



## **ACCESSIBILITY PLAN**

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## ACCESSIBILITY PLAN

### INTRODUCTION

The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is to establish, implement and enforce standards to make Ontario completely accessible to those with disabilities with respect to goods, services, facilities, employment, accommodation and buildings by 2025. The *Accessibility Standard for Customer Service* was the first standard to become law, and the *Integrated Accessibility Standards Regulation* (IASR) will have general requirements phased into law between 2011 and 2025.

The Accessibility for Manitobans Act, 2013 (AMA) provides a proactive process to remove barriers affecting persons with disabilities in Manitoba. *The Customer Service Accessibility Standard* came into effect in October 2015 and addresses business practices and training requirements to provide better customer service to people with disabilities.

This document is the accessibility plan for all MNP's active business entities, and it outlines MNP's strategy for preventing and removing barriers to accessibility and meeting the requirements set out in both acts and related regulations.

### COMMITMENT

MNP is committed to meeting the expectations and intent of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), The Accessibility for Manitobans Act, 2013 (AMA) and related regulations. MNP values diversity and inclusion in its team members and embraces diversity as a core value. We recognize the diverse needs of our clients and we strive to provide services in a way that respects the dignity, independence, integration and equal opportunity. We consider a diverse range of people for employment and offer advancement opportunities to all team members. We are committed to providing reasonable accommodation for individuals with disabilities.

MNP will achieve a barrier-free and accommodating work environment through this accessibility plan that outlines actions to prevent and remove barriers to accessibility and to meet the requirements.. We have created policies and procedures that clearly benefit team members with disabilities and show our commitment to provide accessibility for our clients and employees overall.

MNP has established additional policies to support our Accessibility Policy:

- 3.1 Equal Opportunity Policy
- 3.2 Workplace Harassment, Discrimination and Violence Policy
- 4.13 Performance Management Program Policy

MNP's Accessibility Plan is posted on the MNP website and will be provided in an accessible format upon request. MNP will review and update the accessibility plan at least once every five (5) years. The most recent revision occurred in December 2020.

In 2015, MNP created an Accessibility Steering Committee. The committee reviews the AODA and recommends and approves accessibility policies and procedures to ensure MNP is meeting our legal requirements under AODA. The committee meets regularly to review MNP's progress in achieving compliance with AODA and the Regulations.

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 (AODA)**  
**ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE**

The first of the five standards relates to customer service and is known as the *Accessibility Standard for Customer Service*. This standard ensures that individuals with disabilities will receive fully accessible, high-quality customer service. Businesses are expected to provide goods and services under the principles of dignity, independence, integration, and equal opportunity. All organizations that have more than one employee are required to comply with this standard.

Businesses are expected to provide goods and services under the principles of dignity, independence, integration and equal opportunity. All organizations that have more than one employee are required to comply with this standard. MNP is committed to providing accessible services to our clients.

**1. Feedback Process Regarding Provision of Services to Persons with Disabilities**

**Objectives:** *Establish a process for receiving and responding to feedback and concerns about the manner in which we provide services to persons with disabilities. The feedback process must permit persons to provide their feedback in person, by telephone, in writing, or electronically.*

**AODA Compliance Date:** *January 1, 2012*

**Actions Taken:** *MNP has created a process for receiving and responding to our accessible processes. MNP welcomes feedback regarding its accessibility processes. Feedback can be provided via:*

- In person via mail to any [local office](#)
- By telephone/TTY or in person at any [local MNP office](#)
- Email: [accessibility@mnp.ca](mailto:accessibility@mnp.ca)

*Where possible, MNP will respond to feedback with a confirmation of receipt and a response or commitment to further investigation within five (5) business days from receipt of the inquiry.*

*Additionally, we have created the MNP Accessibility Information form to provide guidance to Human Capital and internal customer facing team members on how to appropriately receive and respond to feedback and on how we provide services to people with disabilities. The guidance is available to all team members. The website indicates that upon request, these documents will be provided in a format that takes individual needs into consideration.*

