

# Ethnic Channels Group

ACCESSIBILITY PLAN 2024-2027



# THREE-YEAR ACCESSIBILITY PLAN

2024-2027

1 JUNE 2024

## 1.GENERAL

Ethnic Channels Group Ltd. (ECGL) 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 ECGL 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.

ECGL is a Canadian independent broadcaster serving Canadian audiences across the country. It is the world's largest ethnic broadcaster that operates 100+ television channels from around the globe, serving the multicultural population in Canada, USA, MENA and Australia, across 20+ language groups. By selecting the best international channels and delivering them directly to viewers' homes via satellite, cable, IPTV and OTT providers, ECG provides exclusive sought-after programming to audiences worldwide. Our mission is to connect, reflect, and enrich the lives of Canadians by delivering a diverse array of compelling, entertaining and high-quality programming.

We are also a member of the Independent Broadcast Group (IBG)/Le groupe de diffuseurs indépendants (GDI). The IBG is an association of independent broadcasters serving Canadian audiences in English, French, Indigenous and a multitude of third languages, reflecting the rich tapestry of Canada's population. In the winter of 2024, a number of IBG members created an Accessibility Working Group with a view to preparing our respective Accessibility Plans for 2024-2027. We worked in collaboration with other IBG members to prepare and conduct our consultations with stakeholders, persons

with disabilities, and experts that were both internal and external to our respective organizations.

The feedback we have received from persons with disabilities, our employees, viewers, stakeholders, and experts was instrumental in completing our Accessibility Plan 2024-2027. We are excited about the journey ahead and committed to ensuring that our organization and services are welcoming, inclusive, and accessible.

## 2. ECGL CONTACT INFORMATION, FEEDBACK PROCESS AND ALTERNATIVE FORMAT REQUESTS

If you would like to provide ECGL 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:

NAILA SEUNATH, our Accessibility Champion, is responsible for receiving all accessibility-related feedback, questions and comments. You can reach NAILA through the following methods:

Mailing address: Ethnic Channels Group Ltd.  
120 Amber Street, Markham, Ontario  
Canada, L3R 3A3  
Phone: (416) 736-7577  
Fax: (416) 736-7677  
Email: [accessible@ethnicchannels.com](mailto:accessible@ethnicchannels.com)

To request an alternate format, please contact NAILA 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.

### 3. ACCESSIBILITY SUMMARY

**ECGL's Accessibility Plan** marks a pivotal stride in fostering a more inclusive environment within Canada's media landscape. Committed to sustained engagement and aligning with the goals outlined in the Accessible Canada Act, we embark on a journey to prioritize accessibility for all. In formulating our plan, we undertook various initiatives to solicit invaluable insights and foster collaboration with individuals with disabilities, as well as our colleagues and stakeholders. Through these concerted efforts, we endeavour to cultivate an environment where accessibility is not just a goal but an inherent aspect of our media sector's fabric.

These initiatives include the following:

Establishment of **Accessibility Working Group** with Certain IBG Members: In the winter of 2024, we formed an Accessibility Working Group comprised of accessibility champions from five independent broadcaster organizations, as well as legal counsel with expertise in regulatory compliance and accessibility. This Working Group met weekly to discuss action items, best practices and the requirements of the *Accessible Canada Act*. This collaborative approach was highly effective for small Canadian businesses seeking to create a more accessible environment for Canadians.

In the winter of 2024, we formed an **Accessibility Committee** comprising leaders from various departments within our organization. These include Naila Seunath, VP Business Development, Irina Volkova, Executive Producer, Paula Sipidias, SVP, Finance and Operations. Our Accessibility Committee meets regularly to identify, remove, and prevent accessibility barriers within our environment. We also met to provide important input and insights into the preparation of our Accessibility Plan.

In the spring 2024, we conducted an **internal overall assessment** of our organization regarding accessibility, including a review of our facilities, workstations, employment policies, communications, technology, and broadcasting services.

In spring 2024, ECGL undertook an **internal consultation process** with employees to gather critical information and include in our Accessibility Plan.

We initiated an online survey to gather insights on workplace accessibility. This optional survey was distributed to all employees, allowing a week for responses. We value their firsthand experiences for identifying and addressing potential barriers within our workplace, revealing that 5% of our employees anonymously identified as a person living with a non-visible disability. That allowed us to gather valuable feedback and insights. This engagement provided a deeper understanding of their experiences and offered essential guidance on how we might enhance our organization to better serve their needs.

In 2024, our IBG Accessibility Working Group conducted purposeful **External Consultations** with disability advocacy groups, accessibility experts, and individuals with disabilities, including SignAble Vi5ion, the Canadian National Institute for the Blind (CNIB), and DeafBlind Ontario Services. These engagements provided invaluable insights into the challenges faced by individuals with disabilities, particularly concerning hiring practices, communication technologies, and accessibility in broadcasting services.

