

 <p><b>Canadian Mental Health Association</b> Across Manitoba Mental health for all</p>	<p>Approval Signature:</p> 	<p>Page: 1 of 9</p>
<p><b>Policy</b> <b>Accessible Customer</b> <b>Service Policy</b></p>	<p>Date: <b>September 2024</b></p>	<p>Supersedes:</p>

**PURPOSE:**

This policy aims to facilitate accessible service for individuals with disabilities in compliance with the [Accessibility for Manitobans Act](#) and its [Accessible Customer Service Standard Regulation](#). The requirements include:

- Ensuring that all individuals can reasonably access the goods or services provided by Canadian Mental Health Association Across Manitoba (CMHA)
- Identifying and proactively addressing existing barriers to accessible customer service for individuals with disabilities.
- If an existing barrier cannot be removed, providing alternative means for individuals with disabilities to access the goods or services.
- Educating CMHA staff on best practices to ensure that people with disabilities can access CMHA’s goods and services.
- To enable access to CMHA sites and services to persons who rely on Service Animals.
- To ensure the provision of accessible service to individuals with disabilities who are accompanied by a support person
- To facilitate a welcoming environment for individuals accompanied by a support person and/or their service animal.

**DEFINITIONS:**

Goods and Services:

Goods are items that are usually (but not always) tangible, such as a resource guide or a pen. Services are activities provided by other people, such as a Rehabilitation Worker or a Service Navigator.

### Accessible Customer Service:

Accessible customer service is provided when all person who are reasonably expected to seek to obtain, use or benefit from all good or service have the same opportunity to obtain use or benefit from the good or service.

### Assistive Devices:

Assistive devices are crucial tools for individuals with disabilities to carry out activities and access services provided by individuals or organizations covered by the Customer Service Standard. These devices encompass a wide range, including but not limited to wheelchairs, reading machines, recording machines, hearing devices, and devices for grasping.

### Barrier:

As specified in the Accessibility for Manitobans Act, a barrier is anything that interacts with that disability in a way that may hinder the person's full and effective participation in society on an equal basis. These barriers can manifest as physical, architectural, information or communication, attitudinal, technological, policy and procedural barriers.

### Disability

Disability may be visible (for example, a physical limitation), or can be hidden from view (for example, a learning disability). As defined by Manitoba's Human Rights Code, disability is a condition that limits someone's day-to-day activities.

### Service Animal:

A service animal as defined by the Manitoba Human Rights Code, is an animal that has been trained to provide assistance to a person with a disability that relates to that person's disability.

### Support Person:

A support person is defined as another person who accompanies a person with a disability to;

- a) Support the person obtaining, using or benefiting from a good or service provided by an organization; or
- b) Assist the person in addressing their communication, mobility, personal care or medical needs.

### Staff:

All persons employed by the Canadian Mental Health Association within the province of Manitoba, as well as students, volunteers and other associates through contracts.

## **POLICY:**

The Canadian Mental Health Association across Manitoba (CMHA) is dedicated to meeting the accessibility needs of all individuals. We are committed to providing equitable goods and services that are easily accessible to everyone and are delivered in a manner that fully embodies the principles of dignity, equity, equality of outcome, independence, and belonging.

This policy establishes clear guidelines for providing goods and services to people with disabilities and supporting full accessibility for individuals with disabilities. In doing so, staff will:

1. Seek to identify Barriers to Accessible Customer Service in their area
2. Seek to remove existing Barriers, so that all persons reasonably expected to obtain, use or benefit from the good or service can do so using the same means;
3. Where an existing Barrier cannot reasonably be removed, provide persons with Disabilities an alternative way to access the good or service, either temporarily or permanently;
4. Not charge a fee relating to accommodating a person who is disabled by a Barrier; and
5. Seek to prevent new Barriers from being created.
6. Staff shall accommodate a person with a disability in the event they require assistive device, service animal, or support person to remove or reduce barriers to access.
7. If a support person is required to pay an amount to be admitted to or present, CMHA will ensure that advance notice is given of the amount payable in respect of the support person, if any.
8. CMHA will ensure that its measure, policies and practices under section 4 include a requirement that
  - a) Any aspect of its built environments intended to facilitate barrier-free access to the goods or services it provides are available for use in the intended manner; and
  - b) If such an aspect is unavailable for use, notice of the following be given:
    - I. the reason why the aspect is unavailable and an estimate of when the unavailability will cease.
    - II. details of alternative means, if any, available to access CMHA's goods or services.
9. In terms of policies and practices under section 4, CMHA will make reasonable efforts to ensure that it provides a process for

