

## Accessibility Standard for Customer Service Policy

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### **A. Introduction:**

Manitoba Blue Cross is committed to complying with the Accessibility Standard for Customer Service under The Accessibility for Manitobans Act. Our policies, practices and measures reflect the principles of dignity, independence, integration, and equal opportunity for people disabled by a barrier. If a barrier to accessing our goods or services cannot be removed, we will seek to provide alternate ways to access the goods or services. The following policy, organizational practices and measures are intended to meet the requirements of the Accessibility Standard for Customer Service. This policy applies to all employees, consultants, and management.

### **B. Statement of Commitment:**

Manitoba Blue Cross is committed to ensuring equal access and participation for all people, regardless of their abilities. We are committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in inclusion. We are committed to meeting the needs of people who face accessibility barriers by identifying, removing, and preventing these barriers and by meeting requirements of The Accessibility for Manitobans Act.

### **C. Accessible Customer Service Objectives:**

This policy reflects the ongoing practices and measures of the eight requirements of the Customer Service Standard:

- i. Communication – We will make reasonable efforts to ensure that, when communicating with a person who self-identifies as being disabled by a barrier, the communication is done in a manner that considers the barrier.
- ii. Assistive Devices - We recognize that a person who is disabled by a barrier may use assistive devices to remove or reduce the barrier, and the measures and practices that our organization implements must reasonably accommodate the use of these devices.
- iii. Support Persons - We recognize that a person who is disabled by a barrier may be accompanied by a support person when seeking to obtain, use or benefit from the organization's good or service.

- iv. Service Animals - We recognize that a person who is disabled by a barrier may be accompanied by a service animal when they seek to obtain, use, or benefit from the organization's good or service.
- v. Maintain Accessibility – We recognize we must ensure that our facilities, measures, policies, and practices enable a barrier free environment.
- vi. Feedback – We must make reasonable efforts to ensure that we provide a process for receiving and responding to feedback, documenting our resulting actions, and making that documentation available on request.
- vii. Documentation - We will provide a copy of the documentation on request; and provide notice that the documentation is available on request.
- viii. Employee Training – We must ensure all public facing staff are trained on understanding and providing proper customer service support to individuals who are disabled by a barrier. We must include a summary of the training content, including when training will be provided.

#### **D. Practices and Measures:**

##### **i. Barrier Free Communication**

Manitoba Blue Cross will take into account potential barriers to people with disabilities. To determine communication and information barriers, Manitoba Blue Cross employees can ask customers what method of communication works best for them.

We meet the communication needs of our customers by offering:

- Practices to reduce communication and information barriers including:
  - writing information down, reading items out loud, and taking extra time to explain the documentation.
  - offer a chair when longer conversations are needed.
  - offer a quieter space.
  - adding “How can we help?” to signage or verbal greetings.
  - sit down to engage with someone using a wheelchair.
  - provide Sign Language support.
- Signs and documents that are easy to read, including using larger fonts, symbols, and colour contrast, and ensuring messages are not printed on images.
- Signs and documents in plain language.
- Support other forms of communication assistance as required, such as a Sign Language interpreter or language interpreter.

ii. Accommodate the Use of Assistive Devices

People with disabilities may use their personal assistive devices when accessing Manitoba Blue Cross's goods, services, or facilities. In cases where the assistive device presents significant and unavoidable health or safety concerns, Manitoba Blue Cross will attempt to use other measures to ensure the person with a disability can access goods, services, or facilities.

Practices for enabling persons who are disabled by a barrier with assistive devices:

- Employees are trained and familiar with the various assistive devices that are provided to customers to ensure access to goods, services, or facilities.
- Training includes appropriate interaction of employees with customers using assistive devices. For example, employees will not touch or move assistive devices without permission.
- In cases where the assistive device presents significant and unavoidable health or safety concerns, we attempt to use other measures to ensure the person with disabilities can access our goods, services, or facilities.

iii. Welcome Support Persons

Manitoba Blue Cross welcomes customers accompanied by a support person. Practices for enabling support persons:

- We address the customer, not the support person, unless requested by the customer, client, or employee to do otherwise.
- We make space for support persons on-site and ensure customers, clients, or employees always have access to their support persons.

iv. Welcome Service Animals

Manitoba Blue Cross is committed to meeting the requirements of Manitoba's Human Rights Code and welcomes customers accompanied by service animals.

The Human Rights Code (Manitoba) defines a service animal to be "An animal that has been trained to provide assistance to a person with a disability that relates to that person's disability."