**Status:** *Complete*

**2. Establishment of Policies, Practices and Procedures**

**Objectives:** *To develop, implement, and maintain policies, practices and procedures that will govern the provision of MNP services to persons with disabilities. Policies, practices and procedures will demonstrate that MNP services will be provided in a manner that respects the dignity and independence of persons with disabilities. These policies will be made publicly available upon request.*

**AODA Compliance Date:** *January 1, 2014*

**Actions Taken:** *MNP has developed an Accessibility Policy that addresses these requirements and includes a statement of organizational commitment to accessibility. The policy outlines the provision of goods and services to persons with disabilities; the use of assistive devices; the use of guide dogs, service animals and service dogs; the use of support persons; notice of service disruptions; customer feedback; training; and the notice of availability and format of documents. The policy is found on the MNP website in our Accessibility Standards Section and can be found in the MNP Policy Manual which is reviewed by all team members upon hire, and annually thereafter.*

*We have also established the MNP Customer Service Plan in Ontario and Manitoba, which provides a process for receiving customer feedback and handling. This plan can be accessed on our website and is available internally for all team members.*

**Status:** Complete

*In the rare event that MNP might require a support person to accompany a person with a disability, we consult with the person with a disability to understand their needs and consider available evidence to determine that:*

- A support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises
- There is no other reasonable way to protect the health or safety of the person or others on the premises

*If there is any payable admission fee that might be charged for the admission of the support person, we ensure such fee is:*

- Disclosed clearly in advance
- Waived for the support person

### **3. Accessibility Customer Service Training**

**Objectives:** *Ensure all team members in Ontario receive training regarding the purposes of the AODA, the requirements of this Regulation, and the provision of MNP services to persons with disabilities. They are to receive training as soon as practicable on how to interact and communicate with persons with disabilities (including those who require the use of an assistive device or assistance of a service animal or support person and how to use assistive equipment or devices).*

**AODA Compliance Date:** January 1, 2015

**Actions Taken:** *Online training has been organized and completed by all current Ontario team members. New Ontario team members are required to complete training upon hire.*

*MNP maintains records of the training dates for team members.*

**Status:** Complete and ongoing

## **INTEGRATED ACCESSIBILITY STANDARDS**

The *Integrated Accessibility Standards Regulation (IASR)* sets out standards regarding information and communications, employment, and transportation. The requirements in this standard are not a replacement or a substitution for the requirements established under the Human Rights Code.

### **GENERAL**

#### **1. Establishment of Accessibility Policies**

**Objectives:** *Develop, implement, and maintain policies that govern how MNP will achieve accessibility through meeting the applicable requirements under the IASR. These policies will include a statement of organizational commitment.*

**AODA Compliance Date:** January 1, 2014

**Actions Taken:** *MNP has developed an Accessibility Policy that addresses the requirements under the AODA and the IASR and includes a statement of organizational commitment to accessibility. The policy outlines the provision of goods and services to persons with disabilities; the use of assistive devices; the use of guide dogs, service animals, and service dogs; the use of support persons; notice of service disruptions;*

customer feedback; training; and the notice of availability and format of documents. It also addresses the requirements under the IASR regarding information, communication, and employment standards.

The policy is found on the MNP website in the Accessibility Standards Section, as is also available internally to all team members. Team members are required to review all MNP policies on an annual basis.

**Status:** Complete

## 2. Integrated Standards Training

**Objectives:** Ensure training is provided on the accessibility standards in the Regulation and the Ontario Human Rights Code to every employee, volunteer, and other persons who participate in the development of MNP's policies or provide goods, services, or facilities on behalf of MNP.

**AODA Compliance Date:** January 1, 2015

**Actions Taken:** In addition to the Customer Service Standards training that all Ontario team members have already undergone; additional training has been organized for current Ontario Human Capital team members on the requirements of the IASR and the Ontario Human Rights Code. This training will be completed prior to January 1, 2016. Additionally, team members outside of Human Capital, who are involved in policy-making, recruitment and performance management will be trained regarding the IASR and the Ontario Human Rights Code prior to March 1, 2016. New Human Capital team members, as well as those involved in policy-making, recruitment, and performance management, will also be required to take this training. MNP maintains records of the dates training was provided to our team members.

