



Elections Manitoba

ACCESSIBILITY PLAN

2025–2027

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Preface

Elections Manitoba's accessibility plan is a living document. We issue updated versions every two years.

Elections Manitoba consults with members of the disability community in this effort. We held an in-person consultation before preparing this plan. Elections Manitoba also sought feedback on the development of policies and processes, and the implementation of measures related to the standards under *The Accessibility for Manitobans Act*, before releasing this updated plan.

Each part of this report begins with a short summary for ease of reading.

Feedback on Elections Manitoba's accessibility initiatives and actions is always welcome.

Introduction: Why accessibility is a key priority for Elections Manitoba

Elections Manitoba has a mandate to make voting accessible. We are responsible for ensuring all eligible Manitobans can participate in provincial elections. Identifying and removing barriers to full participation helps us reach this goal.

Current election law already provides many ways for Manitobans with disabilities to cast a ballot easily and independently.

In December 2013, *The Accessibility for Manitobans Act (AMA)* became law. The legislation required public sector organizations to create an accessibility plan and update it regularly.

Elections Manitoba continues to build on its achievements in enhancing accessibility to the democratic process in Manitoba.

Accessibility is for everyone

Everyone benefits from accessibility.

According to the 2022 Canadian Survey on Disability, 29.2% of Manitobans have at least one disability.

More than half the respondents in that survey had experienced barriers to accessibility in public spaces during the past year.

The most commonly reported barriers were wait lines, sidewalks, and entrances or exits to buildings. Other commonly reported issues relevant to Elections Manitoba are lighting or sound levels inside buildings, self-serve technology, floorplans, public washrooms, and wayfinding signs and directions.

People are more likely to experience barriers to accessibility as they get older. Disability is intersectional. People who are marginalized in other ways are also more likely to be affected by disabilities and barriers.

Social model of disability

The *Accessibility for Manitobans Act* is first and foremost a human rights law; it reflects moving past the medical and charitable models of disability ([Report of the Second Review of The Accessibility for Manitobans Act, Manitoba Accessibility Office](#)).

Under the social model of disability, disability is an interaction between functional limitations and barriers to accessibility in the environment.

Disabilities can be temporary or permanent. They are not always visible.

Barriers to accessibility affect persons with disabilities, their family and friends, and their communities. An accessibility barrier is anything that limits or prevents a person from receiving information, goods, and services, from accessing a space or from participating in an activity.

Barriers may be:

- Attitudinal — may result in some people being treated differently than others
- Informational or communication-related — arise when a person cannot easily receive and/or understand information available to others
- Technological — when technology, or the way it is used, is not accessible to people with disabilities
- Systemic — policies, practices or procedures that result in unequal access or exclusion for people with disabilities
- Physical or architectural — when the environment prevents physical access for people with varied abilities

This accessibility plan provides an opportunity for Elections Manitoba to review our existing practices and processes, celebrate our accomplishments, and identify priorities for eliminating barriers in the future.

Statement of commitment

Accessibility is an essential part of free and fair elections. Elections Manitoba is committed to ensuring that all eligible voters can access their democratic right to cast a ballot. Election law in Manitoba includes many accessible voting options and Elections Manitoba has developed practices and policies to support accessibility. Our organization has identified accessibility as an ongoing strategic priority. We will continue to work towards removing barriers to ensure equitable and accessible opportunities to participation in the democratic process.

Part 1. About Elections Manitoba

SUMMARY:

Elections Manitoba is the office of the Chief Electoral Officer of Manitoba.

We conduct provincial elections, byelections and referendums.

Elections Manitoba is an independent office of the Legislative Assembly. This means that Elections Manitoba reports to the Manitoba Legislative Assembly as a whole, rather than to any one department or minister.

Primary roles of Elections Manitoba:

- Conduct provincial elections and byelections
- Maintain the Manitoba Voter Register
- Conduct referendums
- Educate the public about voting and the electoral process
- Register political participants
- Help political participants follow reporting rules
- Review political participants' annual and election financial returns
- Share political participants' financial activity with the public

Legislation

Elections Manitoba's work is governed by two laws: *The Elections Act* sets out the way elections are run, and *The Election Financing Act* sets out the rules for political participants. These include registered parties, candidates, leadership contestants, constituency associations and third parties.

The main role of Elections Manitoba is to oversee the conduct of provincial elections and byelections in Manitoba. We are responsible for developing the processes that ensure elections are free and fair while meeting legislative requirements. When election law is amended, it is our job to put changes into effect in a timely and efficient way.

Elections Manitoba provides election information to the public. This includes election education programs for people and groups that may experience barriers to participation.

Political participants and election volunteers must follow many rules and regulations. Elections Manitoba is the best source of accurate information to assist them in following those rules. Elections Manitoba offers information sessions, guides, manuals, and one-on-one assistance to political participants.

Elections Manitoba also publishes financial statements of political participants on our website. The public may also view statements in person at our office, on request. Public disclosure ensures transparency and integrity in election spending.

