

# Manitoba Public Insurance's Multi-Year Accessibility Plan

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# 1. Overview of programs and services

#### Mission

Exceptional coverage and service, affordable rates and safer roads through public auto insurance.

#### **Profile**

The Manitoba Public Insurance Corporation (Manitoba Public Insurance, or MPI) is a provincial Crown corporation that has served Manitobans since 1971. It provides universal compulsory Basic automobile insurance coverage, as well as a number of additional insurance options for private and commercial vehicles. MPI also administers driver and vehicle licensing services for the Government of Manitoba, and promotes road safety through education, programming, and awareness campaigns.

Services are available through claim and service centres in 12 communities across the province and at more than 300 Autopac agents across Manitoba.

#### Insurance

The universal compulsory insurance, Basic Autopac, provides physical-damage and third-party liability coverage. The Personal Injury Protection Plan (PIPP) provides no-fault coverage for all Manitoba residents injured in an automobile accident anywhere in Canada or the United States.

Manitobans can choose to add Autopac options to their Basic insurance, such as lower deductibles, increased third-party liability, and coverage for rented, leased and off-road vehicles. MPI also offers Special Risk Extension products, primarily for commercial fleets.

## **Driver and vehicle licensing**

On behalf of the Government of Manitoba, MPI tests and licenses all classes of drivers, and oversees vehicle registrations and safety inspections. MPI also administers the Manitoba Identification Card program.

# Working together with our community

MPI delivers Manitoba's High School Driver Education program – "Driver Z" – in schools across the province, and leads safety awareness and community programming to educate Manitobans of all ages about road safety.

For more information, visit <u>www.mpi.mb.ca</u>.

#### 2. Statement of commitment

MPI's Statement of Commitment to Accessibility:

Manitoba Public Insurance is committed to ensuring equal access and participation for people with disabilities. We believe in inclusion and are committed to treating people with disabilities in ways that allow them to maintain their dignity and independence. We will do this by identifying, removing and preventing barriers and by meeting the requirements of The Accessibility for Manitobans Act.

The Accessibility for Manitobans Act (AMA) seeks to identify, remove and prevent barriers in key areas of daily living. To align its workplace and operation with this legislation, MPI created an Accessibility Plan to serve as a guide to ensure that the Corporation has a clear and comprehensive roadmap towards universal accessibility.

With the leadership and advocacy of a broad-based internal Accessibility Committee <sup>1</sup> composed of representatives from a variety of MPI business areas, the Corporation is continuously acting on this commitment to improve barrier-free access to its goods and services and comply with the AMA and any related regulations and standards. Specifically, the Committee facilitates the implementation and promotion of accessibility-centred policies and accessibility-related tasks as outlined in its Multi-Year Accessibility Plan. These efforts are coordinated throughout MPI through its designated Accessibility Coordinator who is tasked with the mandate of promoting and enhancing barrier-free access for MPI customers and employees. The Accessibility Coordinator also ensures that feedback processes are accessible, and is responsible for fielding, tracking and reporting on accessibility feedback received both internally and externally in a timely fashion.

Over the last eight years, MPI has built on its accessibility plans to ensure continued adherence to the requirements of the provincially legislated standards, which began with *The Accessible Customer Service Standard Regulation* in 2015. MPI's Accessible Customer Service Plan was developed specifically to address the requirements of this standard. The Accessible Customer Service Plan is designed to ensure that services and products are accessible to all customers – regardless of their abilities or challenges.

<sup>&</sup>lt;sup>1</sup> MPI's AWG (Accessibility Working Group) is now known as the Accessibility Committee.



The Accessible Employment Standard Regulation was the second standard to be enacted under the AMA (2019). In response, MPI developed its Accessible Employment Policy to address the removal and prevention of barriers that affect current and potential employees.

The Accessibility Standard for Information and Communication is the third standard to be enacted under the AMA. This standard was enacted in 2022, and MPI is currently developing an internal policy to ensure its requirements are understood and met throughout the Corporation. It addresses the Standard's requirements that barriers that exist digitally, in print or through interactions with technology or people, are identified, removed and prevented to ensure information and communication is accessible to all Manitobans.

MPI believes that everyone has a role to play in improving accessibility and is proud to stand with its employees and customers in doing so. Looking ahead, MPI will continue its commitment to comply with the AMA and will evolve its Multi-Year Accessibility Plan to ensure that future, additional standards brought forward are addressed.