**Status:** Complete and ongoing

## INFORMATION AND COMMUNICATION STANDARDS

### 1. Accessible Feedback

**Objectives:** Ensure that the current process for receiving and responding to feedback is accessible to persons with disabilities by providing for accessible formats or communication supports on request.

**AODA Compliance Date:** January 1, 2015

**Actions Taken:** MNP has created the MNP Accessibility Plan for Customer Service in Ontario to provide guidance on receiving and responding to feedback. This plan can be accessed on our website and will be provided in an accessible format upon request.

All feedback we receive is monitored and handled in accordance with our documented procedures.

**Status:** Complete

### 2. Accessible Formats and Communication Supports

**Objectives:** Provide alternate formats or communication supports for persons with disabilities, on request. Consult with the person making the request to determine the suitability of an accessible format or communication support and provide these alternative formats or communication supports in a timely manner.

**AODA Compliance Date:** January 1, 2016

**Actions Taken:** We have created an accommodation plan request form, which team members can access internally. As per our documented accommodation process, Regional Human Capital will work directly with the team member requiring the accommodation to ensure alternative formats or communication supports are provided as needed, in a timely manner.

*Additionally, upon request, MNP will arrange for the provision of accessible formats and communication supports.*

**Status:** Complete

### **3. Accessible Websites and Web Content**

**Objectives:** *Make all new internet websites conform to certain sections of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0.*

**AODA Compliance Date:**

*January 1, 2014: new internet websites and web content must conform to WCAG 2.0 Level A*

*January 1, 2021: all internet websites and web content must conform to WCAG 2.0 Level AA*

**Actions Taken:** *MNP's internet site has undergone a significant refresh. As part of this process, updates to the website have been made to ensure compliance with WCAG 2.0 Level AA, except where impracticable.*

**Status:** Complete

## **EMPLOYMENT STANDARDS**

### **1. Recruitment, Assessment, and Selection Process**

**Objectives:** *Notify employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process. Notify selected job applicants during the recruitment process that accommodations are available upon request in relation to materials or processes to be used. In the circumstance that a selected applicant requests an accommodation, consult with the applicant and provide or arrange for suitable accommodation that take into account the applicants unique accessibility needs.*

**AODA Compliance Date:** January 1, 2016

**Actions Taken:** *All standard communications with applicants, used throughout the recruitment process have been updated to ensure the public is aware of the availability of accommodations for applicants with disabilities. The [MNPcareers.ca](http://MNPcareers.ca) website has been updated with a Diversity and Inclusion statement, and an accommodation statement has been added to the start of our online application process and in all of our pre-formatted and standard email communications.*

*Our recruitment processes, including interview guidelines and scripts, have been updated with details on informing candidates of available accommodation during the recruitment process to ensure non-bias and to recognize accessibility standards at MNP.*

**Status:** Complete

### **2. Notice to Successful Applicants**

**Objectives:** *When making employment offers, notify the successful applicant of our policies for accommodating employees with disabilities.*

**AODA Compliance Date:** January 1, 2016

**Actions Taken:** *All standard MNP offer letters for permanent, fixed-term contract, part-time and subcontractors have been updated to include an accommodation statement. Additionally, the standard email in which our offer letters are distributed also includes information for candidates on how to request accommodation prior to and upon hire.*

**Status:** Complete

### 3. Informing Employees of Supports

**Objectives:** Inform team members of policies to support employees with disabilities, including policies on the provision of job accommodation. Provide new employees with the information as soon as practicable upon commencement of employment and provide updated information whenever there is a change in policy.

**AODA Compliance Date:** January 1, 2016

**Actions Taken:** As part of MNP's onboarding process, all new hires are required to review our entire policy manual. All team members are required to review our policies on an annual basis. Additionally, new team members in Ontario will have the opportunity to complete the accommodation plan form so they may request necessary accommodations. We have developed a guideline for Human Capital staff on how to provide accommodations for those team members who request it. This accommodation plan form is also available to existing team members who require accommodations during the course of employment with MNP.

