



**Five-Year Review of the Accessibility
Standard for Customer Service:
Report for the Minister of Families**

September 10, 2021

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Please contact the Manitoba Accessibility Office at mao@gov.mb.ca or 204-945-7613.

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Message from the Accessibility Advisory Council

On behalf of the Accessibility Advisory Council of Manitoba (Council), we are pleased to submit this report to the Honourable Rochelle Squires, Minister of Families, and Minister responsible for Accessibility, summarizing the findings of Council's five-year-review of the Accessibility Standard for Customer Service.

The Council, with the support of the Manitoba Accessibility Office, designed and implemented a comprehensive review process that provided Manitobans impacted by the Standard a number of opportunities to contribute their insights and advice regarding the current Standard. Collectively, Manitobans from a broad range of entities and disability groups invested over a thousand hours in building this report, by participating in focus groups, surveys, town halls, and contributing through written and oral submissions

It is believed that the 22 recommendations identified through this review process will help enhance customer service for those with accessibility issues, as well as strengthen the understanding and implementation practices for those obligated under the regulation.

Council would like to thank the government of Manitoba for the opportunity to lead the five-year review, as it has helped members further understand the impact of their responsibilities under our Terms of Reference.

While we recognize that this Standard alone will not eliminate every barrier, we believe this report is an important step towards creating a more equitable accessible customer service environment in Manitoba.

Most Sincerely,

John Graham

Chair of the Accessibility Advisory Council

Chair of the Accessibility Standard for Customer Service five-year review

Accessibility Advisory Council Members:

- John Graham (Chair), Retail Council of Canada
- Brad Robertson (Vice Chair), People Corporation
- Councillor Kelly Cook, City of Selkirk / Association of Manitoba Municipalities
- Dr. Kristine Cowley, Rady Faculty of Health Sciences, University of Manitoba
- Scott Jocelyn, Manitoba Hotel Association
- Laurel Repski, Human Resources Expert
- Dianna Scarth, Human Rights Commission Expert
- Josh Watt, Manitoba School Boards Association
- Emily Walker, Council Secretary, Manitoba Accessibility Office

List of Acronyms and Abbreviations

ACS: Accessibility Compliance Secretariat. Manitoba's [Accessibility Compliance Secretariat](#) monitors compliance of accessibility legislation among stakeholders in the private, non-profit and public sectors. The Secretariat also works with organizations to raise awareness about accessibility, and enforce compliance of legislative and regulatory requirements.

AMA: The Accessibility for Manitobans Act. [The Accessibility for Manitobans Act](#) is provincial law, with accessibility standards acting as regulations under law. As each new accessibility standard is introduced, there are new requirements and deadlines for affected employers, organizations and businesses.

ASL: American Sign Language. American Sign Language is considered the first language of many Deaf people in Canada and the United States. In Canada, there are two commonly used sign languages: American Sign Language (ASL) which is used in Anglophone communities and Langue des Signes Québécoise (LSQ) which is used in Francophone communities.

Council: The Accessibility Advisory Council. The Accessibility Advisory Council is made up of members of the disability community and affected stakeholders, including representatives of business, municipalities and other organizations. It makes recommendations to the Minister regarding: priorities for accessibility standards, their content and implementation timelines activities of government to improve accessibility and long-term accessibility objectives for Manitoba.

DAC: Department Accessibility Coordinator(s). Each Manitoba government department has a designated employee acting in the role of Department Accessibility Coordinator (DAC). The DACs support management, enhance awareness of accessible services, and liaise with senior leadership to respond to accommodation requests. For most staff, the DAC is their lead point of contact for accessibility and accommodation-related requests from the public.

MAO: Manitoba Accessibility Office. The Manitoba Accessibility Office is the administrative arm of The Accessibility for Manitobans Act and its accessibility standards. It acts as secretary to the Accessibility Advisory Council and its committees. The MAO also develops resources and tools to promote awareness of the AMA and offers training to educate obligated sectors.

MGAP: [Manitoba Government Accessibility Plan](#)

Standard: [Customer Service Standard Regulation](#) (legislation) also referred to as the Accessibility Standard for Customer Service. This was the first accessibility standard launched in 2015 under the AMA. [See Appendix A for specific requirements.](#)

I. Introduction

The [Accessibility for Manitobans Act](#) (AMA) sets out a path to remove, reduce, and prevent barriers through the development of accessibility standards in five fundamental areas: customer service, employment, information and communication, transportation, and the design of public spaces.

On November 1, 2015, the first [Customer Service Standard Regulation](#) came into force, requiring businesses and organizations to develop accessible customer service policies, practices and other measures. The goal of this Accessibility Standard for Customer Service (Standard) was to remove, reduce and prevent barriers to accessing goods and services, thereby creating a more accessible Manitoba for people of all abilities.

The AMA calls for a review of the effectiveness of accessibility standards five years after their creation. The Accessibility Advisory Council (Council) has the responsibility under the AMA to make recommendations to the Minister regarding the development of accessibility standards. As set out in section 11 of the AMA, Council is mandated to undertake this review in consultation with Manitobans with disabilities and organizations obligated under the AMA.

Council members that completed this review are John Graham, Chairperson; Brad Robertson, Vice-Chairperson; Kelly Cook; Kristine Cowley; Scott Jocelyn; Laurel Repski; Dianna Scarth; and Josh Watt. [Read Council member biographies.](#)

The first part of the report introduces the Standard and the process Council followed to complete their review. The body of the report sets out the Council's findings and recommendations on how to improve the Standard moving forward. It is important to note that Council's review occurred during a global pandemic, which brought new challenges to the process of consultation, including moving to virtual platforms.

The COVID-19 pandemic has had an impact on accessible customer service, highlighting the inequities in Manitoba. For example, members of the disability community reported they were unable to receive a vaccination due to lack of safe transportation, accessibility accommodations or attendant care.

Many Manitobans continue to raise concerns about the government's perceived inaction surrounding COVID-19 critical-care guidelines and triage protocols. Council heard concerns that Manitoba has yet to be transparent about how patients will potentially be prioritized for life-saving treatment, as hospitals filled up in the COVID-19 pandemic's third wave. Consultation participants expressed concern that Manitoba continues to lack a triage plan that would guide doctors and health care providers for critical concerns, such as in cases of insufficient hospital space.

The Manitoba Accessibility Office (MAO) has continued to provide support and advice to those tasked with leading and implementing the COVID-19 response, including the important vaccine rollout. The Council supports MAO's continued effort to ensure the government's pandemic related resources are accessible to all Manitobans.

This transition to a “new normal” is an opportunity for Manitoba to improve the status quo. Citizens, including business owners, have been dealing with what one hopes to be a once in a lifetime issue. Council urges the Manitoba government to use this time as an opportunity to sustain and improve accessible practices that will improve the daily lives of the over 234,000 Manitobans with disabilities. For example, Council was encouraged to hear the government of Alberta’s recent announcement of the [Alberta Jobs Now program](#), whereby private sector businesses and non-profit organizations across all industries can apply for funding to reduce the costs of hiring and training unemployed or underemployed Albertans, including additional funding for hiring persons with disabilities.

II. Brief Overview of the Customer Service Standard Regulation

As required by the AMA, within five years after an accessibility standard is established, and every five years after, the Council must undertake an examination of a standard’s effectiveness.

As the Customer Service Standard Regulation was the first standard to be developed and enacted in 2015, Council assumed the role of the Customer Service Standard Development Committee to ensure a consistent application of the legislation and a consistent understanding of stakeholder interests.

A. Goals of the Accessibility Standard for Customer Service

The Standard’s goals include identifying, removing, and preventing barriers to accessible customer service. Organizations are responsible for providing equivalent customer service to Manitobans affected by barriers. Barriers to accessible customer service are obstacles that make it difficult – sometimes impossible – for people disabled by these obstacles from doing activities like shopping, going to restaurants, or attending school.

The Standard outlines minimum practices that can help ensure goods and services are accessible by addressing areas like communication, assistive devices and the presence of service animals. The Standard does not require organizations to make renovations, but to ensure accessibility features already in place are used as intended. It can be as easy as asking, “How can I help?”

As outlined in [Appendix A](#), the Standard focuses on a series of basic requirements in the form of policies, practices and measures that ensure disability-related barriers continue to be identified, reduced or eliminated by all organizations that serve Manitobans.

III. The Accessibility Advisory Council's Review Process

The Manitoba government provided the Council with Terms of Reference that outline the responsibilities, expectations and requirements of Council during the course of the review.

The Council conducted a review of the Standard per section 11 of the AMA. It began by reviewing the existing provisions of the Standard. It then led targeted and accessible consultations on the objectives, requirements and implementation of the Standard. Council analyzed the information gathered through the consultation process to prepare this final report for the Minister responsible for Accessibility. The report outlines the findings of the review, including recommendations on any updates to the Standard, if appropriate.

The review focused on activities already undertaken by obliged sectors and included information affecting the following areas and others, as identified by the Council:

- policies, measures and practices of Manitoba organizations to meet the requirements under the regulation, including documentation required by public sector organizations and those that have 50 or more employees;
- variability in compliance by sector, geography, official language or other factors, as identified by the Council;
- achievements and challenges associated with achieving compliance of the Standard.

As stated in the Terms of Reference, Council consulted the following groups:

- persons disabled by barriers or representatives from organizations of persons disabled by barriers;
- representatives of those engaged in the activity or undertaking, or representatives of the sector of the persons or organizations, that may be subject to the accessibility standard. This includes small and large municipalities, public sector organizations, the Manitoba government, businesses of all sizes and non-governmental organizations;
- other representatives of the government or government agencies that have responsibilities relating to the activity or undertaking, sector or persons or organizations that may be subject to the accessibility standard.

Government staff from the MAO provided secretariat and research support, including the coordination of consultations and assistance in preparing the final report for the Minister's consideration.

In drafting this report, Council members attempted to seek consensus on the recommendations made to the Minister. Consensus means substantial agreement of

members, without persistent opposition by a process that takes into account the views of all members. In the event that consensus cannot be reached, Council members have the option to submit separate recommendations to the Minister.

A. Steps in Consultation Process

Council began planning this review in late 2020. In early 2021, John Graham, the Council Chair, participated in pre-consultation meetings with a number of stakeholders to aid in identifying general themes and a public consultation road map.

To ensure Manitobans had ample opportunity to express their perspectives on the Standard, Council launched a multi-pronged consultation plan. The MAO shared the plan and an invitation to participate with its contact list of over 3,000 professional associations and organizations.

The public consultation road map included the following engagement activities:

- small business survey
- sector-specific focus groups
- online EngageMB survey
- virtual town hall forums
- written submissions
- oral submissions

B. Small Business Survey

In preparation of a multi-year Communications Strategy, the MAO contracted Prairie Research Associates to conduct a survey from February 25 to March 18, 2021 to assess awareness and perceptions of accessibility standards. Prairie Research Associates contacted by phone a random-sample of 201 Manitoba small businesses (less than 50 employees). The survey did not include businesses with 50 or more employees and those that do not have customers/clients in their operation. The questions focussed on accessibility legislation in general and not specifically the Accessibility Standard for Customer Service. Nonetheless, the survey results provide valuable information to this review.

Key findings from the survey were that businesses contacted preferred online rather than in-person training. Businesses also predominantly thought of accessibility as it relates to accessing the physical environment. Some were unsure about the exact costs of implementing accessibility improvements and felt they could not afford them. The summary findings are found in [Appendix B of this document](#).

C. Sector-Specific Focus Groups

On April 15, 2021, Council began multiple sector-specific focus groups, moderated by MNP, an independent third party. The objective was for Council to hear directly from a wide range of stakeholders impacted by the Standard.

With assistance from MNP, Council held eight focus groups from April to June 2021 that included 76 participants from the following sectors: disability community organizations, Manitoba government departmental accessibility coordinators, public sector accessibility coordinators, K-12 education representatives, municipalities, local businesses, Francophone participants and Manitobans with disabilities. One focus group specifically targeted customer service issues affecting Deaf and hard-of-hearing Manitobans. Each group had eight to twelve participants, and sessions typically lasted 90 minutes. All participants had the opportunity to follow-up further by telephone or email, or participate in other engagement activities such as the survey or virtual town hall workshops.

Participants represented the following organizations:

- Abilities Manitoba
- Altona
- Alzheimer Society of Manitoba
- Association of Manitoba Municipalities (AMM)
- Barrier-Free Manitoba
- Bilingual Service Centres
- Canadian Federation of Independent Business (CFIB)
- Canadian Footwear
- Canadian Hard of Hearing Association - Manitoba Chapter (CHHA)
- Centre de santé Saint-Boniface
- Cerebral Palsy Association of Manitoba (CPAM)
- City of Portage la Prairie
- City of Winkler
- City of Winnipeg
- Civil Service Commission
- The CNIB Foundation
- Colors Beauty & Wellness
- Community Futures Entrepreneurs with Disabilities Program
- Deaf Centre Manitoba
- Deaf Resource Centre
- Department of Families
- la Division scolaire franco manitobaine
- Economic Development and Training
- Frontier School Division
- The Gates on Roblin
- Independent Living Resource Centre (ILRC)
- Inn at the Forks
- Louis Riel School Division
- Luxe Furniture Company

- Manitoba Agriculture and Resource Development
- Manitoba Association of School Business Officials
- Manitoba Association of School Superintendents
- Manitoba Deaf Association
- Manitoba Federation of Independent Schools
- Manitoba Finance
- Manitoba Hotel Association
- Manitoba Hydro
- Manitoba Indigenous and Northern Relations
- Manitoba League of Persons with Disabilities (MLPD)
- Manitoba Liquor and Lotteries
- Manitoba Possible
- Manitoba Public Insurance
- Manitoba Restaurant & Foodservices Association
- Manitoba School Boards Association
- McNally Robinson Booksellers
- Municipality of Grahamdale
- New Directions
- Norwood Grove BIZ
- One Family Fitness Centre
- Organization and Staff Development
- Parks & Protected Spaces
- Retail Council of Canada
- Rural Municipality of Grey
- Rural Municipality of Victoria Beach
- Rural Municipality of Wallace-Woodworth
- School District of Mystery Lake
- Seine River School Division
- Shared Services & Risk Management
- St. Boniface Library
- Super 8 Winnipeg West
- Town of Morris
- Université Saint-Boniface
- University of Winnipeg
- Winnipeg School Division
- World Trade Centre Winnipeg

D. Online EngageMB Survey

With the assistance of Prairie Research Associates, Council created an EngageMB survey, which was available online from April 30 to May 28, 2021 in English and French. Print or electronic copies of the survey were also available to ensure accessibility. An email from EngageMB announcing the engagement opportunity was sent to approximately 67,000 registered users who had previously participated in a related engagement project or indicated an interest in related topics.

