

**Accessibility Plan**

**(January 2023 – December 2024)**
**for Manitoba Liquor & Lotteries**

The following plan highlights Liquor & Lotteries’ achievements in calendar years 2021 and 2022 as well as identifies the actions Liquor & Lotteries will commit to in calendar years 2023 and 2024.

Contents

[Overview of programs and services 2](#_Toc111036715)

[Statement of commitment 3](#_Toc111036716)

[Accessibility achievements in 2021 and 2022 4](#_Toc111036717)

[Current accessibility barriers 9](#_Toc111036718)

[Actions for 2023 and 2024 11](#_Toc111036719)

[Contact 16](#_Toc111036720)

This publication is available in alternative formats upon request.

# Overview of programs and services

Manitoba Liquor & Lotteries is a Crown corporation of the Province of Manitoba.
We distribute and sell liquor, provide gaming and entertainment experiences, and source and distribute non-medical cannabis to retailers in the province, all in a socially responsible manner.

As a Crown corporation, our mandate is to provide revenue to the Government of Manitoba to support provincial programs and initiatives in areas such as healthcare, education, social services, housing and infrastructure. Each year, Liquor & Lotteries commits 2% of annual anticipated net income for liquor, gambling and cannabis based social responsibility programs.

As a retailer, Manitoba Liquor & Lotteries operates 63 Liquor Marts (including six Liquor Mart Express locations) in the province. As the province’s distributor, wholesaler, and retailer of liquor, we manage liquor distribution for approximately 1,800 commercial customers including licensees (bars, restaurants, hotel beer vendors), liquor vendors, and specialty wines stores, as well as Liquor Marts.

Liquor & Lotteries owns and operates Club Regent Casino and McPhillips Station Casino as well as the Club Regent Event Centre. We are also responsible for the conduct and management of three First Nations casinos, manage and operate gaming activities at the Shark Club Gaming Centre for True North Sports & Entertainment, and deliver online gambling for Manitobans through PlayNow.com. We are also responsible for the operation and maintenance of the province’s Video Lottery Terminal (VLT) network.

As the sole distributor of lottery products, Manitoba Liquor & Lotteries manages a lottery retailer network across Manitoba that is responsible for selling products and services for lotteries, conducted and managed under the authority of the Western Canada Lottery Corporation (e.g., Lotto 6/49, Lotto Max, Sport Select, Scratch n’ Win). Liquor & Lotteries is also the exclusive supplier of breakopen tickets and bingo paper in the province.

As the Province of Manitoba’s designated wholesale and distributor of non-medical cannabis, Manitoba Liquor & Lotteries facilitates the purchase and delivery of non-medical cannabis transactions between cannabis retailers and licensed producers.

Manitoba Liquor & Lotteries employs approximately 3,000 people throughout our offices, warehouses, casinos, and retail locations in Winnipeg, Brandon, and Morris. Focusing on sustainability, and customer and employee well-being 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 to ensure consistency. These policies are available in alternate formats upon request.

# Accessibility achievements in 2021 and 2022

Manitoba Liquor & Lotteries continually looks to identify, remove, and prevent barriers for people with disabilities. Past achievements can be found in the corporation's website by clicking on this link called: [previous accessibility plans](https://www.mbll.ca/content/accessibility).

In the calendar years 2021 and 2022, the corporation took the following steps to enhance accessibility for customers and employees:

**Corporate**

* Established a Diversity, Equity + Inclusion (DE+I) Committee, comprised of employees from across the corporation. This Committee serves as the main discussion and advisory body of advancements of DE+I for minority groups like age, gender, racially marginalized, Indigenous, and persons with disabilities.
* Conducted an employee diversity census in 2022 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 was captured in the results.
* Due to a recent change to the corporate procurement process, by embedding an accessibility requirements list, some projects were screened or scored for their accessibility features.

**Customer service**

* Accessible seating was installed at the Club Regent Event Centre to improve comfort for those who request seating accommodation. The new accessible chairs are sturdy, have wide arms, and can be used for either theatre seating or event floor functions.
* A new satellite bar was installed in the Club Regent Event Centre “pre-function room”. This new bar offers accessible features which improves the ability for customers to order and pay for drinks.
* Accessible features were implemented in all casino washrooms, including accessible hand washing, improved wheelchair access and new grab bars.

