

# **ACCESSIBILITY PLAN**

**June 2023**



**Pattison**  
Media

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# 1. SUMMARY

## Introduction

This Accessibility Plan is presented in response to the Accessible Canada Act (ACA) and the Accessible Canada Regulations (regulations) that federally regulated entities, which includes broadcasting enterprises such as Pattison Media Ltd. (PML), prepare and publish Accessibility Plans.

The ACA has been passed into law, to bring about a more accessible Canada for people with disabilities. PML has published this plan to not only be in compliance with its regulatory obligations but also to support its commitment to a more equitable and accessible environment for all.

## Feedback

If you have feedback on this Accessibility Plan, we would appreciate hearing from you! Please contact: Kate Marshall, 460 Pemberton Terrace, Kamloops, BC, V2C 1T5, (250) 851-3212 or at [kate.marshall@pattisonmedia.com](mailto:kate.marshall@pattisonmedia.com).

## Our Plan

PML has developed this Accessibility Plan to help make our workplaces, information, and services more accessible for people with disabilities. This Plan is in effect for 3 years, from 2023 – 2025. We will review and publish a new plan before the third anniversary of this plan.

Our accessibility goals are:

1. To review our physical locations with the goal of exploring how access and exit can be improved for persons with disabilities to independently access our facilities.
2. To review our methods of company communications and research ways to improve the accessibility of the material by persons with disabilities.



3. To provide feedback mechanisms for improvements to our company communication platforms that would provide more accessibility to people with disabilities.
4. We will review and encourage feedback from applicants as part of our job posting protocol to ensure that there are steps taken to eliminate barriers for people with disabilities in applying for available positions.
5. We will give training to all our staff about accessibility.
6. We will review our websites with the goal of making them more accessible for people with disabilities.
7. We will write guidelines about accessibility applicable to our purchasing practices to ensure that new products purchased are accessible to people with disabilities.

## **Getting Feedback from People with Disabilities**

To help us make this Accessibility Plan, we surveyed our PML Team members, some of whom identify as people with disabilities. Contributing Team members also have family members who are persons with disabilities and have contributed to this plan from the valuable perspective of caregiver. We consulted with members of our Employment Equity Committee (“EEC”) which reviews issues pertaining to disability issues on a quarterly basis. As part of this plan, our EEC will be reaching out to organizations in the communities we serve to better understand and help our company respond to accessibility issues. We also published on June 1, 2022, a contact process enabling the public to give us feedback on accessibility issues.

We have used feedback from these resources to help create this plan.



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## **2. GENERAL**

### **2.1 Statement of Commitment**

PML is dedicated to being accessible to everyone. No one person with disabilities is the same as another and we see this plan as an opportunity for our company to bring our workplaces, activities and services to a level that would provide accessibility for all persons with disabilities. We are open to hearing from people with disabilities who interact with our company as an employee, client, or visitor, as this process will require evolution over time for us to address changing needs. We commit to addressing barriers as soon as possible even if they are not outlined in this Accessibility Plan.

### **2.2 Description of Pattison Media Ltd.**

Headquartered in Kamloops, B.C., PML is the country's largest, private, western-based media company. Spanning British Columbia, Alberta, Saskatchewan and Manitoba, our operations currently include 48 radio stations, 3 television stations, 20 online news portals, podcasting, and digital marketing agencies, in 29 different Canadian communities. PML is a division of the Jim Pattison Group, a diversified group of operating businesses, based in Vancouver, which has grown to become one of the largest, privately held companies in Canada.

### **2.3 Contact Information & Feedback Process**

PML welcomes feedback about this Accessibility Plan whether the contributor offers their name and contact information or chooses to remain anonymous. We are committed to reviewing all contributions we receive and to taking steps to address barriers identified through this feedback.

The link to submit feedback is: <https://form.jotform.com/rod.schween/pml-accessibility-feedback-form>.

The person responsible to collect and retain any feedback we receive is:



Kate Marshall

Executive Assistant to the President and Executive Team

250-851-3212

[info@pattisonmedia.com](mailto:info@pattisonmedia.com)

460 Pemberton Terrace

Kamloops, BC V2C 1T5

Information about how to give feedback is also available on our public website at [www.pattisonmedia.com/accessibility](http://www.pattisonmedia.com/accessibility)

It is our goal to respond to any feedback, unless it is submitted anonymously, within 5 business days.

We will maintain an archive of all feedback submitted via this online link and any other method of submission in a single document for the duration of 7 years. This information will be used as a measurement of our progress towards our accessibility goals, document identified barriers and help us to refine our Plan in future editions.

## **2.4 Alternative Formats**

This Plan is available in alternative formats and a description of our feedback process can be requested by contacting:

Kate Marshall

Executive Assistant to the President and Executive Team

460 Pemberton Terrace

Kamloops, BC, V2C 1T5

[info@pattisonmedia.com](mailto:info@pattisonmedia.com)

250-851-3212

An electronic version of this Plan that works with assistive technology is available on our public website at <http://www.pattisonmedia.com/accessibility>.

