

WCB Accessibility Plan 2017-18

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A. Background

In December 2013, the Manitoba Government passed *The Accessibility for Manitobans Act* (AMA) into law. The AMA lays out the foundation for removing barriers for people with disabilities and developing standards for making Manitoba accessible for everyone.

The AMA applies to organizations that provide services or information, employs persons, or owns a building or premises.

The AMA provides the legislative authority and framework for a number of Accessibility Standards that will be passed in stages as Regulations under the AMA.

The first of these is the Customer Service Standard which was passed on November 1, 2015, and will apply to the WCB and similar bodies on November 1, 2017.

Further Standards are anticipated for the following areas: Employment; Information and Communications; Built Environment; and Transportation.

As an initial step in achieving compliance with the AMA and the associated Standards, by December 31, 2016, public-sector entities such as The Workers Compensation Board are required to prepare an Accessibility Plan covering the period 2017-2018 that includes:

- the measures the WCB has taken to date to identify and address accessibility barriers (Baseline Report);
- the measures the WCB intends to take in the two-year plan identify and address accessibility barriers (Plan);
- the measures the WCB will put in place to assess proposed policies, programs and services, enactments and by-laws for their effect on accessibility. (Evaluation).

In the preparation of the Accessibility Plan, the organization must consult with persons disabled by barriers or representatives from their organizations. Each part of the Accessibility Plan must be made available to the public.

Additional information on *The Accessibility for Manitobans Act* is available from the Disability Issues Office www.manitoba.ca/dio and Accessibility Manitoba www.AccessibilityMb.ca

Baseline Report

B. About the WCB

The WCB is an injury and disability insurance agency governed by a Board of Directors representing employers, workers and the public interest and funded by employer premiums. The WCB administers The Workers Compensation Act of Manitoba, provides benefits to injured workers including replacement of lost income and medical aid, and works with workers, employers and healthcare professionals to promote safety and health in workplaces and to return workers to health and work in a safe and timely manner.

The WCB provides benefits and supports to approximately 30,000 injured workers per year, as well as assessment and related services to approximately 34,000 employers. The WCB's main location is at 333 Broadway in Winnipeg, and it has satellite offices in Brandon and Thompson. In addition, SAFE Work Manitoba, an arms-length agency of the WCB located at 363 Broadway, provides training, consultation, information and other injury and illness prevention services to workers and employers throughout Manitoba.

The WCB is a customer-focused organization whose Mission includes putting workers and employers at the center of all we do. As part of this Mission, the WCB's Strategic Priorities Include "understanding the diverse needs and expectations of workers and employers, and providing proactive and relevant services."

C. Commitment to Accessibility

The Workers Compensation Board of Manitoba is committed to ensuring equal access and participation for all people, regardless of their abilities. In their experiences with us, the WCB is committed to the removal of barriers that are experienced by injured workers and their families, their employers, and our own employees. We are committed to treating all people in a way that allows them to maintain their dignity and independence.

This commitment includes meeting the needs of people who face accessibility barriers by identifying, removing, and preventing these barriers and by meeting the requirements of The Accessibility for Manitobans Act and its associated Standards.

The WCB administers both compulsory and optional no-fault insurance for workplace injuries to workers. Its primary function is to provide wage loss, medical, rehabilitation and impairment benefits to workers who are injured on the job. The WCB primarily focusses on compensation and return-to-work services, but injury prevention services,

such as training and consulting with workplaces on safety and health are becoming increasingly important and effective tools to reduce injury and fatality.

D. Service at the WCB

Providing compassionate and responsive service to injured workers has always been top of mind at the WCB. Examples of current initiatives and services in the regard include:

- Establishment of a Claims Service Centre staffed by representatives who are able to help the majority of injured workers with their questions and approve some medical expenses under delegated authority. This “real time” service is already reaping benefits by speeding up approvals and communication with customers.
- Establishment of a Customer-Centered Service unit whose work includes identifying from the perspective of workers and employers, where the WCB service meets expectations and where the WCB could still improve. This exercise has resulted in a number of recommendations, including technology upgrades, enhancements to the Voice of the Customer program and improvements to enable customers to use their preferred channel to interact with the WCB. The WCB also developed realistic customer profiles that will be incorporated into training to help our staff understand and anticipate individual needs.
- Introduction of a Compliance Self-Evaluator tool that employers can use to ensure they are meeting their legal responsibilities. Following a self-evaluation, they are encouraged to seek assistance from Compliance Services. Both the WCB and employers prefer this collaborative approach, with many employers reaching out for assistance to ensure they have the necessary resources to meet their obligations. The WCB also introduced an information package for newly-registered employers.
- The rollout of FlexPay, an enhanced payroll reporting and assessment payment system that allows employers to select a payment option that suits their needs. Nearly 40 per cent of employers enjoy the convenience of online payroll reporting and approximately 30 per cent of employers opted into the new electronic payment options.
- The establishment of an Employer Relationship Management unit The WCB is also working with employers to establish or strengthen their return to work programs so that injured workers are able to return quickly and safely to meaningful work. The WCB's enhanced business intelligence is helping to

