



ACA, Accessibility Plan, Golden West Broadcasting Ltd. (Golden West) 2023-06-01
Version 1, Amendment 1 (2023-08-09)

ACCESSIBILITY PLAN POLICY

Intent

Golden West Broadcasting Ltd. (Golden West) is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers, and any visitors who enter the premises, access information provided by the company, or use the company's goods and services.

The company will work to identify and remove barriers, and prevent new barriers, for persons with disabilities as they relate to employment, communication, the built environment, goods and services, and transportation at Golden West. This policy outlines the company's accessibility plan and strategy for identifying, removing, and preventing these barriers.

General

Contact to receive feedback for the Golden West Accessibility Plan:

Human Resources Manager
PO Box 950, Altona MB, R0G 0B0
204.324.2337
gwhr@goldenwest.ca

Executive Summary

We are a Canadian radio and digital media company with radio stations and internet portals in Manitoba, Saskatchewan and Alberta. Serving primarily small markets, we operate 38 radio stations and 18 internet portals in 22 communities. We also offer holistic marketing and organizational development consulting to local businesses.

We generously give back to our communities by supporting organizations that support accessibility for persons with disabilities. By raising money and providing promotional radio/online support from our local radio stations and internet portals, we help promote fundraising campaigns for these organizations.

Internally, we seek to remove barriers to employment in areas such as our recruiting practices, gradual return to work policies for short and long-term disability cases, and by providing reasonable accommodation to individual requests.

Golden West solicited feedback/comments from the public, as required, beginning in June 2022, and none has been received. In the absence of feedback, we have worked at creating the best plan possible.

Definitions

Barrier: 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 a person with an impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment, or a functional limitation.

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.

GUIDELINES

Accessibility Plan

The accessibility plan includes an overview of our policies, programs, practices, and services in relation to the identification and removal of barriers and the prevention of new barriers. The accessibility plan was prepared and published by June 1, 2023, and will be updated every three years following that, or sooner if necessary.

The accessibility plan has included an invitation for public consultation via feedback forms on our local internet portals. We intend to continue consultations with persons with disabilities on an ongoing basis. Golden West adheres to all requirements made by regulation in the development and ongoing maintenance of the accessibility plan.

The accessibility plan is offered in any of the following formats upon request:

- Print;
- Large print;
- Audio; and
- Electronic.

Requests to receive an accessibly formatted version of the Golden West Accessibility Plan are available by phone, email or via the **Accessibility Feedback** sections on each of community portal's home page.

The accessibility plan will be provided 45 days after the day the request was received.

AREAS OF ACCESSIBILITY

Our Employment Practices

Our Employment Equity and Accessibility Committee is aware of the *Accessible Canada Act* and our Golden West Accessibility Plan. Our online job postings state that, "*Golden West is committed to providing a fair and equitable work environment and encourages applications from qualified women, men, visible minorities, Indigenous peoples, and persons with disabilities.* We provide training on fair selection practices to our hiring managers.

We continue to seek input, work to identify and eliminate employment barriers when they are identified. Our goal is to identify barriers and make recommendations to management on how to eliminate the barriers. Reasonable timelines are established for eliminating barriers when identified.

Our Built Environment

Our Employment Equity and Accessibility Committee seeks input on our built environment from our staff, our listeners, and our clients. Our goal is to identify barriers and make recommendations to management on how to eliminate the barriers. Reasonable timelines will be established for eliminating when barriers are identified.

Our Information and Communication Technologies (ICT)

Our Employment Equity and Accessibility Committee seeks input on our Communication and Information Technologies from our staff, our listeners, and our clients. Our goal is to identify barriers and make recommendations to management on how to eliminate the barriers. Reasonable timelines will be established for eliminating when barriers are identified.

Communication other than ICT

Our Employment Equity and Accessibility Committee seeks input on our other types of communications, including but not limited to verbal and signage. Our goal is to identify barriers and make recommendations to management on how to eliminate the barriers. Reasonable timelines will be established for eliminating when barriers are identified.

Our Processes to Procure Goods, Services and Facilities

Our Employment Equity and Accessibility Committee will seek input on our procurement process from our suppliers, listeners, and clients. Our goal is to identify barriers and make recommendations to management on how to eliminate the barriers. Reasonable timelines will be established for eliminating when barriers are identified.

Our Design and Delivery of our Programs and Advertising Services

Our Employment Equity and Accessibility Committee will seek input on how we design and deliver our radio programs, online features, and our advertising services with regard to accessibility. Our goal is to identify barriers and make recommendations to management on how to eliminate the barriers. Reasonable timelines will be established for eliminating when barriers are identified.

