

CINA RADIO GROUP

ACCESSIBILITY PLAN 2024-2027

1 June 2024



CINA Radio

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Three-Year Accessibility Plan

2024-2027

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1. General

i) Introduction to CINA Radio Group's Accessibility Plan 2024-2027

CINA Radio Group is pleased to introduce our Accessibility Plan for 2024-2027, which sets out our commitment to addressing barriers to accessibility over the next three years.

We are a small and growing media company that primarily services a range of ethnic communities in the Province of Ontario. CINA Radio Group currently operates three Canadian radio stations—FLOW 98.7 FM Toronto, CINA AM 1650 Toronto, and CINA FM 102.3 Windsor. Each station is dedicated to serving and reflecting the diverse needs and preferences of its distinct listener base. FLOW 98.7 FM focuses on the Caribbean and African communities in Toronto; CINA AM caters to the Greater Toronto Area's South Asian community; and CINA FM provides a mix of English-language and multilingual programming for a diverse audience in Windsor.

CINA Radio Group supports the objectives of the *Accessible Canada Act*, which aims to create a barrier-free Canada by 1 January 2040. As we prepare to welcome new stations with planned acquisitions on the horizon, this Accessibility Plan is designed to meet the *Accessible Canada Act's* requirements and mandate. By integrating diversity and accessibility into our operations, we aim to ensure our programming and workplace are accessible and resonant with the diverse needs of our growing audience and employees, including individuals living with disabilities.

ii) Contact Information, Feedback Process, and Alternative Format Requests

Our **Accessibility Champion** is responsible for receiving accessibility-related feedback, suggestions, questions and comments. You can reach them through the following methods:

Phone: 416-777-1650 Ext. 4

Email: accessibility@cinaradio.com

Mail: Attn: Accessibility Champion, CINA Radio Group, 65 International Blvd., Suite 200, Etobicoke, ON M9W 6L9

Our Accessibility Plan and Accessibility Feedback Process are available in alternative formats, upon request. To request an alternate format, please contact our Accessibility Champion using the contact details above.

If you include your name and contact information in your email, voicemail or posted letter, we will acknowledge receipt of your feedback using the same method of communication with which you contacted us.

If you prefer to remain anonymous, please do not include any personal details like your name, email address or contact information in your communications with our organization.

Any personal information you provide will only be used to address the issue for which you contacted us and will remain confidential unless you explicitly consent to share it with others.

2. Accessibility Summary:

CINA Radio Group, encompassing FLOW 98.7 FM in Toronto, CINA AM 1650 in Toronto, and CINA FM 102.3 in Windsor, actively celebrates the rich tapestry of diversity within the communities we serve. We recognize that accessibility is an important component of diversity and inclusion. CINA Radio Group is keen to ensure that our employees, listeners and visitors are supported and accommodated. This approach not only fulfills regulatory requirements but also reinforces our organization's role as a community-centered broadcaster that values and respects the unique contributions of the communities that we serve.

We anticipate expanding our radio holdings in the coming months (subject to CRTC approval), which will increase the overall number of our employees. We have, therefore, prepared this Accessibility Plan to ensure compliance under the *Accessible Canada Act*, which will apply to all of the broadcasting undertakings within our group of media services.

This Accessibility Plan focuses on identifying, removing and preventing accessibility barriers within our organization. As we prepared our Accessibility Plan, we conducted a number of initiatives to address barriers to accessibility including the following:

- The appointment of an Accessibility Champion;
- The creation of a new Accessibility Committee;
- Conducting of an internal employee online consultation on accessibility;
- Began outreach with external experts and persons with disabilities; and
- Registered for specialized training on accessibility for our Accessibility Champion and other employees.

These initiatives are discussed in further detail below.

3. Guiding Principles for Accessibility at CINA Radio Group

At CINA Radio Group, we appreciate the principle of "Nothing Without Us." We are also mindful of the important principles set out in section 6 of *the Accessible Canada Act*, which form the basis of our Accessibility Plan and our accessibility decision-making work for the future.

