



**TLN MEDIA GROUP**

**ACCESSIBILITY PLAN 2024-2027**

**1 June 2024**

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## **Three-Year Accessibility Plan**

**2024-2027**

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### **1. General**

#### **i) Introduction**

TLN Media Group is very pleased to publish its first Accessibility Plan for 2024-2027. This inaugural plan outlines our approach to identifying, removing, and preventing barriers to accessibility in alignment with the *Accessible Canada Act (ACA)*.

At TLN Media Group, we strive to create an inclusive environment for our employees, stakeholders, clients and audiences. We view this plan as the beginning of an ongoing journey regarding accessibility within our organization.

TLN Media Group is a Canadian independent, immigrant-owned broadcaster serving Canadian audiences across the country. Our mission is to inform and entertain millions of Canadians through media, events, storytelling, and shared experiences.

We are excited about the journey ahead and committed to ensuring that our organization and services are welcoming, inclusive, and accessible.

#### **ii) TLN Media Group's Contact Information, Feedback Process and Alternative Format Requests**

If you would like to provide TLN Media Group with feedback relating to accessibility and our organization, our Feedback Process, or our Accessibility Plan 2024-2027, please contact our Accessibility Champion who will be pleased to assist:

TLN Media Group **Contact Information:**

Ingrid Zaldivar in Human Resources, our Accessibility Champion, is responsible for receiving all accessibility-related feedback, questions and comments.

You can reach Ingrid through the following methods:

Mailing address: 901 Lawrence Ave W. Level 2, Toronto, ON M6A1C3

Phone: 416-744-5738

Email: [accessibility@tlnmediagroup.com](mailto:accessibility@tlnmediagroup.com).

## **Requesting Alternate Formats: Accessibility Plan and Accessibility Feedback Process**

Our Accessibility Plan and Accessibility Feedback Process are available in alternative formats such as: print, large print, and electronic.

To request an alternate format, please contact Ingrid using the contact details above.

### **Anonymous Feedback**

If you prefer to remain anonymous, please do not include personal details like your name or contact information in your communications with our organization.

Any personal information you provide will remain confidential unless you explicitly consent to share it with others.

## **2. Accessibility Summary**

TLN Media Group's Accessibility Plan represents an important step towards creating a more accessible and inclusive environment within Canada's media sector. We are dedicated to ongoing engagement as well as to meeting the objectives of the *Accessible Canada Act* in the years ahead. As we prepared our Accessibility Plan, we conducted a number of initiatives to gain invaluable input and to work collaboratively with persons with disabilities, our colleagues and stakeholders.

These initiatives include the following:

- Appointment of an Accessibility Champion within our organization.
- Establishment of an Accessibility Committee.
- Conducted an internal assessment of our organization regarding accessibility, including a review of our facilities, workstations, employment policies, communications, technology and broadcasting services.
- Conducted an internal employee consultation in the spring of 2024.

- Initiated outreach and external consultations with accessibility experts and persons living with disabilities.
- Enrollment in specialized accessibility training for our employee(s).

**Guiding Principles for Accessibility at TLN Media Group:** At TLN Media Group, we appreciate the principle of “Nothing Without Us.” We are also mindful of the important principles set out in section 6 of *the Accessible Canada Act*, which form the basis of our Accessibility Plan and our accessibility decision-making work for the future.

These principles are:

1. “All persons must be treated with dignity regardless of their disabilities
2. 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
3. all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities
4. all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities
5. laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their Guidance on the Accessible Canada Regulations – Module 1: Accessibility Plans 3 environments and the multiple and intersecting forms of marginalization and discrimination faced by persons
6. persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures
7. 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.”<sup>1</sup>

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<sup>1</sup> [Guidance on the Accessible Canada Regulations - Module 1: Accessibility Plans.](#)

### **3. Consultations for TLN Media Group's Accessibility Plan**

At TLN Media Group, engaging with our employees, clients, stakeholders and audiences is a vital part of our regular activities. While preparing our Accessibility Plan, we also conducted several consultation initiatives to obtain invaluable input from our community and persons living with disabilities.

