



Accessibility Plan 2024 - 2026

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Executive Summary

The Accessible Canada Act aims to realize a barrier-free Canada by 2040. Broadnet has developed this work-in-progress Accessibility Plan to meet its responsibilities under the Accessible Canada Act and to persons with disabilities.

This plan outlines the barriers that may currently exist, and over the next three years (2024–2026) we will identify the steps that we will take to remove them.

A key principle of the Act is “Nothing Without Us,” which means that persons with disabilities should be consulted when developing rules, regulations, policies, practices, services, and programs. People with disabilities are in the best position to tell us about the barriers they face. As such, the contribution of Broadnet employees with disabilities will be instrumental in the development of this action plan.

Broadnet used the guidelines of the Accessible Canada Act, and intends to consult with partners in accessibility, such as Diversity and Inclusion Committees, and other working committees and advisory groups on the development of this plan.

All employees of Broadnet will be provided with an opportunity to identify barriers to accessibility through a survey and to contribute to the plan.

Summary of the key barriers and actions to be taken

Broadnet is implementing solutions to address barriers to accessibility. Broadnet’s actions will contribute to a society that is more accessible and a workforce that reflects the diversity of Canadians.

Key Perceived barriers identified	Actions to be taken by Broadnet
<p>Barriers exist in a range of communications methods with the public and employees, particularly relating to digital communications.</p> <p>Accessibility standards are not fully met with respect to:</p> <ul style="list-style-type: none"> • Information available on the public website. • Public and internal events. • Software and equipment used by employees. 	<ul style="list-style-type: none"> • Soliciting feedback and conducting consultation and engagement activities with persons with disabilities (2024). • Improving public and internal communications during meetings and events and ensuring that digital communications are fully accessible. • Improving Broadnet’s technology architecture and software systems to meet the Web Content Accessibility Guidelines (WCAG 2.0 Level AA).
<ul style="list-style-type: none"> • Some employee office workspaces occupied by Broadnet are not fully accessible. 	<ul style="list-style-type: none"> • Ensure office space and meeting facilities are available at ground levels to facilitate access to restricted mobility persons.
<p>Awareness training for employees to support awareness and accessibility are currently limited.</p>	<ul style="list-style-type: none"> • Embed diversity and inclusion into company standards of business conduct (2024). • Implementing training on accessibility

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	<p>and disability awareness, diversity and inclusion for employees, managers and executives (2025).</p> <ul style="list-style-type: none">• Implementing best practices aimed at embedding a culture of diversity and inclusion in the workplace to attract and retain employees, regardless of ability, age, gender and other identity factors.
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Accomplishments and highlights

While Broadnet still has barriers to remove, we are proud of the many actions we have already initiated to support accessibility in our facilities and our workplaces. In 2024, the advancement of diversity and inclusion was made one of Broadnet’s priorities and incorporated in our standard of business conduct best practices.

Broadnet is maintaining a public website to enable interested groups and persons to learn about our plans and to provide feedback via online accessible documentation and electronic forms.

Broadnet is in the process of preparing its training plans for the next fiscal year and intends to embrace and feature accessibility awareness to the entire workforce to help them develop awareness about health and safety, gender-based analysis plus and harassment prevention, with more learning opportunities to come.

I. General

The Accessibility Plan Broadnet aligns with the Accessible Canada Act (ACA) and the Accessible Canada Regulations.

Words used in this document that are related to accessibility are defined in the Glossary.

Background

The Accessible Canada Act aims to realize a barrier-free Canada by 2040. It is a federal law that involves identifying, removing and preventing new barriers to accessibility. Broadnet is subject to the Act and, as such, we must:

- Publish an accessibility plan.
- Set up a process for receiving feedback about the plan and barriers to accessibility.
 - Consult with persons with disabilities.
- Prepare progress reports on the implementation of the plan.
- Provide a description of the feedback process.
- Report to the Accessibility Commissioner every year.
- Carry out Broadnet's responsibilities by applying the principles identified in the Act.
- Update the accessibility plan every three years.

About Broadnet

Broadnet is a federally registered corporation established in 2008. Broadnet provides engineering, planning, products, and technical services to help build and operate Canada's private and public telecommunications infrastructure. Broadnet provides a unique value to its clients with the support of its employees by focusing on three specific areas:

- Value.
- Reliability.
- Innovation.

Our commitment to universal accessibility

The 2017 Canadian Survey on Disability found that over 6.2 million people in Canada met criteria for having a disability. This includes over 6 million people with long-term health problems or conditions that fit into one or more of the ten categories of disability.

Broadnet is committed to ensuring our goals and actions are aligned with Government of Canada action plan of ensuring inclusiveness and the richness of Canada's diversity are reflected in our workforce and workplaces, and in the development of our products and services.

