



Corporate Directive

ACCESSIBLE INFORMATION AND COMMUNICATION			
Policy No.	CP.3	Policy Owner	Director, Risk, Privacy & Compliance
Date of Last Review	Initial release	Approval Date	April 16, 2025
Effective Date	April 16, 2025	Approver	Board
Additional information about this policy This is a corporate policy with a corporate-wide impact on all employees of Manitoba Public Insurance. It will be made publicly available online in accordance with the requirements of the <i>Accessible Information and Communication Standard Regulation</i> . The document is available in alternate formats upon request.			

1. Policy Statement

Manitoba Public Insurance (“MPI” or “Corporation”) is committed to ensuring equal access and participation for people with disabilities. MPI believes in inclusion and treating people with disabilities in ways that allow them to maintain their dignity and independence when transacting with MPI. This policy supports the Corporation in the systematic identification, removal, and prevention of diverse forms of information and communication barriers through its alignment with the requirements of the *Accessible Information and Communication Standard Regulation* (M.R. 47/2022) (“the Standard”) under *The Accessibility for Manitobans Act* (“The Act”).

2. Background

The Standard focuses on removing and preventing barriers that exist digitally, in-print, or through interaction with technology or people. As a Crown Corporation, MPI is required to consider how Manitobans interact with or access its information - including on websites - to develop measures, policies, and practices to ensure this information is provided barrier-free to all its customers and employees. The Standard adopts globally recognized web content accessibility guidelines as a minimum requirement. Through this policy, MPI demonstrates its intention to comply with both the spirit and the letter of the statute and regulatory standard.

3. Policy Objective

The objective of this policy is to provide guidance to the Corporation on compliance with the Standard, including how MPI is required to deliver information and communication that is accessible to all employees and customers by removing and preventing barriers that exist digitally, in print, or through interactions with technology or people.



4. Scope

This policy applies to all Member(s) of the MPI Community including service providers such as brokers (Autopac agents) and consultants who interact with MPI's customers when acting on behalf of the Corporation. See 7.4 (ii) for additional clarity regarding brokers and consultants.

5. Definitions

When interpreting this policy, the following definitions apply:

“accessible communication” means communication of information in a manner that is free from barriers that prevent or hinder a person from obtaining, using, or benefiting from the information.

“accessible format” includes large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

“barrier” is anything that interacts with the physical, mental, intellectual, or sensory disability of a person in a way that may deter the person's full and effective participation in society on an equal basis. Examples of barriers include physical, architectural, information or communication, attitudinal, and technological barriers. It can also include barriers established or systemically perpetuated by an enactment, a policy, or a practice.

“communication” means the transfer of information between two or more persons or entities or any combination of them.

“communication support” includes captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication.

“information” means data, facts or knowledge that is written, photographed, recorded, or stored in any manner.

“Manitoba's Accessible Information and Communication Standard Regulation” is a regulation enacted under the Act that sets out measures for removing and preventing barriers that exist digitally, in-print, or through interaction with technology or people.

“Member(s) of the MPI Community” means the Board of Directors, all employees of the Corporation, Brokers, and all consultants¹ in the service of the Corporation.

“significant update” means an update to an existing web application that changes the web application's functionality, user base, or purpose.

“WCAG 2.1 Level AA” means the World Wide Web Consortium Web Content Accessibility Guidelines 2.1 Level AA.

¹ Including service providers who are interacting with customers on MPI's behalf.



“**web content**” means information that is published on the Internet website of an organization or government agency.

“**web application**” means a software application that:

- i. includes dynamic and interactive elements (i.e. the application is run on a web server); and
- ii. can be assessed through a web browser.

6. Policy Guiding Principles

MPI recognizes that some individuals may face barriers that prevent or hinder them from obtaining, using, or benefiting from information and communication provided by the Corporation.

MPI is committed to full compliance with the Standard under The Act. To this end, this policy prescribes certain requirements for both individuals and the organization at large to implement and with which to adhere to ensure compliance with all responsibilities and obligations under the legislation and specifically, the Standard.