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; and
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.”¹

4. Consultations for CINA Radio Group’s Accessibility Plan:

i) Accessibility Feedback Page

We recently published a Feedback Process for each of the stations in our radio group. There have been fluctuations in the number of employees at our stations, including full time and part time. In light of this and other questions that made us uncertain as to the applicability of the feedback process and other requirements under the *Accessible Canada Act*, we decided to publish an Accessibility Feedback Process for each station. Our Accessibility Feedback Process Page is designed to engage the public, our employees, and stakeholders in a meaningful dialogue about accessibility within our organization, including content accessibility, digital accessibility (like assistive technology use on our website or app), and facilities (including access to facilities and events accessibility).

Since the recent launch of our Accessibility Feedback Process Page, we have not yet received any feedback. As we await insights from the public, employees, and stakeholders, we remain committed to using this feedback mechanism to ensure our services and environments are inclusive and accessible.

For ease of reference, we have attached the text of one of our Feedback Process Pages at **Appendix A** attached to this Accessibility Plan.

¹ [Guidance on the Accessible Canada Regulations - Module 1: Accessibility Plans.](#)

ii) Accessibility Committee

In our ongoing commitment to creating an inclusive workplace, we established an Accessibility Committee in the spring of 2024. This committee is composed of designated accessibility champions within our organization including our owner and CEO, Mr. Neeti Ray, and our recently appointed Accessibility Champion. Their primary role is to receive and review accessibility feedback and comments, facilitate discussions and consultations to assist with the preparation of our Accessibility Plan and Progress Reports, consult with persons living with disabilities, and spearheading initiatives to enhance accessibility within organization.

iii) Internal Employee Consultation

As part of our consultation process, in the spring of 2024, CINA Radio Group conducted an internal consultation process that involved engaging with our employees, to gather important information in view of preparing our Accessibility Plan. To that end, we conducted an optional online survey regarding accessibility in our workplace. This optional survey was distributed to all employees, and each was given six days to respond to the questionnaire.

We designed the survey to include a series of questions that will help us identify any barriers our employees may face concerning accessibility. We also sought input on how to address and prevent barriers to accessibility that might exist. While a considerable number of our employees responded to the consultation, none identified any barriers to accessibility. Additionally, we have not received any specific feedback for change at this time through our employee consultation. We remain eager to continue engaging with our staff and are committed addressing barriers to accessibility that may exist.

iv) External Consultations

CINA Radio Group has recently initiated outreach efforts with various accessibility organizations, such as the CNIB Access Labs and DeafBlind Ontario Services, as part of our efforts to enhance our understanding of accessibility barriers, to obtain important input from persons living with disabilities, and implement best practices for accessibility. We are committed to continuing this engagement over the next three years to expand our knowledge and improve accessibility within our workplace. Further, our Accessibility Champion and other colleague(s) are scheduled to participate in specialized accessibility training with DeafBlind Ontario Services in July 2024. This training is specifically designed to expand our knowledge about the needs of individuals living with disabilities in terms of communications, facilities and technology.

These external consultations and training efforts are integral to our ongoing commitment to fostering an inclusive and barrier-free environment for both our listeners and our staff, reinforcing our dedication to accessibility at every level of our operations.

5. Accessibility Priorities – Section 5 of the Accessible Canada Act:

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:

- a) Employment
- b) The built environment
- c) Information and communications technologies
- d) Communications other than information and communications technologies
- e) The procurement of goods, services, and facilities
- f) The design and delivery of programs and services
- g) Transportation
- h) 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.

a) Employment

At CINA Radio Group, we are proud of our inclusive approach to hiring. Diversity is one of our core strengths, and we consistently seek to provide employment opportunities to individuals from diverse backgrounds. We are also very proud that most of our employees are individuals from Black or other racialized communities. We also provide an important voice and media platforms for individuals from a broad range of cultural and ethnic backgrounds.

CINA Radio Group is committed to continuing to foster an inclusive workplace that supports the hiring, retention and promotion of our employees, including those with living with disabilities. Moreover, we strive to comply with the *Accessibility for Ontarians with Disabilities Act (AODA)*, *the Employment Equity Act*, and the *Ontario Human Rights Code*.

That said, we recognize that there is always room for improvement. We are, therefore, planning on reviewing and updating our employment policies to assist with hiring, retention, promotion and accommodation for persons living with disabilities. This will include investigating how we can make job postings more accessible and accommodating diverse needs during interviews.