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PML will provide this Plan in print within 15 days of a request.

PML will also provide this Plan in Braille or audio format within 45 days of a request.

## 2.5 Definitions

This plan uses these definitions:

**Disability:** An impairment, or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary or can change over time.

**Barrier:** Anything that might prevent people with disabilities full and equal participation in society. Barriers can be based in attitudes, the built environment, technology, in how information is communicated or can be the result of a policy or procedure.

**Accessibility:** Greater accessibility is achieved through the design of products, devices, services, environments, technologies, policies, and rules in a way that allows all people, including people with a variety of disabilities to access and use them, as independently as the person wishes.

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## 3. AREAS DESCRIBED UNDER SECTION 5 OF THE ACA

### 3.1 Build Environment

#### OVERVIEW

PML has physical locations in more than 30 different cities across Western Canada from BC to Manitoba. This network of physical spaces directly impacts our ability to be accessible and inclusive. The current state of accessibility across our built environment portfolio differs from region to region based on the various municipal, provincial, and territorial building codes along with the year of building construction. While the barriers experienced in our build environment are many, prevention of barriers is the primary goal for newly leased locations, and active work is ongoing to remove barriers within existing spaces. As many of our real estate locations are leased, there can be changes



which are solely within our landlord's control, impacting accessibility. We strive in our lease negotiations to address accessibility concerns where they arise.

Members of the public occasionally visit these office spaces; however, this is not a common occurrence. Primary access is by our employees. During our consultation process we received feedback regarding our physical locations and are planning further review to improve the accessibility of the office spaces as well as continuing to promote flexible work arrangements wherever possible. Our goals are described in the next section.

## **ACCESSIBILITY GOALS**

- By December 2023 we will have the PML Health and Safety Committee review emergency evacuation plans through the lens of people with disabilities for all our locations.
- By June of 2024 we are planning to review accessibility for all our buildings and assess the need for further accessibility features where possible.
- As office leases expire, PML will look at leasing space that is as accessible as possible. This will be done in consultation with employees who have disabilities and with accessibility advisors where possible.

## **3.2 Employment**

### **OVERVIEW**

PML has approximately 650 employees in 4 provinces. In the fall of 2023, we will be readministering the Employee Self-Identification Form to collect up-to-date data on the diversity of our personnel.

Our personnel include people who work in our offices in each market and employees who work remotely as well. PML has been able to create virtual teams who live in different provinces and fulfill the duties of one department. Some jobs in the broadcasting industry can be performed remotely while others are limited to being in a broadcasting facility.

We strive to be reflective of Canada's diversity and report on our employees with disability data annually through Employment Equity reporting. Achieving the goals outlined below will help us to improve accessibility for our current and future employees with disabilities.

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## ACCESSIBILITY GOALS

- By the end of 2023, PML will conduct a review of hiring processes to look for barriers including reviewing the process for job applications for individuals with disabilities who experience barriers to the online system.
- By the end of March 2024, PML will review and update our corporate policy about accommodations for employees and candidates with disabilities.
- By the end of 2024, PML will conduct a review of the accessibility of the platform where we post jobs. Once this review is complete, we will strive to remove any barriers.

### 3.3 Information and Communication Technologies (ICT)

#### OVERVIEW

As a company, PML uses the following technologies:

- Our public website of [www.pattisonmedia.com](http://www.pattisonmedia.com)
- Web news portals
- Social media platforms
- Internal communication platforms

Our public website has some accessibility features. However, there are improvements that can be made.

The posts that we make and jobs that we post on social media can also be more accessible.

The technology that our employees use has not been reviewed for accessibility. Our plans to address these are outlined below:

#### ACCESSIBILITY GOALS

- By June 2024, PML will conduct a website accessibility audit that includes user testing by persons with disabilities. We will remove the minor website barriers found throughout consultations and others that are discovered. These include:
  - Changes to text font and size
  - Improvements to structure and formatting

- Improving navigation of the website for people who are using a screen reader.
- By December 2024 PML will provide web accessibility training for all employees who create or edit webpages or content for the web.

## 3.4 Communication, other than ICT

### OVERVIEW

We produce content, report news, and sell advertising on our radio stations, TV stations, web portals, podcasts, and digital media. We communicate internally with our Team as well as externally with the public.

As a media company, our main source of communicating our information is by ICT. However, each of the locations in which we operate has its own autonomy to communicate with their audience, public and internally, in a manner that best suits their needs.

PML President, Rod Schween, visits each of our locations once a year, to provide an update on what is going on in the broadcast industry and in our company. He also makes himself available for one-on-one appointments with any member of our team, (during his in-market visit or virtually, at any time), who wishes to communicate with him in the manner that best suits their needs. This allows for personal communication and connection to instill and support a workplace environment that has open and honest conversations and helps those who have a difficult time with virtual meetings or group meetings.

