



# Accessibility Plan (January 2021 – December 2022) for Manitoba Liquor & Lotteries

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The following plan highlights Liquor & Lotteries’ achievements in calendar years 2019 and 2020 as well as identifies the actions Liquor & Lotteries will commit to in calendar years 2021 and 2022.

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This publication is available in alternative formats upon request.

## **Overview of programs and services**

Manitoba Liquor & Lotteries' purpose is to enrich the lives of Manitobans. As a provincial Crown corporation, we contribute to the general revenue of the Province of Manitoba directly through the sale of liquor, gaming and indirectly through the distribution of cannabis from producers to private retailers. Programs and services like healthcare, education, social services, housing and infrastructure are funded through the Province of Manitoba's general revenue.

We provide products, services and entertainment to customers 18 years and older. Our customers are primarily residents of Manitoba, but we also deliver services to the many tourists visiting our province. Consumers of our products and entertainment services span a wide range of demographics and we strive to ensure our products meet the diverse needs of our customers.

All liquor, gaming and cannabis sold by over 3,300 private retailers and other businesses in Manitoba is purchased through the corporation. We supply products to liquor and beer vendors, specialty wine stores, restaurants and bars, lottery retailers, cannabis retailers and other licensees.

We operate the network of video lottery terminals (VLT) found at privately licensed establishments and First Nations sites, and supply equipment and oversight to First Nations casinos and the Shark Club Gaming Centre. Manitoba's PlayNow.com is managed under agreement with British Columbia Lottery Corporation.

We distribute and sell lottery tickets as a member of the Western Canada Lottery Corporation and, by extension, the Interprovincial Lottery Corporation. We are the exclusive supplier of breakopen tickets and bingo paper in Manitoba.

We directly operate all Liquor Mart, Liquor Mart Express stores and the Casinos of Winnipeg. We employ more than 3,200 people in Liquor Marts, Casinos of Winnipeg, Shark Club Gaming Centre, our liquor distribution centre, multi-use warehouses and corporate offices in Winnipeg, Brandon and Morris.

Focusing on customer and employee well-being, and sustainability are central to our business approach.

## **Statement of commitment**

Manitoba Liquor & Lotteries believes in diversity and inclusion. We are committed to equal access and participation for all people, regardless of their abilities. We are committed to treating all people in the way that allows them to maintain their dignity and independence. We are committed to identifying, removing and preventing barriers to accessibility and meeting the requirements of *The Accessibility for Manitobans Act*.

On an ongoing basis, Liquor & Lotteries monitors its operations as it relates to *The Accessibility for Manitobans Act* and standards. Liquor & Lotteries' policies, including its accessibility policy, are reviewed, and if required, updated annually to ensure consistency. These policies are available in alternate formats upon request.

## **Accessibility achievements in 2019 and 2020**

Manitoba Liquor & Lotteries continually looks to identify, remove and prevent barriers to people with disabilities. Past achievements can be found in the corporation's [previous accessibility plans](#).

In the calendar years 2019 and 2020, the corporation took the following steps to enhance accessibility for customers and employees:

### **Corporate**

- Employees at office and retail locations across the corporation were actively involved in the identification and removal of barriers.
- Conducted an employee diversity census with an expanded definition of persons with a disability to ensure representation of persons with invisible disabilities and those who do not require workplace accommodation. The percentage of employees with disabilities increased from 5.09% to 5.27%.
- Accessibility reviews have been incorporated into the corporate procurement process alongside existing sustainable development requirements.

### **Customer service**

- Liquor home delivery service can be accessed through online and phone-ordering service in Winnipeg, a phone-ordering service in Brandon, and most recently began accepting credit card orders over the phone which allows greater ease of ordering for customers.
- Liquor home delivery significantly enhanced the convenience and accessibility of delivered products by increasing the daily maximum order threshold, general product assortments and locally manufactured products.
- Click and collect contactless services began on a pilot basis at three Winnipeg Liquor Marts in December 2020. Click and collect accommodates customers with safety and health concerns and/or customers who have difficulty wearing masks or face shields during the COVID-19 pandemic.