As part of our Accessibility Plan, we also plan to develop and review the mandate and objectives of our Accessibility Committee to determine how it can best support our organization and employees.

Further, we plan to provide accessibility awareness training to all employees over the course of the next two years, and to ensure that new hires are also provided with such training within six to twelve months of joining our organization.

The following table sets out our action items and timelines in relation to employment and accessibility over the next three years.

Employment - Action	Planned Completion
Review and update hiring and retention processes in relation to persons living with disabilities.	Year 1
Review and develop the mandate and objectives of CINA Radio Group's Accessibility Committee	Year 1

Ensure that all staff receive accessibility training over the next three years	Year 1 and 2
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b) The Built Environment

CINA Radio Group is dedicated to providing equitable access to our facilities for employees, stakeholders, clients, and visitors alike. Our headquarters and radio facilities in Toronto and Windsor are designed with accessibility in mind, featuring accessible elevator access and accessible parking spaces. In addition, offices and studios are wheelchair accessible for individuals living with mobility issues. Moreover, there are no stairs required to enter or navigate the main areas, facilitating ease of access for individuals using mobility aids.

Recognizing the importance of accessibility, we are committed to conducting further assessments of our facilities, such as reviewing our signage and entry ways. These assessments aim to identify and address barriers that might affect accessibility for employees, guests, and other individuals visiting our office. Our goal is to enhance the safety, comfort, and independence of individuals within our environments, promoting a more inclusive and accessible workspace. This work will be done in consultation with individuals living with disabilities.

We also anticipate that through our accessibility feedback, consultations, training, and engagements more insights will be obtained about accessibility and the physical environment for our community over the next three years.

Built Environment - Action	Planned Completion
Review and assess our organization’s facilities to determine what additional measures can be undertaken to enhance accessibility, such as signage and entryways.	Year 1
Develop action plan for additional measures that may be undertaken to enhance accessibility in our built environment	Year 2
Where possible, provide accessible parking to stakeholders living with disabilities, who attend at our facilities.	Annually

c) Information and Communication Technologies (ICT)

As a Canadian radio broadcaster that works within the digital landscape through our live streams, on our websites and various applications, we place a high priority on ensuring that our Information and Communication Technologies (ICT) are inclusive for our audiences and stakeholders. As a small and growing media company, we strive to provide the best possible service to our audiences and to work with leading technology within our organization.

CINA Radio Group recognizes that information and communications technologies are a critical element for individuals living with disabilities to participate fully in the workplace. To that end, we propose the following action items as part of our Accessibility Plan over the next three years:

ICT - Action	Planned Completion
Conduct an audit and assessment of the communications technology options available for persons with disabilities	Year 1
Conduct an audit of our organization's policies and procedures for accommodating requests for use of accessible technologies in the workplace	Year 1
Develop policies and procedures for accommodating requests for use of accessible technologies in the workplace.	Year 2

d) **Communications, other than ICT**

Clear and effective communication is crucial to our operations. Sharing information and keeping our employees and stakeholders apprised of developments of our services is an essential part of our organization's day to day work. We are committed to adapting traditional communication methods to better serve our employees and stakeholders, with special attention to the needs of those living with disabilities.

To that end, we plan to conduct a review and assessment of communications within our organization (other than ICT) in consultation with persons with disabilities. We also plan to review and update our existing policies to seek to address barriers to accessibility that may exist.

Communications Other than ICT - Action	Planned Completion
Conduct a review and assessment of our organization's communications tools in relation to accessibility.	Year 1
Review and update internal communications policies with a view to addressing and preventing barriers to accessibility (e.g., consider type and size of font for email messages)	Year 2
Create a Policy for ensuring that virtual conference calls and meetings are conducted on more accessible platforms, such as Zoom	Year 1 and Year 2

e) **Procurement of Goods, Services, and Facilities**

Procurements at CINA Radio Group are conducted mainly by our organization's technical director and chief engineer. Moreover, our procurements largely **relate to the purchase of information technology, broadcast engineering and facilities management**. These individuals conduct important work in fulfilling CINA Radio Group's mandate and key priorities. This work can also have an impact on accessibility. As such, we believe that it would be appropriate to review our procurement practices to identify approaches that may enhance accessibility and address barriers that may exist.