- a) receiving and responding to feedback about the accessibility of CMHA's goods or service in a manner that is appropriate in the circumstances and is suitable for persons who are disabled by barriers; and
  - b) documenting its resulting actions and making that document available upon request.
10. Ensure that CMHA customer service policy is displayed on the CMHA across Manitoba's website, and to be provided in a format that is reasonable upon request.
11. Subject to subsection (4) CMHA will
  - a) document implementation of accessible customer service, policies and practices and provide a copy of the document on request.
  - b) Provide notice that the document is available upon request.
  - c) If a document is requested CMHA will ensure that the document of the information contained in it is given to the person in a manner that takes into account the barrier; and
  - d) Provide the document within a reasonable time and at no cost to the person.
12. Staff shall complete training on Accessible Customer Service.
13. CMHA will provide training that includes a review of the Manitoba Human Rights Code and the Accessible Customer Service Standard Regulation.
14. Managers shall maintain a record of completed training for each Staff person.
15. For any public event held or sponsored by a CMHA Site or program, the organizers/sponsors must:
  - a) Give notice of the event in a manner that is accessible to persons with Disabilities;
  - b) Hold the event in a meeting space that is accessible;
  - c) Meet the physical and communication needs of persons with Disabilities upon request, including requests for materials to be provided in alternative formats;
  - d) Give notice that persons with Disabilities may request relevant supports;
  - e) Take reasonable means to provide requested support.

## **PROCEDURE:**

CMHAs across Manitoba are dedicated to delivering exceptional service to all individuals, including those with disabilities. We confidently execute our functions and responsibilities in the following areas:

### **Communication:**

CMHA will ensure effective communication with people who are living with disabilities by taking their specific needs into account. Our staff will continue to receive comprehensive training on how to interact and communicate with individuals

with various types of disabilities, both in person and through online, telephone, and written communication.

We are fully committed to providing accessible telephone services to all our participants. If telephone communication is not suitable for someone's needs or is not available, we will offer alternative communication methods such as in-person meetings, email, online communication, or fax.

### **Assistive Devices:**

1. People with disabilities have the right to use their own assistive devices when accessing goods and services. CMHAs across Manitoba recognizes the crucial importance of these devices and fully supports individuals with disabilities in using their own personal assistive devices to access, use, and benefit from our services.
2. If a person with a disability cannot access CMHA's services using their own assistive device, CMHA will promptly assess service delivery and available options to fulfill the individual's needs within financial and human resource constraints.
3. All CMHA staff and third-party contractors who provide services to people will be informed on the use of assistive devices and other accessibility support available at CMHA to enhance the accessibility of our services for people with disabilities.

### **Billing:**

CMHA is committed to providing an accessible invoice to all individuals. Invoices will be provided in the following formats upon request: hard copy, large print or email.

CMHA will answer all questions individuals may have about the content of the invoice, by email, telephone, mail or in-person.

### **Service Animals:**

1. CMHA acknowledges the vital relationship and dependency which exists between a person with disabilities and their service animal. CMHA is committed to welcoming people with disabilities who are accompanied by a service animal on the agency site premises that are open to the public and other third parties.
2. Public areas of our premises include common areas such as lobby, building offices, common eating areas, meeting rooms etc. Service animals are not permitted where food preparation is being undertaken; or as otherwise disallowed by law and/or other resident's private space unless at the discretion of the resident.

3. The individual/customer when accompanied by a service animal will be allowed to enter the premises with the animal and keep the animal with them at all times, unless the animal is excluded by law from the premises.
4. The individual/customer is accountable for the supervision, care, and control of their service animal. The service animal must remain under the handler's control at all times. CMHA reserves the right to request the handler to remove the animal from the premises if it exhibits disruptive behavior such as barking, whining, wandering, or aggression.
5. Staff will not touch a service animal and will not speak to a service animal while the animal is working without permission.
6. Staff will notify individuals who use a service animal of areas designated for service animals to relieve themselves and communicate policy that the individual is responsible for supervision and care of their animal.