Broadnet is committed to working towards the goals of the Accessible Canada Act by:

- Striving for a barrier-free by 2040.
- Identifying, removing and preventing barriers to accessibility in its programs, policies, services and workplaces.
- Working with and consulting persons with disabilities, organizations who advocate on their behalf and internal committees, to better understand the full range of diversity of the communities Broadnet serves and to identify and address barriers to accessibility.
- Increasing its representation of persons with disabilities.
- Creating a work environment where everyone is treated with dignity, fairness and respect and where everyone can fully participate and contribute to the objectives of Broadnet.

Contact information

You may communicate with us about accessibility in the following ways:

- Telephone: 514-759-9256
- Email: HR@broadnet-telecom.ca
- Mail: Broadnet Telecom Inc., 9464 Boul. Henri Bourassa O., Saint-Laurent, QC, H4S 1N8, Canada. Attention : Humain Ressources.

II. Barriers and actions

The barriers and plans to remove and prevent them are grouped into seven priority areas.

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

1. Employment

Broadnet strives to be an employer of choice, for all people. We want to give persons with disabilities equal access to employment and advancement opportunities. We also want to offer them access to accommodation they need so they can contribute to their full potential as employees. It is important that all employees feel they belong within Broadnet.

Barriers: Employment	Planned actions: Employment
<p>Knowledge and awareness about accessibility is limited. Employees may not have enough knowledge or awareness to apply an accessibility lens fully and effectively in their work.</p>	<ul style="list-style-type: none"> • Implement accessibility and disability awareness and training requirements for employees, including managers, Human Resources advisors, executives and specialists. • Implement training and awareness sessions on diversity and inclusion, and unconscious bias for all employees. • Develop plans to improve the recruitment and retention of employees with disabilities.
<p>Workplace activities may not fully consider and support the needs of employees with disabilities.</p>	<ul style="list-style-type: none"> • Continue to look for ways to improve workplace culture through human resources programs and services. • Continue to promote inclusiveness in the workplace. • Identify ways to make sure that employees with disabilities are considered and included in the development of workplace activities and special events.

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<p>There is no official procedure for communicating the availability of accommodations for candidates in staffing processes. This could lead to:</p> <ul style="list-style-type: none"> • Candidates missing opportunities to request and receive accommodations. • Managers and Human Resources Advisors not knowing how to provide accommodations to candidates who have disabilities. 	<ul style="list-style-type: none"> • Improve communications to applicants on how to request accommodations. • Improve communications to managers on how to provide accommodations to candidates during staffing processes. • Add information about the accommodations process into the onboarding process.
<p>Some human resources policies, procedures and employment systems use outdated language, approaches or practices that could contribute to systemic barriers to accessibility.</p>	<ul style="list-style-type: none"> • Periodically review the policies, procedures, programs technology systems, etc. and make recommendations on how to improve them. • Based on the recommendations, develop a plan to modernize Human Resources policies, programs and services to remove and prevent systemic barriers and to build trust with persons with disabilities. • Include and consult committees and persons with disabilities in the redevelopment of Human Resources programs and policies.
<p>Information technology used for staffing and performance management may not be fully accessible.</p>	<ul style="list-style-type: none"> • Develop plans to remove and prevent barriers in systems used for staffing.

2. The built environment

Broadnet is a leading telecommunications solutions provider. As such, we collaborate with stakeholders to use and develop our solutions and services with accessibility and environmental sensitivity, sustainability and best practices in mind. We care for and strive to protect the environment.

Barriers: Built environment	Planned actions: Built environment
Our facilities may not be fully barrier free to persons with disability.	<ul style="list-style-type: none"> • Include universal accessibility principles to design, construction and restoration of facilities and workspaces. • Continue to identify and monitor facilities, workspaces and assets, including buildings and work sites for additional barriers.
Inaccessible work equipment: Equipment used by employees in the workplace may not be fully accessible or not meet accessibility standards.	<ul style="list-style-type: none"> • Consult staff on accessibility needs, requirements and equipment • Inform managers of the process for evaluating and requesting accessible equipment for employees.

3. Information and communication technology

Broadnet provides corporate-wide information and communication technologies tools and services, and information management, designed to ensure efficient and effective operations. In the procurement process for information and communication technology, software and equipment, Broadnet shall strive to include a preference for solutions that comply with the Web Content Accessibility Guidelines 2.0 Level AA (Web Accessibility Standard). These guidelines provide technical specifications to improve the accessibility of web content, websites and web applications across all devices for people with a wide range of disabilities — including hearing, cognitive, neurological, physical, visual and speech disabilities.

Barriers: Information and communication technology	Planned actions: Information and communication technology
Certain software solutions are non-compliant or partially compliant with the Treasury Board Secretariat, Web Accessibility Standard.	<ul style="list-style-type: none"> • Assess all software systems for compliance with the Web Accessibility Standard. • Develop a strategy to resolve and migrate away from partial and non-compliance with the Web Accessibility Standard. • Transition, replace or modify information technology solutions to meet or exceed the Web Accessibility Standard.

