



# **The Accessible Canada Act**

## **2024 Progress Report**

### **Manitoulin Group of Companies**

Including:

Jet Transport Ltd.

Lakehead Freightways Inc.

Manitoulin Transport Inc.

Northwest Transport Ltd.



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### General

#### Input and Feedback

The Organization welcomes feedback on our Accessibility Plan from the public and from anyone associated with the business. This feedback is valuable to help break down accessibility barriers and build on our commitment to accessibility. If you have an inquiry wish to provide feedback or would like to request a copy of the Accessibility plan, progress reports in an alternate format, please use one of the contact methods below. We will respond to all feedback and requests in a timely manner. If you require support while providing feedback, let us know and we will do our best to accommodate your needs.

Contact: Janelle Addison, Human Resources Department  
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#### Statement of Commitment

The Organization is committed to ensuring our organization and the services we provide are accessible to all, including persons with disabilities. All Canadians have the right to benefit from our services equally and those who work with us have the right to perform their jobs free of barriers. Our Accessibility journey will be developed by consultation with persons with disabilities.

### Addressing Areas Identified in the Accessible Canada Act (ACA)

**Talent Acquisition** - The Organization pledges its support to all of its business partners with regard to the acquisition of talent in support of the business. All candidates and incumbents with disabilities and those who experience barriers shall be supported throughout the entirety of their employment lifecycle.

The Organization has identified the following barriers that may be present:

**Barrier #1:** *The organization continues to experience competition for talent and is currently not attracting a high volume of qualified candidates from underrepresented populations such as persons with disabilities.*

**Action:**

- Support the extension of job posting reach to those with disabilities and affiliated communities.
- Support job posting documentation to follow accessibility best practices and readability and be prepared to provide information in accessible formats when requested.
- Support the Development of recruiting and employment procedures for applicants with disabilities.



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▪Support the Education to hiring managers throughout the Organization on accessibility and how they can ensure a barrier-free hiring, selection, and accommodation process.

### **Progress Report on Barrier #1**

- Efforts have been made to ensure all aspects of job postings have been reviewed to ensure they are accessible to any and all potential applicants; including those with disabilities. This includes improving the readability of the postings and having steps in place to provide an alternative format of the posting when requested. Continuous review/education is required to make sure new job postings follow the same protocol.
- Initial training has been given to some managers as to how to respond to requests for accommodation during the recruitment and interview process.
- Furthermore, training is being developed regarding what tools and procedures are available if managers are recruiting someone who requires accommodation.

**Barrier #2: Improve awareness opportunities for candidates to request reasonable accommodations during the recruitment process.**

### **Action:**

- Support language in job postings that show accommodations are available for roles that do not have a bona fide occupational requirement for applicants with disabilities and establish a process for receiving accommodation requests.
- Support the Education of candidates and incumbents about the availability of accommodations for applicants with disabilities in recruitment and selection processes.
- Support the recruitment effort to include accessibility commitments and offerings to careers pages so candidates can envision themselves working in an environment with available accommodations.

### **Progress Report on Barrier #2**

- Verbiage has been drafted to be used when communicating with applicants to make sure they are aware of accommodations, if required
- Requests have been submitted to marketing to see how career pages can be revised to make them more accommodating. Further consultation is required to ensure proper direction is given and proposed improvements achieve the desired results.



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**Build Environment** - The “build” environment area ensures that workspaces and the work environment are accessible for all.

**Barrier #3:** *Some spaces within the main office and shop locations may limit the mobility.*

### **Action:**

- Conduct a built environment audit to assess all physical barriers that may be present and require correction.
- Identify mobility barriers in all building locations that can only be accessed by stairs and develop plans to correct or find alternate space in buildings that can accommodate a permanent or temporary restriction.
- Add illumination signage in less lit areas to support those with visual impairments to identify important safety signage.
- Facilities and Finance leadership will provision a budget for modifications required to address accessibility deficiencies.

### **Progress Report on Barrier #3**

- A review of what should be included in a “built environment audit” and who would be qualified to perform such an audit, has begun.
- Initial conversations regarding a budget for potential modifications are ongoing. Future meeting times to review with the necessary leaders are being proposed for Q1 / Q2 2025.

**Barrier #4:** *Cannot safely dispose of sharps or medical devices in office or yard locations leading to improper handling and transporting items home to dispose of.*

### **Action:**

- Install designated sharps containers in a small number of washrooms with tamper resistant disposal units and educate on how to use them appropriately.

### **Progress Report on Barrier #4**

- After investigation, sharp disposal units are available in some washrooms. More are required to be installed to ensure adequate coverage. Through the feedback process, staff are encouraged to anonymously bring forward locations that require additional units.

**Information and Communication Technologies (ICT)** - “Information and Communication Technologies” are various technological tools used to send, store, create, share, or exchange information.

**Barrier #5:** *Some systems do not support accessibility features and technology teams are not well versed with supporting accessibility technologies.*



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### **Action:**

- Review current company websites, intranet and applications and remediate accessibility deficiencies.
- Update and standardize technology style design guides to ensure compatibility with accessibility features and tools.
- Ensure training materials and support are available for persons with disabilities on how to access and use accessibility features such as scaling text and images, enabling text to speech features, and closed captioning on Microsoft Teams.