## Information and communication

- Web links to accessibility commitments and customer service information is now included on five websites: liquormarts.ca, casinosofwinnipeg.com, mbllpartners.ca, manitobavlts.ca, and manitobabrewhub.ca.
- Liquor home delivery and click and collect are featured prominently on liquormarts.ca for easy access to the online service. The Contact Centre email is placed prominently throughout checkout and the phone number is available on the site for easy alternative access.
- PlayNow.com accessibility has improved by using technology that re-sizes content based on a user's device screen and changing layout to make game tiles easier to view. In addition, British Columbia Lottery Corporation, the service provider, allows support persons to represent customers on customer service calls.
- New gaming machines now include brighter and higher resolution graphics for visual clarity and taller displays with curved monitor technology so that it is less strenuous for players to view the entire screen.

## Employment

- The Employee Mass Notification System was launched in 2019 to notify employees of hazardous or dangerous events at or around their workplaces. This system allows corporate email users to receive email notifications and an additional notification to the corporate cell phone users. Employees who do not have corporate cell phones have the option to receive notifications on their personal cell phones.
- *Manitoba Fire Code* and city by-laws require us to have fire safety plans. Over the last six years the fire safety plans were significantly refined and now incorporate accessibility procedures. Employees are actively asked to self-declare a temporary or permanent disability that could impact a workplace emergency. A copy of the individual's needs is maintained within the properties' fire safety plans. A support person is identified and informed of an individuals' specific needs during a workplace emergency.

- Reducing Unconscious Bias in Hiring training was recently developed internally to help management be aware of and reduce any implicit attitude, stereotype, motivation, or assumption that could significantly impact potential and existing employees. This training was developed with voiceover and closed captioning options and has been rolled out to Liquor Mart management.
- A new diversity policy was developed.

### **Built Environment**

- A procedure on service animals was developed and shared with employees at casinos and Liquor Marts. Service animals have full access to all spaces available to customers and are provided space next to the guest at Club Regent Event Centre and other assigned/rushed seating events.

### Liquor Marts

- Controlled entrances were added to Winnipeg, Portage la Prairie, Brandon, and Selkirk stores with minimal impact on accessibility. The security desk to present identification meets accessibility standards.
- Liquor Marts with controlled entrances must only allow entry to customers with acceptable identification. If a support person does not have acceptable identification, employees will offer to support the customer during their shopping experience. In addition, customers in Winnipeg can use click and collect, and customers in Winnipeg and Brandon can use liquor home delivery as an alternate shopping solution.
- Accessibility features such as lowered counters, single lane checkouts, wide aisles, new rear-stocking fridges are incorporated into the renovation plans for Liquor Marts.

### Casinos

- Casino navigation has improved by creating separate entrance and exit doors to allow for social distancing during the pandemic. Promotional displays are placed in areas where there is easy navigation and access for all and are of a size that they can be clearly seen.

- Line-ups to enter casino tournaments are monitored for guests requiring registration assistance, and tournament machines are monitored for guests who require assistance to remove the slot chair.
- Scan to Win program scanners are now installed in easy to access areas. Scanners are positioned at an accessible height. Signage is large and bright on a monitor above the scanner.
- Interactive prize giveaway showdowns are held on main floors in large accessible spaces and participants may use a support person if needed (for example, to spin the wheel).
- Gaming equipment design was improved to allow employees easier access to service the machines.
- Casinos of Winnipeg Club Card program is available at the casino Players Club. This allows guests to interact in-person with an employee who can help them sign up and explain program benefits. Additionally, guests can apply for a Club Card through the online sign-up form that is screen reader compatible.
- Single lane checkouts were implemented at the casino's Players Club.

## **Current accessibility barriers**

To identify operational accessibility barriers, accessibility audits were conducted in 2017 at main customer contact points including casinos, Liquor Marts, Liquor Mart Express stores, and corporate receptions. In addition, ongoing consultations occur with Liquor & Lotteries employees from all areas of the corporation. Some of the barriers found include:

### **Attitudinal**

- Management plays an integral role in ensuring the accessibility needs of their employees have been met. Management would benefit from added training on providing reasonable accommodation to employees who encounter permanent or temporary barriers and considering the barriers during the employee's performance review process.
- A network of coworkers committed to raising awareness and celebrating diversity and inclusion in the workplace could be brought together as a diversity committee.
- A diversity policy and long-term diversity strategy have not yet been implemented.

