



NIAGARA REGIONAL BROADBAND NETWORK LTD.

Accessibility Plan

2024-2027

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General

Overview of NRBN's Activities

Niagara Regional Broadband Network Ltd. ("NRBN") provides superior, ultra-reliable internet, voice, TV, and data services within the Niagara Region. We are proud to provide our community with exceptional service through the products offered and support provided.

Our small team comprised of less than fifty exceptional individuals, whose expertise and dedication drive everything we do, work every day to provide advanced network solutions, customer-centric support and service, innovative technology, and continuous improvement for our customers, for each other, and for our community.

NRBN's Commitment to Accessibility

NRBN's mission is to connect all people, including those with disabilities. We are dedicated to continually improving our accessibility practices to remove barriers and strive to provide an inclusive experience that honours the dignity and autonomy of each person.

Application

NRBN's Accessibility Plan has been prepared in accordance with the requirements of the *Accessible Canada Act*, S.C. 2019, c.10 and its Regulations (ACA). In developing this Accessibility Plan, NRBN considered the principles set out in section 6 of the ACA, as follows:

- (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.*

Contact Information, Alternate Formats, and Feedback Process

This Accessibility Plan can be requested in an alternate format and accessibility -related feedback can be submitted anonymously, via telephone or e-mail. The designated person responsible for receiving accessibility feedback is:

Manager, People Culture and Administration

Telephone:
(905) 358-1157

Mail:
4343 Morrison St., 2nd Floor
Niagara Falls, ON
L2E 6Z9

Email:
accessibility@nrbn.ca

Glossary

This plan uses the following definitions:

Barrier: means anything – including physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or 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*)

Accessibility: refers to the design of products, devices, services, or environments for people who experience disabilities.

Executive Summary

At NRBN, our team and customers are comprised of diverse and unique people which is why we understand the importance of creating and fostering an equitable, diverse, and inclusive space where everyone belongs.

Creating this Accessibility Plan is a key initial step toward becoming a barrier-free organization. This plan not only helps raise awareness but also details our approach and commitment to developing and revising policies and procedures, to ensure that every employee and customer is treated with dignity and respect.

Using feedback from our consultations, we were able to identify, and create action plans to remove, barriers in the following areas:

- our employment practices;
- our built environment;
- our information communication and technology (“ICT”);
- the procurement of goods, services and facilities; and
- the design and delivery of our programs and services.

This plan will be reviewed annually, a yearly progress report will be published, and the work toward enhancing accessibility will be ongoing. Though this plan outlines the expectations we are creating today, we understand and appreciate that it is subject to change, in accordance with applicable law.

Areas Described Under Section 5 of the ACA

Employment

Summary

NRBN focuses on enhancing the employee experience for all our team members. This includes offering various flexible work arrangements such as hybrid and remote work, developing a self-serve intranet site and creating new feedback processes. In addition, we continuously review our policies and procedures to ensure they support our commitment to equity, diversity, inclusion and belonging for both current and future employees.

Barriers

- Employees and managers may not be aware of the process for requesting or implementing accommodations.
- Employees and managers may not be aware of some of the accessibility features that NRBN's systems and equipment have.
- Job postings and descriptions may have unnecessary requirements that can exclude people with disabilities.

Action Plan

F2025 - 26

- Develop and deliver training regarding accommodations during the recruitment and selection process, as well as throughout the employment lifecycle. This will assist in ensuring that stigma is minimized and offer all people the opportunity to participate fully, learn, grow, and succeed.
- Develop reference guides and communications to ensure that all employees at NRBN understand what accessibility features NRBN's systems and equipment have and how to use them.
- Address the built environment-related barriers that prevent people with disabilities from accessing office space.
- All job postings and descriptions will be reviewed, and all unnecessary requirements will be removed.

Ongoing

- Audit employment resources including (but not limited to) policies, procedures, job advertisements, and job descriptions to ensure that they are written in plain language and are accessible and inclusive.
- Review training procedures and implement new training as required.

The Built Environment

Summary

NRBN has two facilities – one being our main office location where some hybrid employees work, and the other is a warehouse facility with a collaborative working space. The main office location is fully equipped with ergonomic workstations, accessible assistive features throughout the building and in the restrooms, and we offer ergonomic equipment at the request of any employee in an effort to make sure all are able to perform their job in ways that work for them.

Barriers

- The primary barrier at the main office is that it is located on the second floor of a building that does not have an elevator, escalator, or ramp.
- The furniture in the warehouse has no accessibility features.
- Emergency response procedures have not been revised to include people with disabilities.