One thousand twenty-five (1025) respondents completed the survey. In addition to the survey, there was a quick poll, which asked, “Have you heard of the Accessibility

for Manitobans Act?” The quick poll received 51 responses; 82 percent choosing “Yes”; 18 percent selecting “No”. Respondents could also submit personal stories about the customer service received while visiting a Manitoba business or organization. Seven stories were accepted and posted. Along with the stories, Probe Research coded and analysed the long-answer portion of the survey.

An optional survey question asked whether respondents had a disability. Fifty-two percent of respondents selected that they did not have a disability. Out of the 41 percent of respondents that did select they had a disability, mobility was the most selected option, followed by chronic pain, with mental health and hearing related disabilities tied for third most common. Forty percent of respondents answered that someone in their household has a disability.

Approximately half (53%) of participants indicated knowledge of the Standard, with the majority (57%) unsure if the Standard has made a difference. For detailed survey results, please review [Appendix C: EngageMB What We Heard Report](#).

E. Virtual Town Hall Forums

The Manitoba government contracted Probe Research and Blueprint to facilitate two Zoom public consultations on the afternoon and evening of May 13, 2021. Although 153 individuals registered, Council was disappointed that only 64 participants attended the two events. The participants represented the disability community, municipalities, the public sector, business and non-profit organizations, Council and individuals from across Manitoba.

During the virtual town hall forums, the hosts provided a brief overview on current accessibility legislation, including the requirements of the Standard. The introduction emphasized what the Standard does not cover, such as the built environment and complaints process.

Participants had the opportunity to provide their perspectives on how to improve accessible customer service and the Standard in the large group, as well as in smaller breakout rooms. Council, with assistance from MAO staff, incorporated the feedback received from participants into this report’s recommendations. Many participants offered general recommendations to increase public awareness and training about the AMA. Some of the feedback is not included in this report, because it related more directly to the built environment.

F. Written and Oral Submissions

Council received written and oral submissions from March to June 2021. Examples of organizations that provided written submissions include:

- Abilities Manitoba

- Association of Manitoba Municipalities (AMM)
- Barrier-Free Manitoba
- Canadian Hard of Hearing Association (CHHA)
- CNIB Foundation

Submissions received have been considered by Council and incorporated throughout this process.

IV. The Accessibility Advisory Council's Findings and Recommendations

In considering the recommendations for this report, Council utilized the input received from Manitobans through the extensive channels provided. Stakeholders who participated in the consultation generally considered the requirements of the Standard fair and not onerous. Many disability community representatives expressed frustration with the perceived lack of full compliance and enforcement. Particularly, smaller business and non-profit organizations were not fully aware of their obligations to comply with the Standard.

The report groups twenty-two (22) recommendations into the following seven specific categories:

- Government Accountability and Leadership
- Monitoring Compliance
- Documenting Policies, Procedures and Measures
- Education, Outreach and Awareness Raising
- Resources and Funding
- Physical Barriers
- Accessibility Advisory Council

A. Government Accountability and Leadership

One of the overarching themes Council heard throughout the consultation process was the lack of perceived leadership and accountability shown by the provincial government in implementing the Accessibility Standard for Customer Service.

Participants expressed that, as the Manitoba government provides services to all Manitobans, it must do a better job of leading by example.

As stated at the time of the four-year independent review of the AMA, the government did not assign additional staff or fiscal resources to implement the

legislation. The direction given to the Disabilities Issues Office (now the Manitoba Accessibility Office) was to implement the law in a cost-neutral manner. Within the last eight years, the MAO's budget has only received a modest increase.

The Council recommends that the Manitoba government strengthen the implementation and impact of the Accessibility Standard for Customer Service, as it currently fails to meet the minimum basic standard, required under the law.

Recommendations – Government Accountability and Leadership:

Council findings indicate that there is an inconsistent attitude, as well as a knowledge gap among some departments, with respect to the Standard and the obligations of government. Government should address this gap.

1. Conduct a review of all departments to ensure the Manitoba government consistently meets or exceeds Standard requirements, and acts as a leader and champion for accessibility legislation.

While Department Accessibility Coordinators (DACs) have the potential to provide valuable support and resource information, the review found not all departments have DACs, they have limited authority, and their duties are not well understood. Further, DACs typically incorporate these duties alongside their main responsibilities. Therefore, their current impact on departmental accessibility is relatively low. DACs are a critical piece in implementing accessibility internally, yet are not given the time and support to prioritize this work.

Council calls on the government to ensure all departments have DACs and to communicate the expectations of these positions clearly. The Manitoba Government Accessibility Steering Committee, which is charged with the implementation of the AMA in government, should ensure every department's senior leadership acts as a champion and supports the work of its DAC.

2. Review the role of Department Accessibility Coordinators as an important strategy for revitalizing accessibility awareness and communication commitments within departments.

While government has made an effort to ensure information is available in a variety of languages and communication channels, the disability community expressed frustration during the review that there has been less commitment to addressing accessibility issues.

Most government meetings, consultations and services are not fully accessible, there is no offer to provide accommodations, and staff do not always know how to respond to accommodation requests. For example, both the Manitoba Regulatory Consultation Portal, which lists important regulations put forward for public

comment, and EngageMB town halls, generally do not meet requirements for public events as laid out in section 15 of the Standard. The MAO provides one of few examples of the integration of accessible services and accommodations in government services.

To ensure consistency in accessible communications across government, Council recommends Communications Services Manitoba establish communication protocols to integrate accessibility into its public communications initiatives and to respond to accommodation requests.

3. Ensure communications and services are consistently accessible to all members of the public.

During the course of the review, Council was asked for information on the Standard and its review to be translated into American Sign Language (ASL). Participants also asked for government materials to be available in ASL.

Council recommends the Manitoba government significantly expand its limited interpretation of information into ASL, such as COVID-19 briefings. Council recommends Communications Services Manitoba consult with affected stakeholders to determine how best to integrate use of ASL throughout government.

4. Expand the provision of materials and information for the public in American Sign Language (ASL).

According to Council's research, government does not have a policy to ensure accessibility is included in the procurement process. Council believes businesses and organizations that receive government contracts and other funding should have accessible customer service policies in place.

Several Manitoba Crown Corporations have integrated accessibility into their procurement processes. The Ontario government advised the MAO that procurement is one of the most significant accessibility marketing strategies available, and at no cost, with significant efficiencies to improve government services for all its citizens.

Council recommends the Manitoba government introduce procurement practices that identify compliance with the AMA as a mandatory requirement for contracts with Manitoba businesses and organizations with more than one employee.

5. Integrate accessibility during initial stages of project and program development, especially in procurement processes.

During the review, accountability concerns were raised regarding the Manitoba government monitoring its own compliance with accessibility legislation, including standards. To address this perceived conflict, Council recommends it be tasked to conduct an annual review of the government's compliance.

Additionally, to improve collaboration between Council and the Manitoba government, Council proposes organizing meetings with affected senior managers (for example, with the Civil Service Commission) to discuss government's leadership in implementing the AMA.

6. Enhance transparency of government compliance and improve collaboration with the Accessibility Advisory Council.

B. Monitoring Compliance

In response to a recommendation made in the 2018 review of the AMA, the Manitoba government created the Accessibility Compliance Secretariat (ACS) in 2019/20 to oversee compliance with the AMA and its accessibility standards. The ACS functions independently from the MAO, which supports Council in the development of standards and leads public awareness initiatives. Like the MAO, the ACS is a part of the Department of Families and reports to the Assistant Deputy Minister, Corporate Services Division.

In part due to the COVID-19 pandemic and other delays, the disability community perceives the government's efforts around compliance as non-existent.

Some disability community members criticized the ACS's emphasis on "educating into compliance" as passive and inadequate in assuring compliance. It was noted that in the Minister's 2019/2020 annual report related to the AMA, no compliance activities were reported regarding customer service. Instead, the focus of compliance activities was on the Accessibility Standard for Employment and accessibility plans, which are a requirement for public sector organizations under the AMA.

Finally, several participants representing the disability community expressed frustration with the lack of a complaint process and with the absence of transparency around compliance efforts due to the lack of public reporting.

Recommendations – Monitoring Compliance:

The government has tasked the ACS with an important and significant responsibility, and yet it currently has only one fulltime staff member. Inadequate support to the ACS risks undermining the reputation and the efforts of government to introduce more standards with expanded areas of compliance.

Council recommends government enhance the ACS by increasing the number of dedicated staff and/or by leveraging other government resources, such as existing field inspectors.

7. Provide adequate resources to the Accessibility Compliance Secretariat.

It is currently not possible to determine if organizations are complying with the Standard, as there are no reporting requirements. The four-year AMA review recommended the implementation of a reporting mechanism.

Council understands that in 2020/21, the ACS developed Achieving Compliance Plans, which it will issue to non-compliant organizations. The Achieving Compliance Plans will outline the specific area (sections) of the legislation requiring compliance and provide organizations access to free tools and resources that will assist them to achieve compliance. The plans also include the date when the ACS will reassess compliance.

Council recommends the government increase the transparency of this process to highlight its commitment to the AMA. At minimum, this should include providing data in the form of numbers in the Minister's annual report.

8. Ensure compliance activities are more transparent through annual reporting.

Under section 19 of the AMA, the Minister must report annually on the activities undertaken during the past year to carry out the Minister's mandate under the AMA, as well as the activities of the Council.

The review has heard concerns that the AMA lacks a clear framework to measure standard effectiveness, which builds a perception of inaction.

The MAO currently uses Google Analytics to measure levels of public awareness and engagement. The recently created Accessibility Awards are another way the MAO can measure the impact of the Standard.

The Council recommends that the Minister's annual report measure and report on the impact the Standard (as well as other accessibility standards) are having on improving accessibility. Developing key indicators of success (including education efforts) could be the responsibility of the Council going forward, and should apply to all standards.

9. Measure and report publicly on the impact that the Standard is having on improving accessibility.

The review heard further concerns about the absence of a clear complaint and resolution process.

The ACS has established a feedback tracking mechanism to record inquiries and to help inform future accessibility initiatives. MAO also receives complaints related to accessibility issues, which it refers to the ACS. However, there is no coordination between the MAO, the ACS and Council.

Council recommends a coordinated review of complaints and responses to build a shared understanding of the types of complaints and accompanying mediation, so that data and lessons learned will be used to guide the way forward. While not recommended at this time, future consideration might include more formalized reporting by obligated organizations on their compliance activities, as is done in Ontario with accessibility compliance reports under the [Accessibility for Ontarians with Disabilities Act](#).

10. Establish Accessibility Compliance Secretariat protocols to report and resolve accessibility standard complaints.

C. Documenting Policies, Procedures and Measures

When the Accessibility Standard for Customer Service was established as a regulation in 2015, only organizations with 20 or more employees were required to write down their accessible customer service policies and make those policies available through a notice or on their website. The Manitoba government established this threshold recognizing that smaller organizations do not have dedicated internal talent to write policies, and commonly operate without formalized policies.

In 2019, the Manitoba government acted on a recommendation of the four-year independent review of the AMA to raise the threshold for organizations required to document and make their accessible customer service policies publicly available from 20 to 50 or more employees. The review's author, Theresa Harvey-Pruden, believed the shift to 50 employees would promote greater compliance with the Standard and would be consistent, or better harmonize with accessibility legislation in Ontario. From the perspective of Manitoba's business community, organizations with 20 to 50 staff also often operate without formalized policies and/or the internal expertise to develop these written policies.

Based on 2019 numbers, this amendment removed the requirement to document policies from 4,151 Manitoba businesses with 20 to 49 employees.

Recommendation – Documenting Policies, Procedures and Measures:

The review received strong feedback from the disability community that the Manitoba government took a step backwards when it increased the threshold of organizations that must document their policies. The community's perspective is

that this move had a negative impact on the service provided by thousands of Manitoba organizations to their customers and clients with disabilities.

The review's business participants agreed that written policies generally enhance the probability of compliance. The MAO has helped address concerns about the expertise required to write policies by creating free templates, handbooks and other tools.

Council recommends government consider lowering the threshold number of employees to 20, from the current 50, with the aim to improve accessibility across Manitoba.

11. Reevaluate returning to the lower threshold of 20 employees or more that must document policies and make these available to the public.