Our Transportation Considerations

Our Employment Equity and Accessibility Committee will seek internal and external input on our use of transportation with regard to accessibility. Our goal will be to identify barriers and make recommendations to management on how to eliminate the barriers. Reasonable timelines will be established for eliminating when barriers are identified.

PRINCIPLES OF ACCESSIBILITY

Golden West supports and believes in the principles of the Accessible Canada Act. We believe that being an equitable and accessible company advances Golden West's core purpose: *We exist to make our communities better.*

When establishing policies and/or changes to physical location, Golden West takes into account the principals of the Accessible Canada Act. We currently take reasonable steps to remove and prevent barriers to provide accessibility for all persons, and will continue to observe these principles.

Some existing initiatives are:

- New builds are constructed to be accessible.
- Managers are trained in equitable hiring practices.
- We provide gradual return to work plans for employees who have been on disability leave, including options for reasonable accommodation where needed

- Ensured corporate website contains font and contrast options

License Conditions Under Part II of the Broadcasting Act

We note that all Golden West stations are members of the Canadian Standards Broadcast Council. Adhering to established codes is an important ongoing role that broadcasters play in eliminating barriers that may be present in radio broadcasts.

Consultations

- Through the work of our Accessibility Committee, we have regular ongoing consultations, addressing staff feedback that identifies barriers within the company. Our feedback form is available to staff 24/7 via the Golden West General Teams Channel.
- As part of their weekly reporting process, our managers report on all accessibility requests, and any accommodations made or still required.
- Our Accessibility Plan is posted on our main website, goldenwest.ca. It will be accessible from the home page. We invite feedback on our plan and ask for input on identifying barriers.
- We will consider other methods of seeking input on our plan from our listeners, our clients, and members of our community, including charitable organizations that we support.

Submitting Feedback

Golden West welcomes feedback from its listeners, clients and members of the community regarding the accessibility plan and any barriers encountered by persons with disabilities. Individuals who provide formal feedback receive acknowledgement of their feedback along with any resulting actions. Individuals can submit feedback via our community online portals, or by obtaining a physical copy of the feedback form from the front desk of any of our company locations. Or by mail to:

Human Resources
Golden West
PO Box 950, Altona MB, R0G 0B0
gwhr@goldenwest.ca

Golden West welcomes feedback from its employees regarding the accessibility plan and any barriers encountered by persons with disabilities. Employees who provide formal feedback receive acknowledgement of their feedback, along with any resulting actions based on the concerns or complaints they submit.

Employees can submit feedback via a digital form. Physical copies may be requested as well.

Employees can provide feedback anonymously if desired, and feedback remains confidential unless the person consents to the disclosure of their personal information. Feedback is received in whatever format the individual providing the feedback is most comfortable with. The feedback process is published in conformance with all applicable legislation. Any changes to the accessibility plan or the feedback process are published as soon as possible, and notice of any changes are reported to the accessibility commissioner. The personal information of anyone who provides feedback remains confidential in accordance with all applicable privacy laws.

Progress Reports

Golden West Broadcasting Ltd. prepares, publishes, and submits a progress report to the accessibility commissioner regarding the implementation of the accessibility plan as required by legislation. This

report follows a similar structure to the accessibility plan and includes feedback and contact information, information about the consultations completed for the development of the plan, and any feedback received on the accessibility plan. The report addresses how the consultations and feedback were taken into consideration during the process. Progress reports can be made available upon request and are available in all accessible formats the accessibility plan is available in.

Document Retention

The company keeps detailed records of the creation, implementation, and updating of the accessibility plan and progress reports. The accessibility plan and feedback process are retained on Golden West's digital file server for seven years from the publication date. Any feedback provided to the company is retained for seven years from the date it is received. Where necessary, names and personal information of individuals and employees who participated in the feedback process are redacted to ensure confidentiality and privacy.

Budget and Resources

Budget and resources will be made available as required for the work of our Accessibility Committee – working to identify and eliminate barriers.

Our radio stations will continue to provide radio promotional support to many local organizations and events that work to overcome accessibility challenges.

We will continue to make donations to community charity organizations that support persons with accessibility challenges.

Training

We have hosted a number of company-wide staff training sessions related to employment equity issues including mental health awareness and employment barriers that persons in equity categories face.

We view staff awareness and a positive company culture related to these matters as very important. We will do training from time to time when we see opportunities to train. This will include in-person sessions and on-line sessions (via zoom for example) on important topics – based on needs identified by our Accessibility Committee.