Structure

Elections Manitoba has a core staff of 22 permanent employees. During a general election, headquarters staff grows to approximately 55. Also, the chief electoral officer appoints 57 returning officers (ROs) and 57 assistant returning officers (AROs), one for each electoral division in the province. These officers are responsible for running the election within their own divisions. Each RO/ARO team opens a "branch office" called a local election office in their electoral division. ROs and AROs hire approximately 6,000 people across the province to work as office staff, registration agents, voting officials and in other positions within their own divisions.

Election cycle

The work of Elections Manitoba takes place in a four-year cycle, as general elections are usually held once every four years. Manitoba has a set date for provincial general elections, though they can be called at any time. The 43rd provincial general election was held October 3, 2023. The next set date is October 5, 2027.

In addition to the election itself, the first year of the election cycle includes wrap-up and closing of local election offices, as well as the return of materials to Elections Manitoba. Following this, registered parties, candidates and third parties must file election financial statements with Elections Manitoba. At the same time, the organization holds debriefing sessions for election staff and permanent staff and evaluates the conduct of the election. Within six months of the election, Elections Manitoba submits a statement of votes and report on the election to the Legislative Assembly.

To begin the second year of the election cycle, we hold a strategic planning session where we identify priorities and develop high-level plans for election preparation. Year two is focused on detailed planning and implementation, with additional work required when new legislation requires changes to our processes. In years three and four, election activities begin, including training of ROs and AROs, securing office space and polling places, ordering materials, recruiting election staff and advertising.

Referendums

In addition to conducting elections and byelections, Elections Manitoba has the responsibility of conducting referendums.

The *Referendum Act* outlines the rules for calling and conducting a referendum. The Act was passed in 2019 but has not yet come into force.

Electoral Divisions Boundaries Commission

Under *The Electoral Divisions Act*, the Electoral Divisions Boundaries Commission reviews provincial boundaries every 10 years. The Commission is independent and non-partisan.

The most recent review was completed in December 2018, with new boundaries in effect for the 42nd provincial general election in 2019. The next review is scheduled to end in 2028.

Environment

Elections Manitoba must always be prepared to conduct elections, byelections and referendums. The organization operates in a complex environment largely due to the uncertainty of election timing and continuous legislative change.

Recent changes to election legislation build on Elections Manitoba's work to modernize the electoral process. These changes incorporate the use technology to improve efficiency and voter service and add more opportunities for voters to cast a ballot.

Changes in 2023 gave people the opportunity to vote at any polling place in their own electoral division on election day.

Changes planned for the 2027 general election will allow Manitobans to vote at any local election office in the province on election day. Two additional days of advance voting at the local election office will also be added.

These changes are supported by the use of technology:

- An electronic voters list that supports real-time strike-off, meaning voters do not have to go to an assigned polling place
- On-demand ballot printers to give voters a ballot with candidates from their electoral division when voting outside of their home electoral division.
- Vote counting machines that count the ballots quickly and accurately, wherever they are cast

Although there is a set election date, a general election may be called at any time, and Elections Manitoba must always be ready. When a vacancy occurs within an electoral division, a byelection must be held to fill the vacancy within six months.

A large number of staff are required to complete election activities in a very short time. Most of the 6,000 staff required to run elections are recruited to work for a short period of time. Most work for a single day, either as voting officers or information officers.

The preliminary and revised voters lists must be completed by specific dates set by law. Elections Manitoba may not accept candidate nominations after the deadline. They must be reviewed by 1 p.m. on the day that nominations close.

All the technology must be configured and tested. Laptops used at polls are updated, loaded with voting software, and tested. Vote counting machines prepared and tested for function and then go through rigorous testing to ensure they are accurately reading and reporting votes.

Another key challenge in an election is space: Locations must be found in each of the 57 electoral divisions for a local election office. Over 900 voting locations are needed for election day and advance voting. Voting locations must be supplied with materials to allow all registered voters to cast a ballot.

Elections Manitoba may be called upon to conduct referendums in future.

Strategic priorities

Elections Manitoba has an updated strategic plan heading into the 44th general election. The priorities and actions to guide our delivery of free and fair elections are:

Uphold integrity and public confidence

- Ensure robust risk management framework to manage emerging threats to democracy, ongoing monitoring of environment and transparent reporting of information to the public.
- Improve access to information and compliance reporting through modernization of the website.

Strengthen organizational effectiveness

- Support internal capacity by building professional development and training plans for employees and field staff including a robust onboarding program.
- Deliver internal communication that is accessible and clear by defining consistent channels.
- Enable effective and efficient access to documentation through consistent protocols, templates and use of standardized tools including integrated project management.

Enhance service and ongoing engagement

- Leverage election knowledge to strengthen collaboration and ensure the delivery of responsive and reliable services.
- Develop new processes and procedures to support Vote Anywhere and other legislative amendments.
- Use technology to modernize election management systems and improve service to local election offices and field staff.

Enable inclusivity and accessibility

- Review and update our engagement strategy and plan for voters who face barriers, establish and reconfirm partnerships, including community groups, to support strategies and tactics for public outreach and voting opportunities.
- Refresh external marketing strategy and plans including media campaign, creative designs, and programming to support access to election information.