This policy is consistent with MPI’s mission, vision, and values including the principles of dignity, independence, access, integration, and equal opportunity for all people with disabilities; it aligns with and is supported by the requirements of Corporate Directive P.36, Accessibility (see section 8 – Related Documents, below).

The Director, Risk, Privacy & Compliance will direct the French Language Services and Accessibility Coordinator (“Accessibility Coordinator”) to ensure implementation of the Standard throughout the Corporation, and to coordinate compliance with this policy. The Accessibility Coordinator will work with relevant departments and business units as required and will be supported on an ongoing basis by MPI’s Accessibility Committee.

To the extent that the Standard allows, including consideration of the concepts of reasonable accommodation and undue hardship, MPI will pursue the implementation, amendment, or removal of MPI policies, procedures, or resources as necessary to support and promote the principles consistent with the Standard.

7. Requirements

7.1 Requesting Accessible Information

A person may request that MPI provide information, including information related to emergency procedures or public safety, through a communication support or accessible format.

MPI will:

- i. Work with the requestor to identify requirements for accessible information and communication that exist respecting the information, formats, and communication supports it provides



- ii. seek to remediate / remove barriers it is responsible for, so that all persons can obtain, use, or benefit from the information and materials in accessible formats and/or communication supports
- iii. seek to prevent new barriers from being created

MPI will make every effort to communicate with a person who has identified an accessibility requirement. Recognizing that there are many different types of disabilities that may impact information and communication, MPI will work directly with individuals to determine their requirements and what method of communication best works for them.

MPI's actions will be consistent with the principles of the Act and its obligations including the obligation to make reasonable accommodations as prescribed under *The Human Rights Code* (Manitoba).

If individuals request information through a communication support or accessible format that cannot be reasonably accommodated, the Corporation will demonstrate why. If there are no further reasonable or practical steps available to reduce negative impacts based on the disability or barriers, one or more of the following reasons must apply:

- i. it is not technically feasible to provide the information through a communication support or accessible format
- ii. the technology required to provide the information through a communication support or accessible format is not readily available
- iii. providing the information through a communication support or accessible format would result in undue hardship to the organization
- iv. the organization does not have direct control over the information
- v. the information relates to product labels or other product information

7.2 Accessible Web Content and Web Applications

MPI's web content and web applications will conform with WCAG 2.1 Level AA if they meet the following criteria:

- i. the web content or web application is published on or after May 1, 2024
- ii. the web application receives a significant update on or after May 1, 2024
- iii. the web content is required to access MPI's products or services

MPI is committed to conforming with WCAG 2.1 Level AA and its actions will be consistent with the purposes and principles of The Act and its obligations – including the obligation to make reasonable accommodations.



There may be some instances where web content and/or web applications are not required to conform with WCAG 2.1 Level AA if one or more of the following applies:

- i. it is not technically feasible to publish the web content or web application in accordance with WCAG 2.1 Level AA
- ii. the technology required to publish the web content or web application in accordance with WCAG 2.1 Level AA is not readily available
- iii. publishing the web content or web application in accordance with WCAG 2.1 Level AA would result in undue hardship to the organization
- iv. the organization does not have direct control over the web content or web application
- v. the web content or web application relates to product labels or other product information

7.3 Training and Awareness

Notwithstanding that this policy applies to all Members of the MPI Community, MPI's Accessibility Coordinator, working with relevant department and business unit managers is responsible for providing awareness and/or training on the Standard to the following groups:

- i. employees, consultants, and volunteers who communicate directly to the public or to another organization in Manitoba on behalf of MPI
- ii. people involved in developing or implementing the Corporation's policies and practices respecting accessible communication
- iii. people who develop or maintain the organization's web content
- iv. people who purchase or procure information technology or communication tools on behalf of the Corporation
- v. people involved in developing and implementing driver education and road safety awareness campaigns
- vi. any other employee assigned responsibilities related to the requirements in this policy