Action Plan

F2025 - 26

- Investigate building modifications or possible relocation to ensure access to all employees as needed.
- Research furniture for the warehouse that would offer features to accommodate people with disabilities.
- Create inclusive emergency response procedures.
- Create a guide for accessible design standards for the workplace.
- Conduct accessibility audits for all NRBN locations.

Ongoing

- Review and update accessibility standards for all office locations.
- Increase awareness to employees of the resources, tools, and equipment that is, or could be, available to them.

Information and Communication Technologies (ICT)

Summary

By resolving issues related to information and communication technologies, we aim to make our digital tools accessible to everyone. We regularly audit our website, networks, and telecommunications systems to identify barriers and work toward improvements.

Barriers

- Some systems commonly used by NRBN employees have limited accessibility features.
- The language used on the website may be too complex or difficult for some to understand.

Action Plan

F2025 - 26

- Investigate internal systems that do not offer accessibility features and find solutions and enhancements to address these gaps.
- Ensure plain language is used on all written materials to the extent possible.

Ongoing

- Continuously work toward receiving feedback from users and create modifications as needed to ensure accessibility compliance.

Communication, other than ICT

Summary

At NRBN, we understand how essential communication is, especially in remote environments. We are committed to ensuring all people are able to access all forms of communication including print materials and digital communications. Included in this is also team and company gatherings, presentations, and meetings.

Barriers

- Employees may not be adequately informed on communicating with customers with disabilities.
- Most employees have not been trained on how to use or create accessible documents or reference guides.
- Feedback has not been requested on accessibility as it relates to company or team events.

Action Plan

F2025 - 26

- Enhance training for customer-facing employees on effective communication and interaction with people with disabilities.
- Create accessibility standards for all written communication (internal and external).
- Create accessibility standards for all verbal communication (internal and external).
- Create accessibility standards for company and team events.
- Create training and guidelines for employees on how to make and use accessible documents.

Ongoing

- Continue to promote alternative methods of communication so employees are aware, and usage increases.
- Audit training for employees to ensure that it is current.
- Review event proposals and ensure that they are accessible to everyone.

The Procurement of Goods, Services, and Facilities

Summary

To date, NRBN has an informal procurement process that, due to its informality, has little consideration for accessibility commitments in the procurement of goods, services, and facilities.

Barriers

- There is no policy or procedure currently to identify potential barriers or address accessibility considerations throughout the procurement process.
- Procurement documents are not accessible.

Action Plan

F2026 - 27

- Develop a formalized policy or procedure to identify potential barriers or address accessibility considerations throughout the procurement process.
- Ensure new procurement resources are accessible.

Ongoing

- Continue to evaluate procurement policies, processes and tools to enhance accessibility.

The Design and Delivery of Programs and Services

Summary

At NRBN, we remain committed to offer meaningful options through the design and delivery of our programs and services. Our goal is to provide autonomy with support when needed, and accommodations that work for individual needs.

Barriers

- Customers may not be aware of accessibility features offered or how to use them.
- Equipment and tools to support the customer's unique needs may not be available.
- Customer-facing teams may not be informed on how to troubleshoot with or explain the accessibility features to a customer.
- Limited hours of customer service and technical support operation may make it difficult for people with disabilities to access support as needed.

Action Plan

F2025 - 26

- Develop training for customer-facing employees on accessibility features to enable them to share relevant information with customers as needed.
- Investigate additional tools such as phones or remote controls with larger buttons for customers who may require them.
- Develop accessibility learning centre on NRBN's intranet.

Ongoing

- Annual training for all customer-facing teams on NRBN's product accessibility features and resources.
- Audit learning materials in learning centre for relevance, accessibility, and to up-to-date content.
- Ensure all company-wide training modules are accessible.
- Continuously assess hours of operation to identify and address gaps where feasible.

Transportation

As NRBN does not run or operate any passenger transportation services, we have not identified barriers related to transportation.

Consultations

In the preparation of this Accessibility Plan, NRBN consulted both internally and externally with people with disabilities, as well as people who represented, lived with, or worked or volunteered with organizations that supported a person or people with disabilities.

Surveys were conducted internally and externally, with a total of 156 respondents, and follow up consultations were conducted as requested. Participants included people with a variety of disabilities including visual, hearing, mobility, cognitive, or multiple disabilities.

The internal survey questions asked were specific to the participant's experiences with:

- our office and warehouse locations,
- internal systems and platforms,
- communication processes,
- office equipment and furniture.

Feedback was also requested for areas of improvement, and what (if any) barriers related to accessibility were presented to the participants.