At ECGL, we highly value the **Guiding Principle for Accessibility**, particularly the ethos of "Nothing Without Us." Additionally, we are cognizant of the significant principles delineated in section 6 of the Accessible Canada Act. These principles serve as the foundation for both our Accessibility Plan and our future endeavours in accessibility decision-making.

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.”

#### 4. CONSULTATIONS FOR ECGL ACCESSIBILITY PLAN

At ECGL, engaging with our employees, clients, stakeholders, and audiences is integral to our daily operations. In tandem with preparing our Accessibility Plan, we launched various consultation initiatives to gather invaluable input from our community and individuals living with disabilities. In our efforts to ensure accessibility within our organization, we published an **Accessibility Feedback Page** in 2023 as required by the *Accessible Canada Act* and the related Regulations. Our Accessibility Feedback Page can be found here:

<https://www.ethnicchannels.com/accessibility-feedback.php>

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 in a range of areas, such as:

- Content accessibility (ie. closed captions, described video)
- Digital accessibility (ie. assistive technology use on the website)
- Facilities (ie. facilities access, events accessibility)

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.

In our ongoing commitment to creating an inclusive workplace, we also established an **Accessibility Committee** in winter of 2024. This committee is composed of designated accessibility champions from various departments within our organization. These include Naila Seunath, VP Business Development, Irina Volkova, Executive Producer, Paula Sipidias, SVP, Finance and Operations.

Their main responsibility involves facilitating discussions, pinpointing potential accessibility barriers, incorporating feedback from individuals with disabilities, contributing to the development of our Accessibility Plan, and leading efforts to improve accessibility throughout our organization.

In tandem with establishing our Accessibility Committee, we held an optional **internal online accessibility consultation** for employees spanning one week in April 2024. Through this initiative, we presented a series of questions aimed at identifying any accessibility barriers experienced within our organization. Additionally, we sought suggestions on strategies to prevent and eliminate such barriers in the future. We received a robust response rate, with 72% of employees participating in the survey.

The survey has yielded valuable insights into the experiences of our employees. Presently, our Accessibility Committee and Human Resource are diligently analyzing the results. These findings will play a pivotal role in guiding potential changes and enhancements within our organization.

Going forward, we remain committed to fostering open dialogue on accessibility and welcome all employees to share their experiences and suggestions. Our aim is to uphold a proactive stance in identifying and resolving accessibility issues within our organization.

As part of our mission to enhance accessibility and inclusivity, members of our Accessibility Committee participated in **External Consultations** with notable disability advocacy groups throughout April/May 2024. Our engagements involved fruitful interactions and discussions with representatives from **SignAble Vi5ion, Access Labs through the CNIB, and DeafBlind Ontario Services.**

As a broadcaster, our primary mediums of engagement revolve around visuals and audio. Consequently, while our consultations encompassed general accessibility awareness, there was a particular emphasis on engaging organizations representing individuals with physical disabilities. This focus was essential for addressing the specific accessibility challenges inherent in our broadcasting services.

**SignAble Vi5ion** is an organization run by founder Leah Riddell who is a consultant, ASL instructor, and deaf woman. Leah is a champion for creating a more equitable world, and champions ASL as a means to not only create inclusion for the deaf, hard of hearing, and deaf-blind, but also for many other communities, such as new Canadians, autistic people, neurodivergent communities, and seniors.<sup>[1]</sup> Leah communicated to the IBG participants through using ASL interpreters. Her presentation focused on cultural etiquette on how to interact with deaf, hearing impaired, and deafblind individuals, including learning essential strategies for effective communication and respectful engagement. Leah also discussed accessibility barriers to employment, workplace accommodations, communications technologies, and broadcasting services. Additionally, Leah discussed strategies and best practices for preventing accessibility barriers.

Leah provided several significant recommendations, including best practices for conducting job interviews with individuals who are deaf or hard of hearing, optimal online platforms for hosting accessible virtual meetings, and appropriate inclusive language for referring to persons living with disabilities. Additionally, a Question and Answer session was conducted to facilitate a deeper understanding of the needs and interests of individuals living with disabilities.

The **CNIB** is a non-profit organization committed to reshaping perceptions of blindness today. Through innovative programs and impactful advocacy, CNIB empowers individuals affected by blindness. CNIB's Access Labs, a social enterprise, collaborates with businesses, organizations, and government institutions to foster barrier-free communities and workplaces, ensuring all Canadians with disabilities can thrive.

During their presentation to the IBG, CNIB focused on enhancing general accessibility awareness, emphasizing the importance of eliminating everyday workplace barriers to create a more inclusive and secure environment for everyone. They provided insights on approaching



individuals who are blind or have low vision, along with actionable steps organizations can take to prioritize the safety, dignity, and well-being of all employees, especially those with disabilities. CNIB also addressed topics such as the duty to accommodate, the significance of accessible web and media platforms, and strategies for promoting inclusivity across various work-related functions.