#### **i) Accessibility Feedback Page**

In our efforts to ensure accessibility within our organization, we published an Accessibility Feedback Page in May 2023 required by the *Accessible Canada Act* and the related Regulations. Our Accessibility Feedback Page can be found here <https://www.tln.ca/accessibility/>.

We have also included at **Appendix 1** the language of our Accessibility Feedback Page.

Our Accessibility Feedback Page was designed to collect information from persons with disabilities, the public, our employees and stakeholders.

We have not yet received any feedback or issues identified regarding our organization over the last year. We will continue to work to ensure awareness about our Accessibility Feedback Page over the course of the next three years.

#### **ii) Accessibility Committee**

In our ongoing commitment to creating an inclusive workplace, we also established an Accessibility Committee in the spring of 2024. This committee is composed of designated accessibility champions from various departments within our organization: Human Resources, Operations, IT, and Production. Their primary role is to facilitate discussions, identify potential accessibility barriers, reflect on input from persons with disabilities, assist with the preparation of our Accessibility Plan, and spearhead initiatives to enhance accessibility across our organization. This committee met to provide important input and insights into the preparation of our Accessibility Plan. Our Accessibility Committee will also assist with the preparation of our Accessibility Progress Reports in the years ahead.

#### **iii) Internal Employee Consultation**

Alongside the creation of our Accessibility Committee, we conducted an optional internal online employee accessibility consultation over the course of one week in May 2024. During this consultation, we asked all employees a series of **13 questions** designed to uncover any barriers they may have encountered concerning accessibility within our organization. Our survey also sought input on how to prevent and remove accessibility barriers in the future. **21 employees** responded to the survey, representing about 32%

of our fulltime employees. At this time, none of the respondents identified themselves as a person living with a disability.

Moving forward, we will continue to encourage open dialogue about accessibility and invite all employees to contribute their experiences and suggestions. Our goal is to maintain a proactive approach to identifying and addressing accessibility issues within our organization.

#### **iv) External Consultations**

Over the next three years, we plan to engage with disability advocacy groups, experts on accessibility and persons with disabilities. Our engagement with these organizations will allow us to consult with persons living with disabilities and to learn more about barriers they may face in the workplace with hiring practices, communications technologies, and in relation to accessibility and broadcasting services.

To that end, we have initiated outreach and external consultations with the CNIB Access Labs. This engagement will allow us to learn more about potential accessibility barriers and how they may be addressed.

## **4. Accessibility Priorities – Section 5 of the Accessible Canada Act**

The purpose of the *Accessible Canada Act* is to allow all Canadians, especially Canadians with disabilities, live in a country without barriers to accessibility by 1 January 2040.

Section 5 of the *Accessible Canada Act* identifies the following areas where the identification, removal, and prevention of accessibility barriers must be pursued:

- a) Employment
- b) The built environment
- c) Information and communications technologies
- d) Communications other than information and communications technologies
- e) The procurement of goods, services, and facilities
- f) The design and delivery of programs and services
- g) Transportation
- h) Other areas designated under regulation, such as conditions of licence for broadcasters.

The following portions of our Accessibility Plan address these priority areas of accessibility.

## **A. Employment**

TLN Media Group is dedicated to inclusivity in our hiring, retention, and promotion practices. Currently, we **employ 65 employees. Our head office is located in Toronto, Ontario and we operate 9** television stations for Canadian audiences to enjoy.

Our organization's Human Resources Department also plays an important role of ensuring accessibility within our company. We aim to foster a supportive and equitable workplace that facilitates the recruitment, retention, and career progression of all employees, with attentive consideration to the accessibility needs of those with disabilities.

While we have made great strides over the last few years, we recognize that there is still more work to be done.

The following are the action items and timelines that we propose in relation to employment and accessibility over the next three years.

<b>Action</b>	<b>Planned Completion</b>
Further develop the mandate and objectives of TLN Media Group's Accessibility Committee	Year 1
Review and update of TLN Media Group's policies, procedures, guidelines, and practices related to accessibility	Year 1 and Year 2
Assess the accessibility training needs of all Departments, particularly those that have a direct impact on accessibility, such as the Human Resources Department	Year 1
Ensure that HR Manager(s) receive accessibility training	Year 1
Following assessment, ensure that 50% of identified staff receive accessibility training	Year 2
Ensure that remaining identified staff receive accessibility training.	Year 3

## **B. Built Environment**

TLN Media Group is committed to ensuring equitable access to our offices and built facilities for employees, stakeholders, clients, and visitors. Our goal is to create environments that are accessible and that promote safety, comfort, and independence for individuals with varying needs.

