in this area, the employee feedback process has been supportive of the processes in place in communication, other than ICT. This public feedback mechanism remains live and BMI is committed to evaluating any feedback received from the public or its employees.

Consideration of Feedback:

- BMI continues to follow the BMI Accessibility plan in communication, other than ICT outlined in our Accessibility plan over the next two (2) years.

All communication supplied through current traditional means including written and verbal. Additional communications formats (may include large print, recorded audio and electronic formats, and Braille) required for persons with disabilities is available upon request through BMI's Designated Accessibility Representative.

BMI continues to understand the importance of training for staff and management in the policies and procedures regarding accessibility to ensure all staff are knowledgeable of accessibility requirements and determining the standards for accessible communication.

BMI is working to incorporate new accessibility requirements under the communication, other than ICT standard to ensure that its information and

communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of deaf persons in Canada.

5. The Procurement of Goods, Services and Facilities

BMI is committed to removing barriers regarding the procurement of goods, services and facilities that will respect the dignity and independence of persons with disabilities.

Feedback Received in the Area of the Procurement of Goods, Services and Facilities:

- The public feedback mechanism and employee feedback process has not garnered any feedback regarding accessibility regarding Procurement of Goods, Services and Facilities. This public feedback mechanism remains live and BMI is committed to evaluating any feedback received from the public or its employees.

Consideration of Feedback:

- While there has been no feedback that identifies a barrier in this area, BMI recognizes the need to improve our contracting process to ensure that goods and services we obtain do not create accessibility barriers.
- BMI continues to ensure that any contract agreements are aware of BMI's accessibility policies and procedures incorporating accessibility comprehension in the procurement of goods, services and facilities.
- All employees receive training needed to help BMI procurement accessibility goals.

6. The Design and Delivery of Programs and Services

BMI is committed to removing barriers in the design and delivery of programs and services that will uphold the dignity and independence of persons with disabilities. We are also committed to giving people with disabilities the same opportunity to get involved with BMI and allowing people with disabilities to benefit from BMI in the same place and in a similar way as other clients.

Feedback Received in the Area of the Design and Delivery of Programs and Services:

- The public feedback mechanism and employee feedback process has not garnered any feedback regarding accessibility about the Design and Delivery of Programs and Services This public feedback mechanism remains live and BMI is committed to evaluating any feedback received from the public or its employees.

Consideration of Feedback:

- To date no service barriers have been identified given the nature of the radio service provided, on-site, at the clients' workplace, or through technology.

BMI has a procedure in place that accommodates clients/customers that identifies accommodations as needed. Trained staff are available to help ensure client's/customers are granted access to the services provided by BMI.

BMI continues to review and welcome feedback in this area from all stakeholders. We continue to train staff to build accessibility awareness when interacting and communicating with persons with disabilities. This covers the following areas: communications, assistive devices, service animals and support persons, and any notice of temporary disruption (if applicable).

7. Transportation

This section is not applicable to BMI.