To that end, we propose the following action items for our Accessibility Plan that relate to procurement of goods, services, and facilities.

Procurement of Goods, Services and Facilities - Action	Planned Completion
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Conduct an audit of current procurement policies, processes and procedures and consider options to improve accessibility within our organization	Year 1
Incorporate accessibility criteria into procurement policies and procedures	Year 2
Develop a list of approved suppliers that offer goods, services, and facilities that are accessible for persons living with disabilities	Year 3

f) Design and Delivery of Programs and Services

At CINA Radio Group, our primary mandate is to deliver high-quality, entertaining, and engaging audio content to Canadian audiences, particularly those from a broad range of ethnic backgrounds. We recognize the importance of making our programs and services inclusive to listeners, including those with disabilities.

With a view to strengthening accessibility within our organization, we plan to consult with persons with disabilities to ascertain whether there are any measures or approaches that we could implement to enhance the inclusivity of our radio and audio platforms for persons living with disabilities.

Design and Delivery of Programs and Services - Action	Planned Completion
Conduct a review and assessment of how our audio content may be more accessible for audiences	Year 2
Conduct a review of the content available on our web-based platforms and determine how accessibility may be enhanced	Year 3

g) Transportation

This area of accommodation and accessibility is not relevant to CINA Radio Group. We therefore have no comments for this section.

h) Conditions and Requirements Under the *Broadcasting Act: Licence*

While each station within the CINA Radio Group has an encouragement to consider employment equity in hiring practices and all other aspects of human resource management, none of the stations are subject to specific conditions of licence related to accessibility. This encouragement is consistent across each of our separate broadcasting licences, reinforcing our commitment to inclusivity and diversity in our workplace management.

CINA Radio Group strives to comply with all of our licence requirements, regulations, and application legislation in the operation of our radio stations. Through our licence obligations, we also strive to comply with the *CAB's Equitable Portrayal Code* which was created to ensure the equitable portrayal of all persons in broadcast programming.

Flow FM Toronto - <https://crtc.gc.ca/eng/archive/2021/2021-275.htm#>

CINA FM Windsor - <https://crtc.gc.ca/eng/archive/2023/2023-73.htm>

CINA AM Mississauga - <https://crtc.gc.ca/eng/archive/2020/2020-403.htm>

5. Conclusion:

CINA Radio Group's proactive approach to inclusivity remains a cornerstone of our organization's values, reflecting our deep commitment to diversity as exemplified by the unique mandate of each of our stations. As we prepare for the anticipated acquisition of additional radio stations, we are excited to craft this Accessibility Plan.

Each station under our umbrella serves its community with tailored content that speaks directly to diverse cultural and linguistic needs, reinforcing our commitment to creating an environment that is welcoming to our stakeholders, including those living with disabilities.

We look forward to implementing these strategies and continuing to foster a culture that celebrates diversity and promotes accessibility.

Appendix A

CINA Radio Group – Accessibility Feedback Process Page

Accessibility Accessibility Feedback Process FLOW 98.7FM

FLOW 98.7FM welcomes your feedback on accessibility. We are committed to identifying, preventing and removing accessibility barriers that may exist within our organization.

The purpose of this Accessibility Feedback online form is to collect information to assist us with the preparation of our Accessibility Plan, Progress Reports and to improve accessibility within our organization.

Please fill out the form below to provide feedback or to receive accessibility support. Feedback can relate to a range of areas such as our facilities, our website(s) and our programming. Please note that **Feedback can be provided anonymously.**

Content accessibility,

Digital accessibility (e.g., website, application(s) other technical issue)

Employment

CINA Radio 1650 AM facilities and studios

Request an alternate format of CINA Radio 1650 AM's Feedback Page, such as brail, large print

Other (please specify)

FLOW 98.7FM Accessibility Champion

By mail:

CINA Radio, 65 International Blvd., Suite 100, Etobicoke, ON M9W 6L9

By phone:

416-498-4987 ext. 6

Email:

accessibility@cinaradio.com

Acknowledgement of Feedback

Except for anonymous feedback, FLOW 98.7FM will acknowledge the receipt of all accessibility feedback provided in the same way it was received.

Thank you for your Feedback! FLOW 98.7FM is committed to identifying, preventing and removing 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.

FLOW 98.7FM 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.