D. Education, Outreach and Awareness Raising

Over 69 percent of EngageMB survey respondents strongly agreed that, "It is important for businesses / organizations to train staff on how to provide goods and services to people with accessibility needs." Nearly half (44%) of respondents believe substantial improvement in training is needed.

Throughout the consultation, participants highlighted the importance of awareness and training as a critical step to make customer service more accessible.

Various reports from Barrier-Free Manitoba, Canadian Federation of Independent Business and Prairie Research Associates show a significant awareness gap amongst businesses who are not aware of the Standard, or their obligations to be compliant.

The MAO has provided free training since 2018. In June 2021, MAO launched a free online learning portal at AMALearningMB.ca. The online learning portal was developed to help Manitoba employers and organizations meet the minimum requirements for employee training required by the accessibility standards under the AMA. The Accessible Customer Service module is now available in multiple formats and with a facilitator's guide for group discussion.

The MAO continues to provide free tools tailored to the needs of different organizations. AccessibilityMB.ca shares information on the Standard, along with Sample Accessible Customer Service Policy templates, compliance checklists, Access Offer signs, accessible customer service handbooks and guides. Print resources are also available by request.

The MAO also sends out a regular Accessibility News newsletter that provides information and updates on accessibility standards, new resources and training events.

Council supports the Standard's requirement that all organizations provide training to employees and volunteers, yet is not overly prescriptive in other aspects of training. This allows organizations the flexibility to train their staff and volunteers the way they want, and update that training as frequently as needed based on their unique situations.

Recommendations – Education, Outreach and Awareness Raising:

The Standard is an important building block to introducing all future standards within affected businesses/organizations. Yet the government has dedicated very limited resources to promoting public awareness. The result is that the review's consultation activities confirm low levels of awareness among those that must comply.

The Council believes that substantially improved education, outreach and awareness to obligated businesses and organizations is critical to the overall success of the objectives of the AMA.

Enhanced outreach and awareness efforts of government will also result in a better understanding of the aims and scope of the Standard among members of the disability community. This will help individuals to align their expectations accordingly.

12. Substantially improve outreach and awareness to obligated businesses and organizations.

The review received feedback that suggests communities outside of Winnipeg are not receiving adequate resources for training and education.

Council recommends the government enhance support in rural and Northern Manitoba. Options include expanding support through the MAO or by building capacity of other government departments and organizations with services outside Winnipeg.

13. Improve education, outreach and awareness in communities outside of Winnipeg.

While the MAO does provide materials in French, they are not always easy to find and do not always comply with government's French Language Services Policy. Feedback received from Francophone participants led Council to believe improvements are necessary, especially on the website.

Council recommends that the MAO fulfills its commitment to making its resources available in both of Manitoba's official languages.

14. Ensure the Manitoba Accessibility Office meets its French language commitments.

The review heard that there has been some public confusion about the absence of the word "accessible" in the title of the regulation: "Customer Service Standard Regulation." All subsequent standards reflect the emphasis on accessibility, i.e. Accessible Employment Standard Regulation and the proposed Accessible Information and Communications Standard Regulation.

Council recommends changing the name of the regulation to the Accessible Customer Service Standard Regulation to be consistent with other accessibility regulations and to be clearer as to the purpose of the regulation.

15. Change the name of the regulation to Accessible Customer Service Standard Regulation, in line with other accessibility standards.

E. Resources and Funding

Obligated organizations, including municipalities and some businesses, have expressed concerns with costs associated with implementing Manitoba's accessibility standards. Regulations attempt to reduce the financial impact on the private sector through a phased in approach with deadlines affecting government and the public sector first. The Human Rights Code (Manitoba) also ensures no organization will accommodate a request beyond a point of undue hardship. Nonetheless, Council believes the government must continue to recognize the costs of enhanced accessibility for obligated organizations.

Recommendations – Resources and Funding:

While the Accessibility Standard for Customer Service has a low financial impact on most organizations, the implementation of future accessibility standards will likely be greater.

The review received positive feedback from many participants about the recent announcement of the \$20 million [Manitoba Accessibility Fund](#). The aim of the grant program is to assist municipalities, non-profit organizations and businesses in Manitoba to remove barriers encountered by persons with disabilities, and promote accessibility in all regions of the province. This includes supporting organizations to comply with the Standard.

The Council applauds the establishment of the Manitoba Accessibility Fund and recommends its use, along with other resources and funds, in addressing organizational cost concerns.

16. Ensure organizations have access to resources and funding support to implement this Standard.

The review received generally positive feedback on the content found on MAO's website, [AccessibilityMB.ca](https://www.accessibilitymb.ca), as a valuable tool for ensuring understanding and compliance of the law. However, there was also feedback noting that it can be difficult to find information on the website.

Council recognizes current efforts by the MAO to update and modernize its website, resources and tools to ensure they are relevant to users. Council recommends additional effort to improve navigation and support for searches within the site and recommends integrating a user feedback process to ensure changes meet the needs of users.

Council also recommends improving the French website to ensure it is consistent with the English site.

17. Enhance the profile and content of AccessibilityMB.ca to make it easier to access tools and resources.

According to consultations, including the EngageMB survey results found in [Appendix C](#), the MAO must develop an updated communication strategy to ensure effective messages reach the target audience.

Council heard during the review that the resources that MAO provided were not always relevant to current trends. For example, only recently has the MAO used videos to provide information on accessibility. Some participants called for more creativity in how resources are developed, launched and promoted.

Council recommends that the government expand the reach, frequency and improve engagement with the public on the topic of accessibility by allowing the MAO to manage its own social media accounts.

18. Modernize Manitoba Accessibility Office resources and awareness raising campaigns to keep them relevant and useful.

While the five full-time MAO staff and the one-person ACS are dedicated and committed, in reality they operate with less than five percent of the staffing of Ontario's equivalent office.

Council recommends that government evaluate the number of staff needed to support the implementation of its three additional accessibility regulations on the horizon, as well as the newly launched [Manitoba Accessibility Fund](#). The aim is to ensure the MAO has the ability to meet capacity expectations, which are only to increase with an aging population, an increasingly engaged disability community, and as more organizations become aware of their obligations under accessibility standards.

19. Ensure Manitoba's commitment to accessibility is adequately administered.

For those that are obligated, it will be important for government, the MAO and Council to continue to provide analysis of the financial implications of their recommendations on stakeholders as part of responsible commitment.

20. Continue to monitor financial implications of recommendations on stakeholders.

F. Physical Barriers

Throughout the review, it was apparent that there is a persistent misunderstanding about the connection between accessible customer service and physical barriers affecting an organization's infrastructure. While the Standard was not designed to make changes to the physical structure of buildings, as one member of the disability community stated, "How can I have equal access as a customer, if I can't even get into the building?"

The Manitoba Building Code 2010 is due for an update to meet the National Building Code 2020. This update may help address physical barriers, but only for new builds and certain renovations. It will not affect most of Manitoba's existing built environment. While outside the scope of this review, Council has heard from the disability community, and it agrees that the AMA should ensure the physical accessibility of buildings.

In the short term, Council recommends public education efforts to create public awareness about the scope of the AMA. In the longer term, the Manitoba government should consider how the AMA should address accessibility of the built environment, not just of public outdoor spaces.

G. Accessibility Advisory Council

The review received feedback that Council would benefit from more diverse representation, especially from the disability community.

While it is a diverse and representative Council, members agree it is important to have representation from a wide range of stakeholders. Council remains committed to extensive stakeholder engagement in recognition that there are unlimited voices that must be heard.

Recommendations – Accessibility Advisory Council:

As there is currently one vacancy on the nine-member Council, it recommends the Minister responsible for Accessibility appoint another member from the disability community.

21. Appoint an additional member to the Accessibility Advisory Council to increase the diversity of viewpoints.

Council recommends that Agencies, Boards and Commissions update their application process to allow potential applicants the opportunity to self-identify their disability status when applying for appointment. This not only supports greater diversity, but also may make it easier to ask if accommodations are needed.

22. Ask all members of Agencies, Boards and Commissions to identify disability status during the appointment process.

V. Conclusion

The recommendations brought forward in this report will strengthen and improve the Standard. Council has met all guidance set out in the review's Terms of Reference.

Council would like to thank the government of Manitoba for the opportunity to lead this important review.

We recognize that this Standard alone will not eliminate every barrier, but it will contribute towards a more equitable and accessible customer service environment in Manitoba.

Improving accessible customer service is most definitely a worthy endeavour.

VI. Summary of Recommendations

Council recommends that the Manitoba government take the following actions:

1. Conduct a review of all departments to ensure the Manitoba government consistently meets or exceeds Standard requirements, and acts as a leader and champion for accessibility legislation.
2. Review the role of DACs as an important strategy for revitalizing accessibility awareness and communication commitments within departments.
3. Ensure communications and services are consistently accessible to all members of the public.
4. Expand the provision of materials and information for the public in ASL.
5. Integrate accessibility during initial stages of project and program development, especially in procurement processes.
6. Enhance transparency of government compliance and improve collaboration with Council.
7. Provide adequate resources to the ACS.
8. Ensure compliance activities are more transparent through annual reporting.
9. Measure and report on the impact that the Standard is having on improving accessibility.
10. Establish ACS protocols to report and resolve accessibility standard complaints.
11. Reevaluate returning to the lower threshold of 20 employees or more that must document policies and make these available to the public.
12. Substantially improve outreach and awareness to obligated businesses and organizations.
13. Improve education, outreach and awareness in communities outside of Winnipeg.
14. Ensure the MAO meets its French language commitments.
15. Change the name of the regulation to Accessible Customer Service Standard Regulation, in line with other accessibility standards.
16. Ensure organizations have access to resources and funding support to implement this Standard.
17. Enhance the profile and content of AccessibilityMB.ca to make it easier to access tools and resources.
18. Modernize MAO resources and awareness raising campaigns to keep them relevant and useful.
19. Ensure Manitoba's commitment of accessibility is adequately administered.
20. Continue to monitor financial implications of recommendations on stakeholders.
21. Appoint an additional member to Council to increase the diversity of viewpoints.
22. Ask all members of Agencies, Boards and Commissions to identify disability status during the appointment process.

Appendix A: Accessible Customer Service Requirements

The [Accessibility Standard for Customer Service](#) requires all businesses and organizations to introduce policies, practices, and measures to help:

1. Meet communication needs

Communication barriers prevent people from being able to understand or access information. Respectful communication that meets individual needs means great customer service for everyone. It may mean offering to communicate in different ways, such as writing things down, reading things aloud, and taking extra time to explain.

2. Accommodate the use of assistive devices

Assistive devices are any pieces of equipment that people use to help them with daily living. This includes equipment that people bring with them, such as wheelchairs, canes, communication or hearing aids. It also may include equipment that businesses and organizations have on-site, such as video captioning, wheelchairs or automatic doors.

3. Welcome support persons

Some people with disabilities use support persons to help them perform daily tasks, for instance related to mobility and communication. Without this support, these customers may not be able to access goods or services. A support person does not have to be a paid support worker. They can be a family member or a friend. Businesses and organizations should let the public know in advance if support persons have to pay admission or service fees. Where possible, do not charge admission or other fees to service people.

4. Allow service animals

Service animals assist people with various types of disabilities. Sometimes the need is obvious, such as guiding a person who is blind. People with less obvious disabilities may also use service animals. For example, who provide medical alert service to people with epilepsy or support to children with autism.

Service animals are welcome in areas of a business or organization that are available to the public.

5. Maintain accessibility features

Accessibility features – supports and structures in your physical space – help people with disabilities and others access goods and services (e.g., elevators, ramps and accessible washrooms). Accessibility features must be maintained so they can be used as intended, like ensuring automatic doors are working properly or keeping aisles and entryways clear of clutter.

6. Let the public know when and why an accessibility feature is unavailable

Sometimes accessibility features require repair or are temporarily out of service. When this happens, businesses or organizations need to notify the public. This can be done by putting up on-site signs or posting information online. The notices should include information on how long the feature will be unavailable, and whether there are other ways to access the goods and services.

7. Welcome and respond promptly to feedback

To learn about barriers that exist and the positive impact of new initiatives, customers should be able to provide feedback on accessible customer service. Businesses and organizations should document the actions and response to the feedback received, and have that information available upon request.

8. Provide the required training to employees, volunteers and management

Training is the key to great customer service. It is management's responsibility to ensure all employees, volunteers and management receive training. All employees and volunteers who interact with the public, including paid and unpaid, full-time and part-time positions, must take training. People involved in developing policies for the organization (including managers, senior leaders, directors and owners) must also take training.

Training must include: how to provide accessible customer service; an overview of The Accessibility for Manitobans Act (2013), The Human Rights Code (Manitoba) and the Customer Service Standard; and organizational policies, practices and measures, including updates or changes.

9. Keep a written record of accessibility and training policies

If a business or organization has 50 or more employees, they need to keep a written record of accessibility and training policies and let the public know that their policies are available on request.

If a business or organization has fewer than 50 employees, they must still comply with the Accessibility Standard for Customer Service, but do not have to write down their policies.

10. Make public events accessible*

Public sector organizations must make public events, such as meetings, hearings and consultations, accessible. This includes choosing an accessible venue and offering disability accommodations if requested, such as American Sign Language (ASL) interpretation for Deaf participants.

* This requirement is only for public sector bodies, not including small municipalities.

Implementation Timelines

- The Manitoba government had one year to comply by November 1, 2016.
- The public sector had two years to comply by November 1, 2017.
- Businesses, small municipalities and non-profit organizations had until November 1, 2018 to comply.

