Westman Communications Group Accessibility Plan
(2023-2026)

General Overview:

Westman Media Cooperative Ltd., operating as Westman Communications Group (WCG) was formed in 1977 as a cooperative cable television distributor. The company has grown significantly over the years and now serves 62 communities in southwestern Manitoba. As a leader in communication and information technology, we offer a variety of products and services including cable TV, Internet, and Voice in both residential and commercial markets. Additionally, Westman WCG TV provides local community programming in 18 communities.

Executive Summary

Westman Communications Group (WCG) strives to be a diverse and inclusive organization, focused on providing an exceptional customer experience while treating all individuals in a manner that respects their dignity and independence. WCG's dedication to service excellence includes our commitment to the *Accessible Canada Act* (the Act)[1] and identifying and removing accessibility barriers.

WCG supports and fosters a culture of diversity and inclusivity which is embedded in our core values of providing equal opportunities, including enabling the full participation of our team members, customers, and stakeholders in the delivery of our services. This enables us to provide the highest quality of customer and team member experience.

We acknowledge that accessibility is a continuing and vital aspect of being an inclusive organization and we are committed to continual enhancements in all aspects of our operations. To achieve this, identifying and removing barriers that persons with disabilities may meet is a vital aspect of our plan. This requires a continued commitment to open and candid discussions with stakeholders, coupled with the development of clear and concrete commitments to eliminating barriers.

Accessibility Statement

Westman Communications Group recognizes our responsibility to build and foster a diverse, inclusive, accessible culture and environment. We are committed to supporting and encouraging the full and equitable participation of team members in our workforce. To achieve this, we recognize that identifying, preventing, and removing barriers experienced by persons with disabilities is vital.

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[1] The Accessible Canada Act (S.C. 2019, c. 10) and its regulations are referred to as the "Act"

Our Feedback Process

Our commitment to inclusion and accessibility encompasses communication, collaboration, and continual improvement. To achieve this, a feedback process has been established.

Feedback may consist of a suggestion, compliment or complaint relating the accessibility of WCG's goods, services, or facilities, or to a specific member experience in being accommodated with accessible formats, or communication supports, which may be requested when providing feedback.

We value and welcome your feedback on how well we are meeting your expectations and enhancing your experience with our team.

- To provide feedback, or to request a description of our accessibility feedback process in an alternative format, we recommend using our online accessibility feedback form.
- Your feedback can be submitted to our team anonymously. However, we may be able to provide a better serve to you, if you provide your contact information, a description of the interaction, suggestion, compliment or complaint, additional comments, preferred alternative format or accessible communication support (as applicable). This information will not be shared with any third party.
- If you require any support while providing feedback, please contact us and we will do our best to meet your needs.

By contacting us, you agree to the collection, use and storage of your personal information provided for the purposes of responding to your feedback and improving member experience.

Upon request, our accessibility feedback process is available in alternative formats, such as, print, large print, braille, audio format, electronic format or any other formats that are agreed upon. Requests for documentation in braille or audio format will be fulfilled within 45 business days of the request. All other requests will be fulfilled within 15 business days.

Accessibility feedback will be received by Senior Director, Human Resources, our designated person responsible for receiving and responding to accessibility feedback.

Feedback will be received by one of our feedback mechanisms (noted below).

Feedback will be acknowledged (other than anonymous feedback) as soon as feasible but at the latest, within 15 days of receiving the feedback.

Alternate Formats Available

WCG will provide any information relating to our Accessibility Plan and/ or feedback process in alternative formats upon request in accordance with the process identified above.

If you have any questions or require this information in an alternative format, please contact: Senior Director, Human Resources (Accessibility and Equity, Diversity, and Inclusion Officer)

Phone 204 717 2030

TTY (Message Relay Service): Call 7-1-1, Ask the TTY Operator to connect you to 204 717 2030.

Email: accessibility-feedback@westmancom.com
In person or via mail:
1906 Park Ave.
Brandon, MB
R7B 0R9
https://westmancom.com/wcg-accessibility

Definitions

Accessibility: As defined by the *Ontario Human Rights Commission*: A general term for the degree of ease that something (e.g., device, service, physical environment, and information) can be accessed, used, and enjoyed by persons with disabilities. The term implies conscious planning, designing and/or effort to make sure something is barrier- free to persons with disabilities. Accessibility also benefits the general population, by making things more usable and practical for everyone, including older people and families with small children.[2]

Barrier: As defined by the *Accessible Canada Act*: "Anything – including physical, architectural, technological, attitudinal, anything that based on information or communications or anything that is the result of a policy or practice – that hinders the full and equal participation of society of persons with impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or functional limitation"[3].

