

November 2018

Intent

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Manitoba Regulation 171/2015* under the *Accessibility for Manitobans Act*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All services provided by the Evangelical Lutheran Church in Canada (ELCIC) shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

This policy applies to the provision of services at the ELCIC National Office, located at 600–177 Lombard Ave., Winnipeg, MB.

This policy applies to ELCIC employees and volunteers who deal with the public or other third parties that act on behalf of the ELCIC, including when the provision of services occurs off premises such as in the delivery of services.

The section of this policy that addresses the use of service animals applies at 600-177 Lombard Ave., Winnipeg, Manitoba.

This policy shall also apply to all persons who participate in the development of ELCIC policies, practices and procedures governing the provision of services to members of the public or third parties.

Definitions

Accessibility – Related to this legislation, accessibility means giving people of all abilities opportunities to participate fully in everyday life. Accessibility refers to the ability to access and benefit from a system, service, product or environment.

Assistive Device – A technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Customer – For the purposes of this policy will mean any individual accessing the ELCIC office for information or services.

Disability – A disability is a condition that limits a person's daily activities. Persons with disabilities may have long-term physical, mental, intellectual or sensory impairments, which, in interaction with various barriers, may hinder their participation on an equal basis with others. A disability, aging, an injury and other life events may temporarily or permanently affect mobility, dexterity (use of hands), vision, hearing, communication, understanding or mental health.

1

Service Animal - A service animal is defined in The Human Rights Code to be "an animal that has been trained to provide assistance to a person with a disability that relates to that person's disability." While an animal may not have received formal training, if the person relying on the animal can demonstrate that it is an integral part of their disability related treatment program, the animal may be considered a "service animal."

Support Person – A support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to services.

General Principles

In accordance with the *Accessibility Standards for Customer Service*, Manitoba Regulation #171/2015, this policy addresses the following:

- The Provision of Goods and Services to Persons with Disabilities
- Communication
- The Use of Assistive Devices
- The Use of Support Persons
- The Use of Service Animals
- Maintain Barrier-Free Access
- Notice of Temporary Service Disruptions
- Customer Feedback
- Training

The Provision of Goods and Services to Persons with Disabilities

- The ELCIC is committed to the Accessibility for Manitobans Act and its accessibility standards.
- The ELCIC is committed to excellence in serving all people including those with disabilities.
- Our policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity for all people with disabilities. Any policies of the ELCIC that do not respect and promote these principles will be modified or removed.

Communication

The ELCIC will communicate with people disabled by barriers in ways that take into account the nature of the barrier. This may include the following:

- Easy to read fonts and plain language.
- Paper and pen available at reception.
- All staff will be trained to recognize barriers to communication and work with the customer to determine what method of communication works best for them.

Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing services provided by the ELCIC.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of services. For example, where elevators are not available and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Support Persons

If a customer with a disability is accompanied by a support person, the ELCIC will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, the ELCIC will make every reasonable attempt to resolve the issue.

Consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Although in many (most) cases there would be no charge for a support person, if payment is required by a support person for admission to any event hosted by the ELCIC, the ELCIC will ensure that notice is given in advance by posting notice of admission fees for support persons where the fees are posted.

Service Animals

A customer with a disability who is accompanied by a service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to service animals.

If a service animal is excluded by law, the ELCIC will offer alternative methods to enable the person with a disability to access services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Recognizing a Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, the ELCIC may ask:

- Is the animal assisting you?
- What assistance has the animal been trained to provide related to your disability?

Care and Control of the Animal:

The customer that is accompanied by a service animal is responsible for maintaining care and control of the animal at all times.

Balancing Rights:

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, the ELCIC will make all reasonable efforts to meet the needs of all individuals. Reasonable assessment of the situation will be required and a decision would be applied in favour of the party who would experience the greater discrimination.

Maintain Barrier-Free Access

The ELCIC will maintain barrier-free access by:

- Keeping hallways and waiting/meeting rooms clear of clutter such as boxes
- Keep entrance ways cleared of snow and ice
- Ensure that the placement of standing signage is not a tripping hazard
- Have space for mobility devices in the waiting area

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the ELCIC. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use the needed services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:

- services that are disrupted or unavailable reason for the disruption
- anticipated duration
- a description of alternative services or options

When disruptions occur, the ELCIC will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the ELCIC website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or by any other method that may be reasonable under the circumstances.

Feedback Process

The ELCIC shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the ELCIC website or by contacting the ELCIC directly. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

Submitting Feedback:

Customers can submit feedback to Kyle Giesbrecht, Director, Finance and Administration; phone (204) 984-9178 or by email at kgiesbrecht@elcic.ca.

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted with seven working days.

Training

Training will be provided to:

- all employees and volunteers who deal with the public or other third parties at the ELCIC; and,
- those who are involved in the development and approval of customer service policies, practices and procedures at the ELCIC.