Appendix B: Report on Survey of Businesses

Prepared for Manitoba Accessibility Office by PRA Inc. March 2021

Key findings

1. Some barriers to improving accessibility exist. The biggest barriers for businesses (aside from awareness of the Act) are in regards to understanding the Act and information from the government. As well, a few (about 1 in 5) think making changes may be too costly for their organization.
2. Accessibility Act is somewhat well known. Almost half of businesses are aware of the Act. When asked to define “accessibility,” most think about it in terms of physical access and accessibility.
3. Businesses want direct contact. Most businesses want to be contacted directly to get information about accessibility standards and laws, most often by email (which is likely how they receive information from other common sources, such as SAFE Work Manitoba or their business/trade association).
4. Majority of businesses not meeting standards. The majority of businesses are not complying with standards or are unaware if they comply, which likely means they do not comply.

Methodology

- PRA conducted a survey of Manitoba small businesses (less than 50 employees) to assess awareness and perceptions of accessibility standards.
- The survey was conducted using a random-sample of businesses, excluding those with 50 or more employees and those that do not have customers/clients in their operation.
- The survey was conducted from February 25 to March 18, 2021 with 201 businesses, yielding an error rate of $\pm 6.9\%$ (19 times out of 20). All results presented in this report are out of 201 unless otherwise noted.
- Data in charts may not always sum to 100% due to rounding.
- For a profile of businesses, please refer to [Annex i](#).

1. Company website

Does your company have its own website?

Do you plan on updating the design of your website within the next five years?

- 63% of small businesses surveyed have a website.
- Among them, 33% plan on updating their website design in the next year (about one-quarter of all businesses).

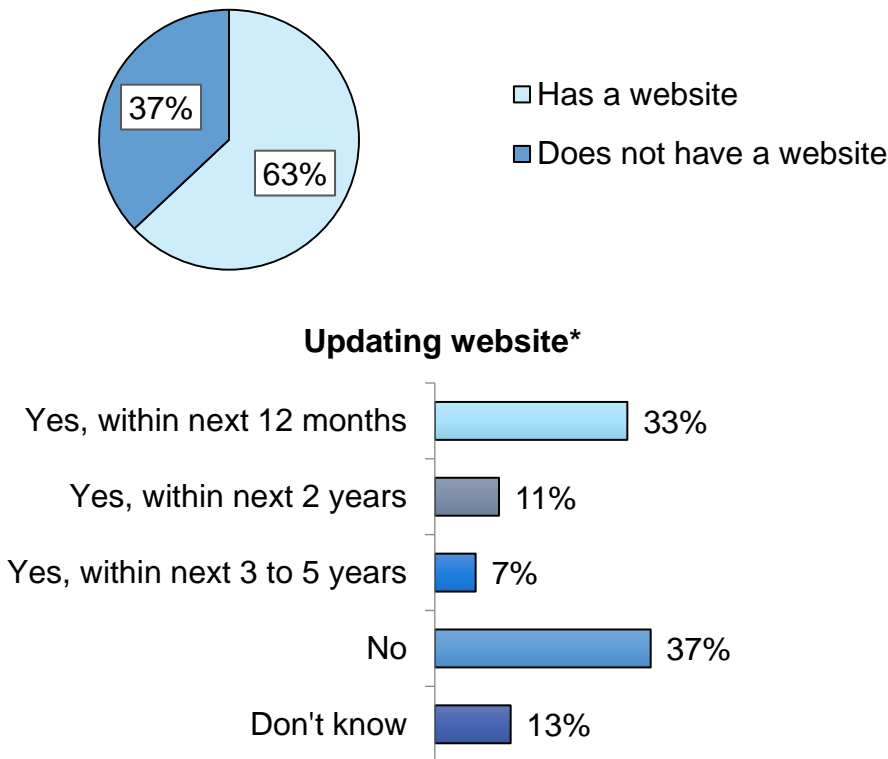


Figure 1: * BASE: Those who have a company website (n = 126).

2. Defining “accessibility”

To start, in your own words, what does the word “accessibility” mean to you when referring to your customers or clients?

- To start, businesses were asked to define what the word “accessibility” means to them. For most, it is related to the physical aspects of access (28%) and ease of access to products and services (24%).
 - “The front door is wide enough to come through.”
 - “Being able to get in and out with no restrictions or hardships.”
 - “Ability to enter and access to washrooms with handrails, etc.”
- There is also a sense that, for some, it is related to simply being open; that is, people can access their business.
 - “Ability to quickly communicate with our customers and clients, provide the services and products for them as best as we can.”



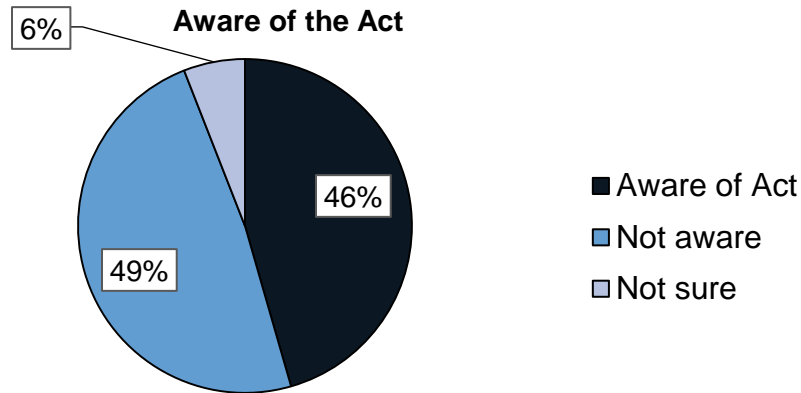
3. Awareness of The Accessibility for Manitobans Act

The Accessibility for Manitobans Act is a law that affects all Manitoba businesses that have employees. Prior to this survey, had you heard of the Accessibility for Manitobans Act?

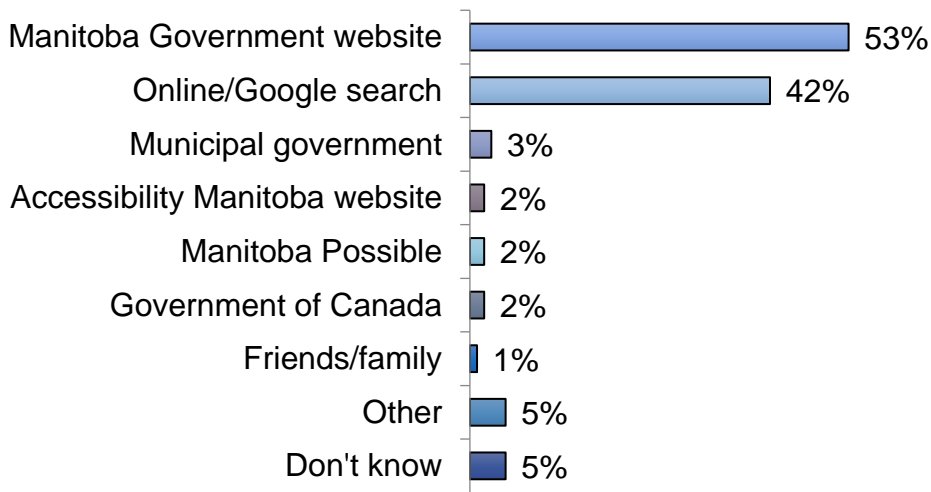
If your business was looking for information about how to comply with this law or on other issues relating to accessibility for businesses, where would you go for information?

What words or terms would you use when searching online for information on Manitoba's accessibility laws?

- 46% of businesses say they are aware of The Accessibility for Manitobans Act.
- The most common sources of information on how to comply with the Act are online, either by directly going to the Government of Manitoba's website (53%) or through a general online search (42%).
- When searching online, the most common search terms are accessibility (72 mentions), Manitoba (54 mentions), laws (34 mentions), disability (8 mentions), access (8 mentions), and act (8 mentions).



Most common sources

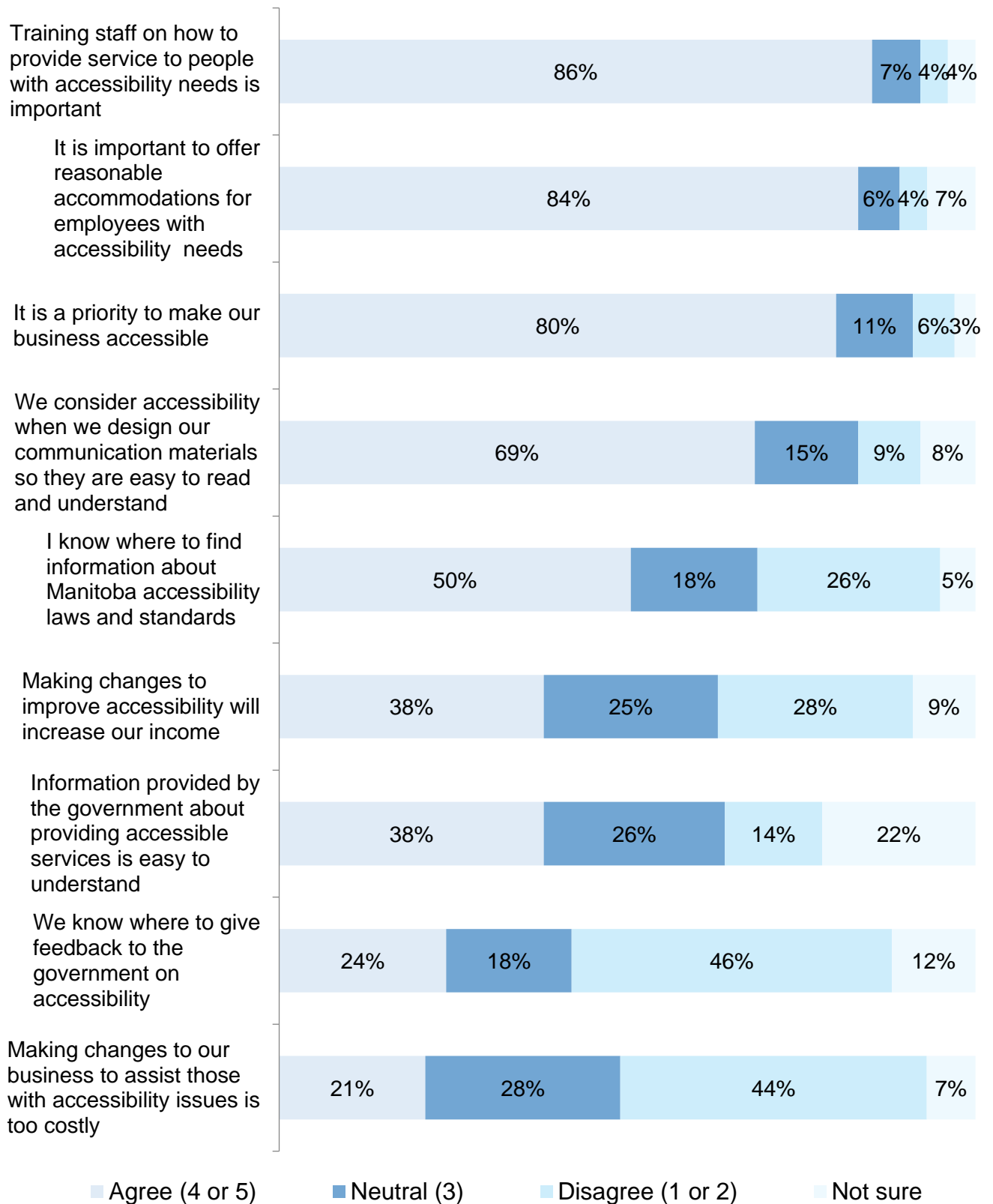


4. Providing accessibility

I am going to list some statements about your business’s approach to providing accessibility for customers and employees. For each, please tell me how much you agree or disagree on a scale from 1 to 5, where 1 is strongly disagree and 5 is strongly agree.

- Businesses tend to have positive perceptions of accessibility, with a few potential barriers, such as 46% disagreeing that they know where to give feedback to the government on accessibility and 38% agreeing that information provided by the government about providing accessible service is easy to understand.
- Restaurants are most likely to agree that it is a priority to make their business accessible.
- Those unaware of the Act are more likely than those aware to agree that changes are too costly.