identify workplaces that might benefit from the WCB's return to work consulting services.

- A Specialized Services Unit (SSU) which serves as an internal crisis unit, providing consultation and support on the most difficult and complex claims including those involving traumatic brain injuries, stress and other psychological conditions.

E. Accessibility Achievements

Customer service at the WCB can occur online through the WCB website, in-person at a WCB facility, over the telephone, and through written communication.

1. Online Accessibility

Web accessibility concerns the removal of barriers to access or interacting with websites by people with disabilities. The needs that web accessibility aims to address include:

- **Hearing:** including deafness;
- **Intellectual:** including developmental, learning and cognitive disabilities that affect memory, attention;
- **Mobility:** such as difficulty or inability to use the hands, including tremors, muscle slowness and loss of fine muscle control due to conditions such as Parkinson's Disease, muscular dystrophy, cerebral palsy, stroke;
- **Seizures:** particularly photo epileptic seizures caused by visual strobe or flashing effects;
- **Visual:** including blindness, low vision and colour blindness.

In 2013 and 2014, the WCB and SAFE Work Manitoba undertook the evaluation of their websites against an international accessibility standard, the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA. This standard was selected for the evaluation because it is the standard used in Ontario's accessibility legislation. The WCB and SAFE Work websites were audited to measure their compliance and complete website improvements were made to enhance accessibility. The audit found that, while the WCB and SAFE Work websites did not have any major barriers to accessibility, significant efforts were needed to bring them up to WCAG 2.0 AA compliance.

Accessibility improvements for each website were completed over the course of 2014. In May 2014, accessibility guidelines for content authors were provided to the WCB to assist in producing accessible content. From December 2014 to March 2015, website

content (e.g., images, videos) was reviewed and updated to bring it into compliance with WCAG 2.0 Level AA.

The WCB internal web-based portal for information (intranet) was audited against WCAG 2.0 Level AA in 2015, and improvements underway in 2016 will bring it into compliance.

2. In-Person Accessibility

In 2003, a space audit was completed for the WCB. From this, recommendations were implemented to ensure physical accessibility in and around the WCB's main building at 333 Broadway.

A Handi-Transit bus stop at the front of 333 Broadway and ample parking at the back with ramps allow for accessibility with various transportation modes.

As the WCB continues to evolve, so does the space at WCB. In the current Request for Proposal for any space planning or renovations to be done on WCB premises, the following clauses are included:

The Contractor must provide all space planning options in consideration of future requirements and obligations anticipated by enactment and proclamation of *The Accessibility for Manitobans Act*. The Contractor must plan with a goal to achieving accessibility by preventing and removing barriers that disabled people may encounter from interaction with the WCB in respect to (o) employment; (ii) accommodation; (iii) the built environment including facilities, buildings, structures and premises; (iv) delivery and receipt of goods, services and information; and (v) any other prescribed activity or undertaking that may occur in relation to the WCB's physical operations.

3. Telephone Accessibility

The WCB has access Text Telephone (TTY). This device assists with the communication needs for persons who have difficulty using a traditional telephone.

4. Written Communication Accessibility

The WCB has adopted communications guidelines to enhance accessibility and service for all by addressing language, culture, and literacy needs. Some of these guidelines include the use of plain language, simple graphics, and easy-to-read fonts.

F. Opportunities and Challenges

While the WCB can celebrate many accomplishments, there is still work to be done to improve accessibility. In order to guide the WCB's journey towards greater accessibility, a team was formed in 2016 with representation from across the organization.