# 3. Multi-Year Accessibility Plan - 2023/24 achievements

# **General requirements**

#### Planned initiatives

- Develop and publish the 2023-2024 MPI Accessibility Plan in accessible formats.
- Continue to collaborate with customers and employees on an individual basis to respond to accessibility needs; feedback is monitored by the Accessibility
   Coordinator in conjunction with the Accessibility Committee to ensure ongoing compliance with the AMA and regulations.
- Review, develop and monitor industry best practices and actions to comply with new standards as they are enacted, ensuring the best customer experience.

#### **Outcomes**

- Developed 2023-2024 Plan and released in an accessible format, based on feedback from customers, staff and advocacy agencies.
- Feedback received, reviewed and handled on an individual basis to respond to the individual accessibility needs; feedback is received by the Accessibility Coordinator and discussed with the Accessibility Committee to ensure ongoing compliance with AMA and regulations.
- Developed new Information and Communication Standard Policy, and internal Accessibility Training delivered to all MPI employees.

# Accessible formats, communication and documentation

### **Planned initiatives**

- Convert existing documents and publications to accessible formats as identified or updated.
- Include access offer on public website, and in all publications and documents.

- Continue with the creation of new documents, publications and information in accessible formats.
- Review, develop and monitor actions to comply with new standards as they are enacted.

#### **Outcomes**

- Updated our corporate style guide to include word choices for more accessible interactions with user interfaces.
- Ensured that all corporate mandatory training is available in accessible format(s) upon request to all who require it.
- Added requirement to meet the new AMA standards in issuing the statement of work for MPI's new knowledge management platform.

#### **Feedback**

#### Planned initiatives

- Continue receiving feedback, addressing barriers and facilitating appropriate solutions to remove identified barriers.
- Continue to collect and analyze data and develop appropriate benchmarking and metrics.

- MPI continued to receive and respond to feedback via various platforms (i.e., inperson, online, phone, etc.); in response to customer and employee feedback,
  collaborated with the Accessibility Committee and/or appropriate departments
  in addressing identified barriers and finding solutions to address these.
- Tracked all requests for feedback, complaints and inquires; data is analyzed and reviewed during quarterly Accessibility Committee meetings.

#### **Procurement**

#### Planned initiatives

 Continue to ensure the procurement process includes accessibility considerations and alignment with new standards as enacted.

#### **Outcomes**

- Added standard requirements to all Requests For Proposals (RFPs) to address the requirements of new and recently enacted standards.
- Existing vendor contracts amended to include reference to new standards.
- Continued to monitor public-facing documents that originate out of the departments regarding accessibility standards.

# **Training**

#### Planned initiatives

- Continue to deliver training to all new employees on the AMA, the Human Rights Code, and Accessibility Standards for Customer Service and Employment.
- Develop appropriate training and resources for successful implementation of The Accessible Information and Communication Standard Regulation.
- Develop appropriate training and resources for new standards as they are implemented.

- Delivered training to all new employees on the AMA, the Human Rights Code, and Accessibility Standards for Customer Service and Employment; since May 2022 a total of 2,661 employees have completed the training.
- Launched mandatory training on the Accessible Information and Communication
   Standard in July 2024.
- Continued to auto-enroll all new employees of MPI to complete mandatory accessibility training at point of hire.

 Continued to offer training specific to each new standard, as it pertains to employees and customers of the Corporation.

# **Employment**

#### Planned initiatives

- Continue to comply with the Accessible Employment Standard addressing:
  - o pre-employment accessibility requirements
  - employment accessibility requirements
- Continue to create individual Persons Requiring Assistance (PRA) plans for employees who require assistance during an emergency evacuation from an MPI location.

#### **Outcomes**

- MPI website updated to comply with the Accessible Employment Standard by
  ensuring current and potential employees are aware that reasonable
  accommodations are available upon request during any phase of the
  assessment and recruitment process.
- Continued to support employees during employment based on employees' individual needs and requirements.
- Continued to develop and enhance plans for employees identifying as PRA as needed.
  - Emergency Response Plans have been put in place for new hires who have self-identified as having an accessibility barrier
  - PRA plans are shared with leaders

#### Information and communication

#### Planned initiatives

- Continue to maintain and update the Accessibility page on MPI's public website
- Continue to ensure all web content and web applications are accessible and conform with WCAG 2.1 Level AA requirements