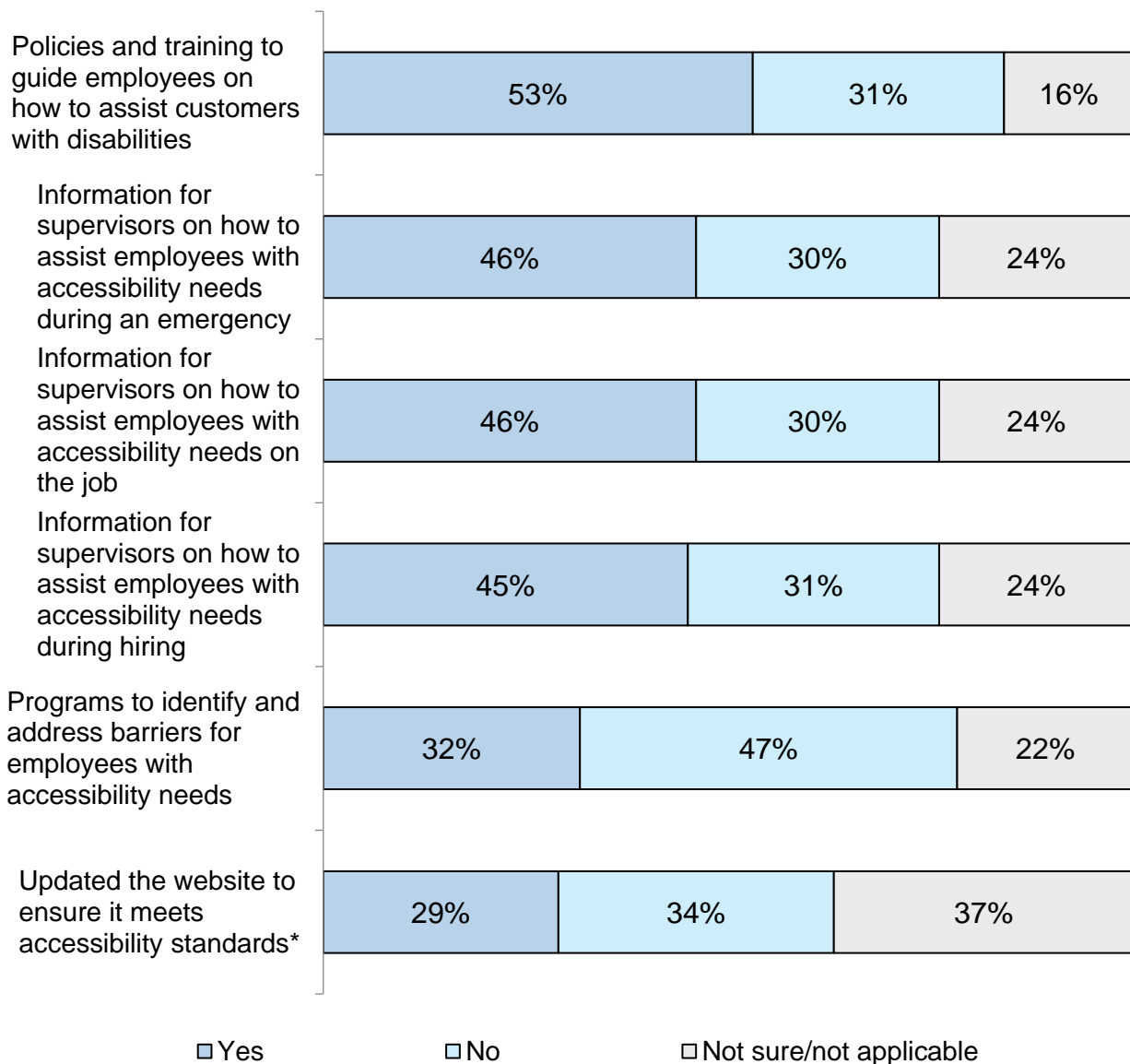
Five-year Review of the Accessibility Standard for Customer Service



5. Assistance and information offered by the business

I am going to read a list of assistance and information your business may or may not currently offer. Please let me know if your business offers the following.

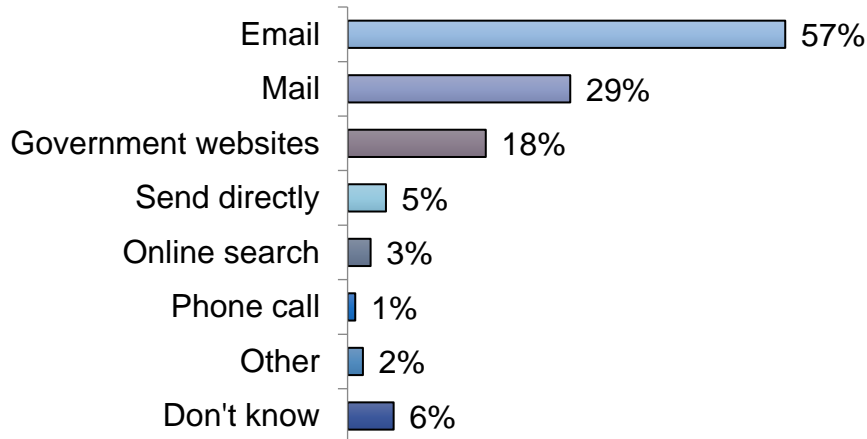
- The majority of business either do not offer or are unsure if they offer (which likely means they do not offer) various forms of assistance or information. The only one that a majority offer is policies and training to guide employees on how to assist customers with disabilities.
- Restaurants are more likely than other businesses to have policies and training for employees on how to assist customers and how to assist employees on the job.



6. Methods of receiving information

What would be the best way to get information to your business about requirements for providing accessible services?

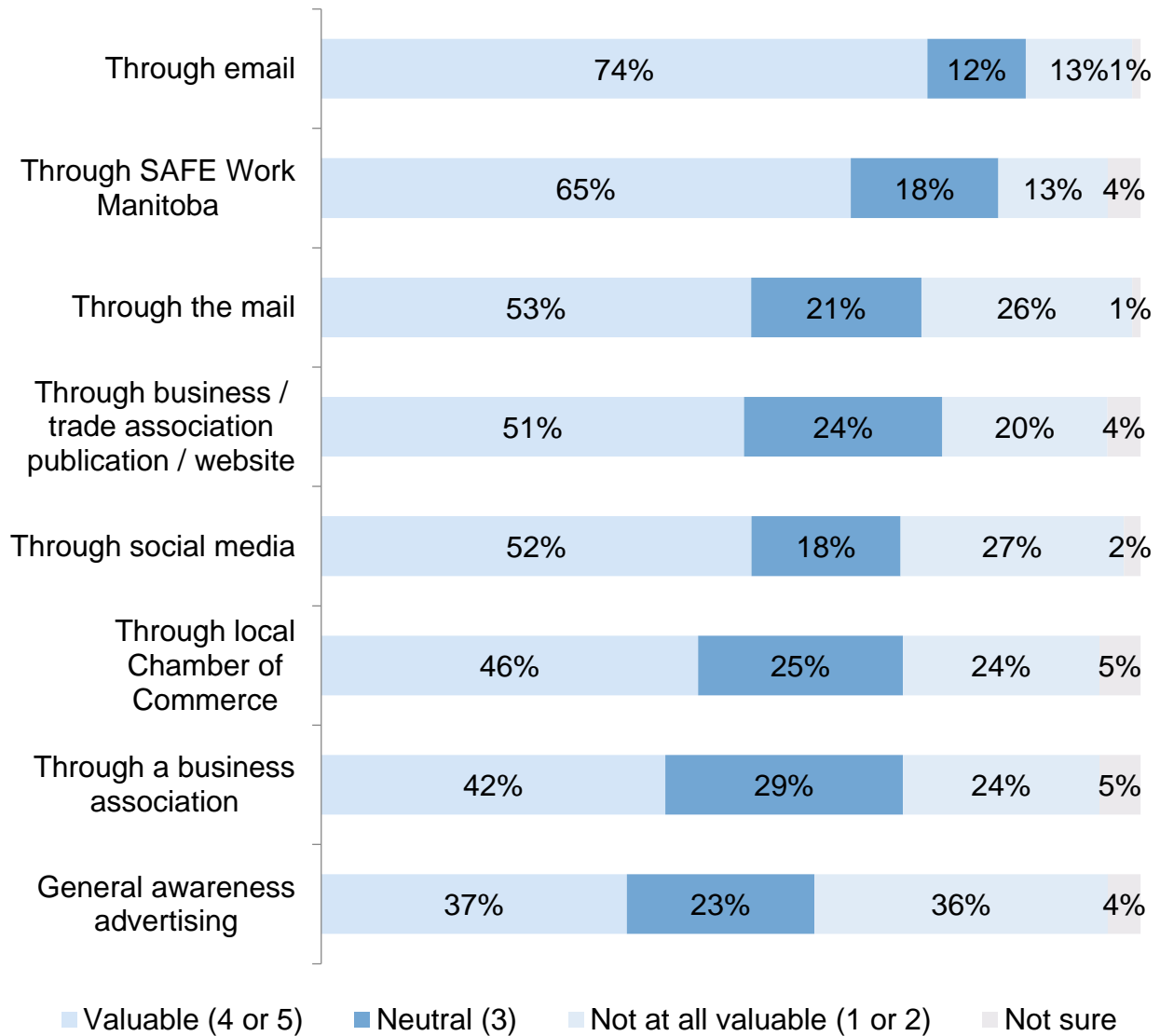
- Businesses were asked for top-of-mind suggestions about how to get information to them about requirements for providing accessible services.
- The most common suggestions were to send information via email (57%) or mail (29%).



7. Interest in information from Accessibility Manitoba

I am going to list some ways in which the Government of Manitoba could raise awareness about accessibility laws among business in Manitoba. For each, please tell me how valuable it would be to your organization on a scale from 1 to 5, where 1 is not at all valuable and 5 is very valuable.

- When asked to rate specific ways to get information, results tend to mimic the top-of-mind suggestions noted on the previous slide.
- Business tend to want information sent directly to them, either through email (74%), SAFE Work Manitoba's regular communications (65%), or mail (53%).
- They are least interested in general awareness messaging through paid ads (37%).



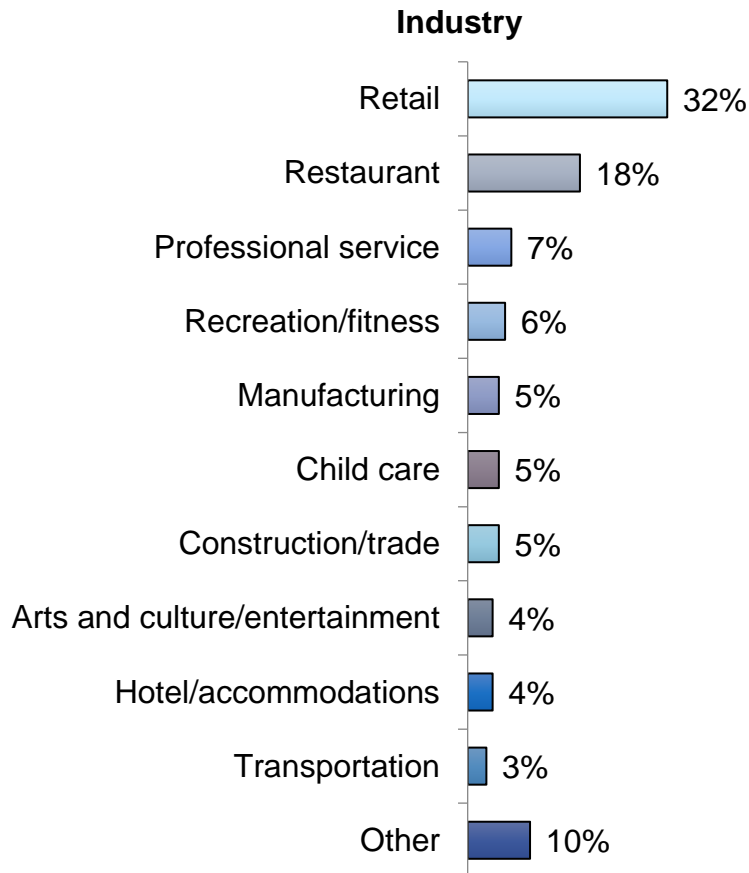
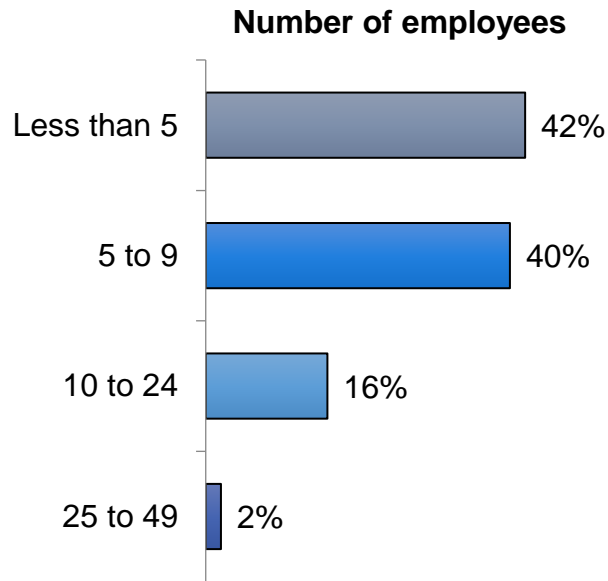
8. Interest in resources from Accessibility Manitoba

I am going to list some free resources available on Accessibility Manitoba’s website. For each, please tell me how valuable it would be to your organization on a scale from 1 to 5, where 1 is not at all valuable and 5 is very valuable.

- Business are most interested in tips for employees on how to provide accessible customer service (72%), and least interested in in-person workshops (33%). The latter is likely impacted by the restrictions related to the pandemic.
- Businesses that are aware of the Accessibility for Manitobans Act tend to be more likely to find these resources valuable.
- Those working in the retail industry tend to be less interested in these resources.



Annex i – Profile of Business



Appendix C: EngageMB What We Heard Report

Engage

MB

What We Heard

Five-Year Review of the Accessibility Standard for Customer Service

Project Overview

The Accessibility for Manitobans Act (AMA) sets out a path to remove, reduce and prevent barriers through the development of accessibility standards in five fundamental areas. The AMA calls for the Accessibility Advisory Council to review the effectiveness of accessibility standards every five years.

The purpose of the council's engagement exercise was to consult with Manitobans about their experiences with the Accessibility Standard for Customer Service, including what is working well and what needs improvement. The goal of the standard is to ensure businesses and organizations provide customer service in a way that removes barriers for people with disabilities. Council will use all findings from this engagement and other consultation activities to make recommendations in a final report for the Minister of Families, Minister responsible for Accessibility, in September 2021.