The following table outlines our proposed action items in relation to the built environment over the next three years.

Action	Planned Completion
Where possible, provide accessible parking to persons living with disabilities.	Year 1
Review and assess our organization's facilities to determine what measures can be undertaken to render them more accessible	Year 1
Ensure that our organization's events and employee gatherings are hosted at accessible venues, where possible.	Year 1

**C. Information and Communication Technologies (ICT)**

As a Canadian broadcaster that works within the digital landscape, we place a high priority on ensuring that our Information and Communication Technologies (ICT) are accessible. This commitment is reflected in our proactive measures as well as our commitment to our employees and organization. The following sets out our proposed action items in the area of ICT.

Action	Planned Completion
Conduct an audit of the communications technology options available for persons with disabilities	Year 1
Conduct an audit of our organization's policies and procedures for accommodating requests for use of accessible technologies	Year 1
When possible, provide employees with accessible technology tools and resources.	Year 3

**D. Communication, Other Than ICT**

Clear and effective communication is crucial to our operations. We are committed to adapting traditional communication methods to better serve all employees and stakeholders, with special attention to the needs of those with disabilities. Our efforts include improving the accessibility of printed materials and ensuring that our in-person interactions and other non-digital forms of communication are designed to promote an inclusive environment.



<b>Action</b>	<b>Planned Completion</b>
Conduct an audit of our organization’s communications tools and assess how they may be more accessible	Year 1
Create a Policy for ensuring that internal and external communications are more inclusive and accessible (consider type and size of font for email messages, message boards, etc.)	Year 2
Create a Policy for ensuring that virtual conference calls and meetings are conducted on accessible platforms.	Year 1

**E. Procurement of Goods, Services, and Facilities**

Procurements are conducted mainly by our organization’s **Operations Department**. This Department conducts important work in fulfilling our mandate and key priorities. Through our procurement practices, we strive to reflect our commitment to accessibility. The following table sets out our action items in relation to procurements.

<b>Action</b>	<b>Planned Completion</b>
Conduct an audit of current procurement policies, processes and procedures and consider options to improve accessibility within our organization	Year 1
Incorporate accessibility criteria into procurement policies and procedures.	Year 3

**F. Design and Delivery of Programs and Services**

As an independent Canadian broadcaster, providing high quality, entertaining, and engaging media services to Canadian audiences is the primary mandate of our organization.

We recognize the importance of designing and delivering programs and services that are accessible to our audiences, including those with disabilities.

Our commitment is reflected in our continuous efforts to evaluate, adapt, and enhance the accessibility of our programs and services to ensure they are comprehensible, reachable, and usable for everyone, regardless of their abilities.

Action	Planned Completion
Conduct a review and assessment of how programming content licensed for our broadcasting service(s) as they relate to accessibility	Year 1
Conduct a review of the content available on our web-based platforms and determine how accessibility may be enhanced.	Year 2

**G. Transportation (If Applicable)**

This area of accommodation and accessibility is not relevant to TLN Media Group. We therefore have no comments for this section.

**H.Licence Conditions and Requirements Under the Broadcasting Act:**

The Canadian Radio-Television and Telecommunications Commission (CRTC) regulates and supervises broadcasting in Canada. As such, the CRTC requires broadcasters to comply with certain accessibility requirements, such as closed captioning, described video and audio description of audiovisual content (these obligations can vary depending on a broadcaster’s licensing requirements).

As required by section 42(1) of the *Accessible Canada Act*, we have set out a list applicable conditions and requirements that TLN Media Group adheres to pursuant to our broadcasting licence(s) that ensure accessibility of our broadcasting services.

