

Native Communications Inc. 2023-2025 Accessibility Plan

About Native Communications Inc.

Native Communications Inc. (NCI) operates in Manitoba as a public broadcaster. NCI is an Indigenous service organization offering radio programming throughout Manitoba, designed for and by Indigenous people. We are a non-partisan organization. NCI is in business to provide a service to our listeners and viewers. We are accountable to a Board of Directors made up of Indigenous people.

In 1985, NCI ventured into television production. NCI-TV programs have appeared on CBC Manitoba, North of Winnipeg, and on the Aboriginal Peoples Television Network (NATIVE COMMUNICATIONS INC.) NCI-TV has produced hundreds of programs, including current affairs programs and children's shows.

NCI is a non-profit organization and, as an educational/cultural entity, has registered charity status. NCI radio is regarded as "The Voice of Indigenous People". Throughout Manitoba NCI is a very real part of the Indigenous community – the same as trapping, fishing, and bannock! The NCI-FM radio network currently reaches 98% of Manitoba: from Churchill to Winnipeg – "you are in NCI country!" We are the first and only Indigenous radio network of our kind in Manitoba.

NCI-FM broadcasts 24 hours a day, 7 days a week, on 59 FM radio transmitters located throughout the province, reaching over 75 communities. Two of NCI's major transmitters (105.5-FM Winnipeg/Selkirk and 91.5-FM Brandon/Westman) have a total power of 200,000 watts. NCI-FM is currently the largest Indigenous radio network in Canada.

Throughout our history, NCI has operated within tight financial constraints. NCI receives some federal government funding through the Northern Native Broadcast Access Program under the Department of Canadian Heritage.

We embrace diversity and inclusion for all, including Persons With Disabilities (PWD).

Improving accessibility and serving all Canadians, means providing products, services, and work experiences that are free of barriers. Doing so makes things better for all.

1. General

This Accessibility Plan applies to all of **Native Communications Inc.** (NCI) and it has legal obligations under *the Accessible Canada Act* (the ACA) and its regulations, as amended from time to time.

We are committed to the principles of the *Accessible Canada Act* (ACA) which seek to identify, remove and prevent barriers for persons with disabilities. At NCI, we pride ourselves on having a diverse staff and on bringing diverse perspectives and realities to the airwaves. It is, therefore,

crucial that we also ensure that our facilities, communications technologies and services are accessible to diverse demographics.

Our Accessibility Plan aims to identify, remove and prevent any existing barriers that individuals may encounter while engaging with our organization. We view our Accessibility Plan as a starting point for improvement and change. We are committed to learning from people with lived disability experiences to further improve the accessibility of our services and our organization. We are taking steps to ensure that we meet all WCAG requirements.

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To ensure we acknowledge your feedback request, please include your name and contact information in your email, voicemail, or letter.

If you wish to remain anonymous, do not including any personal details such as your name, phone number, or return address.

Any personal information you choose to share with NCI-FM will be kept confidential unless you give us permission to share it.

2. Accessibility Summary

This is Native Communication Inc.'s first Accessibility Plan for 2023-2026, required under the *Accessible Canada Act* and related regulations approved by the Canadian Radio-television and Telecommunications Commission (CRTC) and the Government of Canada. This is an important step towards ensuring that First Nations, Inuit and Métis Peoples as well as Canadians living with disabilities, can live in a barrier-free world by 2040.

Native Communication Inc.'s Accessibility Plan outlines a clear strategy for our organization to identify, remove, and prevent accessibility barriers within our workplace and the services we provide. NCI is committed to helping our employees reach their full potential and ensuring our audience feels accommodated when collaborating with us. Additionally, we are dedicated to making our high-quality, engaging audio content on our broadcasting services accessible, reflecting the needs and interests of Indigenous Peoples.

NCI's Accessibility Plan 2023-2026 focuses on:

1. building stronger awareness within our organization around the experiences of, and potential barriers for, persons with disabilities;
2. reviewing and addressing technological barriers for accessibility;
3. ensuring meaningful access to the services we provide for persons with disabilities; and
4. identifying and addressing barriers to external and internal facilities.

NCI embraces the importance of the foundational principle “Nothing about us without us” in the *Accessible Canada Act*. NCI is also mindful of the guiding principles set out in section 6 of the *Accessible Canada Act*, which informed the preparation of our Accessibility Plan, as well as NCI’s decision-making processes more broadly.

