



Multi-Year Accessibility Plan 2023-2026

ACCESSIBILITY REQUIREMENT	STATUS	COMPLIANCE DEADLINE	COMPANY RESPONSIBILITY
GENERAL			
Feedback to: Janet Brooks, Human Resources Manager 321B Raglan St., Renfrew, ON 613-432-6936 ext. 9991 janetb@mbcmedia.ca	Founded in Renfrew in 2004 with a single radio station, My Broadcasting Corporation has grown to 18 local radio stations in small communities across Ontario, specializing in bringing local content to these markets. There are approximately 125 employees spread across these stations. The stations offer oldies, classic rock, country, top 40 and other musical genres. Underpinning the organization is a commitment to local news, local events, and community support where it operates.		
PART 1 - EMPLOYMENT			
<i>1.1 Documented Individual Accommodation Plans</i>			
Develop and implement a written process for the development of documented individual accommodation plans for employees with disabilities.	Completed process	01/01/16	Human Resources/ Station Managers
<i>MBC Action Plan</i>			
MBC will develop and implement a written process for documented individual accommodation plans for employees with disabilities. As per ACA requirements, the plan will include the following elements. <ol style="list-style-type: none"> a. The way an employee requesting accommodation can participate in the development of the accommodation plan. b. The steps that will be taken to protect the privacy of the employee's personal information. c. The content of the accommodation plan will be restricted to only those required to facilitate the plan or supervise the employee. The accommodation plan template will include a section identifying the individuals that will have knowledge of the plan and will require each person to sign an acknowledgement of the confidentiality of its contents. d. The frequency with which the individual accommodation plan will be reviewed and updated. 			

<ul style="list-style-type: none"> e. An outline of how the reason for denial of an accommodation will be communicated to the requesting employee f. The means of providing the individual accommodation plan in a format that considers the employee's accessibility needs due to a disability 			
1.2 Recruitment, Assessment and Selection			
<ul style="list-style-type: none"> 1. Notify employees and the public about the availability of accommodation for applicants with disabilities in the company's recruitment processes. 2. During the recruitment process, notify applicant selected to participate in selection and assessment processes that accommodations are available upon request. 3. Should a job applicant request accommodation, consult with the individual and adjust to suit his or her needs. 4. Notify successful applicants of the company's policies for accommodating employees with disabilities. 	Ongoing	01/01/16	Human Resources/ Station Managers
MBC Action Plan			
<ul style="list-style-type: none"> 1. MBC has an accessibility statement posted on our online Join Our Team page notifying applicants that reasonable accommodations will be made upon request to ensure that individuals with disabilities are able to fully participate in our recruitment efforts. As not all applicants apply through our online postings, this statement will also be included on future job postings to ensure that it is properly communicated to all potential applicants. 2. Successful applicants will be informed of the availability of accommodations relating to MBC's selection/assessment processes upon initial contact from the hiring manager or human resources. 3. Our internal Accommodation Policy will be provided to all new hires as part of their 90 Day Training. This policy includes how MBC will support employees with disabilities. Alternative formats of the policy will be made available upon request. 			
1.3 Accessible Formats and Communication Supports for Employees			
<ul style="list-style-type: none"> 1. Where an employee makes a disability request MBC will work with that individual to provide or arrange for the provision of accessible formats and communication supports for: <ul style="list-style-type: none"> a) Information that is needed to perform the employee's job; and b) Information that is generally available to employees in the workplace. 2. Where a request is made, work with the requesting employee to determine the suitability of the proposed accessible format/communication support. 	Ongoing	01/01/15	Human Resources/ Station Managers
MBC Action Plan			

