

# CFRC 101.9 FM Radio Queen's University Accessibility Plan

Overview	2
Definitions	3
The Principles	5
The Consultations & Outreach	6
Promoting the Feedback and Consultation Process	6
An Advisory Committee	6
Barriers to Access Survey	7
Protecting Privacy	7
	7
Barriers in Policy	8
Addressing Barriers in Programs	9
Addressing Barriers in Our Practices	10
Addressing Barriers in Services Offered	11
Publishing of The Accessibility Plan	12
Availability of Alternative Formats	13
The Feedback Process	14

# Overview

This station has developed the following Accessibility Plan in accordance with the Telecom and Broadcasting Regulatory Policy ([CRTC 2021-215](#)) The Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations. These regulations were developed by the CRTC to comply with the Accessible Canada Act ([S.C. 2019, c. 10](#)).

At Radio Queen's University, hereby known by its trade name CFRC-FM we want to work with our community to ensure that we are not only accessible, but actively welcoming and effectively empowering our entire community.

As a community radio station, we believe that our obligation to promote and empower accessibility is fundamental to our ethos. The Community sector exists specifically to reflect and amplify our local communities:

**CRTC Campus and Community Radio Policy ([Broadcast Regulatory Policy CRTC 2010-499](#))**

*The Commission considers that campus and community radio distinguishes itself by virtue of its place in the communities served, reflection of the communities' needs and values, and the requirement for volunteers in programming and other aspects of station operations.*

The following Accessibility Plan reflects the expectations of the regulations and legislation in addition to our internal guiding documents.

As federally regulated broadcasters our station is governed by several Acts of Parliament to ensure fair and equitable access. This Accessibility Plan compliments our compliance with other pieces of legislation such as the [Employment Equity Act](#) and the [Canadian Human Rights Act](#). We are uniquely positioned as a federally regulated industry which offers public access, and volunteering in key and critical areas, doing so in a way which empowers our community is critical to our mission and purpose.

If you have any questions about how we work to promote accessibility, and diversity please contact us [station@cfr.ca](mailto:station@cfr.ca).

# Definitions

[The Accessible Canada Act](#) defines the following:

**barrier** means anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation. (obstacle)

**disability** means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society. (handicap)

The CRTC Accessibility Reporting Regulations define the following:

**employee** means a person employed by a regulated entity referred to in paragraph 7(1)(e) or (f) of the Act and includes a dependent contractor, as defined in subsection 3(1) of the Canada Labour Code, but does not include

- (a) a person employed under a program designated by the employer as a student employment program; and
- (b) a student employed solely during their vacation periods. (employé)

## IMPORTANT NOTE REGARDING VOLUNTEERS

The regulations are designed for federally regulated industries with employees.

It's worth looking at how the [Canadian Labour Code](#) defines Employee and Employer

**employee means** any person employed by an employer and includes a dependent contractor and a private constable, but does not include a person who performs management functions or is employed in a confidential capacity in matters relating to industrial relations;

**employer means**

- (a) any person who employs one or more employees, and
- (b) in respect of a dependent contractor, such person as, in the opinion of the Board, has a relationship with the dependent contractor to such extent that the arrangement that governs the performance of services by the dependent contractor for that person can be the subject of collective bargaining;

In addition, under the Canadian Labour Code, under Part II Occupational Health and Safety there's a little more guidance under section 125(1)(y).

***Specific duties of employer***

- *125 (1) Without restricting the generality of section 124, every employer shall, in respect of every workplace controlled by the employer and, in respect of every work activity carried out by an employee in a workplace that is not controlled by the employer, to the extent that the employer controls the activity, ... and ensure that the activities of every person granted access to the work place do not endanger the health and safety of employees;*

Clarification on 125(1)(y) is given in the [Manager's Handbook Canada Labour Code - Part II](#) created by the Treasury Board Secretariat.

*The use of the defined terms “workplace” and “every person granted access” is very broad. The duty outlined in paragraph 125(1)(y) of the Code includes, as a minimum, an understanding of the expected activities of contractors, employees from other workplaces, students, volunteers, visitors, clients, etc.*

# The Principles

This Accessibility Plan was developed in keeping with the core Principles of the Accessible Canada Act.

## **Principles**

**6** *This Act is to be carried out in recognition of, and in accordance with, the following principles:*

*(a) all persons must be treated with dignity regardless of their disabilities;*

*(b) 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;*

*(c) all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;*

*(d) all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;*

*(e) laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;*

*(f) persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and*

*(g) 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 keeping with the Principles, specifically (f) and (g) we invite persons with disabilities to actively participate in the development of CFRC-FM's Accessibility Plan.