As such, TLN Media Group’s licensed broadcasting services adheres to applicable conditions of licence (now referred to as conditions of service under the revised *Broadcasting Act*) related to accessibility, ie. those listed under **Standard requirements for television stations, discretionary services, and on-demand services under Section 9 of Broadcasting Regulatory Policy CRTC 2016-436:**

***Accessibility***

*9. The licensee shall caption 100% of the English- and French-language programs broadcast over the broadcast day, consistent with the approach set out in A new policy with respect to closed captioning, Broadcasting Public Notice CRTC 2007-54, 17 May 2007.*

*10. Consistent with Accessibility of telecommunications and broadcasting services, Broadcasting and Telecom Regulatory Policy CRTC 2009-430, 21 July 2009, the licensee shall:*

*a) ensure that advertising, sponsorship messages and promos in the English and French languages are closed captioned; and*

*b) implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal, and this captioning reaches the distributor of that signal, in its original form.*

*11. In regard to the quality of closed captioning:*

*a) for French-language services, the licensee shall adhere to the requirements set out in the appendix to Quality standards for French-language closed captioning – Enforcement, monitoring and the future mandate of the French-language Closed Captioning Working Group, Broadcasting Regulatory Policy CRTC 2011-741-1, 21 February 2012, as amended from time to time; and*

*b) for English-language services, the licensee shall adhere to the requirements set out in the appendix to English-language closed captioning quality standard related to the accuracy rate for live programming, Broadcasting Regulatory Policy CRTC 2016-435, 2 November 2016, as amended from time to time.*

*12. In accordance with Let's Talk TV: Navigating the Road Ahead – Making informed choices about television providers and improving accessibility to television programming, Broadcasting Regulatory Policy CRTC 2015-104, 26 March 2015, the licensee shall file a report relating to the provision of closed captioning when distributed on non-linear online platforms operated by the licensee, in a format deemed acceptable by the Commission, by no later than 30 November of each year for the broadcast year ending the previous 31 August, consistent with other reporting requirements.*

*13. The licensee shall provide audio description for all the key elements of Canadian information programs, including news programming.*

*14. In accordance with Let's Talk TV: Navigating the Road Ahead – Making informed choices about television providers and improving accessibility to television programming, Broadcasting Regulatory Policy CRTC 2015-104, 26 March 2015:*

*a) if the licensee broadcasts four hours or more per broadcast week of English- or French-language programming drawn from any of the program categories listed below, it shall, by the beginning of the fourth year of the first licence term during which this condition of licence applies, provide a minimum of four hours of described video per broadcast week for that programming;*

*b) if the licensee broadcasts less than four hours per broadcast week of English- or French-language programming drawn from any of the program categories listed below, it shall, by the beginning of the fourth year of the first licence term during which this condition of licence applies, provide described video for all of that programming.*

*These requirements apply to programming drawn from the following program categories set out in Item 6 of Schedule 1 to the Television Broadcasting Regulations, 1987, as amended from time to time: 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 to programming targeting preschool children (0-5 years of age) and children (6-12 years of age).*

Our exempt broadcasting undertakings are subject to the accessibility requirements set out in Broadcasting Order CRTC 2015-88.

We strive to meet these requirements during each broadcast year. We will continue to do so over the next three years.

<b>Action</b>	<b>Planned Completion</b>
Strive to operate in compliance with licensing and regulatory requirements relating to closed captioning, described video and audio description.	Year 1, Year 2 and Year 3
Explore best practices within the broadcasting sector to serve persons with disabilities.	Year 1, Year 2 and Year 3

## **5. Conclusion**

As we move forward our Three-Year Accessibility Plan, TLN Media Group is inspired by a vision of an inclusive community for all Canadians. This plan reflects an important step towards diversity, inclusion, and equality.

We look forward to continuing to work with persons with disabilities, our stakeholders, the broadcast community, and our clients to contribute to achieving the goals and objectives of the *Accessible Canada Act*.

## **Appendix 1**

### **TLN Media Group's Feedback Process**

#### **Accessibility**

TLN Media Group is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness, and equality of opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements outlined by the principles set out in the Accessible Canada Act.

#### **Accessibility Policy**

If you have any comments on the manner in which TLN Media Group provides goods and services to persons with disabilities, or wish to request documents in an accessible format, you may contact **TLN Media Group's Accessibility Officer** at 416-744-8200 ext. 253 or [accessibility@tlnmediagroup.com](mailto:accessibility@tlnmediagroup.com) or at 901 Lawrence Avenue West, Level 2 Toronto, Ontario, M6A 1C3.