Our community

As stewards of democracy in the province, Elections Manitoba works to meet the needs and expectations of a wide range of people and organizations.

These groups include:

- Manitobans, voters, and prospective voters
- Political participants
- Local election offices, election workers, vendors, and partners
- Legislative Assembly and Independent Officers
- Other election management bodies

Our primary stakeholders are eligible Manitoba voters. As per *The Elections Act*, this group includes all Manitobans who are:

- 18 years of age or older
- Canadian citizens
- Residents of Manitoba for six months immediately before election day

Part 2. How Elections Manitoba makes elections accessible

SUMMARY:

Elections Manitoba already has many options to make voting accessible.

Polling places must be accessible.

Voters can choose a polling place that best meets their needs:

- anywhere in Manitoba during advance voting
- anywhere in their electoral division on election day
- at any local election office on election day

People can access:

- a list of candidates in braille
- help marking ballots
- other ways to vote (from home, by mail, in hospital)
- personal devices when voting
- candidate reimbursement for disability expenses

Other accessibility measures are explained in more detail below.

Current election law eliminates many potential barriers to participation. Local election offices and polling places must be accessible. With a variety of voting options, Elections Manitoba can meet the needs of almost every eligible voter.

Accessibility in election laws

The following are specific accessibility provisions in *The Elections Act* and *The Election Financing Act*:

- **Polling places must be accessible to people with physical disabilities.** This includes election day polling places and advance polling places. Because each local election office is also a polling place, the office itself must be accessible.
 - *The Elections Act* section 103(3)
 - *The Elections Act* section 125(6)
- **Vote Anywhere provisions:** Election legislation no longer requires Manitobans to vote at an assigned polling place. Voters can choose from many convenient voting locations. They can also choose to vote at buildings they may already be familiar with or know will meet their needs.
 - Anywhere in Manitoba during advance voting
 - *The Elections Act* section 129(1)
 - Anywhere in their electoral division on election day
 - *The Elections Act* section 115(1)
 - At any local election office on election day
 - Currently a modification to the voting process
- **Voting with a braille ballot template:** Elections Manitoba has braille ballot templates and braille lists of candidates for all polling places. This allows people who are blind to vote with a regular ballot and without assistance.
 - *The Elections Act* section 119(1)(b)
- **Voter requiring assistance:** A voter may bring someone with them to help them mark the ballot. The person must be at least 16 years old and must take an oath. Alternately, the voting officer may help the voter.
 - *The Elections Act* section 119(1)(a) and 119(2)
- **Curbside voting:** If a voter cannot enter a voting station because of a disability, the voting officer can bring the ballot outside to them.
 - *The Elections Act* section 121(1)

- **Accessible voting from home:** If a voter cannot leave their home because of a disability, they can apply to vote at home. The voter's caregiver may also vote this way. A voting officer brings the ballot to the voter's home and then returns the ballot in an unmarked envelope to the local election office. The voting package can also be mailed to the voter and then mailed back.
 - o *The Elections Act* section 151(1 – 3)
- **Personal devices for assistance:** Voters are allowed to use their own devices to assist them with voting, such as a smartphone app that helps them read the ballot.
 - o *The Elections Act* section 119(1)(b)
- **Institutional voting:** The returning officer must set up voting stations for patients and residents of health care facilities.
 - o *The Elections Act* section 137(1)
- **Co-located facilities:** A returning officer may extend an institutional voting station in a health care facility to include an adjoining facility or residence where seniors or persons with disabilities live.
 - o *The Elections Act* section 137(1.1)
- **Candidates with a disability:**
 - o Any reasonable disability-related expenses incurred by a candidate to allow them to campaign in an election are not considered election expenses. In other words, they are not counted towards the candidate's election spending limit.
 - *The Election Financing Act* section 50(3.6)
 - o Candidates are reimbursed for 100% of all reasonable disability-related expenses incurred during an election period, as long as the candidate receives 5% or more of the valid votes in their electoral division. The expenses must be over and above any expenses he or she would normally incur.
 - *The Election Financing Act* section 74(2)

- Interpreters: Voters who do not speak English or French must have an interpreter present before signing oaths. An election official may act as an interpreter.
 - o *The Elections Act* section 120 (1 – 4)
- **Plain language:**
 - o *The Elections Act* was re-written in plain language in 2008.
 - o *The Election Financing Act* was re-organized and re-written in plain language in 2013.

Policies and practices

Elections Manitoba has developed other policies and practices to improve accessibility beyond what the legislation requires.