Training may include the following topics:

- background and purpose of relevant legislation including *The Accessibility for Manitobans Act* and *The Human Rights Code*
- the requirements of *The Accessible Information and Communication Standard Regulation*
- how to identify, prevent, and remove barriers to accessible communication in the workplace



- how to provide information through a communication support or accessible format

7.4 Customer Request and Feedback

MPI will respond to all requests for accessible information in alignment with Corporate Directive P.36, and using existing internal processes² the Corporation has developed for:

- i. receiving and responding to requests and feedback about the accessibility of its information and communication in a manner that is appropriate in the circumstances and is suitable for persons who are requesting the information;
- ii. educating and working closely with brokers (*Autopac* agents) and consultants to provide knowledge of available services through established procedures regarding access to the Standard; and
- iii. documenting its resulting actions and making that documentation available on request.

7.5 Documentation

MPI will document its policies, practices, and procedures for providing accessible information and communication, including:

- general policies, practices, and procedures;
- a description of the feedback process.

MPI will provide copies of this documentation on request.

If the documentation is requested by a person who has an accessibility requirement, the Corporation will ensure that the documentation or the information contained in it is given to the person:

- i. in a manner that considers the accessibility requirement; and
- ii. within a reasonable time and at no cost to the person.

8. Roles and Responsibilities

8.1 Members of the MPI Community are responsible for adhering to the expectations outlined in this policy when and to the extent that they:

- i. communicate directly to the public or to another organization in Manitoba on behalf of the Corporation;
- ii. develop or maintain the Corporation's web content;
- iii. purchase or procure information technology or communication tools for or on behalf of the Corporation;

² This refers to the requirements under the Access & Privacy Policy and its associated procedures among several others that may exist.



- iv. develop or implement the Corporation's measures, policies and practices respecting accessible communication; and
- v. develop or implement driver education and road safety awareness campaigns for or on behalf of the Corporation.

8.2 The Director, Risk, Privacy & Compliance will:

- i. be accountable for the implementation of this policy.
- ii. direct the Accessibility Coordinator to ensure implementation of the Standard throughout the Corporation, and coordination of compliance with this Policy.

8.3 Management will:

- i. ensure that all persons within the scope of this Policy under their supervision are informed of their responsibilities related to the Act and Standard.
- ii. be responsible for monitoring and enforcing the terms of this Policy and for notifying and escalating gaps and breaches accordingly.
- iii. coordinate with the Accessibility Coordinator to ensure that this Policy is made publicly available.

9. Related Documents

- [Accessible Information and Communication Standard Regulation](#)
- [Access and Privacy Policy](#)
- [Corporate Directive P.36, Accessibility](#)
- [Manitoba Public Insurance Corporation's Accessibility site](#)
- [The Accessibility for Manitobans Act \(AMA\)](#)

10. Exceptions to the Policy

There are no exceptions to this policy unless as granted by appropriate Executive Committee and Board approvals.

11. Owner/Inquiries

The owner of this policy is the Director, Risk, Privacy & Compliance who is responsible for enforcing and updating the policy as required. All inquiries regarding this policy should be directed to accessibility@mpi.mb.ca for assistance.

12. Transitions Provisions

Although this policy is effective from the date it is approved, it is understood that not all the requirements defined in it can be complied with until associated procedures and practices are established, and technical and technological solutions can be procured and



implemented. The Corporation will always comply with the policy to the greatest extent possible as the implementation process of the WCAG requirements matures.

13. Periodic Review

The Accessibility Coordinator working with the Director, Risk, Privacy & Compliance will review and revise this policy as required in line with applicable organizational changes and regulatory developments.



Document Version Control

Version	Date	Summary of Changes	Author
0.1	February 22, 2024	Initial draft	Yvette Deveau
0.2	November, 2024	Enhanced draft prepared for POC review	Marie-Josée Carrière Karl Krueger
1.0	December 6, 2024	Initial release for EC and Board approval	Marie-Josée Carrière Karl Krueger