**Status:** Complete

### 4. Accessible Formats and Communication Supports for Employees

**Objectives:** Upon request, consult with team members requiring accessible formats and communication supports for information that is needed in order for them to perform his or her job, and information that is generally available to employees in the workplace. Team member consultation should determine the suitability of an accessible format or communication support.

**AODA Compliance Date:** January 1, 2016

**Actions Taken:** Accessible formats and communication support processes have been developed for both those returning from leave as well as for existing employees. Employees can request an accommodation via the accommodation plan form, and Regional Human Capital will work with them to understand what supports are required, and ensure those supports are supplied in the appropriate format.

**Status:** Complete.

### 5. Workplace Emergency Response Information

**Objectives:** Provide individualized workplace emergency response information to each team member that requires assistance in the event of an emergency. The emergency response information must be provided as soon as practicable once MNP becomes aware of the need for an accommodation for the team members. Review individualized workplace emergency response information as required.

**AODA Compliance Date:** January 1, 2012

**Actions Taken:** Health and Safety guides for each MNP office in Ontario include a statement regarding the availability of accommodation and individualized workplace emergency response procedures. The guides will advise team members how to receive the Health and Safety guide in an alternate format, as well as how to request an individualized safety plan. Regional Human Capital Advisors will work directly with team members to create an individualized plan with any team member who requests it via our accommodation plan form.

**Status:** Complete.

### 6. Documented Individual Accommodation Plans

**Objectives:** Establish written processes for the development of a documented individual accommodation plan for employees with disabilities that meets the requirements described in the Integrated Standards.

**AODA Compliance Date:** January 1, 2016



**Actions Taken:** A process for the development of a documented individual accommodation plan for those returning from a medically supported leave of absence, and for those who need accommodation outside of a leave absence has been created and has been posted internally. Individual accommodation plans will include the team member's workplace emergency response information and the accessible formats and communication supports that the team member requires. The plan will also include any other accommodations that the employee needs to do their job.

**Status:** Complete

## 7. Return to Work Process

**Objectives:** Document a return-to-work process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work. The process must outline the steps MNP will take to facilitate the return to work of the team member, and use documented individual accommodation plans.

**AODA Compliance Date:** January 1, 2016

**Actions Taken:** A return-to-work process has been created and is utilized as a best practice by our MNP Group Benefits team and Regional Human Capital when assisting a team member with their return to work. As part of the process, individual accommodation plans will be created, and include the team member's workplace emergency response information and the accessible formats and communication supports that the team member requires. The plan will also include any other accommodations that the employee needs to do their job.

**Status:** Complete

## 8. Performance Management

**Objectives:** The accessibility needs of team members with disabilities or individual job accommodation plans, will be taken into consideration during performance management processes.

**AODA Compliance Date:** January 1, 2016

**Actions Taken:** MNP management will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans during mid-year and year end performance management reviews with team members. MNP's Performance Management process has been updated to include a statement on accommodation. MNP's Equal Opportunity Policy also addresses this objective.

**Status:** Complete

## 9. Career Development and Advancement

**Objectives:** The accessibility needs of team members as well as any individual accommodation plans must be taken into consideration when providing career development and advancement opportunities to employees.

**AODA Compliance Date:** January 1, 2016

**Actions Taken:** MNP management will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when considering career development and advancement for team members. MNP's Workplace Harassment, Discrimination and Violence Policy includes a statement regarding this. MNP's Equal Opportunity Policy also addresses this objective.

**Status:** Complete

## 10. Redeployment

**Objectives:** *The accessibility needs of team members with disabilities as well as any individual accommodation plans must be taken into consideration when coordinating redeployment.*

**AODA Compliance Date:** *January 1, 2016*

**Actions Taken:** *MNP management will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when considering the redeployment of team members. MNP's Equal Opportunity Policy addresses this objective.*

**Status:** *Complete*

## THE ACCESSIBILITY FOR MANITOBANS ACT (AMA), 2013 ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

*The Accessibility for Manitobans Act (AMA)* is legislation which provides a proactive process to remove barriers affecting persons with disabilities and many other citizens. The Government of Manitoba is committed to making Manitoba more inclusive for everyone.