Voting

- Accessibility checklist: As part of their election preparation, all returning officers must complete an accessibility checklist for every polling place in their electoral division.
- Polling places are situated in multi-unit dwellings where most residents are seniors or persons with disabilities as much as practicable.
- Co-ordination with building managers to set up polling places in multi-unit buildings housing primarily seniors or persons with disabilities wherever possible.
- Ballots were redesigned with candidate names printed in a larger font.
- Elections Manitoba provides braille ballot templates and braille candidate lists to voters with low vision.
- Elections Manitoba arranges for American Sign Language (ASL) interpreters to assist voters with registration and voting on request. This service is provided at no cost to the voter.
- Easy-grip pencils are available at all polls.
- A writing pad is available at all polls to assist with communication.
- Voters may bring service animals with them into the polling place.
- Designated parking is available for voters with disabilities.
- Voters can use their own assistive devices to help them vote.

Communications

- Elections Manitoba's website includes information on accessibility options for voters.
- Print advertising during an election includes information about accessible voting options. The information is also publicized in our media relations campaign, through social media and in the voter's guide, which is distributed at various locations throughout the province.
- Elections Manitoba produced a series of four accessible videos, featuring closed captioning and sign language interpretation (ASL and LSQ).
- Elections Manitoba uses plain language in the creation of all public documents.
- Documents can be made available in alternative formats upon request.
- Elections Manitoba consults with the Manitoba Accessibility Office on accessibility information and practices.
- Question & Answer Book prepared for election period includes sections on accessibility options for voters. This book is used by all headquarters and local election office staff to easily access information on specific topics.

Recruitment and training

- Election official training includes a section on assisting voters with a disability. The section provides advice on how best to assist voters with specific types of disabilities, while emphasizing respect and the need to safeguard the rights of all voters.
- Headquarters staff are required to complete accessible customer service training by viewing a series of videos developed by Manitoba Possible.
- Employment equity policy and procedures are in place for recruitment of local election office and field staff.

Elections Manitoba follows many of the same policies developed by the Civil Service Commission that are used throughout the Manitoba government. These include:

- Manitoba Policy on Access to Government Publications, Events and Services
- Reasonable Accommodation Policy
- Employment Equity Policy
- Principles & Policies for Managing Human Resources: 2.1.3. Employment Equity In Staffing

Elections Manitoba's mandate is to ensure free, fair, and accessible elections so all eligible voters in Manitoba have the opportunity to cast their ballot. The legislative framework for the operations of Elections Manitoba comes from *The Elections Act* (EA) and *The Election Financing Act* (EFA). Other pieces of legislation that ensure accessibility to elections in Manitoba include:

- *The Canadian Charter of Rights and Freedoms* guarantees that every eligible voter has the right to vote.
- *The Accessibility for Manitobans Act* (AMA) states that people should have barrier-free access to places and events that are generally available in the community. It also states that people with disabilities should have barrier-free access to those things that will give them equality of opportunity and outcome.

In addition to the legislative requirements, Elections Manitoba maintains Accessible Employment policies. See Appendix A for full policy text.

Part 3. Barriers and priorities

SUMMARY:

Barriers to access are different for each person.

The first step is naming the barriers most often faced by people trying to access Elections Manitoba services and information.

As stated in the introduction, these barriers can be related to:

- Attitudes
- Communication or information
- Technology
- Systems
- Physical or architectural

Once we know the barriers people face, we can try to set priorities to address them.

Existing barriers

Attitudinal

Barriers:

- Lack of knowledge/awareness among some staff of range of barriers that exist and how to support accommodations.
- Lack of knowledge/awareness among some staff about accessibility legislation and standards.

Ongoing commitment:

- Elections Manitoba has been addressing the knowledge gap through training and will continue to do so.

Information and communication

Barriers:

- Some forms and publications not easily available in multiple formats.
- Some forms not written in plain language.
- Not all staff aware of appropriate communication methods and accessible customer service practices for people with disabilities.

Ongoing commitment:

- Existing forms that are revised and new forms that are developed are written in plain language.
- Documents are made available in alternate formats.
- Staff training.

Technological

Barriers:

- Existing website is not accessible to all. All pages do not meet WCAG 2.0 AA standards for web accessibility.

Ongoing commitment:

- All new web content and updates to meet standards where possible.
- A new website is planned for 2026 with accessibility-first design and text.

Systemic

- Elections Manitoba's operations are primarily event-based. This means that our services only come to public attention during an election. With every election, we must educate or re-educate the public on accessible voting options and services available. Given the large amount of information that Elections Manitoba must provide during an election, it is challenging to make our accessibility message stand out.

Ongoing commitment:

- Ongoing partnership with disabilities organizations to communicate this information is one of the ways we are addressing this challenge.
- Continue to prioritize public education.

Physical and architectural

- Not every polling place can be fully accessible for every individual. Elections Manitoba must balance physical accessibility with other barriers, and with convenience. In smaller communities, the most central and/or convenient location may not have complete accessibility. There can also be a challenge in finding accessible locations available to rent on a short-term basis.

Ongoing commitment:

- Other voting options can offset gaps in physical accessibility of polling places. For example, curbside voting, accessible voting from home, and absentee voting do not require voters to enter a polling place.
- Thanks to recent changes in legislation, voters no longer have to report to one specific polling place. Voters may choose the best polling place to suit their needs.