Our 3 TV stations already participate in and subscribe to Closed Captioning and a Described Video service for our broadcasts. We have company protocols in place to ensure that these services are enabled and available to people with disabilities for all our broadcasts.

### ACCESSIBILITY GOALS

- By June 2023, any document for the public will be available in alternative formats.
- By the end of 2023, all PML markets will do a review of their non-ICT communications to identify barriers for people with disabilities and will endeavor to remove these barriers.



- By the end of 2023 we will increase the accessibility of our social media by doing the following:
  - Making our contact information and website address visible on all platforms
  - Writing posts in plain language and without acronyms
  - Capitalizing the first letter of each word in hashtags and placing hashtags at the end of captions
  - Adding alt-text for images
  - Making sure photos have sharp colour contrast
  - Using timed closed captions for videos and Descriptive Transcripts where possible
- By December 2024, PML will provide accessibility training for all employees who work on communication activities.

## 3.5 Procurement

### OVERVIEW

PML buys products and services that support our activities. Currently, accessibility is not considered for any products and services.

### ACCESSIBILITY GOALS

- By the end of 2024, PML will develop rules for accessibility in procurement. These rules will include:
  - When and how accessibility should be considered
  - Identifying areas where accessibility can/should be considered

## 3.6 Design & Delivery of Programs & Services

### OVERVIEW

PML is federally regulated to provide the essential services of radio and TV broadcasts. As a broadcast license holder, it is our duty to ensure that our representation of the local area and its people is accurate, entertaining, timely and fair.

Most of the way that people interact with us as a company is through our Information and Communication Technologies (ICT) or communication, other than ICT. Because of this, the goals contained in the previous sections of this

plan will help make the design and delivery of our programs and services more accessible. We will continue to monitor internal and external feedback to identify any additional barriers related to design and delivery of programs and services to address any existing barriers and prevent any new ones.

### **3.7 Transportation**

#### **OVERVIEW**

PML does not provide transportation services to the public.

PML provides station vehicles, in most locations, for use by team members primarily in the programming, technical, news or promotions departments.

These vehicles require a valid driver's license from our employees in order to be approved to use them.

Our current company Accommodation Policy addresses the need for flexibility and allowances in this area, such as when an employee with a disability is unable to drive or needs to use their own accommodated vehicle to perform their job duties. PML currently has policies in place to either send an alternate employee or provide mileage for use of their personal vehicle.

### **3.8 Organization-wide Initiatives**

#### **OVERVIEW**

PML is committed to organizational-wide training, as outlined by the following goal.

#### **ACCESSIBILITY GOALS**

- By the end of 2024, PML will commit to training all employees on disability and accessibility awareness.

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## **4. CONSULTATIONS**

#### **OVERVIEW**

PML is committed to listening and learning from people with disabilities. To uphold this commitment, PML will continue to consult people with disabilities in all aspects of this Plan.

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The following section outlines how we consulted with people in preparation of this 2023–2025 Accessibility Plan. We recognize that consultations need to continue. We are dedicated to building relationships of trust with people with disabilities to engage in effective consultations going forward.

For this Plan, we consulted our employees, some of whom are people with disabilities and some of whom are their caretakers. We consulted with members of our EEC which has responsibility for assessing our employment equity initiatives under the Federal *Employment Equity Act*. We posted a feedback process June 1, 2022, to encourage feedback on accessibility issues.

## **4.1 Consultations with Employees**

### **OVERVIEW**

We consulted with employees through an electronic survey that was anonymous but gave the option of including their contact information. We sent the survey to all employees and asked them to share their accessibility experiences working for PML. The survey also asked them to share any barriers that they have encountered or have witnessed others experiencing as well as if they wished our head office to respond to their feedback. We received 96 responses from our employees.

The feedback encompassed comments primarily about the buildings that our locations are in. They also identified some technical barriers within our communication platforms, recommended more sensitivity training for people with disabilities, and workplace accommodations related to invisible disabilities such as mental health.

## **4.2 Consultations with Other People Who Have Disabilities**

### **OVERVIEW**

PML consulted with other people outside of our own employees who have disabilities through the activities of our EEC which experience helped inform this plan.

### **ACCESSIBILITY GOALS**

- By the end of 2023, PML will consult with persons with disabilities outside its employee group to find ways that we could improve this Plan.

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## 5. CONCLUSION

PML is committed to improving accessibility by implementing this Accessibility Plan in the upcoming years. We are committed to making sure that we are accessible to everyone. We will continue examining our practices and operations to address barriers when they are identified. PML is determined to improve our accessibility by listening to feedback and working with people with disabilities to remove these barriers and allow for them to interact with us as independently as possible.