- Continue to create corporate standard guidelines and requirements for accessible web content and applications, and share the document with employees who:
  - communicate directly to the public or other organizations on behalf of MPI
  - o develop or maintain MPI's web content and applications
  - o purchase or procure information technology or communication tools
  - develop or maintain measures, policies and practices respecting accessible communication
- Consider audit tools to flag accessibility issues in web content and applications
- Increase use of ASL and alternate audio and video formats

- Continued to ensure applications and content developed and used at MPI conform to the accessibility guidelines
  - several internal and customer-facing applications and website features
     were updated to conform with minimum requirements this past year
  - o various others are scheduled for the next and future years as feasible
- Continued to explore how to increase use of American Sign Language (ASL).
- Providing alternative formats for all newly created internal training web content.
- Complete audit of all existing internal training materials; created plan to provide alternate formats as required and feasible.
- Updated Corporate branded templates for improved accessibility.
- Created training content standards for accessibility.
- Newly created internal training videos are required to have closed captioning.
- Continued to maintain and update the Accessibility page on MPI's public
  website to reflect the Corporation's ongoing efforts to provide barrier-free
  access and to provide critical communications and awareness on accessibility
  issues.

#### **Built environment**

#### Planned initiatives

- Continue to integrate barrier-free, universal-design principles when upgrading current or designing new buildings.
- Finalize the Cityplace Space Plan Project, with the intent to reach a high level of barrier-free/universal design, based on staff and third-party specialist feedback.
- Address feedback from employees and customers in a timely way.

- Incorporated broader accessible design principles into the Cityplace Space Plan, 8<sup>th</sup> Floor, in addition to meeting minimum building code requirements.
- Incorporated feedback from an internal Accessibility resource team and Independent Accessibility Reviewer into the 8<sup>th</sup> floor space; feedback included consistent placement of card access readers, contrasting finishes to indicate changes in direction or obstructions, and automatic door operators in locations not required by code, but used frequently by all staff.
- Considered needs of all staff of furniture in the new space
  - o for example, low seating and tables are available, as are standing options
  - o open space near collaborative furniture enables ease of movement
  - workstations have electric height adjustable tables to suit a wide range
     of people and abilities
- Assisted with staff returning to the office at-large (Hybrid Work Program) by creating empathetic and thoughtful solutions for those experiencing difficulty with elements of the new space.
- Began redesign of the Gateway Service Centre front counter, with aim to achieve better accessible design features for both our staff and customers.
- Continued with the creation of a responsive atmosphere with regard to staff and customer questions, suggestions, and requests about accessibility (e.g.,

moving ahead with installing a door operator in a space not "technically" required to have one, based on a thoughtful suggestion).

# Consultation and survey feedback

As in previous years, in preparation for the drafting of this new Multi-Year Accessibility Plan, MPI carried out consultations with the general public, customers, employees and representatives from 73 Manitoba agencies that support people with disabilities, to obtain feedback and help identify issues which pose barriers to accessibility at MPI.

The consultations consisted of surveys to the various target audiences. For ease of benchmarking, attaining greater year-over-year confidence in data, and to be able to better identify trending issues, the survey questions and sources of feedback were consistent with those utilized for all previous consultations dating back to MPI's 2017-18 accessibility plan. This past year, however, a few new questions were added to specifically address the new *Accessibility Standard for Information and Communication*. The survey also included a new question to gain insight into various assistive technologies in use and gaining popularity today. As we continue to move to more online services, it becomes useful to better understand our customers' and employees' current and future accessibility needs in this regard.

The public was invited to participate on MPI's website and via social media channels. The survey was also sent to MPI's Voice of the Customer ePanel<sup>2</sup> members to seek customer feedback.

Employees of MPI, and Manitoba agencies serving the disabled community were notified of the survey via email. Surveys were made available in Accessible format and were offered in both English and French.

In all, more than 1,400 surveys were completed:

- 46 public surveys
- 10 agency surveys
- 783 employee surveys
- 603 Voice of the Customer ePanel surveys

MPI values the insights obtained, and considers all feedback in the development of

 $<sup>^2</sup>$  MPI's Voice of the Customer ePanel is a randomly selected group of MPI customers that provides ongoing feedback to help shape the future of MPI products and services. MPI has been contacting customers by email to obtain their consent to participate in ongoing feedback and surveying opportunities.

this and future plans and will continue to reflect on opportunities during the timeframe covered by this Accessibility Plan.

The following is a representative sample of employee and customer feedback that highlights the main themes and issues that emerged through the most recent feedback process.