Priorities for this plan

- a. Ensure that all voters can participate in the democratic process in a manner that is fair and respectful.
- b. Ensure staff understand all options and services available to voters with a disability.
- c. Ensure staff understand different types of barriers and how to offer accommodations, within existing election law.
- d. Ensure staff know how to communicate respectfully.
- e. Ensure staff are trained to provide service in a manner that is fair and respectful to people with disabilities.
- f. Ensure policies are in place to support the above priorities.
- g. Ensure all policies and training are documented.
- h. Ensure awareness of and compliance with standards as they come into effect.

Part 4. Accessibility planning process

SUMMARY

Elections Manitoba follows the *Accessibility for Manitobans Act*.

Based on Accessibility Manitoba's guide for accessibility plans, we have:

- Consulted with participants from Manitoba disability organizations
- Received their recommendations
- Set priorities to make our functions more accessible
- Reviewed previous goals and results

2025 Accessibility consultation

On April 24, 2025, Elections Manitoba hosted a consultation event with local accessibility organizations. The BDO Canada Accessibility Consulting Team was hired to co-facilitate and collaborate.

The consultation was held in person with 16 participants representing Manitoba disability organizations:

- Abilities Manitoba
- Alzheimer Society Manitoba
- Canadian Mental Health Association
- Canadian National Institute for the Blind (CNIB)
- Community Living Manitoba
- Epic Opportunities
- Independent Living Resource Centre
- Manitoba League of Persons with Disabilities
- People First Manitoba
- Spinal Cord Injury Manitoba Inc.
- Vision Impaired Resource Network
- Manitoba Possible

During the six-hour session, participants shared their thoughts about how Elections Manitoba can remove barriers to participation in the electoral process. They highlighted the need for equitable access to barrier-free participation. Participants appreciated the kindness and helpfulness of Elections Manitoba staff, and the existing accessibility supports at polling places.

Recommendations from participants:

Voting opportunities

- Ensure consistent availability of seating options
- Provide real-time polling place information
- Select accessible polling locations
- Include accessible parking as a key criterion in polling place selection
- Develop tool for viewing accessibility features by polling location
- Provide clear, consistent, and accessible signage
- Prioritize transit-accessible locations when selecting polling places

- Use inclusive scripts for polling place staff
- Redesign ballots for visual accessibility
- Offer alternative secrecy options for voters with dexterity disabilities
- Provide voting kits in advance
- Organize trial voting opportunities in partnership with disability organizations

Accessible information and communications

- Expand public outreach on accessible voting options
- Offer voter information cards in alternative formats
- Adopt more inclusive terminology

Employment

- Partner with disability employment organizations and job boards

BDO review

The BDO Canada Accessibility Consulting Team also reviewed Elections Manitoba's previous accessibility plan. Overall, significant progress was marked. The plan was compared to the *Accessibility for Manitobans Act* and Act standards.

- Customer service standard: aligned
- Accessible employment standard: partially aligned; needs strengthening
- Information and communication standard: aligned

The goal for this accessibility plan was for Elections Manitoba to move from compliance to leadership in accessibility.

Review of 2022–24 accessibility plan goals

The goals below were established in Elections Manitoba’s 2022 accessibility plan. Reporting on the status of past goals is an important part of developing new goals to make real change for accessibility.

1. Continue to provide training to all HQ staff on the Accessibility for Manitobans Act, including customer service standard, employment standard, and other standards as they come into effect

Result: Attempted, but is not always a part of onboarding process. Recommitted for 2025–27.

2. Review and ensure understanding of the information and communication standard to plan for any required compliance activities.

Result: Affected staff are aware of responsibilities under this standard.

3. Continue to document processes that ensure voting is accessible and make those processes available to the public in plain language.

Result: In progress. We heard in our recent consultation that more can be done.

4. Review polling place accessibility checklist to ensure criteria are up to date. Continue to seek feedback from disabilities organizations on the criteria.

Result: Important to continue every cycle.

5. With the assistance of Manitoba disabilities organizations, develop and conduct a post-election survey of their clients’ experience during the election.

Result: Survey of public after the 43rd provincial general election included feedback from people with a disability specifically about accessibility measures. Around 8 in 10 were satisfied or very satisfied with the voting location’s support to accommodate their disability; 7% were not satisfied. No respondents reported awareness of visual accessibility tools, but one said they would have used the tools if they had known they were available.

6. Investigate the possibility of offering a live chat option during the election period as an additional method to provide feedback and ask questions about the election.

Result: Currently exploring live chat and other feedback options.

7. Following a general election, review customer service feedback received to inform future planning for prevention and removal of barriers.

Result: Feedback from public is reviewed on an ongoing basis.

8. Continue to do targeted registration at homeless shelters.

Result: Targeted registration continues at homeless shelters.

9. Ensure WCAG compliance for voting opportunities sections of the Elections Manitoba website.

Result: Committed to ensuring WCAG compliance for entire website.

10. Ensure deliverables for employment standard are completed on schedule:
 - a. Emergency response planning.
 - b. Reasonable accommodation measures, policies, and practices.