These principles are:

1. All persons must be treated with dignity regardless of ability or disability.
2. All persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of ability or disability.
3. All persons must have barrier-free access to full and equal participation in society, regardless of ability or disability.
4. All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of ability or disability.
5. Laws, policies, programs, services, and structures must consider the disabilities of persons, the different ways that persons interact with their environments and the intersection of indigenous issues with disability concerns and how they relate to one another.
6. Persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures.
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.

In response, NCI conducted internal and external consultations to identify, remove, and prevent accessibility barriers within our organization, both now and in the future. Our extensive community outreach experience enabled us to gather valuable insights from our employees, colleagues, and partners, contributing to a more accessible experience for all.

NCI’s Accessibility Plan aligns with the objectives and requirements of the federal Accessible Canada Act. We will publish annual progress reports on our website, and update our Accessibility Plan every three years as mandated by federal legislation.

We aim to build on the accessibility foundation NCI has established. Our goal is to identify, remove, and prevent any barriers that may exist for persons with disabilities employed at NCI or seeking to use our services.

Accessibility statement: NCI is dedicated to addressing and preventing accessibility barriers for its employees, communities, partners, and audiences, both now and in the future. While NCI has been particularly mindful of persons with disabilities in its hiring and retention practices, its external and internal infrastructure, as well as the technologies we use and the services we provide, we recognize that

there is always room for improvement and opportunities for growth. We are proud of the work we have accomplished so far and will continue to strive to remove barriers to create a more accessible organization for individuals living with one or more disabilities, especially Indigenous Peoples.

Indigenous Peoples and Individuals Living with Disabilities

According to Statistics Canada, in 2017, 32% of First Nations Peoples living off reserve, 30% of Métis and 19% of Inuit had one or more disabilities. These rates of disability were higher among First Nations Peoples and Métis living off reserve than they were for non-Indigenous people. NCI understands that there are also many other First Nations Peoples living on reserve who are living with disabilities as well.

With this perspective and mandate, we prepared our Accessibility Plan 2023-2026. We will strive to understand, address, and overcome barriers that may exist for persons with disabilities, including members of our Indigenous communities.

3. Native Communication Inc's Accessibility Plan

Our Accessibility Feedback Pages can be accessed from the homepage of NCI-FM and NOW Country 104.7 websites at: www.ncifm.com and www.nowcountry.fm

During the preparation of our Accessibility Plan for 2023-2026, NCI's management met on several occasions to discuss how best to ensure that the key goals of the *Accessible Canada Act* were met within our organization. Discussions on these topics also took place with various levels of management at NCI on multiple occasions and with multiple key members.

4. Identifying, Removing and Preventing Barriers to Accessibility – Section 5 of the Accessible Canada Act

In preparing our Accessibility Plan, NCI has established an internal Accessibility Committee. This committee draws expertise from various areas within our organization, including people and culture, marketing and communications, operations (including broadcast technology, facilities, digital media, and information technology), and community outreach. In its initial phase, NCI's Accessibility Committee will be co-led by our Director of Operations and Promotions and our Music Director. The Accessibility Committee will play a crucial role in supporting NCI's ongoing efforts to create a more accessible environment.

The following sections of Native Communication Inc.'s Accessibility Plan address each of these section 5 areas of the *Accessible Canada Act*.

1. Employment;
2. The built environment
3. Information and communication technologies;
4. Communication, other than information and communication technologies;
5. The procurement of goods, services and facilities;
6. The design and delivery of programs and services;
7. Transportation; and

8. Areas designated under regulations made under paragraph 117(1)(b).

4.1 Employment

As an Indigenous broadcaster with a workplace that employs more than 38% Indigenous Peoples, NCI understands the principle of inclusion as established in the *Accessible Canada Act*. Currently, NCI employs approximately 21 employees. Our head office is in Winnipeg, Manitoba and we broadcast across the province.

NCI's team is mindful of accommodating individuals with disabilities during the hiring processes, on boarding of new employees and while individuals are employed at NCI. We offer a well-established approach, ensuring that each new and existing employee is accommodated in terms of their workspace needs, including the appropriate technology, ergonomic desk and chair they need to effectively perform their duties.

NCI acknowledges that there needs to be constant improvement within our organization to address accessibility barriers to employees. Through our internal review and consultations, we have learned that our Human Resources policies and procedures should be updated, that our workforce could benefit from accessibility AND SENSITIVITY training, and that more work can be done in terms of hiring and retaining policies/procedures for persons with disabilities, particularly Indigenous Peoples living with disabilities.