# Architectural or structural barriers and opportunities

- Some office configurations and meeting spaces are difficult to access and navigate for customers and employees using mobility aids.
- The photo station footprint at some locations is small and inaccessible for someone in a wheelchair.
- Provide a stool or a chair with removeable arms so everyone fits in a chair at a photo station.
- Some employee workstations are elevated, and customers sitting in a standard office chair sit significantly lower than the employee and their desk.
- Some kitchen and washroom counter heights are inaccessible to someone in a wheelchair.
- Snow clearing is not always thorough or completed promptly making entry a challenge to some Manitobans.
- Some parking lots at cityplace are not easily accessible (the doors for Lot 1 and Lot 5).
- Promote and share information on parking options for customers and employees with mobility issues.
- Some customers need to sit while waiting or transacting and some MPI locations have limited or no seating.
- Some of the elevators at Cityplace are not audible (e.g., the arrival chime, the floor announcement).

# Information and communication barriers and opportunities

- Certain colour combinations make details invisible for colour blind people. Provide training and promote the accessible colour palette. Using accessible colours can enhance understanding and reduce bias and misunderstanding.
- Relocate the link to the accessibility page on the MPI public website so it is more visible.
- Provide customers with more and easier access to language and communication options including American Sign Language (ASL).

# **Technology barriers and opportunities**

- While there is public interest in online services, it is not feasible for some customers. Maintain options for customers who are unable to access online services. Some customers need to phone or transact in-person due to poor computer skills or they are unable to use communication technology or the internet.
- Partner with disability advocacy agencies to promote MPI's accessibility tools and services.
- Ensure web-based applications are accessible to employees using assistive technologies
- Colours and text sizes used in corporate branding, MPI website, documents, applications, and surveys can be problematic for some customers and employees with visual impairments.
- Permit the use of video relay service (VRS).
- Ensure the MPI website is compliant with WCAG (Web Content Accessibility Guidelines) and regularly audit the website for continued compliance with these standards.

# Systemic barriers and opportunities

- Use the public website and social media to promote the accessibility resources offered to the public.
- Allow customers who are unable to sign documentation due to physical limitations to verbally sign.
- Ergonomic requests are inefficient, cumbersome, and take too long to complete. Some employees claim their ergonomic requests are ignored or unfulfilled.

# **Attitudinal barriers and opportunities**

- Educate MPI employees about nonvisible disabilities. The needs of customers and employees with nonvisible disabilities are not always accommodated.
- Develop more resources and perhaps independent consultation as to how to address and accommodate customers and employees with nonvisible disabilities.
- Employees do not always have patience when asked to repeat communications, or when
  a customer is anxious. Understand that anxiety can make transactions such as a licence
  suspension, reporting an at-fault claim, or taking a test more difficult for some customers.
- Use plain language during customer transactions and in communication.

Some customers seem to be unaware of the accessibility resources available to them.
 These resources should be promoted for customers who may need to reach out to someone to discuss their accessibility concerns and needs.

# 2025/26 Multi-Year Accessibility Plan

MPI's 2025/26 Multi-Year Accessibility Plan builds on previous plans to develop and navigate a roadmap to guide the Corporation on its journey to becoming a fully accessible organization. The goal is to make all MPI environments (physical, online, etc.) accessible and welcoming – places where both employees and customers are accommodated according to their needs, and barriers are eliminated, reduced, or expertly managed. Accessibility is a long-term, continuous process, but success also depends on maintaining and achieving effective short-term goals. The following planned initiatives and actions for the upcoming fiscal year reflect a continuation of our multi-year approach to building an accessible MPI.

#### Planned initiatives and actions for 2025/26

#### 1. General

- Develop and publish the 2025/26 Multi-Year Accessibility Plan in accessible formats.
- Collaborate with customers and employees on an individual basis to respond to accessibility needs.
- Monitor government and industry best practices and actions to enhance MPI's knowledge and understanding of the development and implementation of a barrier-free environment for its employees and customers.
- Work to ensure ongoing compliance with the AMA and regulations.

#### 2. Accessible formats, communication and documentation

- Continue the process of updating frontline policy and procedure documentation to MPI's plain language standard to help support frontline teams and partners in customer conversations where possible.
- Continue to use inclusive language and words in documentation that work effectively with assistive technologies (e.g., screen reader tools).
- Continue to ensure access to alternate formats is offered on public website, and in all publications and documents.

 Conduct regular checks to identify improvements to ensure compliance with Web Content Accessibility Guidelines (WCAG) standards; identify, track, and implement improvements for both content and format.

