



TEACHERS' RETIREMENT  
ALLOWANCES FUND

# ACCESSIBILITY PLAN AND PRACTICES

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SERVING TEACHERS  
PAST · PRESENT · FUTURE

## TABLE OF CONTENTS

Statement of commitment	2
Overview of programs and services	2
Accessibility achievements	2
Accessibility barriers	4
Policies	4
Actions	4
Action 1 - Establish framework for measuring the effect of policies and procedures on accessibility	4
Initiatives/actions	4
Expected outcomes	4
Action 2 - Provide accessible programs and services	5
Initiatives/actions	5
Expected outcomes	5
Action 3 - Staff awareness and training	5
Initiatives/actions	5
Expected outcomes	5
Action 4 - Monitor progress	5
Initiatives/actions	5
Expected outcomes	5
Appendix A - Accessible Customer Service Policy	6
Appendix B - Accessible Employment Policy	9
Appendix C - Accessible Information and Communication Policy	11

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# Accessibility Plan and Practices

## STATEMENT OF COMMITMENT

TRAF believes in inclusion and is committed to ensuring equal access and participation to the programs and services it provides to its members, stakeholders and the public, regardless of their abilities, and is committed to providing an accessible workplace for its employees. TRAF is committed to treating people with disabilities in a way that will allow them to maintain their independence and dignity, and is committed to meeting the needs of people who face accessibility barriers.

In accordance with the requirements of *The Accessibility for Manitobans Act (AMA)*, the *Customer Service Standard Regulation (CSSR)*, the *Accessible Employment Standard Regulation* and the *Accessible Information and Communication Standard Regulation*, TRAF will use its best efforts to identify, remove and prevent barriers to accessibility, while creating sustainable and accessible business practices.

## OVERVIEW OF PROGRAMS AND SERVICES

The Teachers' Retirement Allowances Fund (TRAF), established in 1925, is the pension plan for public school teachers and other eligible employees (members) in the Province of Manitoba. TRAF:

- collects contributions from members;
- manages the investments of the pension plan;
- provides retirement, termination and death benefits to members and their beneficiaries as outlined in *The Teachers' Pensions Act*; and
- complies with the applicable sections of *The Pension Benefits Act* and the *Income Tax Act*.

TRAF offers programs and services that target the public, as reflected in TRAF's mission statement:

We commit ourselves to:

- manage the funds entrusted to our care in a prudent and professional manner;
- administer the pension plan in accordance with the legislation, and exercise discretion in a fair and equitable manner; and
- provide timely and accurate information to stakeholders.

## ACCESSIBILITY ACHIEVEMENTS

TRAF uses its best efforts to identify, remove and prevent barriers to people with disabilities. TRAF fosters an accessible organization and workplace. To that end, in 2018, TRAF conducted an initial accessibility assessment to identify existing accessibility achievements and barriers.

While TRAF has endeavored to make information and services available online, we recognize that some of our members, beneficiaries and authorized representatives may face accessibility barriers, which make it difficult for them to access our services. We remain committed to offering supports and alternative methods of communication that are sensitive to these barriers, such as offering telephone support and in-person or virtual meetings.

More specifically, TRAF has taken the following steps in a number of areas to achieve accessibility:

### Telephone

- Our telephone system is easy to navigate
- We use a telephone operator at first instance, rather than an automated system

## Written materials

- Print materials are designed with plain language, simple graphics and easy-to-read fonts
- We provide explicit notice that alternative forms of accessible communication are available

## Website

- Meets Website Content Accessibility Guidelines (WCAG) 2.1 level AA
- Uses colours, fonts, icons, photography and white space mindfully to create a readable environment
- Provides the ability to modify some font sizes and contrast settings
- Offers the option for certain information to be presented in audio format
- Provides notice that materials are available in alternate formats
- Materials that are available on our website are supplemented in the following ways, upon request:
  - We provide assistance in filling out forms
  - We are available for telephone enquiries
  - We are available for face-to-face or virtual meetings
- Our website has an "accessibility" page, which contains a one-stop shop for communicating all of our accessibility measures to members and stakeholders
- The accessibility page offers a specific feedback mechanism process for accessibility issues and opportunities. Contact information is provided for TRAF's Accessibility Coordinator, including an email address dedicated to this purpose, [accessibility@traf.mb.ca](mailto:accessibility@traf.mb.ca).