This Plan was established with a template developed by the **National Campus and Community Radio Association's** Abilities Committee which included volunteers living with disabilities and CFRC FM's Executive Director. This final version was developed by staff and volunteers at CFRC-FM including participants living with disabilities. Finally, we invite our volunteers, staff, and community members, especially those living with a disability to participate in our feedback process.

# The Consultations & Outreach

The following section details how this station will engage with our community, specifically those in our community who are living with a disability.

## Promoting the Feedback and Consultation Process

In order for our plan to be most effective, and reflective of the community we will be promoting how to reach us in the following ways:

- A notice for consultation will be sent to all of our members & volunteers via our internal email lists.
- Calls for community consultation will be placed on CFRC's website, social media and prominently placed in the station's physical space.
- Over a period of twelve months commencing February 2022, we will be broadcasting PSAs promoting opportunities for our community members to engage with our consultation process
- We will be sharing information on our consultation process with our partner organizations to reach a wider audience.
- We will consult with the Queen's University Accessibility Office and student groups dedicated to accessibility between June and December 2022 on our feedback process.

## An Advisory Committee

This station will invite our volunteer members, and members of the broader community to support our station's accessibility by participating in our Advisory Committee. All members of our community are welcome to provide feedback through the process outlined below. For those providing feedback, they will be invited to indicate their interest in joining the Advisory Committee.

The Advisory Committee selection will be approved by the Board based on the recommendation of the Executive Director. The Terms of Reference for the Committee will be developed and approved at their first meeting.

This committee will convene at least four times a year commencing March 1<sup>st</sup> 2022.

## Barriers to Access Survey

This station will be releasing a community consultation survey among our members/volunteers. The survey will be developed by staff and will reflect best practices. The questions will be sourced from the sector standard provided by the National Campus and Community Radio Association, and their *disAbilities Handbook* and training.

Following our survey release to our members/volunteers we will update the survey to reflect feedback from our station before sharing it with the larger community.

- The survey will be available over 52 weeks
- The survey can be taken over the phone (by appointment)
- The survey can be taken in-person at the station (by appointment)
- The survey can be taken over digital platforms such as Zoom
- The survey can be mailed or emailed to and from individuals wishing to provide feedback

The results of the survey will be factored into our first revision to this Accessibility Plan in June 2023.

CFRC FM will release the community consultation survey data and make this available on its website, in a prominent location inside the physical station, and furnish it in accessible formats to individuals as required. The station will release this survey data in February 2023.

## Protecting Privacy

Our Access Survey will have the option for anonymous contribution. For those who disclose their name and contact information, their information will remain confidential. The information gathered will be anonymized for our plan.

Participants can request a copy of their responses from our staff.

The identities of participants in the Advisory Committee will be made public and posted with our Accessibility Plan.

# Barriers in Policy

This station's Accessibility Advisory Committee in collaboration with Radio Queen's University's Policy Committee will conduct a review of all of our policies to identify potential barriers. Our policies can be found here: [https://www.cfr.ca/volunteer\\_resources](https://www.cfr.ca/volunteer_resources).

We will use guidance from the National Community Radio Accessibility Advisory Committee on common barriers in policies, in concert with our own Accessibility Committee. CFRC FM will also consult with the Queen's University Accessibility Office to ensure that our policies regarding accessibility are consistent with the rest of campus.

CFRC-FM's Accessibility Committee will review all station policy (ie: bylaws, volunteer policy etc.) to identify unrealized barriers emergent in documentation. Below is a list of what we will review:

- RQU's Mission / Mandate
- RQU's By-laws
- RQU's Volunteer Agreement
- RQU's HR Policy (inclusive of our Harassment and Violence Prevention Policy and Equity Policy)

The review of our policies will be completed by: January 1<sup>st</sup> 2023. Recommended revisions will be presented to CFRC'FM's board of directors by January 31<sup>st</sup> 2023. The suggested revisions, and any changes made will be included in our updated accessibility plan to be completed by June 2023.

CFRC FM recognizes that Policy barriers are frequently related to **a lack of awareness or enforcement of existing laws and regulations that require programs and activities be accessible to people with disabilities.**

Our Accessibility Committee, in collaboration with our Policy Committee will review all policies listed above to ensure all programs and activities are accessible.



# Addressing Barriers in Programs

We will address the programs that we offer to ensure that we have removed barriers to participation.