<ol style="list-style-type: none"> 1. The availability of accessible formats and communication supports has been communicated to all employees through the company's internal Accommodation Policy. All future employees will be made aware of their availability through the same policy which is provided through the 90 Day Training Plan. 2. Upon receiving a request, Human Resources will work with the employee and any individuals responsible for providing the information (for example the employee's manager) to deliver a suitable accessible format or communication support. Prior to involving the employee's manager, consent will be obtained from the employee. 			
1.4 Information for Employees			
<ol style="list-style-type: none"> 1. Communicate the company's policy on accommodating employees with disabilities to all staff members. 2. Ensure that all new hires are informed of the company's policy on accommodating employees with disabilities. 	Ongoing	01/01/16	Human Resources
MBC Action Plan			
<ol style="list-style-type: none"> 1. MBC's Accommodation and Accessibility Policies have been developed. Verbal reminders of the policies will occur at a weekly Monday Morning Meetings at each station location by the station manager or by the office Health & Safety representative. The policies will be posted on the company's Health & Safety on-line bulletin boards. 2. Provide all new hires with the Accommodation and Accessibility Policies within their 90 Day Training Plan. The policies address how MBC will support employees with disabilities, including emergency planning/responses, accessible formats and communication supports as well as accessible performance management, career development and redeployment. 3. Ensure that all employees are informed of changes to the Accessibility and Accommodation Policies as they occur, Changes will be communicated via email. 			
1.5 Processes to Accommodate Employees/ Return to Work Process			
<ol style="list-style-type: none"> 1. Create a process to develop accommodation plans and return to work plans for employees who have been absent from work due to a disability and who require disability-related accommodations to return to work. 	Completed	01/01/16	Human Resources
MBC Action Plan			
<ol style="list-style-type: none"> 1. Develop a template accommodation form and a return-to-work form that both address all applicable requirements. Use of these forms will ensure that all accommodation and return-to-work plans are properly recorded and retained on file. 			
1.6 Accessible Performance Management, Career Development and Job Changes			
<ol style="list-style-type: none"> 1. Ensure the organization's performance management and career development opportunities account for the accessibility 	Ongoing	01/01/16	Human Resources

needs and plans of employees and that these processes are inclusive and barrier-free.			
<p>1.7 Redeployment</p> <p>1. Consider the accessibility needs and accommodation plans of employees who are reassigned to an alternate department, position or location with the company as an alternative to a layoff.</p>	Ongoing	01/01/16	Human Resources
<p>MBC Action Plan</p> <p>1. As part of the redeployment process, MBC will incorporate the accessibility needs and accommodation plans of any employee that is being redeployed to an alternate position, department or building location. The HR department will oversee the redeployment process; however, new and/or amended reporting hierarchies will be reviewed to determine who is to be involved with and informed of any accessibility plans and requirements.</p>			
<p>1.8 Workplace Emergency Response Information</p> <p>1. Create and implement individualized plans to assist employees with disabilities during an emergency.</p> <p>2. Obtain consent from employees with individualized plans to disclose emergency response or evacuation plans to the person responsible for assisting the employee in situations where the plan requires the assistance of a colleague.</p> <p>3. individualized plans/information will be reviewed when:</p> <ul style="list-style-type: none"> • The employee moves to a different location or starts working on a different shift in the company • The employee's overall accommodation needs or plans are reviewed or changed • The company reviews its general emergency response procedures • Changes in building structure or staff takes place that would affect the response plan 	Ongoing	01/01/12	Station Managers
<p>MBC Action Plan</p> <p>1. An Individualized Emergency Response Plan Consent Form has been included in the employee 90 Day Training, so that employees can make MBC aware of their need for accommodation in the event of an emergency. Emergency planning information and directions are also included in the internal MBC Company Policy Manual/ Employee Handbook and on each location's Health & Safety boards.</p> <p>2. The process/policy used by Human Resources to develop individualized emergency response plans included the requirement that consent is obtained from the requesting employee to disclose the contents of the plan to the individual required to provide assistance when responding to the emergency or evacuation.</p>			