## Premises

- We have visible signage
- Our building is wheelchair accessible (including washrooms)
- Our building has slip-free floors
- Our building has emergency alarms
- Our building has elevator access
- Braille is offered in our elevators
- We permit service animal access

## Meetings

- We allow for support persons, advisors and interpreters at meetings
- We provide for alternative off-site meeting locations and meetings outside regular office hours
- Alternative access is available virtually, through email and by phone

## Seminars

- Occur in accessible locations
- Alternative access is available virtually and by phone
- Service animals and support persons are permitted

## Employment

- We offer accessible workspaces and washrooms
- Individual emergency response plan information is provided to every employee

## Consultation

- As part of the development of this Accessibility Plan, we conducted public consultations through surveys on accessibility with our members, disability agencies and our employees
- We have consulted with the Manitoba Accessibility Office to ensure we are meeting our obligations under the AMA

## Training

- Our front-line staff and supervisors have received training on the customer service standard, including effective methods of communicating with individuals who have cognitive impairments and other challenges
- Staff who are responsible for recruiting, selecting, training, supervising and managing other employees have received training on the accessible employment standard, including making employment opportunities accessible to persons disabled by barriers
- Communications staff have received training on the accessible information and communication standard, including on meeting WCAG guidelines

## ACCESSIBILITY BARRIERS

The accessibility barriers facing TRAF, as identified by our initial accessibility assessment, are as outlined below.

### Physical and architectural barriers

- External entrance areas and ramps are subject to inclement weather, which may make access difficult (though our landlord has procedures in place to ensure that walkways are cleared during regular business hours)
- We do not have visual (strobe) lights to assist visually or hearing-impaired individuals, in the event an emergency evacuation is required (but our health and safety staff will provide assistance to anyone who needs it, during an evacuation)

### Information or communications barriers

- Our pamphlets are not available in Braille or in an e-reader format
- We do not, as a rule, provide ASL at our meetings (though it can be made available upon request)

### Technological barriers

- Text Telephone access (TTY) is not currently available

### Systemic barriers

- We are developing a process for evaluating new policies and enactments for their promotion of accessibility, including consultation with stakeholders from the disability community
- Difficulty locating retired or deferred members or their beneficiaries may pose a systemic technological barrier, since the absence of valid contact information at times hinders our ability to reach these people using online and electronic communication – we continue to explore solutions to this issue.

## POLICIES

TRAF will review all programs and services, and any new initiatives it provides, to ensure accessibility in accordance with this Accessibility Plan. More information about how we will accomplish this objective is set out below, under the "Actions" heading.

TRAF is committed to meeting the accessibility standards which are prescribed under the AMA. To that end, we will develop and implement policies related to each standard which applies to

TRAF, as and when the standard is developed. Our Accessible Customer Service Policy is attached as Appendix A to this Accessibility Plan. As part of our Accessible Customer Service Policy, we will make information available in an accessible format or provide communication supports to people with disabilities in a way that considers their disability.

Our Accessible Employment Policy is attached as Appendix B and our Accessible Information and Communication Policy is attached as Appendix C to this Accessibility Plan.

## ACTIONS

The following actions have been identified as the measures TRAF will take to identify, remove and prevent barriers that preclude people from accessing our products and services. These actions will also allow TRAF to assess new measures to determine their effect on accessibility for persons affected by barriers.

### Action 1 – Establish framework for measuring the effect of policies and procedures on accessibility

#### Initiatives/actions

- TRAF has appointed an Accessibility Coordinator
- The Accessibility Coordinator oversees the Accessibility Plan and ensures it is carried out in accordance with the AMA and its standards
- The Accessibility Coordinator documents work performed in accordance with the Accessibility Plan, and makes such documentation available on request in a reasonable amount of time, for no or a reasonable cost, and in a manner that is accessible
- The Accessibility Coordinator coordinates the review and update of the Accessibility Plan every two years
- Any material update to the Accessibility Plan will include consultation with our members and persons disabled by barriers or representatives from organizations of persons disabled by barriers
- Proposed policies, programs, practices, services, enactments and other rules will be presented to the Accessibility Coordinator, to consider their effect on accessibility

#### Expected outcomes

- The Accessibility Plan will be implemented and carried out in accordance with the AMA and its standards

## Action 2 – Provide accessible programs and services

### Initiatives/actions

- The Accessibility Coordinator works with others at TRAF to find and implement alternative solutions to the accessibility barriers that are identified above in the Accessibility Plan. TRAF's accessibility goals are summarized below:
  - All TRAF information is communicated in an accessible manner
  - TRAF allows the use of assistive devices, support persons and service animals for the purposes of accessibility
  - TRAF ensures an accessible built environment
  - Individual emergency response plans are created for all employees who require them
- An accessibility page is available to the public on the TRAF website
- The contents of the accessibility page include:
  - A copy of the Accessibility Plan
  - Accessibility Coordinator information
  - Information about how to request alternative access to information
  - Information about how to provide feedback regarding accessibility
  - Any other relevant information pertaining to accessibility
- The Accessibility Coordinator documents all feedback received regarding accessibility and the Accessibility Plan, and makes such documentation available on request in a reasonable amount of time, for no or a reasonable cost, and in a manner that is accessible

