



## INTRODUCTION

Last Updated: April 9, 2023

Online is committed to ensuring equal access and participation for people with all abilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the [Accessibility for Manitobans Act](#) and the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

This policy applies to all employees, contractors, volunteers, and management of Online. In this policy, the word "customer" refers to a person who is reasonably expected to obtain, use or benefit from Online's services, whether or not the person paid for them.

## COMMUNICATION

We communicate with people disabled by barriers in ways that take into account the nature of the barrier, and attempts to remove the barrier to access our services.

### **PRACTICES:**

- We offer to communicate in different ways, such as writing things down, reading things out loud, and taking extra time to explain things.
- Have paper and pens available to capture verbal communication in written forms.
- Offer a chair when longer conversations are needed.
- Offer a quiet space for learning or discussion.
- Sit down to engage with someone using a wheelchair.
- We use signs and documents that are easy to read, including using larger fonts and colour contrast. We make sure our printed material is designed to ensure readability.

We write signs and documents in plain language.

## ASSISTIVE DEVICES

Online accommodates the use of assistive devices (e.g., wheelchairs, crutches, canes, scooters, walkers, magnifiers, and communication and hearing devices) when customers are accessing our services or facilities.

### **PRACTICES:**

- Training includes appropriate interaction with the customers' assistive devices.
- We make space for assistive devices on-site and ensure customers have access to their assistive devices at all times.

## SUPPORT PERSONS

Online welcomes customers accompanied by a support person.

### PRACTICES:

- We address the customer, not the support person, unless requested by the customer to do otherwise.
- We make space for support persons on-site and ensure customers have access to their support persons at all times.

## SERVICE ANIMALS

Online is committed to meeting the requirements of Manitoba Human Rights Code and welcome members 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.” A service animal can often be identified through visual indicators, such as its harness or vest, or through the assistance it is providing.

### PRACTICES:

- We:
  - treat 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 to do so by the person with the service animal.
  - 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 (e.g., 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 (e.g., food preparation areas), we explain why the animal cannot enter the space.

## MAINTAINING ACCESSIBILITY

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

### PRACTICES:

- We organize our space so that there is room for people with assistive devices, support persons, and service animals.
- Our seating accommodates people of varying sizes and abilities.
- We keep hallways, aisles, entrance and reception areas, waiting rooms, and meeting rooms clear of clutter.

- It is our landlord's responsibility to keep our entrance area clear of ice and snow. If our landlord fails to meet this need, we will immediately request them to meet this requirement.
- We place 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, meeting rooms, and accessible washrooms. The elevator and the ramps in our building are under the control of our landlord and, therefore, it is their responsibility to maintain those accessibility features.

## WHEN AN ACCESSIBILITY FEATURE IS UNAVAILABLE

Online lets its customers know when and why an accessibility feature is temporarily unavailable, how long it will be unavailable, and other ways to access our services.

### PRACTICES:

- If one of our accessibility features becomes temporarily unavailable, we prepare and post a notice and/or announcement about (i) the disruption, (ii) the reason for the disruption, (iii) how long it will approximately last, and (iv) whether there are other ways we can provide access to our services (e.g., by using an alternate entrance), unless our landlord has control over such accessibility features, in which case any provision of notice and/or announcement is the landlord's responsibility. If requested, we work with the customer to find other ways to provide services.
- We let our customers know about disruptions in the following ways:
  - Putting up on-site signs posted in high traffic areas.
  - Through employees (in person).

## FEEDBACK

### POLICY STATEMENTS:

Online welcomes and responds promptly to feedback we receive on the accessibility of our services and the accessibility needs of our customers.

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

### Practices:

- We invite feedback in the following ways:
  - Visit our reception desk, or contact us by phone, email, website or feedback form
- All feedback is directed to the People Care team who determines what action, if any, should occur.
- If the feedback requires us to follow up, the customer is notified that the request is being reviewed and when (s)he can expect a response.
- We advise the customer of the action we will take to address their feedback, if any.
- We respond to feedback in a way that meets the communication needs of our customers.

## TRAINING

We provide the required training on accessible customer service to employees, contractors, volunteers, and management. Our training includes:

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- How to interact and communicate with people who face barriers to accessing 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 of Manitoba, and the Customer Service Standard Regulation.
- Our organizational policies, practices, and measures, including updates or changes.
- We provide refresher training regularly, including updates to policies, practices, and measures. Refresher training is provided after significant changes are made to our accessibility-related policies, practices, or measures.

#### **PRACTICES:**

- People Care records who has completed training and when.
- Feedback from our customers on the accessibility of our services is addressed in regular staff meetings.

## **RECORDS**

#### **POLICY STATEMENTS:**

Online keeps a written record of our accessibility and training policies.

Our written documents include a summary of our training material and when training is offered.

We let our customers know that our written policies are available on request.

#### **PRACTICES:**

- We let the public know that our accessibility and training policies are available in the following ways:
  - Posted on our website.
  - Through Onliners (in person, or by phone)
- We provide our policies within a reasonable time frame, at no cost, and in a format that meets the needs of our customers.