**Information and communication**

* Liquor & Lotteries’ Annual Public Meeting was conducted virtually in February 2022. For the first time, the recording of this meeting, that is posted for public viewing on mbll.ca, included an American Sign Language (ASL) interpreter.
* Completed accessibility reviews of the Liquor Mart Sip N’ Savor newsletter, the Casinos of Winnipeg Club Card E-Calendar, and Club Regent Event Centre pre-sale emails for upcoming events. Improvements identified from this accessibility review will be implemented.
* Initial technical accessibility reviews for websites and social media channels were completed in 2022. The outputs of these reviews will be evaluated in 2023 and appropriate improvements will be implemented.
* Website and social media content managers (employees) participated in accessibility training through LinkedIn Learning; employees will now apply their learnings to future content creation.
* Developed a website and social media accessibility checklist to assist content creators when publishing new online content.
* Improved awareness of accessibility considerations among employees by increasing the cadence of internal communications that featured accessibility topics. This included intranet features, posters, and signage for Manitoba Access Awareness Week, Disability Employment Awareness Month, and the introduction of the newest standard under *The Accessibility for Manitobans Act*.
* The Accessibility & French Language Services Committee participated in a session conducted by the Deaf Centre Manitoba. This provided the committee with valuable insights to apply to future accessibility policies and procedures.

**Employment**

* Corporate office employees continued to be given the option to work from home throughout 2021 and 2022, with accommodations made for those who required office space to perform their work. This remote work flexibility, for some, increased ease of accessibility to their employment.
* Updated 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.
* Leaders and Human Resource employees participated in a customized training session focused on providing reasonable accommodation to employees who encounter barriers in the workplace and offered tips on how to consider these barriers when completing the employee’s annual performance review. Leaders will retake this training every four years; the next rollout is scheduled for 2025.
* The performance review instructions provided to leaders were improved and now include a step that requires leaders to proactively discuss workplace barriers and accommodations with their employees.
* All hiring managers participated in the *Reducing Unconscious Bias in Hiring* training to help leaders be aware of, and reduce, any implicit attitude, stereotype, motivation, or assumption that could significantly influence the hiring process.

**Built Environment**

Liquor Marts

* Liquor Marts with controlled entrances must only allow entry to customers with acceptable identification, and those 11 years and under accompanied by an adult. For individuals with a support person, both the support person and the individual may enter the store if both appear to be 18 or older and one has valid ID. In addition, customers in Winnipeg and Brandon can use click and collect and liquor home delivery as an alternate shopping solution.
* Six rural Liquor Marts are included in a new Accessibility Maintenance and Modernization Program which will be completed annually. Exterior improvements to store entrances (grades, ramps, parking spaces) and interior upgrades to doors and vestibules, cash desks (lowering and widening of access), and improved access for employees’ lunchrooms, washrooms, and offices.

Casinos

* Promotional displays are placed in areas where they do not inhibit access or navigation and are produced in a format that can be clearly visible by all customers.
* Gaming equipment placement was improved to allow employees easier access to service the machines.

# Current 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 to these audits, ongoing consultations occur with Liquor & Lotteries employees from all areas of the corporation to understand potential barriers. Some of the barriers discovered through these processes include:

**Physical and architectural**

* While the facilities are being continuously upgraded to increase accessibility, not all sites currently meet accessibility requirements.

**Informational and communication**

* Liquor & Lotteries’ managed websites have not been professionally audited for accessibility since 2017. Accessibility continues to be a requirement during content development; however, it is not guaranteed that all portions of the websites are accessible under the proposed guidelines.
* The current telephone system does not accept telephone calls from Deaf customers.
* Intercoms at corporate offices are not accessible for persons who are Deaf and, or, blind.
* Multiple assistive devices continue to be made available to casino customers at no charge, however, headsets are not yet available for gaming devices.
* While 95% of electronic games in casinos are physically accessible with its seating design, machines do not have all accessibility features on-screen.

**Systemic**

* Employees who have identified a barrier during a workplace emergency may benefit from having more than one support person, or advanced technology supports, for their safety.

# Actions for 2023 and 2024

The ongoing actions identified below represent the initiatives that Manitoba Liquor & Lotteries will continue to monitor, and deliver on, in the upcoming two years.

Please note that the actions referenced and completed in earlier accessibility plans have not been included below.

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

**Ongoing actions**

* The Vice-President, General Counsel & Corporate Secretary continues to have executive responsibility and oversight of accessibility policy and compliance.
* The Accessibility Coordinator continues to consult with internal stakeholders to embed accessibility considerations, 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 in ensuring accessible customer service is provided, enabling access for all remaining compliant with provincial accessibility standards.
* Customers, and members of the disability community, will be invited to share their feedback and identify barriers that exist in both the workplace and customer facing facilities.