Training will include:

- A review of the background and purpose of the Accessibility for Manitobans Act
- A review of the requirements of the Accessibility Standards for Customer Service, Manitoba Regulation #171/2015
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who use assistive devices or require the assistance of a service animal or a support person, including handling of admission fees for a support person.

- Instructions on how to use the equipment or devices on-site or otherwise provided, to help people access goods and services or facilities. These include:
 - front stair lift
 - elevator to lower level
- Instructions on what to do if a person with a disability is having difficulty accessing our goods, services, or facilities.
- Staff will be informed and/or trained when changes are made to our accessible customer service policies.

Training Schedule:

The ELCIC provided training to staff. Training will be provided to new employees and volunteers who deal with the public or act on our behalf during orientation. Additional training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

The ELCIC will keep a record of training including the dates when training was provided and the number of employees who attended the training.

Administration

If you have any questions or concerns about this policy or its related procedures please contact: The Evangelical Lutheran Church in Canada, by phone at (204) 984-9150 or by email at ginfo@elcic.ca. Information on this policy can be found on our website at www.elcic.ca.

This policy and its related procedures will be reviewed as required in the event of legislative changes.

Acknowledgement and Agreement

l,	, acknowledge that I have read and understand
the Accessibility	Standards for Customer Service Policy of the ELCIC. Further, I agree to adhere to the Policy and
will ensure that	t employees working under my direction adhere to these guiding principles. I understand that if
I violate this Po	licy, I may face corrective action.
Name:	
Signature:	
Date:	
Witness:	

Notice of Service Disruption

Dear:
The (insert services that are unavailable) will be out of service for (insert reason for disruption) from (insert appropriate date) until (if known, insert appropriate date).
The following alternative services and options are available:
(List options)
We regret any inconvenience this may cause. If you have questions or concerns, please contact (name, title, email, telephone).
Thank you for your understanding and patience.
[Name]
[Title]

Customer Service Feedback Form

•	•	value your opinion and will strive to meet everyone's needs.
1. Were you sa	tisfied with the cust	omer service we provided you?
Yes	☐ No	☐ Somewhat
Comments:		
	omer service provid	ed to you in an accessible manner?
Yes	☐ No	Somewhat
Comments:		
		s accessing our services?
Yes	☐ No	Somewhat
Comments:		
Contact Informa	tion (optional)	
Name:		Phone Number:
Email:		
Thank-you, [Name]		[Title]

Record of Training

Course Title: Accessibility Standards for Customer Service

Date of Training	Participant Name	Participant Signature
Spring of 2018		

Compliance Checklist

Requirement	Person Responsible	Date Completed
Develop a policy that complies with the Accessibility Standards for Customer Service: Provision of services to persons with disabilities The use of assistive devices The use of The use of support persons Notice of service disruptions Customer feedback Training		
Develop practices and procedures that follow policy guidelines (see above) and that are consistent with the core principles of independence, dignity, integration and equal opportunity.		
Develop communication plans and strategies that consider customers and take into account individual disabilities.		
Allow customers to use their own personal assistive devices when accessing your services.		
Develop other measures to enable customers to access your services in the event that the assistive device presents a safety concern or where accessibility might be an issue.		
Allow customers with disabilities to be accompanied by a guide dog, service dog and/or service animal unless prohibited by law.		
If an animal is prohibited by law, consider reasonable measures that could be taken to ensure the customer has access to your services.		
Allow customers who are accompanied by a support person to bring that person with them while accessing services.		
If admission fees are charged, provide notice ahead of time on what a support person will be charged.		

Compliance Checklist - continued

Requirement	Person Responsible	Date Completed
Provide notice of service disruptions that include the reason, anticipated duration and alternative options to access services.		
Develop a process for accepting feedback, including how it will be recorded, responded to and handled.		
Make information about your feedback process readily available to customers.		
Train employees, volunteers, agents, contractors and others who deal with the public or act on your behalf on the provisions required by the <i>Accessibility Standards for Customer Service</i> :		
Accessibility Standards for Customer Service, Manitoba Regulation 171/2015		
Instructions on how to interact and communicate with customers with various types of disabilities		
Instructions on how to interact with people with disabilities who: use assistive devices; require the assistance of a guide dog, service animal or service dog; or require the use of a support person		
Instructions on how to use equipment or devices that are available at your premises or that may help customers with disabilities		
Instructions on what to do if a customer with a disability is having difficulty accessing your services		
Developed policies, procedures and practices surrounding the legislation.		
Train those who are involved in the development and approval of customer service policies, practices and procedures on the required provisions (see above).		
Document in writing all of your policies, practices and procedures for providing compliant customer service.		

Compliance Checklist - continued

Requirement	Person Responsible	Date Completed
Notify customers that the documents are available upon request.		
When requested, provide documents in a format that takes into consideration the customer's disability.		
Keep a record of training that includes the dates training was provided and the number of employees who attended.		
Complete the online report by November, 2018.		