The external survey questions were specific to the participant's experiences with:

- our office space,
- information and communication technologies (social media, website, electronic forms, etc.)
- communications (access to captioning on audio content, descriptions on written content, clarity of communication, etc.)
- programs, products, and services (ease of access and delivery of)
- technical support and customer service delivery.

Feedback was also requested for specific areas in which we could enhance the experience for people with disabilities with respect to our products, services, and support.

Conclusion

NRBN is committed to making a meaningful impact for people with disabilities by removing barriers as outlined in our Accessibility Plan. We strive to design our products and services to enrich the lives of the communities and people that we serve, and are driven to improve accessibility for all.

As we put our plan into action, we will continuously engage and consult with people with disabilities to learn more about their lived experiences and use that insight to make improvements. An updated Accessibility Plan will be published every three years and progress reports will be published annually in accordance with the ACA.

Appendix 'A' – Requirements under the *Telecommunications Act*

As required by section 51(1) of the ACA, this Appendix sets out:

Telecommunications Act S.C. 1993, c.38

- 51(1)(b) – the conditions imposed under section 24 or 24.1 of the *Telecommunications Act* to which some or all of NRBN is subject that relate to the identification and removal of barriers and the prevention of new barriers; and
- 51(1)(c) – the provisions of any regulations made under the *Telecommunications Act* that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all of NRBN.
- [Requirements Under the *Telecommunications Act* for Accessibility Plans](#)

This Appendix does not include requirements that have not been in effect for at least 3 months prior to the publication date of the Accessibility Plan, for which NRBN has been exempt, nor does it cover expectations or encouragements that do not constitute imposed changes.

Offering and Promoting Accessible Products and Services

- Telecommunications Service Providers (TSPs) must make general call centres accessible to the point of providing a reasonable accommodation by training customer service representatives to handle questions from persons with disabilities and familiarizing customer service representatives with all accessible products and services.¹
- TSPs that will transition to 10-digit local dialing in order to implement 988 must also provide information about the transition to 10-digit local dialing in ASL and LSQ.²

Message Relay Services (MRS)

- All local exchange carriers (LECs) must provide teletype writer (TTY) and Internet Protocol (IP) Relay services to their customers 24 hours a day, seven days a week.³
- TSPs must fund video relay service (VRS) via the National Contribution Fund.⁴
- MRS providers must provide access to 911 service.⁵

¹ Broadcasting and Telecommunications Regulatory Policy 2009-430 - *Accessibility of telecommunications and broadcasting services*

² Telecom Regulatory Policy CRTC 2022-234, *Introduction of 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services and Northwestel Inc.'s application for modified implementation of ten-digit local dialing*, paragraph 142.

³ BTRP 2009-430, paras. 11 and 21.

⁴ TRP CRTC 2014-187, *Video relay service*.

⁵ TRP 2018-466, par. 229.

Alternative Formats

- TSPs must provide paper bills upon request at no charge to customers who self identify as a person with a disability.⁶
- Canadian carriers must provide bills, bill inserts, and information setting out the rates, terms and conditions in alternative accessible formats, such as in Braille or large print, for people with a visual disability.⁷

Website Accessibility

- TSPs must make the information on telecommunications and broadcasting services and products on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.⁸
- TSPs must make customer service functions that are available only over the service providers' websites accessible. If a customer service function on the service providers' website is not accessible, then persons with disabilities can not be charged or disadvantaged for using an alternate channel to access those functions.⁹
- TSPs must have an easy-to-find home page link to the accessibility section of their websites, if their websites include such sections.¹⁰
- MRS providers must ensure that any IP relay related web and mobile interfaces meet the W3C Web Content Accessibility guidelines.¹¹

CRTC Reporting

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, Braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated entity agree upon and for which there is proof of the agreement.¹²
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.¹³

⁶ Telecom Decision CRTC 2022-28, *When and how communications service providers must provide paper bills*.

⁷ Telecom Order CRTC 98-626; TD 2002-13, *Extending the availability of alternative formats to consumers who are blind; and*, TO 2001-690, *Alternative formats for a person who is blind*.

⁸ BTRP 2009-430, para. 65.

⁹ BTRP 2009-430 para. 68

¹⁰ BTRP 2009-430 para. 57

¹¹ TRP 2018-466, para. 151

¹² *CRTC Accessibility Reporting Regulations* (SOR/2021-160), sections 24, 27, and 31.