The *Accessibility Standard for Customer Service* ensures that individuals with disabilities can access barrier-free customer service in all Manitoba organizations (including businesses) that have at least one employee. Under the regulation, accessible customer service is provided when all personal who are reasonably expected to obtain, use or benefit from a good or service have the same opportunity to obtain, use or benefit from the good or service.

MNP is committed to providing accessible services to all our clients and vendors by identifying barriers, creating policies and procedures and providing service accommodations at no additional fee. MNP has taken the following actions to ensure compliance.

### 1. Feedback Process Regarding Provision of Services to Persons with Disabilities

**Objectives:** *Establish a process for receiving and responding to feedback about the accessibility of an organization's goods or services in a manner that is appropriate in the circumstances and is suitable for persons who are disabled by barriers, document its resulting actions, making that documentation available on request.*

**AMA Compliance Date:** November 1, 2018

**Actions Taken:** *MNP has created a process for receiving and responding to our accessible processes. MNP welcomes feedback regarding its accessibility processes. Feedback can be provided via:*

- In person via mail to any [local office](#)
- By telephone/TTY or in person at any [local MNP office](#)
- Email [accessibility@mnp.ca](mailto:accessibility@mnp.ca)

*Where possible, MNP will respond to feedback with a confirmation of receipt and a response or commitment to further investigation within five (5) business days from receipt of the inquiry.*

*Additionally, we have created an MNP Accessibility Information form to provide guidance to Human Capital and internal customer facing team members on how to appropriately receive and respond to feedback and on how we provide services to people with disabilities. The guidance is available to team members. The website indicates that upon request, these documents will be provided in a format that takes individual needs into consideration.*

**Status:** Complete

### 2. Accessibility Customer Service Training

**Objectives:** *Ensure all team members in Manitoba who provide goods or services directly to the public or who is responsible for participating in the development or implementation of the organizations measures, policies and practices receive training about accessible customer service. Training must include how to interact and communicate with persons disabled by barriers, how to accommodate assistive devices and what to do if a person is disabled and having difficulty accessing a good or service and a review of the Human Rights Code, the Act and this regulation. Documentation on when the training occurred and its content is to be provided.*

**AMA Compliance Date:** November 1, 2018

**Actions Taken:** Online training has been organized and completed by all current Manitoba team members. New team members in Manitoba are required to complete training upon hire.

MNP maintains records of the training dates for team members.

**Status:** Complete and ongoing

### 3. Documentation re: Measures

**Objectives:** Prominently display the measures, policies and practices an organization has established and implemented on the company website and provide a copy of the documentation in a manner that takes into account the barrier within a reasonable time frame upon request.

**AODA Compliance Date:** November 1, 2018

**Actions Taken:** MNP's website has an accessibility link that outlines our commitment to accommodating those with disabilities along with this Accessibility Plan. The website contains accessible PDF copies of our Accessibility Policy that outlines the provision of goods and services to persons with disabilities; the use of assistive devices; the use of guide dogs, service animals, and service dogs; the use of support persons; notice of service disruptions; customer feedback; training; and the notice of availability and format of documents.

Our website also contains access to our MNP Customer Service Plan in Ontario and Manitoba, which provides a process for receiving customer feedback and handling. This plan can be accessed on our website and is available internally for all team members.

**Status:** Complete

### 4. Communications

**Objectives:** Create measures, policies and practices that make reasonable effort to ensure that when communicating with a person who self-identifies as being disabled by a barrier, the communication is done in a manner that takes into account the barrier. This includes accommodating requests for assistive devices, support persons, and service animals.

**AODA Compliance Date:** November 1, 2018

**Actions Taken:** MNP's website contains accessible PDF copies of our Accessibility Policy that outlines the provision of goods and services to persons with disabilities; the use of assistive devices; the use of guide dogs, service animals and service dogs; the use of support persons; notice of service disruptions; customer feedback; training; and the notice of availability and format of documents.

Our website also contains access to our MNP Customer Service Plan in Ontario and Manitoba, which demonstrates our commitment to accommodating a client's requirement for an assistive device, support person or service animal.

**Status:** Complete

This document is available in accessible formats upon request

Questions? Email: [accessibility@mnp.ca](mailto:accessibility@mnp.ca)