Engagement Overview

Council began planning this review in late 2020, with members completing pre-consultation meetings with a number of stakeholders in early 2021 to help identify general themes and to create a public consultation road map. To ensure Manitobans had many opportunities to express their perspectives on the standard, council launched a multi-pronged consultation plan, with multiple consultation activities.

As this standard applies to every organization in Manitoba with one or more employees, the council consulted the following groups:

- persons disabled by barriers, including representatives from organizations of persons disabled by barriers

- organizations required to comply with the standard, including small and large municipalities, public sector organizations, the Manitoba government, businesses and non-governmental organizations
- other representatives of the government or government agencies that have responsibilities under the standard

The EngageMB survey was posted from April 30 to May 28, 2021 in English and French and made available in other formats by request. An email from EngageMB announcing the engagement opportunity was sent to approximately 67,000 registered users who had previously participated in an engagement project related to Manitoba’s disability community or indicated an interest in related topics. The Manitoba Accessibility Office also informed its contact list of over 3,000 professional associations and organizations about the survey.

In addition to an EngageMB survey, council completed eight focus groups from April to June of 2021. Council held two webinars on the afternoon and evening of May 13, 2021 with participants from the disability community, municipalities, the public sector, businesses and non-profit organizations, council and individuals from across Manitoba.

What We Heard

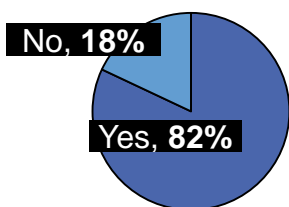
A total of 1,483 individuals visited the EngageMB project on the Five-Year Review of the Accessibility Standard for Customer Service, with 1,025 individuals participating in the survey and 51 participating in the quick poll.

Awareness of Accessibility Legislation

In response to the quick poll, 82 per cent of the participants indicated familiarity with the Accessibility for Manitobans Act, versus 18 per cent who were not.

When asked specifically about the Accessibility Standard for Customer Service, 53 per cent had heard of the standard, 35 per cent had not heard of it and 12 per cent of respondents were unsure.

Quick poll: Have you heard of the Accessibility for Manitobans Act?



Prior to this survey, had you heard of the Accessibility Standard for Customer Service?

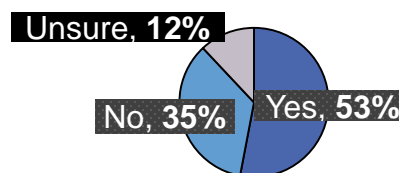
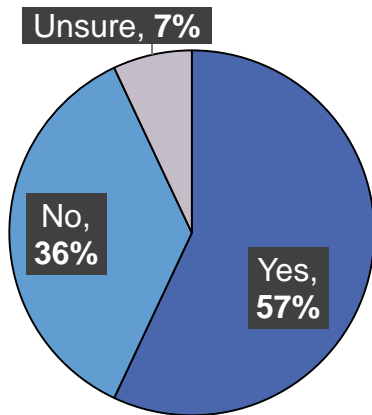


Figure 2: Pie charts identifying participant’s familiarity with Manitoba accessibility legislation (n=1025).

Over half of the respondents (57 per cent) were aware that the standard requires Manitoba businesses and organizations with at least one employee to provide accessible customer service. Thirty-six per cent were not aware and seven per cent were unsure. Fewer respondents (32 per cent) indicated the standard has made a difference in how Manitobans access goods and services, 57 per cent of respondents were unsure, and 11 per cent thought the standard had not made a difference.

Prior to this survey, were you aware that under the Standard all Manitoba businesses / organizations with at least one employee have responsibilities to provide accessible customer service?



Has the Accessibility Standard for Customer Service made a difference in how Manitobans access goods and services?

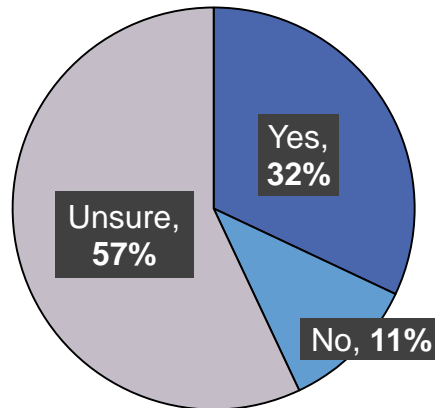


Figure 3: Pie charts identifying participant’s knowledge of the standard and if it has made a difference (n=1025).

Providing accessible goods and services

Respondents indicated how much they agreed or disagreed with several statements related to accessible customer service. In response to the statement: “Manitoba’s accessibility laws and standards have changed the way businesses and organizations offer goods and services,” 46 per cent of the poll participants indicated they were neutral or did not know. Overall, 87 per cent either strongly agreed or agreed that access to goods and services is a human right, with four per cent strongly disagreeing. Similarly, 85 per cent of respondents either agreed or strongly agreed that it should be a priority for businesses and organizations to be accessible.

Respondents were not as certain whether information provided by the government about accessible customer service is easy to understand. The most common response was neutral (31 per cent), followed by agree (25 per cent) and don’t know (21 per cent). In response to the statement: “I know where to find information about Manitoba accessibility laws and standards,” 48 per cent of participants either agreed or strongly agreed.

In terms of costs, 60 per cent of respondents either disagreed or strongly disagreed with the statement: “It is too costly for businesses and organizations to make changes to assist those with accessibility needs.” However, 89 per cent of respondents agreed or strongly agreed with the statement: “It is important for businesses and organizations to train staff on how to provide goods and services to people with accessibility needs.”

Providing accessible goods and services

■ Strongly disagree ■ Disagree ■ Neutral ■ Agree ■ Strongly agree ■ Don't know

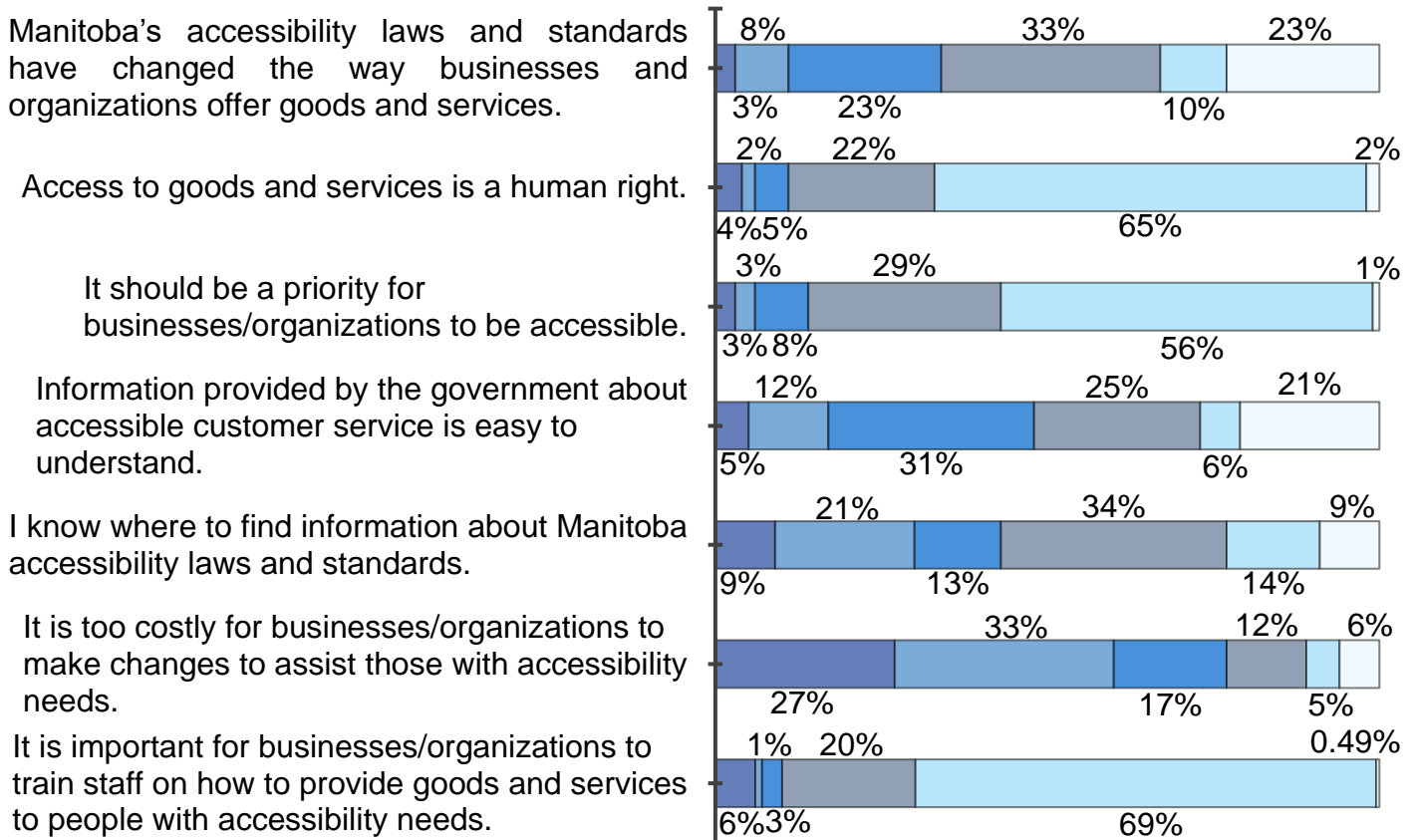


Figure 4: Mandatory questions related to how businesses and organizations in Manitoba can approach providing accessible goods and services for their customers and clients (n=1025).

Improving to provide accessible customer service

Respondents were given examples of how businesses and organizations in Manitoba could improve to provide accessible customer service. They were asked to indicate the extent to which improvement is needed in each area. Substantial improvement needed was the most frequent response to:

- training employees and volunteers on how to provide accessible customer service (44 per cent)
- Maintaining accessibility features (e.g., keeping ramps clear of snow and ice) (42 per cent)
- welcoming feedback from customers and visitors on how to improve accessibility (39 per cent)
- meeting communication needs of individuals with disabilities (e.g., affecting sight, hearing and understanding) (39 per cent)
- accommodating the use of assistive devices (e.g., wheelchairs, canes, communication or hearing aids) (37 per cent)
- informing the public when accessibility features are unavailable (e.g., an elevator is broken) (37 per cent)

Some improvement needed was the most common response for:

- allowing service animals in areas where the public can go (33 per cent)
- welcoming support persons who assist customers and clients with disabilities (31 per cent)

Improving to provide accessible customer service

- No improvement needed
- Slight improvement needed
- Some improvement needed
- Substantial improvement needed
- Don't know

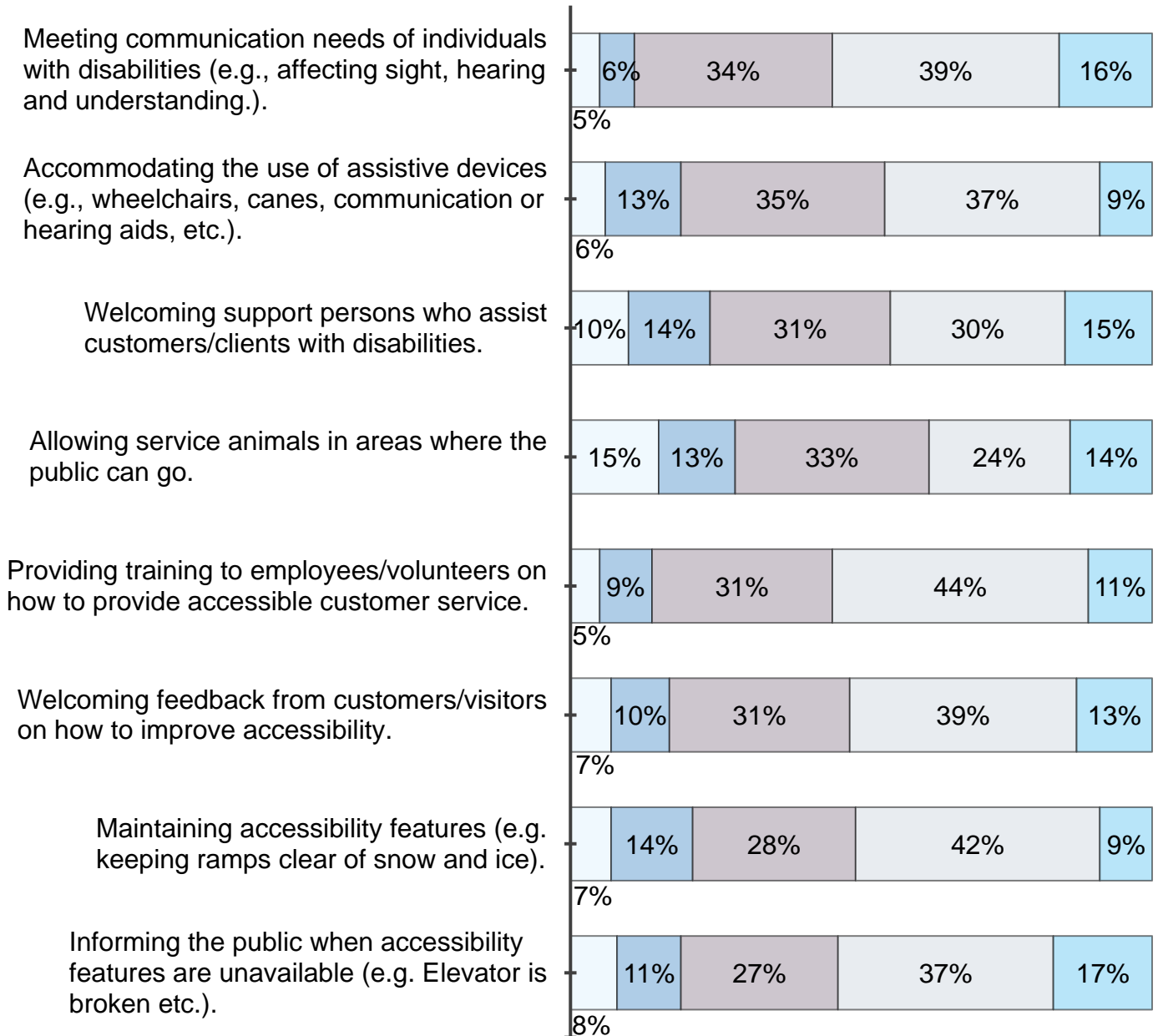


Figure 5: Mandatory questions related to how businesses and organizations in Manitoba can improve to provide accessible customer service (n=1025).