### **Physical and architectural**

- While the facilities are being continuously upgraded to increase accessibility, not all sites currently meet accessibility requirements.
- New controlled entrances at all Liquor Marts in Winnipeg, Brandon, Portage la Prairie and Selkirk, have introduced barriers for support persons who do not have proper identification to enter these retail locations.

### **Informational and communication**

- Employees would benefit from increased information about the importance to self-declare a disability or a workplace barrier.

## **Technology**

- Current telephone system does not accept TTY (Teletype) telephone calls from customers.
- While multiple assistive devices are made available at no charge to customers at the facilities, headsets are not available on gaming devices.

## **Systemic**

- Plans for 2020 wayfinding signage improvements were interrupted by the COVID-19 pandemic. Continuous improvements to wayfinding signage is made ad hoc at retail establishments according to customer feedback.
- Employees who have identified a barrier during a workplace emergency may benefit from having more than one support person to ensure support is provided.

## **Actions for 2021 and 2022**

Manitoba Liquor & Lotteries acknowledges the unprecedented nature of the COVID-19 pandemic and the effects it has had on our operations and customers. Addressing barriers will continue to be a priority as public health orders and related operational changes evolve.

The actions mentioned in earlier plans that have been executed and completed are not mentioned below.

The ongoing actions mentioned below are the initiatives that continue to be monitored.

### **1: Corporate-wide processes to ensure equal access and participation for people with disabilities**

#### **Ongoing actions**

- Vice-President, Legal & Corporate Secretary has executive responsibility and oversight of accessibility policy and compliance.
- Accessibility Coordinator consults with internal stakeholders to embed accessibility, monitor progress, and facilitate priority planning for the accessibility plan. Accessibility Coordinator also leads consultations with the disability community to identify and remove barriers.
- All employees have a role to ensuring customer service is provided, enabling access for all and meeting provincial accessibility standards.

#### **New initiatives/actions**

- A new long-term diversity strategy will be developed in 2021 by a newly hired Program Manager of Diversity & Inclusion.
- Feedback from customers and the disability community will be actively sought to identify barriers in the workplace and at facilities through consultation meetings and surveys.
- An accessibility requirements list will be developed for guidance when monitoring Requests for Goods and Services bid documents. Proactive efforts will be made to train affected departments across the corporation.

- Accessibility requirements will be embedded within the corporation's educational development policy.

### **Expected outcomes**

- Executive and senior management is aware of progress made on compliance with *The Accessibility for Manitobans Act* and considers future action plans.
- Clear expectations will be set about accessibility commitments and requirements.
- Identified barriers will be removed and/or reasonable accommodation alternatives will be in place.
- Accessibility plan is posted on mbll.ca website every two years and available in alternate formats.
- Progress on accessibility compliance and initiatives will be continually monitored for implementation.

## **2: Provide accessible customer service**

### **Ongoing actions**

- Mandatory *Accessibility Act – Customer Service Standard* training helps employees identify and remove barriers, work with customers to offer reasonable alternatives when a barrier cannot be removed and respond to customer's accommodation requests. Review the *Accessibility Act – Customer Service Standard* training to ensure it meets the current standards and ensure all employees requiring the training have completed it.
- A record of accessibility requests through [accessibility@mbll.ca](mailto:accessibility@mbll.ca) is maintained. Employees are given the tools and support to provide accessible customer service when requests are received.
- A process to communicate to the public about temporary barriers is in place and has been shared with affected employees.
- Accessibility guidelines are included in corporate event planning processes.

### **New initiatives/actions**

- Teletype (TTY) telephone call capabilities will be explored.
- The annual public meeting will be conducted virtually to make it more accessible for Manitobans.

### **Expected outcomes**

- Improved customer service.
- Employees are trained to identify and remove barriers, respond to customer's accommodation requests, and offer reasonable alternatives when a barrier cannot be removed at facilities and public events.