#### 3. Feedback

- Continue receiving feedback and addressing barriers by facilitating appropriate
  solutions to remove identified barriers with the appropriate teams at MPI.
   Feedback will be acknowledged within two business days and solutions will be
  communicated within 30 days or less depending on the complexity of the
  feedback received.
- Initiate "deeper dives" into issues identified through MPI's recent public
  consultation and ongoing engagement with staff and customers (for example,
  and especially, the rise in non-visible, mental health barriers), and working with
  MPI's Accessibility Committee, plan and advance initiatives to address these
  issues.
- Continue to collect and analyze data and develop appropriate benchmarking and metrics to better understand accessibility requirements throughout the organization.

#### 4. Procurement

- Continue to ensure that MPI's procurement processes include accessibility considerations and align with new standards as enacted.
  - Explore the potential amendment to the procurement process to expand on accessibility by appointing a subject matter expert to its Strategic Sourcing and Vendor Management team.

#### 5. Training

- Continue to deliver "mandatory" training to current and new employees on the
   Human Rights Code and the AMA and its associated regulations.
- Undertake revision of all MPI Accessibility Training at MPI to include content specific to the Accessibility and Communication Standard; new training to be

- rolled out to employees to provide an in-depth refresher on the importance of identifying and removing barriers for all Manitobans.
- Explore new assistive technology tools such as those included in Microsoft 365 that will enhance the use of various different assistive devices within MPI.
- Provide education and training to MPI employees as necessary and/or applicable on available accessibility tools and services offered at MPI.

# 6. Employment

- Review and assess specific feedback from the 2024 Public Consultation relating
  to the application and recruitment process and explore improvement
  opportunities as feasible or as required to ensure compliance with statutory
  and regulatory requirements.
- Ensure ongoing compliance with the Accessible Employment Standard
   Regulation by addressing:
  - o pre-employment accessibility requirements
  - o employment accessibility requirements
- Continue to create individual Persons Requiring Assistance (PRA) plans for employees with disabilities who require assistance during an emergency evacuation.
- Explore new options for employee ergonomic assessments to create efficiencies and improvement in delivery.

#### 7. Information and communication

- Continue to maintain, audit and update the Accessibility page on MPI's public website.
- Continue to update content platforms to enable additional accessibility features once moved to new platforms.
- Convert MPI website content to use plain language (at a Grade 8 reading level)
   wherever possible to improve the consistency of content across all topics.
  - Develop and maintain new standards to improve content on an ongoing basis

- Complete a planned audit of all systems, applications, and software used at MPI
   to:
  - ensure all web content and applications follow accessibility requirements
     where possible to do so
  - identify any remaining web content and applications required to be updated to meet WCAG 2.1 Level AA requirements
  - ensure formal plans are in place to support accessible formats requests for web content and applications that cannot be brought up to required accessibility standards
- Increase awareness, availability, and use of ASL and alternate audio and video formats.
- Update and maintain an internal centralized Accessibility Intranet mini site to provide MPI employees with a central virtual hub to promote awareness and provide training on available accessible services and options at MPI.
- Explore the possible implementation and use of Video Relay Service (VRS).
- Create a plan to help educate our customers on the availability of Accessibility
   Services offered at MPI using multiple different platforms.

#### 8. Built environments

- Continue to integrate barrier-free, universal-design principles at the highest level possible when upgrading current or constructing new facilities.
- Review and assess feedback concerns from employees and customers as feasible or as required to ensure compliance with statutory and regulatory requirements.
  - Make action plans to integrate changes to our facilities, based on customer and employee feedback.
- Ensure contracts (i.e. snow clearing/elevator maintenance) receive regular audits and monitoring to ensure MPI's contract specifications that support Accessibility are being met.

• Ensure finer details, such as furniture for customer and employee environments are carefully considered to ensure the utmost in inclusivity.

# 4. Feedback process

MPI encourages feedback about accessibility and our Multi-Year Accessibility Plan. Feedback can be shared in writing via mail or email or by telephone:

# **Mailing Address:**

Manitoba Public Insurance Accessibility Coordinator P.O. Box 6300 234 Donald Street Winnipeg, MB R3C 4A4

Phone: 204-985-8770 ext. 7477 Toll-free: 1-800-665-2410 TTY/TTD: 204-985-8832 Email: accessibility@mpi.mb.ca

MPI, through its Accessibility Coordinator commits to reviewing all feedback and any concerns received.

A response acknowledging receipt of feedback or concern is generally provided within two business days.

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