4. Communication (other than information communication technology)

Broadnet communicates with the public through multiple media, such as webpage content, blog posts, media advisories, media clippings, news releases and digital ads in online platforms and through social media. Broadnet also creates visual communication materials, including photos, videos, infographics, maps, brochures, posters and signs. Broadnet interacts with the public during industry events, recruitment events, and workshops.

Barriers: Communication	Planned actions: Communication
The language used in communications and consultations can be at a high-literacy level and not all communications use plain language	<ul style="list-style-type: none"> • Draft guidelines for employee on using plain language.
Not all communications use inclusive language or are available in various accessible formats. Examples: <ul style="list-style-type: none"> • Audio-only materials such as meetings or speeches. • Visual-only materials such as images, maps, presentations. 	<ul style="list-style-type: none"> • Draft guidelines for employees on: <ul style="list-style-type: none"> ○ Creating accessible communications products, including web content, documents and visual materials. ○ Providing accessible services. ○ Hosting accessible meetings and events.
Digital communications, including documents available on Broadnet website and intranet, may not currently meet the Web Accessibility Standard	<ul style="list-style-type: none"> • Migrate and update the content of Broadnet website and intranet to ensure compliance with the Web Accessibility Standard.

5. The procurement of goods, services and facilities

Broadnet procures a diverse and wide range of goods and services; as such, Broadnet intends to integrate accessibility requirements into its procurement guidelines and policies.

Barriers: Procurement	Planned actions: Procurement
Broadnet's Procurement Policy and the processes for procuring goods and services may not currently consider accessibility requirements or refer to the Accessible Canada Act, which may have an impact on procuring accessible goods and services.	<ul style="list-style-type: none"> • Review and update the Procurement Policy and related procedures to: <ul style="list-style-type: none"> ○ Include accessibility criteria and requirements for the procurement process for goods and services. ○ Include reference to the Accessible Canada Act.

6. The design and delivery of programs and services

Broadnet is a leading telecommunications solutions provider. As such, we strive to collaborate with stakeholders to use and develop our solutions and services with universal accessibility in mind.

Barriers: Design and delivery of programs and services	Planned actions: Design and delivery of programs and services
Lack of design guidance on universal accessibility.	<ul style="list-style-type: none"> • Develop a new approach to address universal accessibility within the offered solutions and services.
Persons with disabilities are not always consulted in the design of services and solutions, policies and procedures.	<ul style="list-style-type: none"> • Implement a procedure for Broadnet planning initiatives to provide for consultations and to identify who will be consulted before consultations.
Public events organized by Broadnet may not fully consider accessibility requirements in their design and delivery.	<ul style="list-style-type: none"> • Develop and apply an accessibility checklist for public events.

7. Transportation

Broadnet maintains a fleet of vehicles. These vehicles are used by staff for the ongoing daily operations of Broadnet’s mandate and emergency response. The fleet is made up of a variety of different types of vehicles, including standard and specialized vehicles.

Barriers: Transportation	Planned actions: Transportation
Broadnet currently has enough vehicles in its fleet, vehicles may not fully meet accessibility guidelines.	<ul style="list-style-type: none"> • Continue to consult employees who use vehicles in the current fleet to identify accessibility issues and make modifications, as required.

III. Consultations

The Human Resources and Facilities Management shall coordinate the consultation efforts on behalf of Broadnet, to contribute to the identification of barriers, the development of actions to resolve the barriers and the development of Broadnet's Accessibility Plan.

We intend to consult persons with disabilities in the preparation and improvement of our accessibility plan.

Broadnet is committed to consultation with members of the public and employees who have disabilities and the organizations that support persons with disabilities, on their perspectives and experiences with Broadnet. The consultation process will be ongoing.

Glossary

Accommodation refers to any change in the working environment that allows people with a disability or functional limitation to do their job. Changes can include:

- Adjustments to the physical workspace.
- Adaptations to the equipment or tools.
- Flexible work hours or job-sharing.
- Relocation of the person's workspace.
- The ability to work from home.
- Reallocation or exchange of some non-essential tasks for others.
- Time off for medical appointments.

Accommodations can be temporary, periodic or long-term, depending on the employee's situation or changes in the workplace.

Attitudinal barriers are behaviours, perceptions and assumptions that discriminate against persons with disabilities. These barriers often emerge from lack of understanding, which can lead people to ignore, to judge, or have misconceptions about persons with disability.

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.

Disability is 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.

Types of disabilities in the 2017 Canadian Survey on Disability

- Seeing
- Hearing
- Mobility
- Flexibility
- Dexterity
- Pain-related
- Learning
- Developmental
- Mental health-related
- Memory

Inclusion is the act of including someone or something as part of a group. An inclusive workplace is fair, equitable, supportive, welcoming and respectful. Inclusion recognizes, values and leverages differences in identities, abilities, backgrounds, cultures, skills, experiences and perspectives that support and reinforce Canada's evolving human rights framework.