Under guidance from the team, the WCB undertook an internal survey of employees regarding accessibility at all its buildings and regarding its services to injured workers and employers. Out of a workforce of approximately 625 people, 106 employees responded to two open-ended questions about accessibility:

- What does the WCB do to serve people with a disability? (abbreviated)
- Are there barriers at the WCB that you can identify? (abbreviated)

In addition, in collaboration with other crown agencies, a joint survey of disability organizations in Manitoba was conducted with questions particular to the WCB. Twenty-two (22) organizations that represent 100 to thousands of Manitobans responded to the survey.

The following sections constitute a summary of the results from these surveys.

1. Survey Results: Accessibility Barriers

The AMA defines "barriers" as anything that interacts with a disability to hinder the person's effective participation in obtaining the service. In general, the AMA notes the following categories of barriers that organizations must identify, remove and prevent from developing in the future:

a. Attitudinal Barriers

Attitudinal barriers are inaccurate beliefs or perceptions of others' ability and/or quality of life that results in unfair treatment. The attitudes carry with them very negative connotations and generate judgments about the person with disabilities. For example, staff may assume a person with a speech impairment has a mental or behavioral impairment.

A perception that arose frequently in the survey was the lack of awareness of what constitutes a barrier that prevents access to WCB services. Numerous responses expressed the absence of barriers of any type, and it seemed respondents had not given adequate consideration to the concept of barriers to accessibility.

b. Informational and Communication Barriers

Informational and communication barriers exist when an individual experiences difficulty communicating as a result of a disability. Some examples noted in the surveys regarding the WCB include:

- Ambient noise at the main front counter can interfere with persons who are hard of hearing;
- Not all staff are trained on how to use the TTY phone;
- Alternate modes of communication, like SKYPE, email, video relay, interactive chat, and blackberries for texting, are not available;
- Not all pamphlets, brochures, etc., provide notice that the document is available in alternate formats (electronic for e-readers, Braille, etc.);
- Signs at the front of 333 Broadway and on the bulletin boards are small and have poor contrast, making it difficult for persons with a visual impairment to receive information.

It was pointed out, however, that language, translation, TTY and hearing solutions are available at the WCB.

c. Technological barriers

Technological barriers include tools or work that cannot be accessed because of a disability. It was pointed out by survey respondents that technological solutions have been provided for user control of computer font sizes.

d. Systemic barriers

Systemic barriers include patterns of behavior, policies or practices that are part of the social or administrative structures of an organization and which create or perpetuate a position of relative disadvantage for certain groups. Respondents noted concerns with how systemic barriers may influence hiring practices or the ability to perform certain tasks, including:

- The use of behavior-based interviews. These interviews are highly verbal, and are critical to hiring/advancement, yet they may impede persons facing a verbal barrier.
- Many WCB jobs require high verbal skills and work on a telephone which may be difficult for employees (or potential employees) who are hearing impaired.

e. Physical and architectural barriers

Physical and architectural barriers are structures or designs preventing or impeding a person from physically accessing the physical environment or service. Some examples noted in the survey include:

- Accessible washrooms are limited to the 1st floor and basement of 333 Broadway;
- Not all workstations and kitchenettes are accessible;
- Automatic doors are not available on each floor;
- Doorknobs are at the wrong height;
- Lighting inconsistencies throughout the building;

2. General Interpretation of the Survey Results

The intent of the surveys was to explore how future consultations should unfold, as well as to provide insight into what the content for the WCB Accessibility Plan could be. The surveys have provided insight into both of these by highlighting:

- The need for consistency across the organization, such as accessibility in offices found outside of Winnipeg;
- The concern employees have regarding accessible evacuation in emergency situations, and the confusion among staff on what resources are available and what processes should be followed;
- The lack of general understanding on what constitutes accessibility, barriers and disability. Accessibility barriers which are intangible in nature are still not widely recognized;
- The general sense of support for accommodation at the same time as pockets of dismissiveness. Further exploration into this disparity may assist with attitudinal accessibility barriers at the WCB.

The responses to the surveys provide a baseline of current awareness of accessibility within the organization, as well as offer an initial opportunity to begin a dialogue on what the WCB can do to fulfill the requirements of *The Accessibility for Manitobans Act*. Respondents admitted that they have not given accessibility at the WCB much thought. The WCB is just beginning to assess the full potential for improved customer service that can be accomplished by following the requirements and spirit of the AMA and its Regulations.