Open-ended Questions

Respondents tended to focus heavily on improvements they want to see in the built environment – ramps, accessible washrooms, door openers and improved sidewalk clearing. They viewed these as integral to customer service and access to businesses. They had fewer opinions to offer that pertained directly to the requirements of the Accessibility Standard for Customer Service. Nonetheless, some key themes emerged.

Respondents tended to favour a multipronged approach to increasing compliance with the standard. They favoured beginning with a softer approach that includes hands-on training for both senior and frontline staff and financial incentives, such as grants and tax rebates for businesses that invest in accessibility measures (particularly retrofits). These respondents indicated that after that work is done, it would be time for a tougher approach to compliance, including audits, inspections, fines and general enforcement.

The survey participants viewed training and awareness as vital to improving customer service. Respondents suggested a public ad campaign, direct outreach and practical advice for businesses, and the creation of online training modules that could be mandatory for new hires. Respondents also felt that an attitude of understanding and patience is often what is really needed to improve customer service (e.g. ingraining the active offer into all interactions.) A number of respondents provided anecdotes to illustrate their points.

When it comes to improving customer service, several practical ideas emerged:

- Encourage businesses to provide their customers with clear messages about the accessibility features they offer on their websites with, for example, a sign on the door. This gives people with disabilities the chance to choose where to take their business and avoids stressful situations.
- Increase the focus of public awareness initiatives and training on invisible disabilities, including sensory issues, autism, chronic pain and cognitive disabilities. Many respondents felt frontline services staff are often ill equipped to deal with these disabilities. They felt the standard should be more explicit in its inclusion of invisible disabilities.
- Listen to and engage people with disabilities. Respondents suggested the Manitoba government and businesses should recruit people with disabilities to design or test any accessibility measures before they put them in place.

A small number of respondents (four per cent) felt the standard and accessibility requirements in general were too onerous and expensive for small businesses. These respondents called for subsidies or grants to help them meet the requirements. Similarly, some respondents felt the provincial government must do a better job of leading by example. Feedback that was included in the “other” category contained specific examples of locations, infrastructure and systems that respondents felt should be made accessible, along with other comments that could not be grouped.

Additional Areas of Focus to Improve Access

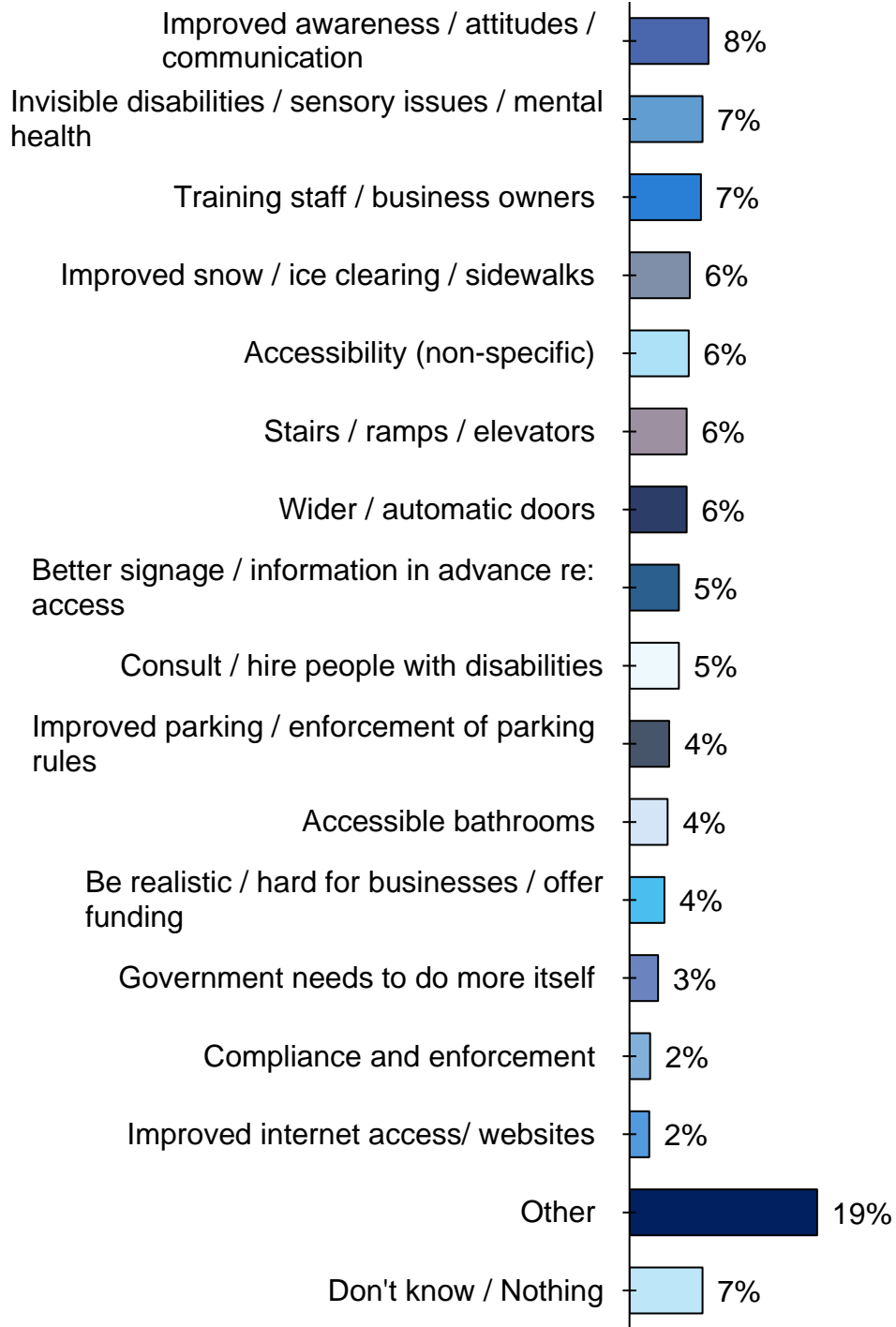


Figure 6: Q. What other areas should businesses and organizations focus on to improve accessibility for all Manitobans? All respondents (N=1,025). Multiple answers accepted. Total will sum to more than 100 per cent.

Views on Government Role in Supporting Accessibility

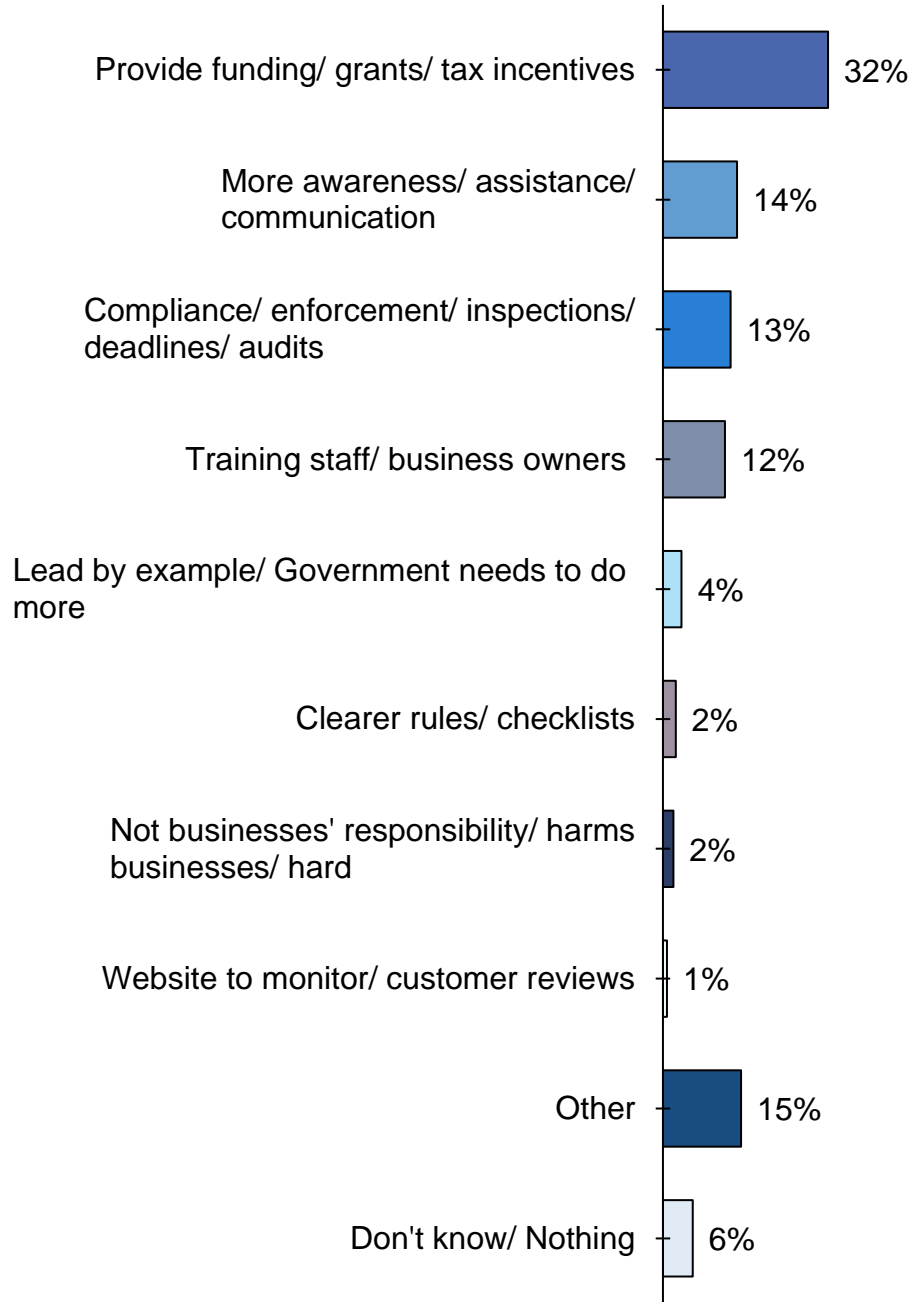


Figure 7: Q. What can the government do to better support businesses/organizations to provide goods and services that are accessible for all Manitobans? All respondents (N=1,025) Multiple answers accepted. Total will sum to more than 100 per cent.

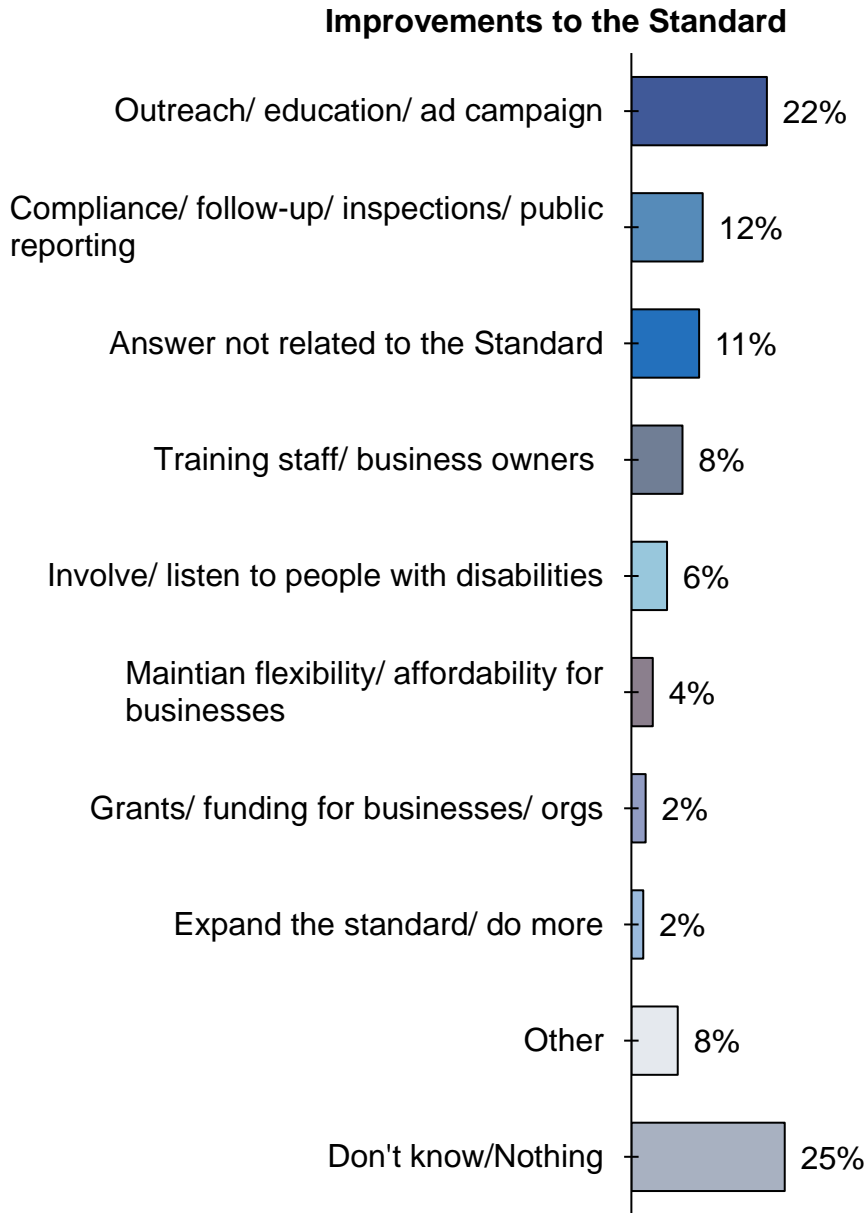


Figure 8: Q. Do you have any suggestions on how the Accessibility Standard for Customer Service can be improved? All respondents (N=1,025). Multiple answers accepted. Total will sum to more than 100 per cent.