Our initial focus will be ensuring that our training program for volunteers is accessible to all.

## **The Volunteer Training Program**

We will be fully reviewing the process of training. Our Programs and Operations Manager will report on both the content and context of the training program and provide recommendations for accessibility improvements.

The CONTENT of the training will be reviewed for any technological, informational or attitudinal barriers which may hinder the full and equal participation of the program. Staff will be asked to provide this information by August 31st 2022.

The CONTEXT of the training will be reviewed to ensure that there are no structural, architectural or communication barriers.

This review will be conducted by either a designated staff member, or member of the advisory committee. The contextual review will be completed by August 31<sup>st</sup> 2022.

## **Fundraising Activities (Radiothon etc)**

We will be reviewing the various activities related to fundraising by our station. We will be asking staff to consider all potential barriers for the staff, volunteers and public in engaging with our fundraising activities. That feedback will be submitted to our advisory committee by August 31<sup>st</sup> 2022.

## **Community Access to CFRC-FM Programming**

We will be reviewing physical, technological, informational and attitudinal barriers to public access to our airwaves, web platforms, our physical space on station premises, and in the community during public events we attend and/or host. The Programs and Operations Manager will provide this report and recommendations to the Accessibility Committee by March 1st 2023.

# Addressing Barriers in Our Practices

The staff and Board at this station have identified the following practices which we will review:

- Our practices around live-remote events
- Our practices around hosting our Annual General Meeting
- Board meetings and committee meetings
- Our volunteer outreach and engagement practices
- Working virtually (i.e. pre-recording a show)
- Procurement of goods, services and facilities

Each of these practices will be reviewed with discovery and recommendations provided to our advisory committee by August 31st 2022. This work will be done by the Executive Director or a designated member of the Accessibility Committee.

We will be releasing an open feedback survey with our staff, board and volunteers to identify any additional practices not listed above. That survey will be completed and results provided to our advisory committee and to the public via our website, our station premises, and through accessible formats upon request by February 28<sup>th</sup> 2023.

# Addressing Barriers in Services Offered

It is important to our station that the services we provide are accessible to all within our community. To achieve this goal we will be reviewing the following services that we offer as part of our accessibility plan.

- Selling Advertising and Sponsorships
- Event or Conference Sponsorship
- Audio editing or audio technical support.
- Equipment rentals and set up
- Studio recording space
- Podcast services
- On site recording services
- DJ services
- Event coverage and promotion
- Website and social media promotion

These service reviews and attendant recommendations will be presented to our Accessibility Committee by March 2023. The review will be done by the Executive Director or a designated member of the Accessibility Committee.

# Publishing of The Accessibility Plan

CFRC-FM will publish the first Accessibility Plan in a variety of formats including digital, hardcopy, and audio on June 1<sup>st</sup> 2022.

We will be publishing our accessibility plan on our website at this address:

<https://www.cfr.ca/accessibility> in accordance with the regulation requiring us to electronically publish. The plan can be identified on our website by the following link on our homepage <https://www.cfr.ca/>.

The placement and readability of the plan on our website will be in a format that meets the requirements of Level AA conformance that are set out in the Web Content Accessibility Guidelines.

As a licensed broadcaster this station also will air a PSA promoting a link to the plan for no fewer than 30 days.

## **Updated Accessibility Plan**

When we issue an update to the plan by no later than June 1st 2023.

## **Notifying the CRTC**

This station will issue the CRTC with a copy of the publication of every version of our accessibility plan within 48 hours of publication and include a link to our webpage for the plan.

# Availability of Alternative Formats

CFRC-FM will endeavor to provide alternative formats upon request for all policies, bylaws, Accessibility Plan and Annual General Meeting materials including but not limited to: Braille, closed captioning, described video (i.e.: for slide presentations), e-text, live transcripts during virtual meetings and large print.

CFRC-FM will also endeavor to provide adaptive technologies to assist volunteers in the production of their programming including, but not limited to: text-to-speech, voice to text, screen readers and screen magnifiers.

This station will make our accessibility plan available in the following alternative formats upon request:

- print,
- large print,
- braille,
- audio format,
- electronic format that is compatible with adaptive technology

For formats not listed above, we will enter into an agreement with the individual requesting the format and make all reasonable efforts to accommodate them.

## **Notifying of Alternative Formats**

This station will prominently list on the webpage for our accessibility plan the alternative formats that are available. The availability of alternative formats will also be included in our other promotion for the plan.