Accessibility Plan 2017-2018

G. The WCB's Accessibility Plan, 2017-2018

The WCB's Accessibility Plan seeks to address requirements under the Customer Service Standard, but also anticipates the standards which will follow (for example, the employment standard that is currently out for consultation in the community).

Taking all reasonable steps to remove barriers will be dependent on budget cycles and resources. However, the WCB is committed to taking steps to ensure that barriers are removed.

An internal staff survey, an external stakeholder survey, feedback from senior management across all areas of the organization, a review of existing corporate policies have identified a number of accessibility issues to be addressed.

The key concerns on which the WCB will focus and act in the near future include:

1. Awareness

The surveys have shown that not all employees are optimally aware of what constitutes a barrier to accessibility as defined by the AMA, and how accessibility issues need to be considered in the delivery of programs and services.

The WCB will address this through several channels.

The WCB will provide training on accessibility for all new and existing staff, as it currently does in other important areas such as health and safety, corporate ethics and customer service. It is anticipated that the WCB's Joint Equity, Diversity and Inclusivity Committee will play a role in this training.

The WCB will also raise awareness about accessibility issues through regular channels such as internal staff newsletters, the Executive Management Committee blog, and intranet postings.

2. Communications

Communications is a key focus of the WCB with respect to accessibility.

An internal review indicated that inter/intranet materials meets accepted standards for accessibility.

With respect to printed materials, the WCB has adopted communications guidelines to enhance accessibility and service for all by addressing language, culture, and literacy needs. Some of these guidelines include the use of plain language, simple graphics, and easy-to-read fonts.

However, while language, translation, TTY and hearing solutions are available at the WCB, the staff survey indicated that not all employees are fully aware of these resources.

The WCB will ensure that staff awareness of these resources and how to access them is incorporated into its training and awareness initiatives.

3. Policies and Practices

The nature of the WCB's mandate means that it interacts with Manitobans with various disabilities (injured workers in particular) on a daily basis. Policies and practices generally reflect this reality and survey feedback does not indicate any substantial barriers to accessibility.

The WCB will develop an Accessibility Policy to require that accessibility be considered in the development of new WCB policies and programs.

4. The Built Environment

Surveys identified several areas where changes to the built environment could enhance accessibility. The WCB will address any immediate barriers and consider how we can enhance accessibility within our space plan and future renovations.

5. Compliance with the Customer Service Standard

The WCB will also give priority to ensuring compliance with the Customer Service Standard Regulation and its nine core requirements, to which the WCB will be subject on November 1, 2017. The nine core requirements are:

1. **Assistive devices** must be accommodated in the provision of services, and recognized in policy as allowable (s. 6);
2. **Built environment** structures that facilitate barrier-free access must be available for use. If they are not, a notice about what's wrong and when it will be fixed, and an alternate means for accessing the service, must be prominently displayed (s.9);
3. **Communications** must be done in a manner that takes into account the barrier that is disabling a person (s. 5);

4. **Complaint process** must be provided and documented in a suitable manner (s.10);
5. **Documenting** the measures must be performed on a regular basis. The documentation includes policies and practices that address barriers, providing copies upon request, and displaying notices that the documents are available upon request (s.11).
6. **Public events**, including consultations, must have a notice requesting information about a person's space accommodation needs, physical barriers, communication needs, and support required. These accommodations must be met on request by the host (s 15);
7. **Service animals** must be allowed to accompany the person (s.8);
8. **Support person** must be allowed to accompany the person with a disability. The right to a support person must be recognized in policy as allowable, including the right of both people to enter together and have mutual access at all times (s. 7);
9. **Training** on accessible customer service must be provided to those who are 1) in charge of developing or implementing measures, policies and practices that provide accessible customer service, and 2) charged with providing the service (s.13).

The WCB will undertake an assessment of its current compliance with these requirements to identify existing gaps and the measures that must be adopted to meet full compliance.

H. Evaluation of the Accessibility Plan

During the course of this Plan, the WCB will designate a staff resource to be the central repository for any accessibility issues that arise, and work with the organization to address barriers that are identified.

The WCB conducts regular customer service surveys with injured workers and employers. An opportunity for feedback on accessibility issues will be incorporated into these surveys, and steps will be taken to address any identified gaps or concerns.

I. Concluding Remarks

The WCB has achieved a great deal in making its facilities and services fully accessible. The WCB welcomes the opportunity provided by *The Accessibility for Manitobans Act* and its associated Standards to more fully recognize and address all barriers to full accessibility.