Result: Ongoing. Recommitted for 2025-2027 accessibility planning process. Elections Manitoba has implemented an accessibility committee which will offer guidance and track progress.

11. Ensure corporate staff are aware of any new obligations and progress made on accessibility measures.

Result: Ongoing. Recommitted for 2025–2027 accessibility planning process.

12. Ensure continuity/knowledge transfer on accessibility file.

Result: Ongoing. Recommitted for 2025–2027 accessibility planning process.

Part 5. Actions

SUMMARY:

This section has the action items Elections Manitoba will work on over the next two years to improve accessibility.

These goals focus on:

- An accessibility committee in Elections Manitoba's office to make these actions happen
- Making polling places accessible for voters with various needs
- Making sure people know about different ways to vote
- Accessible employment
- A new website that puts accessibility first
- Accessible and inclusive information-sharing

These goals are broken down into smaller parts below to be specific and achievable.

Elections Manitoba has amended the way it sets accessibility plan actions in alignment with the Manitoba Accessibility Office's resources.

1. Formalize accessibility working group

Initiatives/actions

- Management to appoint working group members
- Accessibility coordinator to develop framework, including purpose, timelines, and work plans
- Working group to review policies, training schedules

Expected outcomes

- Consistent delivery of staff training
- Provide expertise and awareness to staff
- Monitor progress in implementing accessibility plan
- Stay up to date with compliance and *The Accessibility for Manitobans Act* standards

2. Polling place accessibility review and prioritization

Initiatives/actions

- Review of polling place accessibility checklist, including parking requirements and proximity to transit
- Review of wayfinding signage

Expected outcomes

- Polling place locations and features are compliant with legislation
- Addition of “distance to poll” markers in polling places where the poll is not close to the entrance

3. Increase awareness of accessible voting opportunities

Initiatives/actions

- Polling place signage review
- Reinforce active offer of support training for workers at the polls
- Collaboration with accessibility organizations
- Social media campaigns focusing on accessible voting opportunities

Expected outcomes

- Display of accessible voting options at the polling place
- Increased awareness of accessible voting options
- Materials and voting demonstrations provided to accessibility organizations
- Cross-channel social media campaign to share information about accessible voting opportunities

4. Employment

Initiatives/actions

- Collaborate with inclusive employment organizations
- Ensure job postings and application process are available in an accessible format

Expected outcomes

- Increase representation of employees with disabilities
- Accommodation requests continue to be implemented where possible

5. Website accessibility

Initiatives/actions

- Update website to ensure all pages and process are accessible to WCAG AA 2.1 standards or above
- Train staff on the process of creating accessible forms and documents

Expected outcomes

- Redesign of website
- Create documents and forms in alternative formats such as large print documents and accessible digital versions so they can be available upon request

6. Accessible and inclusive information

Initiatives/actions

- Replacing the term “homebound” voting
- Increase font size and colour contrast on ballots
- Provide voter information card in other formats

Expected outcomes

- Inclusive language used in all communications
- Change to ballot design
- Creation of large print and accessible pdf versions of the voter information card

Feedback

Feedback on this plan is always welcome. An accessible feedback form is available on our website at electionsmanitoba.ca.

Other ways to provide feedback include:

Emailing Elections Manitoba at: elections@elections.mb.ca

Calling Elections Manitoba at: 204-945-3225

Visiting Elections Manitoba at 120-200 Vaughan St. in Winnipeg

Appendix A: Accessible Employment Policies

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Introduction

Elections Manitoba has developed the policies, organizational practices and measures outlined in this document to meet the requirements of The Accessible Employment Standard Regulation. Our policies, practices and measures reflect principles of dignity, independence, integration and equal opportunity for people with disabilities.

We aim to remove barriers in our workplace. If a barrier cannot be removed, we work collaboratively with the affected employee(s) to provide reasonable accommodations. See definition of 'reasonable accommodation' below.

Wherever practicable, Elections Manitoba follows the policies of the Civil Service Commission with respect to removing barriers to employment, specifically:

- 1.5.2 Removing Employment Barriers;
- 2.2.3. Barrier-Free Recruitment; and
- 3.1.3 Reasonable Accommodation.

Application

This policy applies to management or any staff responsible for supervisory activities identified under sec. 7(1) of *Accessible Employment Standard Regulation* under *The Accessibility for Manitobans Act*.^[1] Application of the policy by staff outside the management group would be in consultation with their supervisor. Application of this policy for temporary election staff can be found on page 12.

Reasonable accommodations in the workplace

The Accessible Employment Standard Regulation requires employers to provide reasonable accommodations for people with disabilities. Under the Act, an accommodation is reasonable if it:

- b) is required for an applicant to access the materials or activities used in the assessment or selection process and would not result in undue hardship to the employer; or
- b) is required for an employee to perform their employment responsibilities or access the benefits available to them, by virtue of their employment, and it would not result in undue hardship to the employer.