## **3: Provide accessible information and communications**

### **Ongoing initiatives**

- Continue to maintain and update the accessibility page on corporate website.
- Continue to ensure all websites are compliant for accessibility and follow current web accessibility development standards.
- Continue to work with BCLC to ensure hosted PlayNow.com site and related customer services are accessible.
- Remind employees who communicate with external partners, customers and other employees about the communications guide resource, which includes accessibility guidelines.

### **New initiatives/actions**

- Create a set of formal guidelines and requirements for accessible websites and social media platforms; share the document with employees who develop or edit these sites.
- Plan an audit of casinosofwinnipeg.com, which was refreshed in 2018 but not yet audited. Accessibility standards were a requirement in the building of the casinosofwinnipeg.com site.

## **Expected outcomes**

- Information regarding accessibility commitments and plans are clear and readily accessible.
- Employees are aware of accessible formats and communication to enhance customer service.
- All websites created by the corporation are accessible.
- PlayNow.com features and related customer services are accessible.

## **4: Maintain an accessible workplace that encourages a diverse workforce**

### **Ongoing initiatives**

- Employment opportunities are broadly advertised to the disability community.
- Identify and remove barriers to job descriptions, where reasonable.
- Interview protocols with a proactive emphasis on accessibility and accommodating the needs of job applicants continues.
- Information about requesting accommodation is accessible and available to all employees, especially new employees during orientation.
- Onboarding training, and professional and personal development training is available in accessible formats, upon request.
- Individualized accommodation plans and workplace emergency processes are outlined in the workplace accommodation policy to provide a safe and productive work environment for employees.

### **New initiatives/actions**

- Implement a diversity network which will bring together employees from various employment equity groups to learn about and discuss diversity issues, including disabilities.
- Implement accessibility training within existing management training that relate to the employment standard. For example, train management on reasonable accommodation to employees who may be disabled by barriers and consider the barriers during the employee's performance review process.
- Include instructions in the performance management process to discuss potential barriers and individualized accommodations for employees.

- Rollout Reducing Unconscious Bias in Hiring training to all management.
- Update the existing online training guide for workers compensation claims to include the return-to-work individualized accommodations procedure for employees who were injured in the workplace.
- Add service animals in the workplace, within the current service animals procedure.

### **Expected outcomes**

- Compliance with the Employment Standard under the *Accessibility Act*.
- Job applications are received from persons with disabilities.
- Job descriptions will not unreasonably exclude persons with disabilities.
- Interview processes that do not create barriers for persons with disabilities.
- New employees are aware of how to request and receive accommodation.
- A network of coworkers who are committed to raising awareness and celebrating diversity and inclusion in the workplace.
- Employees are supported and provided with the training and accommodation required to perform their duties to the best of their abilities.
- Service animals are allowed in the workplace.

## **5: Create and maintain barrier-free facilities and workplaces**

### **Ongoing initiatives**

- Ongoing review of facilities and workplaces to identify, temporarily accommodate, and remove barriers.
- Ensure all applicable building codes and by-laws with respect to accessibility are met in future lease acquisitions, and facility and site renovations
- Continue to evolve wayfinding signage at retail establishments.
- Maintain fire safety plans and evacuation procedures.

## **New initiatives/actions**

- Work with the disability community to complete an audit of facilities and workplaces to identify any new accessibility barriers since 2017.
- Assess inventory and list the minimum requirements and cost estimates for any additional accessibility options that are beyond the building codes.
- Communicate to employees the importance of self-declaring a new, temporary or pre-existing barrier for workplace emergency response plans.
- Assign two support persons in the emergency response plans for each employee who is temporarily or permanently disabled in the workplace.

## **Expected outcomes**

- Barrier-free facilities and workplaces.
- Removal and prevention of barriers is included and considered in future leased space, and facility maintenance and renovations on an ongoing basis.
- Ongoing improvements are made in consultation with the disability community.
- Improved wayfinding at retail establishments.
- Emergency response plans remove barriers during a workplace emergency.

## **Contact**

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### **Approved by:**

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Date approved