Disability: As defined by the *Accessible Canada Act*: "Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment – or functional limitation – whether permanent, temporary

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[2] https://www.ohrc.on.ca/en/teaching-human-rights-ontario-guide-ontario-schools/appendix-1-glossary-human-rights-terms
[3] The Accessible Canada Act (S.C. 2019, c. 10) and its regulations are referred to as the "Act"

or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society."[4]

Keys Areas Identified by the Accessible Canada Act

Employment

Accessibility will be embedded in our practices throughout a team member's journey on the WCG team. Accommodations will be made available to candidates and team members upon request and accessibility should be embedded into our policies, processes, and practices, such as: recruitment, team member onboarding, learning and development, short- and long-term disability leaves, return to work processes and redeployment.

Identified Barriers:
1. At present, the number of job candidates and team members hired with disabilities is lower than the current labour market availability in our region.
2. We need to heighten our engagement, promotion, and communications to support accessibility and encourage self-disclosure while enhancing a supportive culture.

Immediate Goal(s) and Action(s) 2023:
1. Enhance the careers section of our website to heighten the visibility of available positions on our team.
2. Enhance communication and education within our hiring managers regarding accessibility.
3. Enhance learning and development initiatives with a specific focus on accessibility to promote inclusive behaviors.
4. Enhance our Team Member Exit Survey to further engage with persons with disabilities who are leaving to capture their insights on any challenges, barriers, and opportunities for enhancements.

Medium-Term Goal(s) and Action(s) 2023-2024:
5. Benchmark our talent acquisition processes against leading accessibility practices.

The Built Environment

The creation of a workspace free from physical barriers is pivotal to fostering a culture of inclusivity.

Identified Barriers:
1. Despite recent renovations, some spaces may continue to limit the mobility of team members with disabilities.

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[4] The Accessible Canada Act (S.C. 2019, c. 10) and its regulations are referred to as the "Act"

2. Automatic door openers are not installed to access the washrooms.

Immediate Goal(s) and Action(s) 2023:

1. Ensuring our workplaces are accessible and inclusive for team members and stakeholders.

Medium-Term Goal(s) and Action(s) 2023-2024:

3. Review and evaluate accessibility features in the second level facilities design.
4. Review automatic door openers to access washrooms.
5. Review WCG's built environment against the current version of the National Standards of Canada Accessible[5] design for built environment to identify any gaps.
6. Ensure that the facilities smoke, fire, and other emergency alarms have both visual and auditory alerts.
7. Incorporate accessibility considerations in the identification and investigation of occupational health and safety matters.

Information and Communication Technologies (ICT)

We aim to achieve a high standard for digital accessibility within our operations by addressing information and communication technology-related barriers.

Identified Barriers:

1. Our current website does not reflect all accessibility protocols.
2. The need for individuals to request accessibility features to be activated may limit the ability of team members and stakeholders with disabilities to use them.

Immediate Goal(s) and Action(s) 2023:

1. Ensure team members receive the required training and software to create accessible documents.

Medium-Term Goal(s) and Action(s) 2023-2024:

2. Ensure our website, mobile applications, and social media content comply with WCAG 2.1 Level AA protocols, where applicable.
3. Integrate accessibility into the design of new digital properties.
4. Complete a gap analysis on internal software systems to ensure they are accessible.
5. Explore methods of offering additional assistance to stakeholders when they are completing any required forms.

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[5] https://www.csagroup.org/wp-content/uploads/B651-18EN.pdf

6. Develop standards for embedding accessibility features into meetings, corporate engagements, and other corporate events, when appropriate.

Long-Term Goal(s) and Action(s) 2024-2025 and thereafter:

7. Sign languages are the primary languages of communication for many people who are deaf, deafened, or hard of hearing. As such, we will be consulting with disability organizations in reviewing and prioritizing some key documents to be prepared in ASL and LSQ formats, such as, our accessibly information.

Communication (Other than ICT)

We aim to achieve a high standard of accessibility within the delivery of our internal and external communication services.

Identified Barriers:

1. Marketing collateral and other communication delivery systems may not meet accessibility protocols.
2. Members may not be aware they can request certain types of information or services in alternative formats to meet their accessibility requirements.