### **Support Persons:**

1. CMHAs across Manitoba is committed to welcoming people with disabilities who are accompanied by a support person. People with disabilities have the right to have access to their support person while accessing goods and services of CMHA.
2. If confidential information is going to be discussed, the person with the disability should be asked if they prefer their support person to remain present. If the support person is present when confidential information is to be disclosed, signed consent must be received from the person with the disability. A signed confidentiality agreement should also be obtained from the support person. See [Ongoing Permission to Exchange Information](#) and [Specific Permission to Exchange Information](#).
3. CMHA may request a person with a disability be accompanied by a support person, in the event that it is considered necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises. This will only occur after consultation with the person with a disability and when it is the only means to allow the person with a disability to access CMHA's goods or services. The following criteria shall be used in consultation with the individual/customer to determine if a support person should be present:
  - a) When the risk is greater than the risk associated with other individuals;
  - b) When there is a clear and significant risk to health and safety of the person with a disability or others;
  - c) When the risk cannot be eliminated or reduced by other means;

- d) When the assessment of the risk is based on consideration of the nature and severity of the potential harm, the duration of the risk, the likelihood that potential harm will occur and how imminent the potential risk is;
  - e) When the assessment of risk is based on the person's actual characteristics, not on perceived risk.
4. If there are any fees for admission (e.g., special events), support persons may be required to pay their entry.
  5. If a support person is required to pay an amount to be admitted to or present, CMHA will ensure that advance notice is given of the amount payable in respect of the support person, if any.

### **Built Environment:**

CMHA will ensure that its policies and practice under section 4 include a requirement that any aspect of CMHAs across Manitoba sites are intended to facilitate barrier-free access to the goods or service we provide are available for use in the intended manner

### **Notice of Service Disruptions:**

1. If there is a temporary disruption in the availability of services and facilities used by individuals (for example, temporary loss of elevator service), CMHA will notify the public of the reason for the disruption, the date(s) of disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.
2. The notice may be provided by a variety of methods, depending on the circumstances, and may include postings in easily seen places at the effected sites (which may include all sites). (For example, common areas by the elevator, next to the elevator on the main floor), and our website [CMHA across Manitoba](#), as well as by other means that will ensure that the notice reaches the person(s) potentially affected by the temporary disruption. Notices will be posted and visible to all individuals.
3. If the disruption is anticipated, a reasonable amount of advance notice of the disruption will be provided. If the disruption is unexpected, notice will be provided as soon as possible.

### **Feedback:**

CMHAs across Manitoba are committed to providing high quality customer service and will continue to enhance and improve accessibility of our customer service to all individuals.

1. A process to receive feedback on the provision of goods and services for customers with disabilities accessing services at CMHA has been established. This process enables people to provide feedback either in person, by telephone, in writing, by email, online, or by other methods.
2. A [Feedback Form](#) can be filled online on our website or a copy of the form can be picked up from a site location or sent to individuals/customers by mail.
3. If a person submits a “request a response” and provides contact information, CMHA will follow-up with the individual in the format in which the feedback was received or requested, within five working days. All feedback will be kept confidential and will be used to improve customer service. Feedback forms can be submitted to the front reception and will be forwarded to the Equity and Belonging Lead for review and response.
4. CMHA will record feedback, document the resulting actions, and make the documentation available upon request.

### **Training:**

All CMHA representatives who may or may not interact with the public must receive training on serving people with disabilities. Representatives includes employees, volunteers, students and third-party contractors.

1. CMHA will ensure that employees, volunteers, and those involved in policy and program development receive training on accessible customer service.
2. Third-party contractors working for CMHA must ensure their employees and subcontractors receive training in accordance with Manitoba Accessible Standard for Customer Services. They may be asked to provide training records to CMHA upon request.
3. CMHA staff, volunteers, students and contractors will receive training on the Manitoba Accessibility Act and the Accessible Customer Service Standard, as well as the organization's policies and procedures for serving individuals with disabilities. The training will cover the following topics:
  - a) Communication and interaction with individuals with various types of disabilities
  - b) Interactions with individuals who use assistive devices, guide dogs, service animals, or support persons
  - c) Proper use of equipment or devices to assist individuals with disabilities
  - d) Steps to take if a person with a disability is experiencing challenges accessing CMHA's goods or services
  - e) CMHA's policies, procedures, and practices for serving individuals with disabilities.



4. Customer service training can take various forms. The training can be provided through online sessions, in a classroom setting, by video, or through other formats.
5. CMHA will provide training to every staff member as part of our onboarding process. Training will also be provided on an ongoing basis in connection with changes to applicable legislation, and/or organizational policies, procedures, and practices governing the provision of goods or services to persons with disabilities.
6. To meet the Manitoba Accessible Standards for Customer Service, CMHA's People and Culture Department will keep records detailing the training provided, as well as the names of those trained, where and when the training took place.
7. CMHA will deliver comprehensive onboarding and reboarding training that encompasses a thorough review of The Accessibility for Manitobans Act, the Human Rights Code, and the Accessible Customer Standard Regulation.