Based on The Human Rights Code (Manitoba), a workplace accommodation is reasonable if:

- it is required for an employee to carry out workplace responsibilities or to access employee benefits and
- it would not result in undue hardship, such as safety risks to other staff or a significant measurable financial burden

Pre-employment accessibility policies and practices

1. Remove barriers to recruitment and selection.

- We include a statement on all job postings that reasonable accommodations are available to applicants with disabilities. We consult with the applicant to determine how best to accommodate their needs.
- When making interview arrangements, we inform applicants that reasonable accommodations are available during the assessment and selection processes.
- When an applicant has made a request for an accommodation during the selection process, we put the appropriate accommodation in place.

2. Mention workplace accommodations when offering employment and employee orientation materials.

- We include information about workplace accommodations in our letter of offer to new employees. Letters are issued by Legislative Assembly Human Resources.
- We include information about workplace accommodations in our employee orientation materials.

Employment accessibility

3. Inform employees about accommodation policies and practices.

We provide information to employees about our policies for employees and any updates in multiple ways, such as:

- posted on the intranet, public website, memos, or through staff emails
- included in posters, brochures, pamphlets or advertisements
- through discussions with management (in person, by phone or through email)
- during staff meetings

4. Communicate in a way that meets employees' needs.

- To meet an employee's communication needs, we ask the employee with a disability what accessible format or communication support is most appropriate for them.
- We provide information to an employee in an accessible format on request.

5. Provide individualized accommodation plans.

We provide reasonable accommodations by developing and documenting individualized accommodation plans for employees with disabilities who request them. We work collaboratively with the employee to develop these plans in a manner that is mutually satisfactory.

The individualized accommodation plan includes:

- accessible formats and communication supports, if requested
- workplace emergency response information, if required
- details of how and when any other accommodations will be provided
- when the plan will be reviewed

Employees participate in the accommodation process by:

- providing related information and taking part in assessments, if requested by the employer
- complying with the individualized accommodation plan
- offering ongoing feedback related to modifications, including whether the accommodation is no longer required

Supervisors will review the accommodation plan within three months of implementation and as part of regular employee reviews. An update may be required, when:

- the employee's workspace is modified or relocated
- the employee's responsibilities have changed
- other workplace changes have occurred that affect the accommodation
- the employee has made a request to review and update the accommodation plan

Process for requesting, developing and implementing accommodation plans

Request for an individualized accommodation plan

An employee may make a request to their supervisor for accommodation. When a request has been received, the supervisor may contact human resources to discuss the request.

A. Assessment of employee and accommodation required

The supervisor and employee will work collaboratively to determine possible accommodations.

We may request that the employee provide documentation from a health practitioner that supports the need for the accommodation.

We may request, and cover costs for, an evaluation by an independent regulated health professional or other practitioner in the area of workplace accommodations for employees with disabilities.

Where there is a duty to accommodate, the employer is ultimately responsible for determining reasonable accommodation for the employee. The employee has a responsibility to actively participate in the accommodation process, and to immediately advise the supervisor if the accommodation requirement changes. Supervisors must ensure that all accommodation requests and measures offered and/or implemented are appropriately documented.

The accommodation must not result in excessive or undue hardship for the employer. Undue hardship is assessed on a case by case basis, considering various factors relating to the situation including, but not limited to, health and safety risk; disruption to collective agreements or other contract; financial costs; business efficiency; interchangeability of employees and facilities; impact on employees and service users; and workplace size.

Supervisors also have a responsibility to recognize situations where a medical condition may be affecting an employee's ability to perform all or some of their duties, or is placing them or other individuals at a health and safety risk. In these situations, the supervisor must take reasonable steps to inquire about the employee's potential need for accommodation and follow up accordingly.

B. Assistance for the employee in developing the plan

An employee may request assistance with developing the plan, including an individual or organization with knowledge of workplace accommodations for employees with disabilities.

C. Accessible formats

We provide the employee with a copy of their plan, or an explanation for denying the request to introduce a plan, in a format and with any communication support to meets the needs of the employee.

D. Reasons for denying a request

We may deny an employee's request for an individualized accommodation plan in the following circumstances:

- The employee is able to carry out most of the job without an accommodation.
- The independent regulated health professional(s) does not support the employee's self-assessed requirement for a workplace accommodation.
- Our research and evidence shows that the accommodation request would cause undue hardship (e.g., by creating safety risks to other employees, a significant measurable financial burden, or a disruption to our business).

E. Maintaining privacy

We maintain employee privacy regarding accommodation plans and personal health information by following the practices outlined in policy 10 below.

6. Manage performance.

- We meet with new staff six months into employment and generally, at least once annually to discuss progress, new goals and any challenges, including accommodation plans and any assistance required during emergencies.
- We speak with employees when they do not follow company policy or meet expectations, and offer a spoken and written warning of consequences, including disciplinary action. Prior to imposing disciplinary measures, we consider whether there is a connection between concerns about job performance and workplace barriers.
- We discuss existing workplace accommodations and propose modifications or new workplace accommodations if we believe this could help improve the performance of an employee with a disability.