## **How to Access Alternative Formats?**

This station requires that requests be made in one of the following ways:

- By calling our main phone number [613 533 2121]
- Or by emailing our designated email address for accessibility queries here: [station@cfrc.ca](mailto:station@cfrc.ca)
- Or by completing our online alternative formats request form available here <https://forms.gle/RRXBQgWqvWkcSU3Y8>
- In person and on site requests are also accepted

## **The Response Time**

This station will make a reasonable effort to provide the alternative format as soon as feasible. For Braille, or an audio format the station will endeavour to fulfill the request within 45 days. For all other formats, CFRC FM will endeavour to provide them within 15 days of the date of the request, unless otherwise agreed to by the station staff and the requester.

# The Feedback Process

CFRC FM invites feedback from our community on how to improve our plan and best serve the community. We will be allowing for anonymous feedback. Our feedback process will be published by December 1st, 2022. The CRTC will be notified of any changes to our feedback process within 48 hours of us publishing any change, and the notification will include a link to the latest version.

To ensure that the feedback is appropriately received and incorporated into our review of the plan we have designated our Executive Director as the Accessibility Officer. Individuals with inquiries related to accessibility may contact them directly at this email address: [station@cfrc.ca]

We will be welcoming feedback in the following formats:

- By calling our main phone number [613 533 2121]
- Or by emailing our designated email address for accessibility queries here: station@cfrc.ca
- Or by completing our online alternative formats request form available here <https://forms.gle/shsbzF1n2PH25wbBA>
- In person and on site requests are also accepted

## Confidentiality

In accordance with the *Personal Information Protection and Electronic Documents Act* and the *Privacy Act*, this station will be keeping all private information (i.e. names, contact information) provided via feedback as confidential. Feedback released for public review will be anonymized.

## Promoting our Feedback Process

In accordance with the regulation requiring us to electronically publish, we will be publishing our feedback process alongside our Accessibility Plan on our website at this address: <https://www.cfr.ca/accessibility>. The plan can be identified on our website by the following link that we will also place on our homepage at [www.cfr.ca](http://www.cfr.ca). This link will also clearly indicate that we are soliciting feedback in clear, simple and concise language.

The placement and readability of the feedback process for our plan on our website will be in a format that meets the requirements of Level AA conformance that are set out in the Web Content Accessibility Guidelines.

Any updates to our feedback process will be published in a manner identical to above.

This station is also happy to provide an accessible form of our feedback process in the following ways:

- By calling our main phone number [613 533 2121]
- Or by emailing our designated email address for accessibility queries here: station@cfrc.ca

- Or by completing our online alternative formats request form available here <https://forms.gle/EmGeRERc3KFg71WK9>
- In person and on site requests are also accepted

## Accessibility Plan Timeline in Brief

**Dec 2021-Jan 2022** Refine Accessibility Plan Draft **Executive Director**

**Feb 2022** Deploy survey, communicate community consultation process online and on air through PSAs **ED**

**Feb 2022** Call for Members to RQU Accessibility Committee **ED**

**March 2022** First Meeting of Accessibility Committee –**Accessibility Committee members**

**May 2022** Revise and approve accessibility Plan, submit to Board for final review **ED & Accessibility Committee**

**June 1 2022**-publish first Accessibility Plan **ED**

**June 1 2022**-deploy on air PSA about published plan **ED**

**June-Dec 2022**-consult student and campus accessibility groups about our feedback process, ask them to share ours **ED**

**June-August 2022**-Review training programs, events, and barriers in our practices including meetings, AGMs, outreach and fundraising activities and remote work. **PROGRAM**

**COORDINATOR**

**August 2023**-develop and deploy accessibility plan feedback process **ED**

December-collect and collate collected feedback, distribute to accessibility committee, begin preliminary revisions to Accessibility Plan **ED**

**January 1 2023**-Complete Review of CFRC Policies **ED**

**January 31 2023**-Submit policy revision recommendations to RQU Board of Directors **ED**

**Feb 2023**-Release survey data online and on site **ED**

**March 2023**-Complete review of physical, technological and attitudinal barriers to our airwaves, website and physical space, submit recommendations to Accessibility Committee **PROGRAM**

**COORDINATOR** **March 2023**-complete review of services, recommendations for improvement, submit to Accessibility Committee. **ED**

**June 2023**-finish updates/revisions to Accessibility Plan, upload to website, submit changes to CRTC **ED**

**March-June 2026**-review and update Accessibility Plan at least once every three years **Accessibility Committee**