Native Communication Inc. has established several action items and goals to enhance accessibility and employment over the next three years. The table below outlines our key initiatives.

Action	Planned Completion
Further develop the mandate and objectives of Native Communication Inc.'s Accessibility Committee.	Year 1
Review and update Native Communication Inc.'s policies, procedures, guidelines and practices related to accessibility, workplace and workstation accommodation. Communicate these policies to all Native Communication Inc.'s employees.	Year 1
Review and update Native Communication Inc.'s hiring practices to ensure the accessible nature of the process (e.g., job posting, interview questions, and interviews).	Year 1
Conduct a review of employee workstation and assess accessibility and accommodation needs.	Year 1
Identify options for accessibility and sensitivity training for all levels of employees at Native Communication Inc.	Year 1
Ensure that Native Communication Inc.'s People and Culture department and Facilities teams, in particular, are provided with accessibility and sensitivity training.	Year 1
Continue to implement our accessibility and sensitivity	Year 2

Action	Planned Completion
training plan throughout the organization.	
Ensure that all employees at Native Communication Inc. are provided with accessibility, accommodation and sensitivity training.	Year 3
Review the policies, procedures, guidelines, and practices in place to ensure that Native Communication Inc.'s employees located throughout the province are well supported in their work.	Year 2
During the three-year period of Native Communication Inc.'s Accessibility Plan, review and update policies, procedures, guidelines, and practices to continuously assess whether barriers exist, how to remove them and how to prevent them in the context of employment within our organization.	Year 3

4.2 The Built Environment

NCI recognizes that equitable access to built environments (exterior and interior) is an important element in identifying, removing, and preventing barriers to accessibility. NCI's broadcast facility is based in Winnipeg, Manitoba and operates from facilities located at 1507 Inkster Boulevard in Winnipeg, Manitoba.

Currently, NCI is reviewing the exterior and the interior of facility. This was implemented to ensure that our studios and facilities were accessible to employees with disabilities (current and future), community members, clients, our audiences as well as the NCI Board of Directors. It was also done to ensure compliance with provincial legislative accessibility requirements. We are currently taking note of areas where we can improve our facilities for all who come into our building.

NCI is aware that further work can be done to identify, prevent and eliminate accessibility barriers to our built environment. The following table outlines the key action items that NCI plans to address during the next three years regarding our built environment.

NCI recognizes that there is more work to be done to identify, prevent, and eliminate accessibility barriers in our built environment. The table below outlines the key action items that NCI plans to address over the next three years in this area:

Action	Planned Completion
Establish a communications plan to inform employees and visitors of accommodations that Native Communication Inc. can provide, and any limitations that may exist within the	Year 1

Action	Planned Completion
Native Communication Inc. facilities.	
Conduct a review and assessment of Native Communication Inc.'s facilities to assess what measures can be undertaken to render them more accessible.	Year 1
Develop a plan to determine what work should be done to Native Communication Inc.'s facilities to ensure greater accessibility.	Year 2
Implement the plan that sets out the work to be done to ensure greater accessibility of Native Communication Inc.'s facilities.	Year 3

4.3 Information and Communication Technologies (ICT)

Information and communications technologies are pivotal for ensuring accessibility in the workplace. At NCI, management is responsible for providing employees with ICT products and services, including those needed to accommodate individuals with disabilities.

During on boarding, management collaborates with our staff to assess any specific technology-related accommodations required. These efforts extend to addressing evolving technological and workspace needs for existing employees.

While NCI strives to ensure all employees have access to the necessary technologies and platforms to fulfill their roles effectively, we recognize opportunities for improvement in meeting our staff's needs. Regular review and updating of policies and procedures are essential in this regard.

We have also identified areas where our websites and apps may not be utilizing the latest features, potentially limiting accessibility.

To maintain proactive accessibility, the table below outlines NCI's key plans for Information and Communications Technology over the next three years.

Action	Planned Completion
Conduct a review and assessment of communications technology options for persons with disabilities.	Year 1
Conduct a review and assessment of Native Communication Inc.'s policies and practices for acquiring, developing, and implementing new technologies.	Year 1
Conduct a review and assessment of accessibility barriers to Native Communication Inc.'s website and web apps.	Year 2
Native Communication Inc. will create request form for employees who may need information or access various ICT	Year 2

Action	Planned Completion
tools that can be submitted to management.	
Conduct a review and assessment of ICT tools and platforms (e.g., website, web apps) that require updating to ensure they are accessible by persons with disabilities.	Year 3

4.4 Communications other than Information and Communications Technologies

This section of our Accessibility Plan pertains to external communications with communities and audiences across the country. As mentioned earlier, NCI engages with Indigenous communities across Manitoba and beyond. This outreach is crucial for NCI to fulfill its service mandate to First Nations, Inuit, and Métis Peoples, facilitating the delivery of meaningful and high-quality programming, including essential news and information for Indigenous audiences.