### Expected outcomes

- TRAF will provide equal access and participation to its programs and services to its members, stakeholders, employees and the public, regardless of their abilities
- Members, stakeholders, employees and the general public will gain awareness of TRAF's Accessibility Plan

## Action 3 – Staff awareness and training

### Initiatives/actions

- TRAF offers periodic accessibility training and awareness presentations to all front-line employees, as well as employees who are involved with the development and implementation of our Accessibility Plan
- TRAF documents all training (such documentation includes the content of training, and when the training was provided)
- The Accessibility Coordinator will arrange for presentations to managers regarding accessibility legislation, expectations and resources that are available to ensure compliance with the AMA and its standards
- The Accessibility Coordinator will acknowledge accessibility achievements and share information with staff

### Expected outcomes

- TRAF employees will understand accessibility issues and support the implementation of the Accessibility Plan
- TRAF employees will be informed of the progress of the implementation of the Accessibility Plan
- TRAF employees will be trained in how to provide barrier-free access to programs and services that are provided by TRAF in a manner that complies with the AMA and its standards

## Action 4 – Monitor progress

### Initiatives/actions

- The Accessibility Coordinator tracks progress on work plans and reports to the General Counsel & Corporate Secretary on a periodic basis
- TRAF reports on its compliance with the Accessibility Plan on its website

### Expected outcomes

- TRAF will be aware of its progress on AMA compliance, and consider future accessibility measures and compliance
- TRAF's website will include a section highlighting progress on accessibility

# Appendix A – Accessible Customer Service Policy

## STATEMENT OF COMMITMENT

We are committed to complying with the Accessibility Standard for Customer Service under *The Accessibility for Manitobans Act*. Our policies, practices and procedures reflect the principles of dignity, independence, integration and equal opportunity for people with disabilities.

If a barrier to accessing our goods or services cannot be removed, we seek to provide alternative ways to access the goods or services. We will not charge any fees reasonably required to accommodate any person who is affected by a barrier.

The following policy statements, organizational practices and procedures are intended to meet the requirements of the Accessibility Standard for Customer Service.

This policy applies to all employees of TRAF.

## COMMUNICATIONS

We are committed to meeting the communication needs of our members and employees. When we communicate with a person with a disability, we will do so in a manner that takes into account the person's disability.

To achieve this outcome, we:

- Provide communications in alternate formats, as and when requested, and include a statement about the availability of alternate formats on publicly available written materials;
- Provide audio/visual and webinar information through our website;
- Help members fill out forms;
- Use font that can be enlarged;
- Use plain language;
- Make ourselves available to answer questions by phone or at in-person meetings.

## ASSISTIVE DEVICES

We are committed to enabling the use of assistive devices by persons with disabilities to obtain, use or benefit from our services.

To achieve this outcome, we:

- Welcome our members to use assistive devices on our premises;
- Inform our members of the assistive devices that are available for their use;
- Ensure our employees are able to use the assistive devices that are available to our members.

## SUPPORT PERSONS AND SERVICE ANIMALS

We are committed to permitting the use of service animals and support persons when we provide customer service to a person with a disability. We will allow service animals in the areas of our premises that are open to the public.

To achieve this outcome, we:

- Permit people with disabilities to bring their service animals to the parts of our premises that are open to the public, except where the presence of service animals may create another hardship (in which case, we will explain why the animal is excluded and discuss other ways to provide our services);
- Ensure our employees are trained on how to interact with people who are accompanied by a service animal;
- Permit people with disabilities to bring an authorized support person to parts of our premises that are open to the public, and allow that support person to engage in assisted decision-making, with and for the member. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises;
- Ensure our employees are trained on how to interact with people who are accompanied by a support person, including training to address the person with disabilities, not the support person, unless we are asked to do otherwise;
- Ensure there is space for support persons and service animals, on our premises.

## **ACCESSIBILITY MEASURES AND NOTICE OF TEMPORARY DISRUPTIONS**

We are committed to maintaining our accessibility measures and providing notice of any temporary disruptions in service that would specifically affect a person with a disability.