- Treating a service animal as a working animal.
  - Do not distract a service animal from its job by petting, feeding, or playing with it, unless given permission by the person with the service animal to do so.
  - Know how to identify a service animal by its harness or vest and by the assistance the animal is providing.
- If we have concerns, we may ask if the animal has been trained to help a person with a disability-related need.
- We do not inquire about the disability.
- We expect the person who is handling the service animal to maintain control of the animal physically or through voice, signal, or other means.
- If the service animal is showing signs of not being controlled (i.e., by barking, whining, or wandering), we may provide a warning to the handler to control the animal.
- If the service animal continues to misbehave, we may ask the handler to leave.
- If another law prohibits service animals, Manitoba Blue Cross will explain why the animal is excluded and discuss with the customer another way of providing goods and services.

v. Maintain Accessibility Features

To ensure barrier-free access to our goods, services, or facilities, we maintain our accessibility features so they can be used as intended.

Practices for eliminating physical barriers include:

- Organizing our space so that there is room for people with wheelchairs, electric scooters, walkers, or support persons.
- Ensure seating accommodates people of varying sizes and abilities.
- Keeping hallways, aisles, entrance, reception areas, waiting rooms and meeting rooms clear of clutter.
- Keeping our entrance area clear of ice and snow.

- Placing standing signs out of the way to avoid tripping hazards.
- Our accessibility features affected by this policy include: hallways, aisles, entrance and reception areas, waiting rooms and meeting rooms, accessible washrooms, elevators, braille in elevators, automatic doors, doorbells and ramps.

vi. Notice of Accessibility Feature is Unavailable

In the event of a planned or unexpected disruption of services or facilities affecting customers disabled by barriers, Manitoba Blue Cross will promptly post notices and, when possible, announce the disruption. A clearly posted notice or announcement will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

- If one of our accessibility features becomes temporarily unavailable, we will prepare and post a notice and/or announcement about the disruption, the reason for the disruption, how long it will last, and whether there are other ways we can provide access to our goods and services (e.g., by using an alternate entrance).
- If requested, we will work with the customer to find other ways to provide goods and services.
- We will let the public know about disruptions in the following ways:
  - Posting on website and on social media
  - posted at our building entrance or reception desk and/or in high traffic areas
  - included in posters, brochures, pamphlets and/or advertisements
  - through employees, or management (in person, by phone or through recorded greetings)

vii. Feedback Process

Manitoba Blue Cross welcomes feedback on how well accessible customer service is provided. Customer feedback will help identify barriers and allow concerns to be addressed.

We document the actions we take in responding to the feedback we receive, and that information is available on request in a format that meets the individual's communication needs.

- We invite feedback by visiting our in-person customer service centre, or by contacting us by phone or through our website.
- All feedback is directed to the Manager, Human Resources, who determines what action, if any, should occur.

- If the feedback requires Manitoba Blue Cross to follow-up with the customer, we will notify that the request is being reviewed and they can expect a response within 5-7 business days.
- We let the customer know what action we will take to address their feedback, if any.
- We will respond to feedback in a way that meets the communication needs of the individual.

## E. Training

### viii. Employee Training

Manitoba Blue Cross employees who interact with clients and the public receive training on accessible customer service.

Training includes:

- The purpose of The Accessibility for Manitobans Act and the requirements of the Customer Service Standard.
- The policies and actions related to the Customer Service Standard
- How to interact and communicate with people disabled by barriers, including persons who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty accessing goods, services, or facilities.
- How to interact and communicate with people who face barriers to accessing goods and services, use assistive devices, are assisted by a support person and/or are assisted by a service animal.
- How to use any equipment or assistive devices that are available on-site.
- An overview of The Accessibility for Manitobans Act, The Human Rights Code (Manitoba), and the Customer Service Standard.
- Our organizational policies, practices, and measures, including updates or changes.

We are focused on:

- Training all new employees within 30-60 days after hiring.
- Providing refresher training regularly to all employees, including updates to policies, practices, and measure. Training is offered annually.
- Recording who has taken training and when.
- Feedback on the accessibility of our goods and services is addressed in regular staff meetings.

## **F. Documentation**

### ix. Documentation

We keep a written record of our accessibility policy and training procedures. Our written documents include a summary of our training material and when training is offered.

We let the public know that our written policies are available on request and that:

- Our accessibility and training policies are available in the following ways:
  - posted on website and on social media.
  - posted at our building entrance, service reception desk and/or in high traffic areas.
  - included in posters, brochures, pamphlets and/or advertisements.
- We provide our policies within a reasonable timeframe, at no cost, and in a format that meets the needs of the individual.

## **G. Policy Review**

We will review our policy every January or as government standards change to ensure we have an accommodating environment that is safe and accessible for all Manitoba's disabled by a barrier and to satisfy all government regulations.

If there are any changes to Manitoba Blue Cross's accessible customer service policies, employees will be promptly informed and trained.