**DeafBlind Ontario Services** provides support not only for individuals who are deafblind but also for those who are deaf, hard of hearing, and non-verbal with developmental disabilities. The organization delivers tailored services that cater to each individual's unique needs, communication methods, and aspirations for a fulfilling life.

During their presentation to the IBG, DeafBlind Ontario Services featured speakers who included a deafblind individual and a person who is deaf. Supported by an ASL interpreter and an expert staff member, their presentation focused on technologies to enhance workplace performance and communication with individuals with disabilities. They also addressed strategies for fostering a more accessible work environment and ensuring the accessibility of broadcasting services. Additionally, both presenters underscored the importance of technology in creating an inclusive workplace and provided insights into effectively collaborating with ASL interpreters for workplace meetings and accommodations.

This direct feedback proved invaluable, offering participants firsthand insights into the daily challenges and technological requirements of individuals with auditory and visual disabilities. A Question and Answer session at the presentation's conclusion fostered an exchange on creating a more accessible work environment.

Furthermore, sessions with these organizations and individuals living with disabilities centered on key areas:

- **Workplace Accommodation for Persons with Disabilities: Exploring strategies to optimize our built environment for better support of employees with disabilities.**

- Hiring, Retaining, and Promoting Persons with Disabilities: Discussions focused on enhancing human resources policies for equitable opportunities.
- Technologies for Optimal Workplace Performance and Communications: Examining current and emerging technologies to enhance workplace performance and communication for persons with disabilities.
- Best approaches for communicating with potential future employees and colleagues living with disabilities.
- Broadcasting Services and Accessibility: Addressing improvements needed to ensure broadcasting services are fully accessible to all audience members.

These discussions with expert representatives allowed for in-depth exploration of critical accessibility areas within the workplace and broadcasting services. They reflect our ongoing commitment to learning from and collaborating with persons with disabilities, experts, and stakeholders. The sessions were highly insightful, informative, and inspiring.

#### 4. ACCESSIBILITY PRIORITIES

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:

- Employment

- The built environment
- Information and communications technologies
- Communications other than information and communications technologies
- The procurement of goods, services, and facilities
- The design and delivery of programs and services
- Transportation
- 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.

### Employment

ECGL is dedicated to inclusivity in our hiring, retention, and promotion practices. Currently, we employ 34 employees. Our head office is located in Markham, ON and we operate 100+ television stations for Canadian audiences to enjoy.

Our Human Resources Department is pivotal in ensuring accessibility throughout our company. We strive to cultivate a supportive and fair workplace that promotes the recruitment, retention, and advancement of all employees, with a particular focus on accommodating the accessibility needs of individuals with disabilities.

Despite the progress we've achieved in recent years, we acknowledge that there is still room for improvement.

ACTION	PLANNED COMPLETION
Enhance the mandate and the objectives of ECGL's Accessibility Committee	Year 1

ACTION	PLANNED COMPLETION
Review and update of ECGL’s policies, procedures, guidelines, and practices related to accessibility	Year 1 and 2
Conduct a review of workstations at work and assess accessibility and accommodation needs.	Year 1
Revise recruitment procedures to guarantee accessible job postings, accommodating interview processes, and onboarding materials available in various formats.	Year 1 and 2
Assess the accessibility training needs of all Departments, particularly those that have a direct impact on accessibility.	Year 1
Conduct further consultations with employees over the next three years as needed	Year 1, 2, 3

**BUILT ENVIRONMENT**

ECGL is dedicated to ensuring equitable access to our building and facilities for all employees, stakeholders, clients, and visitors. Our aim is to establish environments that are not only accessible but also promote safety, comfort, and independence for individuals with diverse needs.

ECGL offers flexible work options, including on-site, hybrid, and remote arrangements. We empower all employees to select the environment that optimally supports their productivity and well-being. Our objective is to cultivate a workplace that accommodates the diverse needs of our staff, empowering each individual to perform at their peak while guaranteeing accessibility and comfort regardless of their location.

ACTION	PLANNED COMPLETION
Review and evaluate our organization's facilities to identify opportunities for enhancing accessibility measures.	Year 1
Develop a plan of the work that should be undertaken to create more accessible facilities	Year 2
Implement the facilities plan to ensure greater accessibility in our built environment such as building ramps, expanding doorways, as well as creating accessible studios, editing suites and workstations where applicable	Year 1
Request guests to indicate any accommodation needs prior to their visit to ECGL facilities.	Year 1

**INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)**

ACTION	PLANNED COMPLETION
Review the communications technology options available for persons with disabilities within our organization	Year 1
Review our organization's policies and procedures for accommodating requests for use of accessible technologies	Year 1
Conduct an audit of our website	Year 1
Update websites and applications to ensure that they are accessible	Year 1 and 2

ACTION	PLANNED COMPLETION
Provide employees with accessible technology tools and resources as needed	Year 1 and 2

**COMMUNICATION, OTHER THAN (ICT)**

Clear and effective communication is paramount to our operations. We are dedicated to modernizing traditional communication methods to cater to the diverse needs of all employees and stakeholders, with particular emphasis on those with disabilities. Our initiatives encompass enhancing the accessibility of printed materials and ensuring that our in-person interactions and other non-digital communication channels foster an inclusive environment.