¹³ *CRTC Accessibility Reporting Regulations* (SOR/2021-160) sections 21, 26, and 30

Other requirements

- Canadian carriers, as a condition of offering telecommunications service to non-carriers, must include in their tariffs and service contracts the requirement that non-carriers and all of their wholesale customers and subordinate wholesale customers, abide by certain accessibility obligations.¹⁴

¹⁴ TRP CRTC 2017-11

Appendix ‘B’ – Requirements under the *Broadcasting Act*

This appendix sets out the following, as required by section 42(1) of the ACA:

- 42(1)(b) - the conditions imposed on the regulated entity under section 9.1 of the Broadcasting Act that relate to the identification and removal of barriers and the prevention of new barriers;
- 42(1)(c) - the provisions of any order made under subsection 9 (4)) of that Act that relate to the identification and removal of barriers and the prevention of new barriers that applied to the regulated entity; and
- 42(1)(d) - the provisions of any regulations made under subsection 10(1) of that Act that relate to the identification and removal of barriers and the prevention of new barriers and that applied to the regulated entity.

The following accessibility requirements apply to NRBN’s broadcasting distribution undertaking (BDU) activities and on-demand services. NRBN is currently an exempt BDU.

Closed Captioning (CC), Audio Description (AD), and Described Video (DV)

- Pass through of CC and DV: BDUs cannot change or alter the content or format of a programming service or delete a programming service in the course of its distribution.¹⁵
- OS Services:
 - BDUs must ensure that 100% of English and French programs in inventory are CC (except for community access TV programming).¹⁶
 - BDUs must implement a monitoring system to ensure that the correct signal is captioned, captioning is included in the broadcast signal, and captioning reaches the distributor of that signal in original form.¹⁷
 - When providing CC, English- and French-language OS services must meet quality standards regarding lag time and accuracy, among other things.¹⁸

¹⁵ Broadcasting Distribution Regulations (SOR/97-555), section 7; and Broadcasting Regulatory Policy CRTC 2017-319 and Broadcasting Order CRTC 2017-230, Appendix, para. 11

¹⁶ Appendix to BRP 2017-138, *Standard requirements for on-demand services* COL 21.

¹⁷ Appendix to BRP 2017-138, *Standard requirements for on-demand services* COL 22.

¹⁸ Appendix to BRP 2017-138, *Standard requirements for on-demand services* COL 23.

Equipment to Support Accessibility

- BDUs must provide equipment, software or other technology for customers with visual or fine motor skill disabilities to identify and have access to programming services.¹⁹
- NRBN's Canadian Radio-television and Telecommunications Commission (CRTC) BDU Annual Returns must include information on the following:
 - Availability of accessible set-top boxes;
 - Remote's an accessibility features;
 - Penetration of accessible set top boxes and remotes; and
 - Number of accessibility related queries received and resolved.²⁰
- BDUs must provide at least one simple means of accessing described programming (open or embedded) requiring little or no visual acuity.²¹

Customer Service

- Disability-specific products and services must be promoted in an accessible manner of its choice.²²
- General call centres will be accessible to the point of providing a reasonable accommodation to persons with disabilities by training customer service representatives to handle calls from persons with disabilities and familiarizing them with products and services for persons with disabilities, and by making the IVR systems accessible.²³

Alternative Formats and Website Accessibility

- BDUs must have an easy-to-find home page link to the accessibility section of their website.²⁴
- BDUs are required to make the information on the website accessible to the point of providing reasonable accommodation for people with disabilities.²⁵
- When customer service functions are unavailable on the website, BDUs will ensure that people with disabilities do not incur a charge or otherwise be disadvantaged if using alternative methods to access those functions.²⁶
- BDUs must make accessible any customer service functions that are available only over their websites.²⁷

¹⁹ BDR (SOR/97-555), section 7.3.

²⁰ Appendix 1 to Broadcasting Decision CRTC 2020-356, COL 9.

²¹ Appendix 1 to Broadcasting Decision CRTC 2018-268, COL 8.

²² Appendix 1 to Broadcasting Decision CRTC 2018-264, COL. 9.

²³ Ibid. COL. 14.

²⁴ Ibid. COL. 10.

²⁵ Ibid. COL. 11.

²⁶ Ibid. COL. 12.

²⁷ Ibid. COL. 13.

CRTC Reporting

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.²⁸
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request in print, large print, Braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated broadcasting entity agree upon and for which there is proof of the agreement.²⁹

²⁸ *CRTC Accessibility Reporting Regulations* (SOR/2021-160), sections 4, 10, and 14.

²⁹ *CRTC Accessibility Reporting Regulations* (SOR/2021-160), sections 8, 11, and 15.