7. Provide career development, training, internal advancement and reassignment.

- We recruit and select candidates based on objective criteria, such as current training, job experience, skills and number of years on the job.
- If a candidate has an individualized accommodation plan, we ensure it is adequate to address any barriers presented by the new opportunity, or we modify the plan accordingly.
- Our training program and methods for career development are accessible to all employees. If a barrier is identified, we attempt to remove or reduce it.

8. Put return-to-work processes in place.

A return-to-work process is a proactive way to help employees with disabilities and health conditions to stay at work or return to work as soon as it is safe to do so. This typically involves modifying and graduating employee duties and hours at work, according to their functional abilities.

Policy statements

- We keep in touch with absent employees, the Workers Compensation Board of Manitoba (WCB) (where involved), and Long Term Disability (where involved) throughout the employees' recovery to help them maintain a connection with their workplace.
- We offer meaningful and productive modified or alternate duties that are safe and within the employee's functional abilities.
- We are flexible and tailor the return-to-work plan to the employee's needs, recognizing and balancing the requirements of the workplace and the job requirements.
- We ensure supervisors and co-workers support employees who have been absent due to a disability and participate in the return-to-work process.
- We educate staff on why returning to work is good for business and outline the expectations for supporting an employee in a modified role, while ensuring privacy for the affected employee.
- We follow WCB's and the Long-Term Disability Plan's return to work processes.
- We recognize that pandemics, like COVID-19, pose serious health threats to people with pre-existing conditions, and we accommodate affected employees.

9. Provide workplace emergency response information.

- We regularly send a memo to all employees to inquire whether they need assistance during an emergency and to remind them of the office or building's emergency plan. Supervisors will inquire about any emergency needs as part of the annual performance review as well as providing a reminder about the emergency plan.
- We regularly discuss general accessibility and identify barriers during Workplace Safety and Health meetings.
- We provide workplace emergency response information to all new employees and invite them to inform their manager of assistance required in an emergency. We also request emergency contact information and keep this information up to date.

- We ensure workplace emergency response information is specific to each employee's needs and the physical nature of the employee's workspace.
- We review the emergency response information provided to an employee requiring assistance any time the employee is moved to a different workspace, the workspace is modified and if a change is made to general emergency response plans.
- If an employee who receives workplace emergency response information requires the assistance of another person during an emergency, we obtain consent from the employee on who will assist, and we inform that person how to assist.

Specific practices and measures:

- In a situation where an employee cannot descend the stairs to exit the building during an evacuation, with permission from the employee, we identify someone to remain with this person in the (designated safe area).
- The fire marshal for the floor on which the employee is located during the emergency, ensures communication with these employees during the emergency by (cellphone or two-way radios). The fire marshal informs building security about the number and location of employees who remain in the building.
- The person acting as fire marshal notifies the fire department about the number and location of employees who remain in the building.

10. Maintain privacy

- We follow proper protocol when storing confidential employee information.
- We protect our employees' personal information and personal health information at all times by limiting access to managers only.
- We respect the requirements of other privacy legislation, including The Freedom of Information and Protection of Privacy Act (Manitoba) and The Personal Health Information Act (Manitoba).

11. Provide training

- We provide training on how to accommodate employees with a disability to staff with the following responsibilities:
 - recruiting, selecting or training employees
 - supervising, managing or coordinating the work of employees
 - promoting, redeploying or terminating employees
 - developing and implementing employment policies and practices
- We train new employees and management as soon as reasonably possible.

- Training content includes:
 - how to make employment opportunities accessible to people with disabilities
 - how to interact and communicate with applicants or employees who face barriers, use assistive devices, or are assisted by a support person or service animal.
 - an overview of The Accessibility for Manitobans Act, The Human Rights Code (Manitoba), and the Accessible Employment Standard
 - our organization’s accessible employment policies, practices and measures, including updates or changes
- We provide refresher training regularly, including informing staff about updates to policies, practices and measures. Training is offered as needed, following updates.
- Managers maintain records of who has taken training and when.

12. Keep a written record of accessibility and training policies.

- We keep a written record of our accessibility and training policies, including a summary of the content of our training material.
- We let the public know that our policies are available upon request and we provide these in a format that is accessible for the user.

Application of this policy to temporary election employees

Elections Manitoba hires approximately 6,000 temporary employees to conduct a general election. Most are hired within weeks or days of their start date and many work less than two weeks.

Due to the temporary nature of most election employment and the legislative requirements for the duties carried out by election staff, it is not feasible to extend the full application of the preceding policy to most election employees.

In order to be inclusive and foster participation of all Manitobans in the electoral process, Elections Manitoba has adopted the following practices in hiring temporary election workers:

1. Provide reasonable accommodation to an employee on request, when time permits, and where no reduction in service to voters would result
2. Permit an employee to use assistive technology, where compatible with Elections Manitoba systems and any security requirements of these systems, and where no reduction in service to voters would result
3. Identify and seek to place potential employee in alternate positions that will better suit abilities of employee.
4. Allow the employee to be accompanied by a support worker if they normally have such support in place. The additional person may be required to undertake similar vetting/clearing processes as employee. The employee would bear any cost related to being accompanied by support worker.

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