**New initiatives/actions**

* A new long-term diversity framework is being developed by the Diversity Equity + Inclusion (DE+I) Committee. This new framework will incorporate accessibility considerations.
* Accessibility requirements continue to be embedded in the process to monitor Requests for Goods and Services bid documents. Proactive efforts will be made to involve affected departments across the corporation including the corporate procurement area.
* Accessibility requirements will be embedded within the corporation’s educational development policy.

**Expected outcomes**

* Executive and senior management is aware of the progress made on the two-year Accessibility Plan and supports the actions necessary to stay compliant with *The Accessibility for Manitobans Act*.
* The Accessibility & FLS Committee will monitor the progress made on the delivery of actions or initiatives identified in the two-year Accessibility Plan.
* Clear expectations will be set by the Accessibility & FLS Committee about accessibility commitments and requirements.
* Identified barriers will be removed and/or reasonable accommodation alternatives will be put in place.
* The current Accessibility plan will be posted on mbll.ca website and available in alternate formats.

**2: Provide accessible customer service**

**Ongoing actions**

* A record of accessibility requests through 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 applicable employees.
* Accessibility guidelines are included in corporate event planning processes.
* The recording of the annual public meeting will continue to include closed captioning and an ASL interpreter on-screen. If the annual public meeting returns to in-person, an ASL interpreter will be on site.

**New initiatives/actions**

* Accessible telephone call capabilities will be explored.
* Initiated a review of the *Accessibility Act – Customer Service* training to ensure it meets both the current and new standards. Once updated, all applicable employees will be required to complete this training again in 2023, four years after the 2019 initial rollout.

**Expected outcomes**

* Improved customer service at all Liquor & Lotteries locations.
* 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 work with BCLC to ensure the hosted PlayNow.com website and all 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.
* Conduct improvements and redesigns to the Liquor Mart Sip N’ Savor newsletter, the Casinos of Winnipeg Club Card E-Calendar, and Club Regent Event Centre pre-sale emails, from findings of the accessibility audit reviews.

**New initiatives/actions**

* Conduct professional accessibility audits for Liquor & Lotteries’ websites for WCAG 2.1 Level AA conformance. Findings from these audits will be used to implement additional accessibility improvements to websites, web applications, as well as maintain ongoing accessible online conformance.
* Source or develop additional accessibility training for employees who are responsible for web content and web development.

**Expected outcomes**

* Information about accessibility commitments and plans are clear and accessible.
* Employees are aware of accessible formats and communication to enhance customer service.
* All websites, web applications, social media channels and newsletters managed by the corporation are accessible.

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

**Ongoing initiatives**

* In the recent employee diversity census, it was identified that the percentage of employees with disabilities decreased from 5.5% to 5.0%. Ensure employment opportunities are broadly advertised to the disability community.
* Identify and remove barriers to job descriptions, where reasonable.
* Install and maintain 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.
* Continue the DE+I Committee that brings together employees from various employment equity groups to discuss diversity issues, including disabilities.
* Onboarding training, and professional 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.
* The Employee Mass Notification System notifies 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.
* Accessibility procedures are now incorporated into fire safety plans. Employees are 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.

**New initiatives/actions**

* 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.

**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 advising on issues related to diversity, equity 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.

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

**Ongoing initiatives**

* Ongoing review of facilities and workplaces to identify, temporarily accommodate, and remove barriers.
* Continue the annual Accessibility Maintenance & Modernization Program for barrier-free access to liquor, casino, and corporate facilities
* 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 and casino establishments.
* Maintain fire safety plans and evacuation procedures.

**New initiatives/actions**

* 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 (e.g., poker tournaments) throughout the casino. Develop a procedure on service animals in our facilities and workplaces and share with employees at casinos and Liquor Marts.
* 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.
* Upgrade eight rural Liquor Marts and 22 city Liquor Marts deemed an accessibility priority in 2023 and ongoing. Upgrades will include: parking lot, sidewalk, entrance, vestibule, flooring, point-of-sale, offices, and washrooms.

**Expected outcomes**

* Barrier-free facilities and workplaces.
* Service animals are welcomed in our 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.

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**Approved by:**

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| DECEMBER 23, 2022 |
| Date approved |