Immediate Goal(s) and Action(s) 2023:

1. Ensure accessibly requirements are included in the development of marketing and advertising collateral.

Medium-Term Goal(s) and Action(s) 2023-2024:

2. Ensure team members receive training on creating and delivering organizational communications in an accessible manner.
3. Develop accessibility guidelines for creating internal and external documents.

Long-Term Goal(s) and Action(s) 2024-2025 and thereafter:

1. Develop and incorporate accessibility requirements in the delivery of member and community engagement initiatives.

Procurement of Goods, Services and Facilities

The *Accessible Canada Act* requires that we consider accessibility requirements when procuring, and as part of our provisioning of services and facilities, where appropriate (for example, accessible technology, materials, and amenities).

Identified Barriers:

1. Accessibility considerations are not fully rooted within our procurement framework.
2. There is no formal process to determine if external venues are accessible.

Medium-Term Goal(s) and Action(s) 2023-2024:

1. Evaluate, enhance, and monitor current procurement policies, practices, and tools to embed accessibility considerations in our procurement system.
2. Develop a venue selection process which embodies an accessibility framework to enable team members or other stakeholders to access venues.

The Design and Delivery of Programs and Services

The inclusion of accessible methods and protocols within our design and delivery of our internal and external programs and services is vital to cultivating a culture of accessibility. As such, we aim to incorporate accessibility considerations in our key activities.

Identified Barriers:

1. The absence of a formal comprehensive and documented approach to incorporating accessibility standards for WCG services and initiatives potentially results in an inconsistent customer and team member experience.
2. Team members have varied levels of understanding of barriers experienced by team members and customers with disabilities and this may impact how they respond to inquiries and requests for accommodation and how they provide customer service and support.
3. The absence of these standards limits the ability to evaluate organizational programs, services, events, and engagements.

Immediate Goal(s) and Action(s) 2023:

1. Monitor customer and team member experience surveys to identify any areas requiring improvement.

Medium-Term Goal(s) and Action(s) 2023-2024:

2. Based on accessibility best practices, develop, implement, and promote an internal accessibility framework for program and services design and delivery.
3. Develop a high-level accessibility metric to track our progress over time and embed the metric into our internal reporting systems.
4. Develop and implement a training program for team members to heighten understanding and the tools available to them.

Transportation

Transportation is not applicable to WCG's operations.

Our Consultation Process

WCG is committed to fostering an accessible culture and environment where team members and stakeholders can fully and equally participate, while growing professionally within our organization. To this end, we will continue to consult and engage with persons with disabilities; capture insights and data from various surveys; and leverage external expert resources within this field; to achieve our accessibility goals.

Regulatory Conditions

The WCG Accessibility Plan has been created within the following regulatory frameworks.

1. Accessible Canada Act, S.C 2019 c.10[6]
2. Telecommunications Act S.C 1993, c.38[7]
3. Broadcasting Act S.C 1991, c.11[8]

The Accessible Canada Act identifies 7 key principles[9]:

1. Everyone must be treated with dignity
2. Everyone must have the same opportunity to make for themselves the life they are able and wish to have
3. Everyone must be able to participate fully and equally in society
4. Everyone must have meaningful options and be free to make their own choices, with support if they desire
5. Laws, policies, programs, services, and structures must take into account the ways that different kinds of barriers and discrimination intersect
6. Persons with disabilities must be involved in the development of the design of laws, policies, programs and services and structures; and
7. Accessibility standards and regulations must be made with the goal of achieving the highest level of accessibility.

Reporting On Our Accessibility Plan

In accordance with the requirements stipulated in the *Accessible Canada Act*, we will publish a status report annually, and we will review and update our accessibility plan every three years.

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[6] The Accessible Canada Act (S.C. 2019, c. 10)

[7] https://laws-lois.justice.gc.ca/eng/acts/T-3.4/page-1.html

[8] https://laws.justice.gc.ca/eng/acts/B-9.01/

[9] https://www.canada.ca/en/employment-social-development/programs/accessible-people-disabilities/act-summary.html

Conclusion

The WCG Accessibility Plan incorporates the seven key evaluation areas as identified by the Accessible Canada Act, which provide the framework for our environmental scan, enabling the identification of barriers to accessibility. We are committed to the implementation of the developed 3-year action plan along with ongoing consultation efforts with stakeholders to identify and rectify any other unidentified barriers as of the time of submitting this report.