

Policy Number:	610.3.7b
Policy Name:	<b>Accessibility Standard for Customer Service (Manitoba)</b>
Policy Created Date:	July 2021
Policy Revised Date:	
Approved Date:	July 2021
Approved By:	President & CEO
Last Review Date:	July 2021
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Policy Owner:	Director, Talent Management

## 1.0 Purpose

Pathways Canada is committed to providing a respectful, welcoming, accessible and inclusive environment for all. This includes providing a barrier-free environment for all stakeholders, including customers, employees, job applicants, suppliers, and any individual who may enter our premises, access our information, or use our services. The company upholds the *Customer Service Standard Regulation* as legislated by the government of Manitoba under *The Accessibility for Manitobans Act*. This policy is to be used in conjunction with the specific workplace procedures created to comply with the requirements of that statute.

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## 2.0 Policy Scope

This policy applies to all employees of Pathways Canada.

## 3.0 Definitions

A full list of definitions can be found in Section 7.0 - Appendix A.

## 4.0 Policy Statement and Guidelines

### Barrier-Free Access to Goods and Services

Pathways to Education Canada will establish and implement measures, policies, and practices to ensure every person has barrier-free access to the company's goods and services. When creating these measures, policies, and practices, the company will:

- Determine current barriers customers face when attempting to access goods or services;
- Seek to remove all identified barriers;
- Ensure that any fees charged relating to accommodating a person who is disabled by a barrier are imposed only where the organization cannot reasonably accommodate the person;
- Identify procedures to ensure that where barriers cannot be removed, the company will provide alternate means for accessing goods or services; and
- Address adequate means for preventing the creation of any new barriers.

The company will also ensure that all employment practices uphold the principles of reasonable accommodation as defined in *The Human Rights Code* of Manitoba and that all individuals have access to employment opportunities.

### Communications

When communicating with or providing information to an individual who has self-identified as being disabled and constrained by a barrier, Pathways to Education Canada will ensure that all communication with the individual is completed in a manner that takes into account the individual's disability. Where an assistive device is used to remove or reduce a barrier, the company will reasonably accommodate the use of said device.

### Support Persons

The company recognizes that a disabled person may be accompanied by a support person when seeking to obtain, use, or benefit from company goods or services. The company will accommodate support persons free of charge, or where this is not possible, ensure the support person is notified ahead of time that admission will be charged and advise of the amount.

### Service Animals

The company recognizes that a disabled person may be accompanied by a service animal when seeking to obtain, use, or benefit from company goods or services. The company will ensure that staff are aware of the company's policy permitting the admittance of service animals in all areas where customers are generally allowed.

## **Built Environment**

Pathways to Education Canada will ensure that all aspects of the built environment designed to facilitate barrier-free access to goods or services are available for use in the intended manner. If one or more of these aspects is unavailable for use, the company will provide notice explaining why the aspect is unavailable and an estimated time-frame for when it will be available. The company will also provide details of an alternate means of access to the company's goods and services. This notice will be prominently displayed on the premises and on the website, or by any means which are reasonably practicable considering the circumstances.

## **Feedback**

Pathways to Education Canada measures, policies, and practices will include processes for receiving and responding to feedback about the accessibility of company goods and services. Such processes will detail actions that the company will take to respond to feedback and complaints, as well as how feedback will be documented.

The company will ensure that information regarding the feedback process is easily available and provided to the public. Documents will be available in alternative formats, where possible, and the availability of alternative formats will be publicly advertised.

## **Documentation**

Documentation of company measures, policies, and practices, including feedback and resulting actions, will be available upon request. This availability will be prominently advertised on the company's premises and website, or by any means which are reasonably practicable considering the circumstances.

If documentation is requested by a person who is disabled by a barrier, the company will ensure that the documentation or the information contained in it is given to the person in a manner that takes into account the barrier, and within a reasonable time and at no cost to the person.

## **Training**

Pathways to Education Canada will provide training to any employee, agent, or volunteer who provides goods or services directly to the public or to another organization in Manitoba, as well as all employees who are responsible for or participate in the development or implementation of company measures, policies, and practices related to this policy and *The Accessibility for Manitobans Act*.

Training will be provided to staff as soon as reasonably practicable after the person is assigned applicable duties. Ongoing training will also be provided when there are

changes to the company's measures, policies, and practices regarding barrier-free access to goods or services.

Training will include:

- Instruction on how to interact and communicate with persons who are disabled and face barriers;
- Instruction on how to interact with persons who are disabled and require the help of a service animal, support person, or the use of an assistive device;
- How to use any company-provided equipment or assistive devices that may be available to assist persons disabled by a barrier;
- What to do if a person disabled by a particular barrier is having difficulty accessing a service or good; and
- A review of *The Human Rights Code*, *The Accessibility for Manitobans Act*, and the *Customer Service Standard Regulation*.

All training policies and training activities will be documented, including when training is to be provided and a summary of training content.

## **Public Events**

If the company holds a public event, Pathways to Education Canada will take reasonable measures to ensure that:

- Notice of the event is provided in a manner that is accessible to persons disabled by barriers;
- The event is held in a meeting space that is accessible;
- The physical and communication needs of persons disabled by barriers are met on request; and
- Notice is given stating that persons disabled by barriers can request that accessibility supports be provided.

## **Additional Requirements**

Pathways to Education Canada will document in writing any and all procedures, practices, or additional policies related to:

- Providing barrier-free accessible customer service to persons with disabilities;
- Providing barrier-free accessible goods or services to persons with disabilities;
- Procedures for any temporary disruptions in services;
- The feedback process; and
- Employee training.

The company will also ensure that customers are aware that these documents are available upon request. Documentation requests will be completed in a barrier-free manner, provided within a reasonable timeframe, and at no cost.

## 5.0 Procedures and Responsibilities

The Director, Talent Management will be responsible for ensuring adherence to the policy requirements outlined in Section 4 and will monitor compliance of this policy and update the CEO and the HR & Compensation Committee on an annual basis.

## 6.0 Related Policies and Legislation

Pathways' AODA Customer Service Policy (Ontario)

Pathways' Human Rights Policy

The Accessibility for Manitobans Act <http://www.accessibilitymb.ca/>

*The Human Rights Code of Manitoba*

## 7.0 Supporting Information Exhibits / Appendices / Forms

### Appendix A: Definitions

**Accessible customer service:** When all persons who are reasonably expected to seek to obtain, use, or benefit from a good or service have the same opportunity to obtain, use, or benefit from the good or service.

**Public event:** Includes a public meeting, a public hearing, and a consultation process required under an enactment.

**Service animal:** An animal that has been trained to provide assistance to a person with a disability that relates to that person's disability.

**Services:** The activities that Pathways undertakes that are related directly to its core mission, or, indirectly, to serving its various customers or stakeholders. Services related to core mission include, but are not limited to: providing funding and support to community partners, working with current and prospective donors to secure funding, working with other community or government stakeholders, including volunteers, to further Pathways' work. Services related to other customers or stakeholders include but are not limited to: providing information through

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various communication including phone, digital media, advertising, printed materials or in-person.

**Support person:** In relation to a person who is disabled by a barrier, a person who accompanies the person to support the person obtaining, using or benefiting from a good or service provided by an organization; or assist the person in addressing his or her communication, mobility, personal care, or medical needs.

**Volunteer:** A volunteer is defined as an individual who contributes time and talent to Pathways without compensation or expectation of compensation.