### **Progress Report on Barrier #5**

- Certain company websites were re-designed/overhauled in order to “freshen” them up but also be more accessible. Plans to re-design other websites are currently being reviewed. This includes standardizing the design, style and functionality of the websites.
- Training delivery methods are under consistent review to ensure accessibility tools are in place. This includes sound, speech, and text features such as closed captioning.
- Being a Google based organization, regular Google “suite” training is being offered to those that require it. Not only does this assist in training staff the various pieces of software Google provides but also trains staff on the various accessibility features available when using tools such as Google Meet or shared documents.

**Barrier #6: *Tools and software used in the company which have accessibility capabilities are not being used in an accessible way.***

### **Action:**

- Educate and communicate opportunities to utilize accessibility features already available to the broader workforce.

### **Progress Report on Barrier #6**

- Plans to review what tools are and are not currently being used are under way. Based on that review, specific training modules will be created to address those certain tools.

**Barrier #7: *Technologies commonly used in meetings, online learning, and collaboration spaces can limit the ability of facilitators and attendees to participate meaningfully.***

### **Action:**

- Add closed captioning to online learning videos and ensure all other accessibility features are available as required.



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### **Progress Report on Barrier #7**

- As a Google based organization, Google Meet provides closed captioning as well as Google Translate features for online meetings. As noted in the progress report for Barrier #5, Google suite training modules are available for all staff who require additional training on how to use these features.

### **Communication Other Than Information and Communication Technologies (ICT)**

- This area requires that organizations provide barrier free access for the public and clients to all the communications that the Company produces for this audience.

**Barrier #8:** *The Organization needs a consistent process to ensure alternate formats of communication are available.*

#### **Action:**

- Review external website social media video content and identify ways to improve accessibility through alt text and closed captioning.
- Develop process to identify and create accessible options when developing web-based content.
- When requested, the Organization will provide alternate formats within time frames required by the Accessible Canada Regulation which will include print, large print, audio format, braille, or an electronic format that is compatible with adaptive technology.

### **Progress Report on Barrier #8**

- Plans to review the process of creating and posting content are in place with the marketing team. This will be a Q1/Q2 2025 initiative.

**Procurement of Goods, Services and Facilities** - The “procuring (buying) goods, services, and facilities” area ensures that accessibility is considered at the beginning of the buying process.

**Barrier #9:** *The Organization’s procurement procedures and practices do not take into consideration accessibility requirements.*

#### **Action:**

- Review vendors accessibility capabilities to ensure they can deliver goods and/or services consistent with our current accessibility needs.
- Ensure accessibility needs are considered when purchasing software, equipment, and food items.
- Review digital accessibility needs when receiving Requests for Proposals from external customers.



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### **Progress Report on Barrier #9**

- Processes to review vendor accessibility capabilities are currently being developed. Standard forms are under review prior to being rolled out. The goal would be to have this rolled out to vendors sometime in Q2 2025, with collection of data to be completed in Q3 and Q4 2025.
- Standard accessibility requirements that fit the goals of the organization are being developed. These standards will be used when reviewing certain purchases.

**Design and Delivery of Programs and Services** - When designing and delivering the Organization's internal and external programs and services, accessibility considerations must be part of the process.

**Barrier #10:** *We do not currently have a standard approach for ensuring all programs, processes, and services have taken accessibility into consideration.*

### **Action:**

- Comply with mandatory requirements to consult with persons with disabilities by creating a forum to review and provide feedback on all programs, processes, policies to support the development of future programs and services.
- Develop and promote guidelines on how to apply the accessibility lens when reviewing company policies, programs, and services.
- Create accessibility checklists to help ensure key accessibility considerations are made.

### **Progress Report on Barrier #10**

- Further education throughout the organization on the Accessibility Act, the Accessibility Plan and Progress reports is being developed.
- This includes creating standardized reports, feedback forms, consultation reporting documents and checklists that will be used to identify and address areas where accommodations are required.
- A review of all procedures, reports and processes is scheduled to be completed within Q2 2025.



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### **Consultations**

To align with the Organization's commitment to make the workplace environment accessible to all, we have a plan to develop the initial Accessibility Plan in consultation with leaders of key areas to support the development of identifying barriers, individuals with disabilities through an intended internal survey and self declaration and subsequent follow up conversations with various management leaders.

We will continue to survey, including members of the general public, as well as consult with external organizations that have been referenced in this Accessibility Plan and measure progress to ensure we meet the commitments we set out to achieve.

#### **Progress Report on Consultations**

- Consultation has been held with key stake holders. This includes leaders of the organization in order to educate them on what is required as per the Act, what steps have been taken thus far and what actions will be completed in the coming year
- Consultation has also been had with staff members. This has been done by an invitation for anyone who wishes to bring forward any accessibility concerns, as well as consulting with those that have self declared to have a disability. Information provided was brought forward to leaders and taken into account when reviewing the plan. All consultations were done to ensure anonymity.
- Further consultation was done with other businesses and organizations in the immediate area. It provided good information to what others are hearing/experiencing within different industries.

### **Feedback**

#### **Progress Report on Feedback**

- At the time of completion of this progress report, no feedback has been received regarding the posted Accessibility Act Plan.