To achieve this outcome, we:

- Ensure there is room for people with wheelchairs, electric scooters and walkers at our premises;
- Offer to meet our members at an alternate location, if our premises are not accessible to them;
- Will post a notice when any aspect of our built environment intended to facilitate barrier-free access to our services is not available for use in the intended manner;
- Include in such notice, the reasons why the aspect is unavailable, an estimate of when it will become available and details of any alternative means that are available to access our goods and services;
- The notice will be prominently displayed at our premises and by such other methods that are appropriate (such as on an outgoing telephone message).

## **CUSTOMER SERVICE FEEDBACK**

We are committed to providing a process for people to provide feedback about our provision of services to people with disabilities. We will indicate how we will respond to any such feedback and provide information about our feedback process.

To achieve this outcome, we:

- Welcome comments on our services;
- Provide a section on our website through which feedback can be provided;
- Will let our members know what other methods are available for providing feedback;
- Respect the privacy and dignity of those who provide us feedback, and respond to them in a way that meets their communication needs;
- Provide direct feedback to the Accessibility Coordinator, who determines what action, if any, should occur;
- Review and consider appropriate responses and initiatives when we receive feedback on our accessibility measures;
- Document our actions that result from this review process, and make that documentation available, upon request;
- Respond to feedback and questions on a timely basis.



## TRAINING

We are committed to providing training for our employees who have interaction with our members or the public, as well as those employees who are involved with developing and implementing our customer service policies, practices and procedures.

To achieve this outcome, our employee training includes information about how to:

- Interact and communicate with people with various types of disabilities;
- Interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- Use any equipment or devices that are made available on our premises to assist with the provision of services to people with disabilities;
- Provide assistance, when a person with a disability is having difficulty accessing any of our services;
- Understand the objectives of, and comply with, *The Human Rights Code* (Manitoba), the AMA and the CSSR.

## DOCUMENTATION OF POLICIES

We are committed to establishing and documenting our accessibility policies, practices and procedures and, upon request, providing a copy of such documentation. We will also notify our members that these accessibility policies, practices and procedures are available, upon request.

To achieve this outcome, we:

- Post our accessibility measures in an accessibility section of our website;
- Provide copies of our accessibility policies, practices and procedures for distribution at our premises;
- Produce these documents in large print, or other formats, upon request;
- Provide these documents at no cost.

## EVENTS

We are committed to taking reasonable measures to ensure that our events are held in a manner that encourages full participation by people with disabilities.

To achieve this outcome, we:

- Provide notice of the event in a way that is accessible;
- Inform people with disabilities that supports can be provided;
- Hold the meeting in a space that is accessible to our members;
- Meet physical and communication needs of people with disabilities, upon request.

## QUESTIONS ABOUT THIS POLICY

This policy exists to achieve service excellence for our members with disabilities. Please contact us if you have any questions about this policy, or to receive a hard copy of this policy.

# Appendix B – Accessible Employment Policy

## STATEMENT OF COMMITMENT

We are committed to complying with the Accessibility Standard for Employment under *The Accessibility for Manitobans Act*. Our policies, practices and procedures reflect the principles of dignity, independence, integration and equal opportunity for people with disabilities.

The following policy statements, organizational practices and procedures are intended to meet the requirements of the Accessibility Standard for Employment.

This policy applies to all employees of TRAF.

## WORKPLACE EMERGENCY PREPAREDNESS

We are committed to ensuring every employee has a plan to stay safe in the event of an emergency in the workplace and to offer individual emergency response information to every employee.

To achieve this outcome, the Accessibility Coordinator invites employees (upon starting employment and annually thereafter) to:

- review the emergency procedures outlined in TRAF's Employee Handbook;
- confidentially self-identify if they may face any barriers in the event of a workplace emergency. An individualized emergency response plan is developed with the employee.

## REASONABLE ACCOMMODATION IN THE WORKPLACE

We are committed to making reasonable accommodations for employees with disabilities.

To achieve this outcome, we:

- Meet with employees to discuss various reasonable accommodations;
- Implement reasonable accommodations.

It is reasonable if it is required for an employee to carry out workplace responsibilities or to access benefits available to employees and would not result in undue hardship, such as safety risks to other staff.

## PRE-EMPLOYMENT OBLIGATIONS

We are committed to providing accommodations during the recruitment and offer of employment processes.

To achieve this outcome, we:

- Include a statement on all career postings that informs applicants that reasonable accommodations are available, upon request;
- Offer and provide reasonable accommodation to individuals participating in the selection process;
- Include a statement on all employment agreements and offers of employment that informs new employees that reasonable accommodations are available, upon request;
- Invite employees (upon starting employment and annually thereafter) to explain what accommodation is required in order for them to carry out their responsibilities;
- Invite new employees to review the Employee Handbook, including this policy.