ACTION	PLANNED COMPLETION
Review our organization s communications tools and assess how they may be more accessible	Year 1
Ensure that internal and external communications are more accessible	Year 1
Ensure that virtual conference calls and meetings are conducted on accessible platforms	Year 1

**DESIGN AND DELIVERY OF PROGRAMS AND SERVICES**

As an independent Canadian broadcaster, our primary mandate is to deliver high-quality, entertaining, and engaging media services to Canadian audiences.

We acknowledge the significance of creating programs and services that are accessible to all, including individuals with disabilities. This commitment is evident in our ongoing endeavours to evaluate, adapt, and improve the accessibility of our offerings. We strive to ensure that our programs and services are comprehensible, reachable, and usable for everyone, irrespective of their abilities.

ACTION	PLANNED COMPLETION
Conduct a review of the content available on our web-based platforms and determine how accessibility may be enhanced where applicable	Year 2

**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. As required by section 42(1) of the *Accessible Canada Act*, we have set out a list applicable conditions and requirements that ECGL adheres to under pursuant to our broadcasting licences that ensure accessibility of our broadcasting services. We strive to meet these requirements during each broadcast year. We will continue to do so during the next three years.

**CRTC Accessibility Requirements**

ECGL’s Canadian services operate under an exemption order for smaller discretionary services (Broadcasting Order CRTC 2015-88). Under this order, our services are required to

1. provide closed captioning for English- and French-language programs broadcast over the broadcast day;

2. ensure that advertising, sponsorship messages and promos in English and French are closed captioned by the fourth year of operation;
3. adhere to quality standards on closed captioning;
4. implement a monitoring system to confirm that closed captioning is transmitted and received by distributors in its original form; and
5. provide audio description for key elements of Canadian information programs.

ACTION	PLANNED COMPLETION
Operate in compliance with licensing and regulatory requirements relating to closed captioning, described video and audio description where applicable	Year 1, 2, 3
Explore best practices within the broadcasting sector to serve persons with disabilities	Year 1, 2, 3

**CONCLUSION:**

As we progress with our Three-Year Accessibility Plan, ECGL is driven by a vision of fostering an inclusive community for all Canadians. This plan signifies a significant stride towards diversity, inclusion, and equality.

We eagerly anticipate further collaboration with individuals with disabilities, stakeholders, the broadcast community, and our clients to contribute to realizing the goals and objectives outlined in the Accessible Canada Act.

**Appendix 1**

Ethnic Channels Group Limited (ECGL) welcomes your feedback on Accessibility. We are very proud of the service we provide. We are committed to identifying and removing accessibility barriers within our organization. The purpose of this Accessibility Feedback online form is to collect information to inform our



Accessibility Plans, progress reports and to improve our accessibility services related, but not limited, to the following areas:

- Content accessibility (e.g., closed captions and described video).
- Digital accessibility (e.g., assistive technology use on ECGL's website and app.)
- Facilities (e.g., ECGL facilities, studios and events accessibility).

Please fill out the form below to provide your feedback on accessibility issues or suggestions, or to receive accessibility support. Feedback can be provided anonymously.

- **Email:** [accessible@ethnicchannels.com](mailto:accessible@ethnicchannels.com)
- **Phone:** (416) 736-7577
- **Online-Form:** <https://www.ethnicchannels.com/accessibility-feedback.php>
- **Mail:** Ethnic Channels Group Limited  
120 Amber Street  
Markham, Ontario  
Canada  
L3R 3A3

YOU CAN ALSO CONTACT US:

ECGL Accessibility Champion: Naila Seunath, VP, Business Development

ACKNOWLEDGEMENT OF FEEDBACK

Except for anonymous feedback, ECGL will acknowledge the receipt of all accessibility feedback provided in the same way it was received. Thank you for your Feedback! ECGL is committed to identifying, preventing, and reducing barriers to accessibility.

PRIVACY

By using this form, you agree to the collection, use and storage of the personal information you provide to us. We will use such information solely to evaluate and improve our accessibility services and, subject to the Personal Information Protection and Electronic Documents Act, such information will not be disclosed without your consent. ECGL may use third party service providers for the collection and storage of data and such providers are required to maintain the confidentiality of such data.