<ol style="list-style-type: none"> 3. Individualized emergency plans include the requirement that the plan be reviewed: <ol style="list-style-type: none"> a. The employee moves to a different location or starts working on a different shift in the company b. The employee's overall accommodation needs or plans are reviewed or changed c. The company reviews its general emergency response procedures d. Changes in building structure or staff takes place that would affect the response plan 			
PART 2 – THE BUILT ENVIRONMENT			
<p>2.1 Buildings</p> <p>Identify any station locations where the built environment is not accessible to those with physical disabilities or poses barriers for employees. Most of our locations are compliant with the legislation. The Perth station recently installed (May 2023) a ramp for accessible entry into that building.</p>	On-going	01/06/2026	Executive Management in conjunction with Human Resources
<p>MBC Action Plan</p> <ol style="list-style-type: none"> 1. Gather feedback from station managers regarding the current accessibility of their stations' built form. 2. Assess the reasonableness of retrofitting the space to improve accessibility including bathrooms. 3. Assess the ergonomic status of employee workstations. 4. The vision is that over time we will make reasonable progress in the re-location of stations to fully accessible buildings. Currently, the Renfrew, ON property is set to move into a newly constructed building in the summer of 2023 as the current corporate headquarters provides a multitude of barriers to access for employees and potential employees. The building in Welland, ON is currently for sale as, again, it was built over 50 years ago and has significant physical barriers which to-date have been grandfathered by the City of Welland. 			
PART 3 – INFORMATION AND COMMUNICATION TECHNOLOGIES			
<p>3.1 Accessible Websites and Web Content</p> <ol style="list-style-type: none"> 1. Ensure website and web content published conforms to Level AA of Version 2 of the Web Content Accessibility Guidelines 	Completed / Ongoing	01/01/14	Web Manager
<p>MBC Action Plan</p> <ol style="list-style-type: none"> 1. To date, MBC's public websites and contents meet all Web Content Accessibility Guidelines. 2. MBC's Web Manager is fully aware of the guidelines and will ensure all new content and/or any substantial refreshes to sites conform to established guidelines. 			
<p>3.2 Feedback</p> <ol style="list-style-type: none"> 1. Upon request, be able to receive and respond to feedback from clients, individuals inquiring about MBC, our employees and members of the public who have a disability. 	Completed	01/01/15	Human Resources/ Station Managers
<p>MBC Action Plan</p> <ol style="list-style-type: none"> 1. A process for receiving and responding to accessible feedback requests has been developed and communicated to all relevant employees. Currently MBC can facilitate requests via phone, email, in-person, in-writing and by mail and by online form. 			

2. All employees who may receive feedback have been trained on how to receive and respond to accessible feedback requests.
3. Receiving and responding to feedback will be included in all new hire training where the position frequently receives and responds to requests (Human Resources/ Station Managers).
4. All other employees will be notified as to the internal party to whom they should direct any accessible feedback requests.

PART 4 – COMMUNICATIONS OTHER THAN ICT

4.1 Accessible Formats and Communication Supports,

<ol style="list-style-type: none"> 1. Upon request, provide accessible formats and communication supports to individuals with disabilities. 2. Notify the public of the availability of accessible formats and communication supports. 3. Where a communication support or accessible format cannot be provided immediately, consult with the client to arrange for a suitable format as soon as possible 	Completed	01/01/16	Human Resources/ Station Managers
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MBC Action Plan

1. Complete an assessment of the ways in which MBC provides information to our clients, potential clients and the public. (i.e on-air, invoices, customer service etc.)
2. Develop a process for responding to various requests. Currently, clients and the public may submit a concern or inquiry through the MBC Accessibility Feedback Form.
3. Make public MBC’s ability to provide for or arrange for the provision of accessible formats and communication supports by posting a statement in our policy located on our website.

PART 5 – THE PROCUREMENT OF GOODS, SERVICES AND FACILITIES

5.1 Procurement

<ul style="list-style-type: none"> • Ensure that all Requests for Proposals indicate that the specifications are available in requested formats • Make available accessibility plans for vendors/suppliers who require them when on MBC premises • Ensure client meetings normally scheduled at a station location with barrier are relocated to an accessible building • Ensure that any employee required at a client location has their accessibility needs noted in the scheduling of said event (i.e., remote programming) • Ensure that this employee can participate in this plan and approve it 	On-going	01/06/2024	Station Managers
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PART 6 – THE DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

6.1 Design and Delivery

	Completed /On-going	Assessments must be made each time	
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<ul style="list-style-type: none"> • Ensure our community level ‘Street Team’ booths and set-ups are accessible to those with physical disabilities • Gather feedback, when possible, from the public during these events to assess the success of these endeavours • Provide feedback to management on potential improvements 		when scheduling these events	Promotions Coordinator/Station Manager
PART 7 - TRANSPORTATION			
<p>7.1 Transportation</p> <ul style="list-style-type: none"> • Ensure any transportation arranged for employees takes into consideration the needs of those employees with physical disabilities 	On-going	In each circumstance	Y Station Manager
CONSULTATIONS			
<p><i>MBC plans to undertake a series of consultations with:</i></p> <ul style="list-style-type: none"> • Ontario March of Dimes • Start Me Up Niagara • CNIB • Niagara Centre for Independent living 	Summer 2023		HR Manager
<p>MBC Action Plan The HR Manager plans to reach out to each of these groups to facilitate a discussion with respect to our plan and helpful feedback they can provide knowing the needs of those individuals associated with their organization.</p>			