## ON-THE-JOB AND RETURNING-TO-WORK REQUIREMENTS

We are committed to removing barriers that affect job performance for all employees, including those who return to work after a disability (e.g., injury or illness).

To achieve this outcome, we:

- Inform employees about employee policies, practices and updates;
- Develop an individualized accommodation plan if an employee requests it;
- Invite returning employees to explain what accommodation is required in order for them to support them in carrying out their responsibilities;
- Work with each individual who is reintroduced to work after a disability to make the necessary accommodations.

## TRAINING REQUIREMENTS

We are committed to ensuring staff who are responsible for recruiting, selecting or training employees are provided with training. This training covers:

- How to create accessibility in the workplace;
- How to interact with individuals who use an assistive device or require a support person or service animal;
- A review of *The Human Rights Code* (Manitoba), the AMA and the Employment accessibility standard.

## QUESTIONS ABOUT THIS POLICY

This policy exists to achieve accessible employment opportunities for all applicants, candidates and employees. Please contact us if you have any questions about this policy, or to receive a hard copy of this policy.

# Appendix C – Accessible Information and Communication Policy

## STATEMENT OF COMMITMENT

We are committed to complying with the Accessibility Standard for Information and Communication under *The Accessibility for Manitobans Act*. Our policies, practices and procedures reflect the principles of dignity, independence, integration and equal opportunity for people with disabilities.

The following policy statements, organizational practices and procedures are intended to meet the requirements of the Accessibility Standard for Information and Communication.

This policy applies to all employees of TRAF.

## WEB CONTENT AND WEB APPLICATIONS

We are committed to meeting current website content accessibility guideline requirements on any new or updated web content and on any significant updates to web applications.

To achieve this outcome, we:

- Ensure our website is mobile responsive for various screen sizes;
- Ensure our website is programmed to be compatible with most current screen reader technology;
- Add descriptive alt text to non-decorative images;
- Ensure that posted materials such as PDF files also follow accessibility guidelines;
- Provide a menu with optional accessibility tools that website visitors can customize to suit their needs;
- Ensure adequate colour contrast between text and backgrounds;
- Use adequate font sizes, spacing and white space;
- Use visual icons to help website visitors navigate the site;
- Use plain language and descriptive link text.

## ACCESSIBLE INFORMATION AND FORMATS

We are committed to providing information in accessible formats.

To achieve this outcome, we:

- Provide communications in alternate formats, as and when requested, and include a statement regarding the availability of alternate formats on publicly available written materials;
- Provide audio/visual and webinar information through our website;
- Assist members in filling out forms;
- Use font that can be enlarged;
- Use plain language;
- Make ourselves available to answer questions by phone or at in-person or virtual meetings.

## PROVIDING ACCESSIBLE INFORMATION

We are committed to providing accessible information.

To achieve this outcome, we:

- Consult with individuals to identify the support or format that would remove a barrier and provide the information in a timely manner at no or equal cost.

## FEEDBACK PROCESS

We have implemented a process to receive and respond to feedback regarding accessible information and communication. We will document feedback and provide information about our feedback process, upon request:

To achieve this outcome, we:

- Welcome comments on our website and other communications;
- Provide a section on our website through which feedback can be provided;
- Will let our members know what other methods are available for providing feedback;
- Respect the privacy and dignity of those who provide us feedback, and respond to them in a way that meets their communication needs;
- Provide direct feedback to the Accessibility Coordinator, who determines what action, if any, should occur;
- Review and consider appropriate responses and initiatives when we receive feedback on our accessibility measures;
- Document our actions that result from this review process, and make that documentation available, upon request;
- Respond to feedback and questions on a timely basis.

## TRAINING

We are committed to ensuring communications staff are provided with training on accessible communications.

To achieve this outcome, our training includes:

- How to identify, prevent and remove barriers to accessible communication;
- How to provide information through a communication support or accessible format;
- A review of *The Human Rights Code* (Manitoba), the AMA and the Accessible Information and Communication Standard.

## DOCUMENTATION OF POLICIES

We document our accessibility policies, practices and procedures and, upon request, will provide a copy of such documentation. We also notify our members that these accessibility policies, practices and procedures are available, upon request.

To achieve this outcome, we:

- Post our accessibility measures in an accessibility section of our website;
- Provide copies of our accessibility policies, practices and procedures for distribution at our premises;
- Produce these documents in large print, or other formats, upon request;
- Provide these documents at no cost.

## QUESTIONS ABOUT THIS POLICY

This policy exists to achieve accessible information and communications. Please contact us if you have any questions about this policy, or to receive a hard copy of this policy.



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