NCI acknowledges potential barriers that Indigenous Peoples with disabilities may face in participating in our community outreach efforts. Their input is invaluable for the success of our services and our ability to fulfill our public interest mandate. The table below outlines NCI's key initiatives concerning community outreach and accessibility over the next three years.

Action	Planned Completion
Conduct a review and assessment of our community outreach and identify any accessibility barriers to participation that may exist. Consider alternatives to face-to-face meetings, such as online meetings where texting is available.	Year 1
Develop new guidelines for Native Communication Inc.'s community outreach to ensure accessibility.	Year 2
Implement guidelines for Native Communication Inc.'s community outreach to ensure participation by Indigenous Peoples living with disabilities.	Year 3

4.5 The Procurement of Goods, Services and Facilities

Procurement at NCI is primarily managed by its Facilities, Information Technology, and Operations departments. These departments play a critical role in our organization's operations and have a direct influence on accessibility and accommodation at NCI.

Given this context, it is prudent to conduct a review of our procurement practices to identify and address any accessibility barriers that may currently exist. We also recognize the importance of

engaging with suppliers who prioritize offering accessible goods, services, and facilities for persons with disabilities.

Action	Planned Completion
Conduct a review and assessment of current procurement policies, processes, and tools to improve accessibility at Native Communication Inc.	Year 1
Develop a procurement checklist that incorporates accessibility considerations.	Year 1
Develop a list of suppliers that offer goods, services and facilities that are accessible for persons with disabilities.	Year 2

4.6 The Design and Delivery of Programs and Services

NCI's primary service is its Indigenous broadcasting platform, distinguishing it as one of the largest broadcasting entities providing programming by, for, and about Indigenous Peoples. NCI offers a diverse array of programming, including news and information on critical issues affecting Indigenous Peoples, entertainment, lifestyle features, and sports.

In addition to ensuring accessibility of our broadcasted programming for persons with disabilities, it is crucial that they can also connect with cultural events and music that resonate with their lived experiences as Indigenous individuals and/or individuals with disabilities. While NCI's content is highly relevant and reflective of Indigenous Peoples, there is ongoing effort to better represent individuals living with disabilities, especially Indigenous Peoples with disabilities, in our programming. The following outlines our plans for NCI's content over the next three years.

Action	Planned Completion
Conduct outreach sessions with Native Communication Inc.'s staff and listeners to consider how Native Communication Inc.'s news and information can identify and address any barriers that may exist.	Year 1
Conduct a review and assessment of programming broadcast on Native Communication Inc. Consider how Native Communication Inc. can reflect the experiences of individuals living with disabilities, in particular Indigenous Peoples living with disabilities.	Years 1, 2 and 3

4.7 Transportation

This area of accommodation and accessibility is not relevant to NCI. We, therefore, do not have any comments to provide in this section.

4.8 Licence Conditions and Requirements Under the Broadcasting Act

Radio plays a vital role in informing listeners about society. NCI is committed to ensuring that all our audience members, regardless of ability, are informed, educated, and entertained through our programming. Therefore, NCI plans to place a strong emphasis on providing written transcripts of our programming to benefit people who are deaf or hard of hearing.

NCI recognizes the significance of meeting our accessibility obligations for our audiences and strives to surpass these standards annually. As an additional measure of accessibility and accommodation, NCI includes Cree and Ojibwe language programs, contributing to language reclamation efforts for individuals reclaiming or maintaining their Indigenous languages.

Over the next three years, NCI will continue to exceed its accessibility requirements for our audiences, as outlined in our broadcast licence.

Action	Planned Completion
Meet and where possible strive to exceed licencing requirements as it relates to people who are deaf or hard of hearing with appropriate access to written transcripts	Years 1 - 3

Conclusion

NCI is grateful for the opportunity to create and share this Accessibility Plan. We are dedicated to enhancing the accessibility and inclusivity of our services, company, and communities for individuals living with disabilities. While we take pride in our accomplishments thus far, we acknowledge that more needs to be done to fulfill the goals of the Accessible Canada Act. We are eager to continue our efforts in identifying, removing, and preventing barriers to accessibility for everyone, especially Indigenous Peoples.