Business and non-profit organization perspective

Respondents were asked to identify whether they were answering the survey as an individual (87 per cent), on behalf of a business or organization (five per cent) or both (nine per cent).

Are you completing this survey...

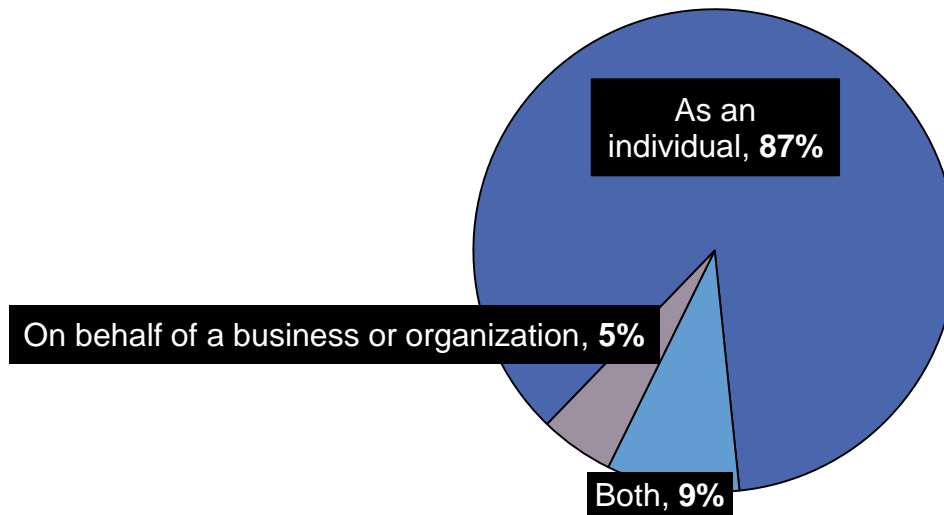


Figure 9: Mandatory question: whether the respondent is participating as an individual, on behalf of an organization or both (n=1025).

Respondents answered the following questions on behalf of their businesses or organizations. The type of industry best represented in the survey responses was professional service (13 per cent), followed by retail (nine per cent). Most respondents (56 per cent) chose other for the type of industry. Other types of industries represented included public sector, non-profit, property management, manufacturing, social services and disability supports.

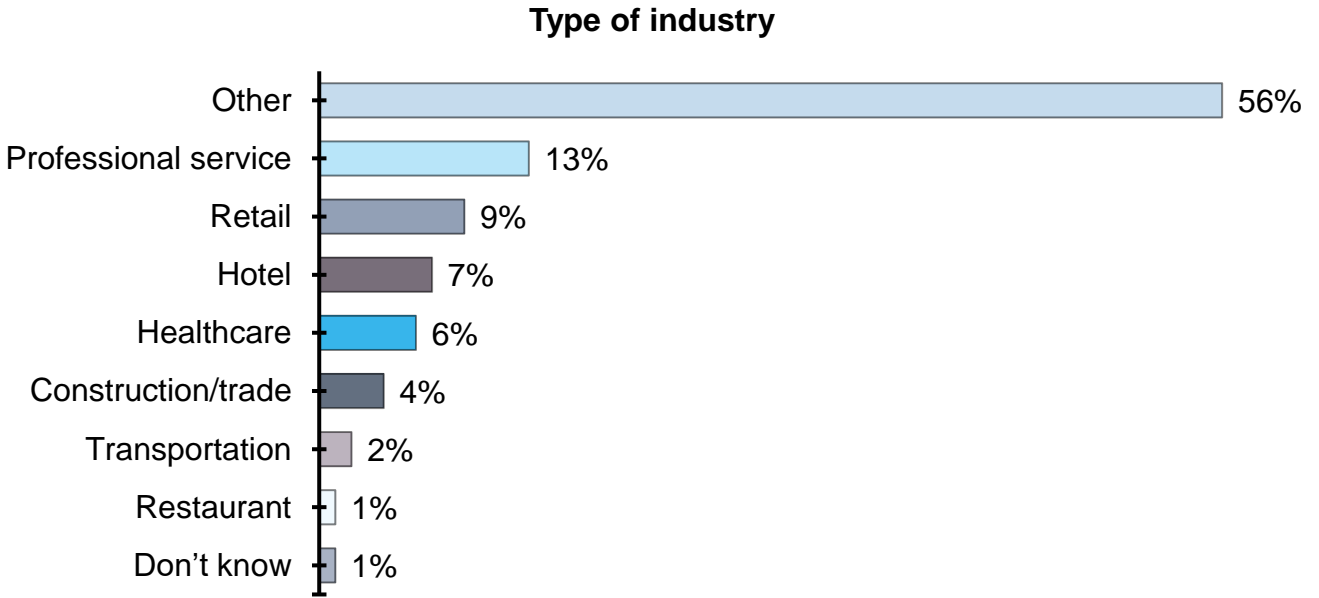


Figure 10: Respondents' who answered on behalf of a business or organization by type of industry (n=135).

The businesses or organizations were small, as the majority of respondents answered that they normally employ one to 20 employees (50 per cent), followed by more than 50 (21 per cent), and 21 to 50 employees (19 per cent) was third.

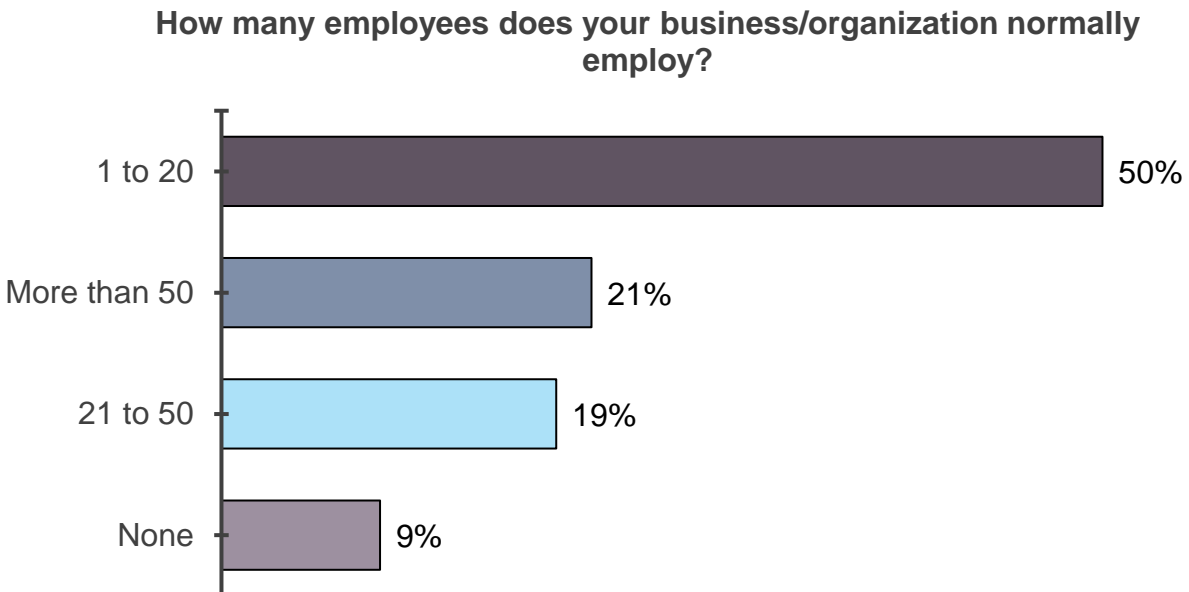


Figure 11: Respondents' who answered on behalf of a business or organization grouped by number of employees (n=137).

Awareness strategies

Respondents representing businesses and organizations considered ways for the Manitoba government to raise awareness about its accessibility laws. Respondents indicated how valuable various communication methods are to their business or organization. The majority of respondents (60 per cent) indicated that sharing information through social media was very valuable. Fifty-one per cent of respondents also thought it would be very valuable to have SAFE Work Manitoba provide information on accessibility in their regular communications. Somewhat fewer respondents (46 per cent) thought it would be very valuable to create awareness through paid advertising on billboards, bus benches or radio and TV, or to share information through a business association (45 per cent). Respondents were least supportive of sharing information through the mail, with 18 per cent selecting this as not at all valuable.

Perceived value of awareness-raising strategies for business and organizations

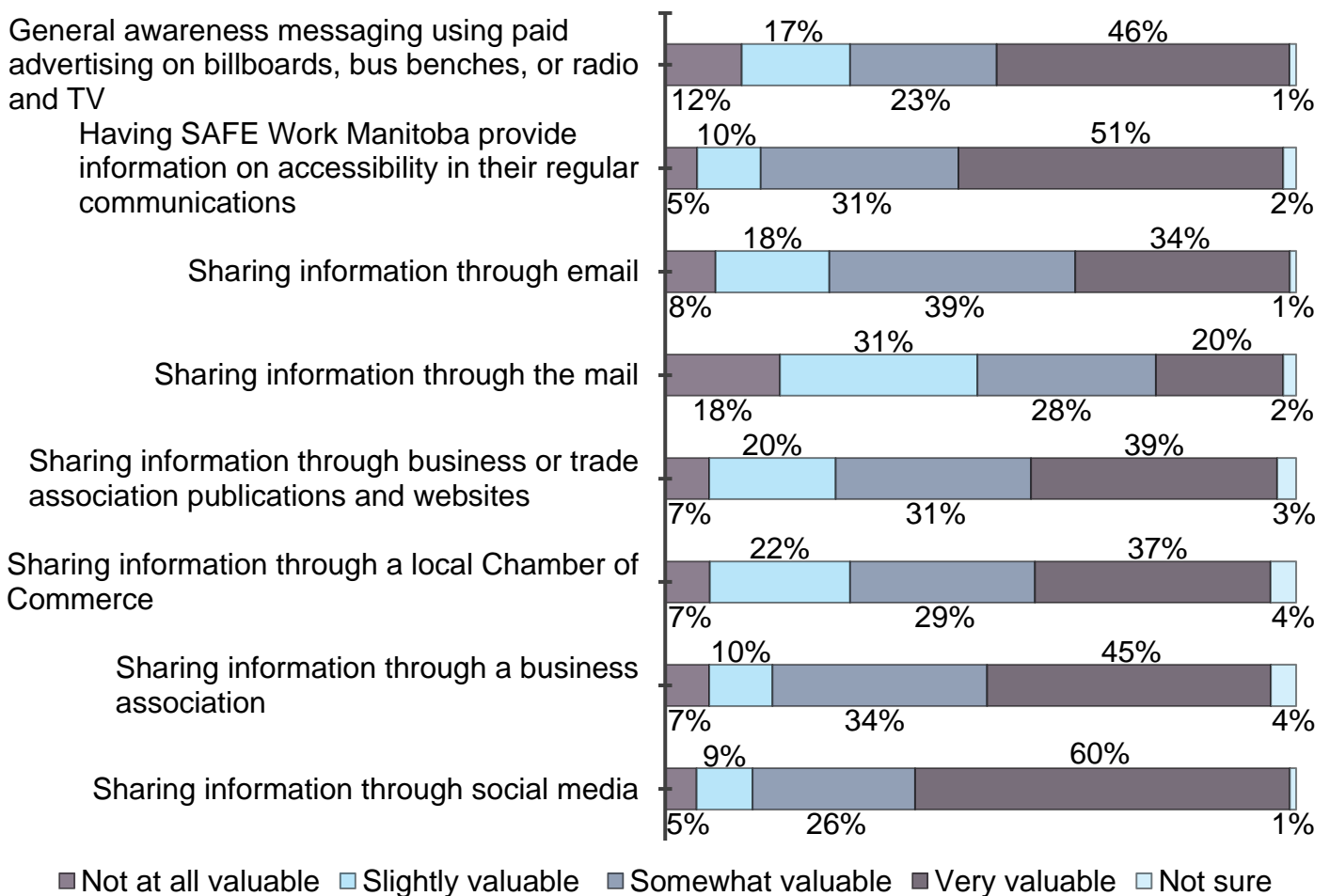


Figure 12: Perceived value of awareness-raising strategies for businesses and organizations. Respondents who answered on behalf of a business or organization (n=137).

Voluntary Demographic Information

Most respondents answered the voluntary demographic information. The most common age range was 55 to 64 years (27 per cent), followed by 65 to 74 years (22 per cent), then 45 to 54 years (20 per cent).

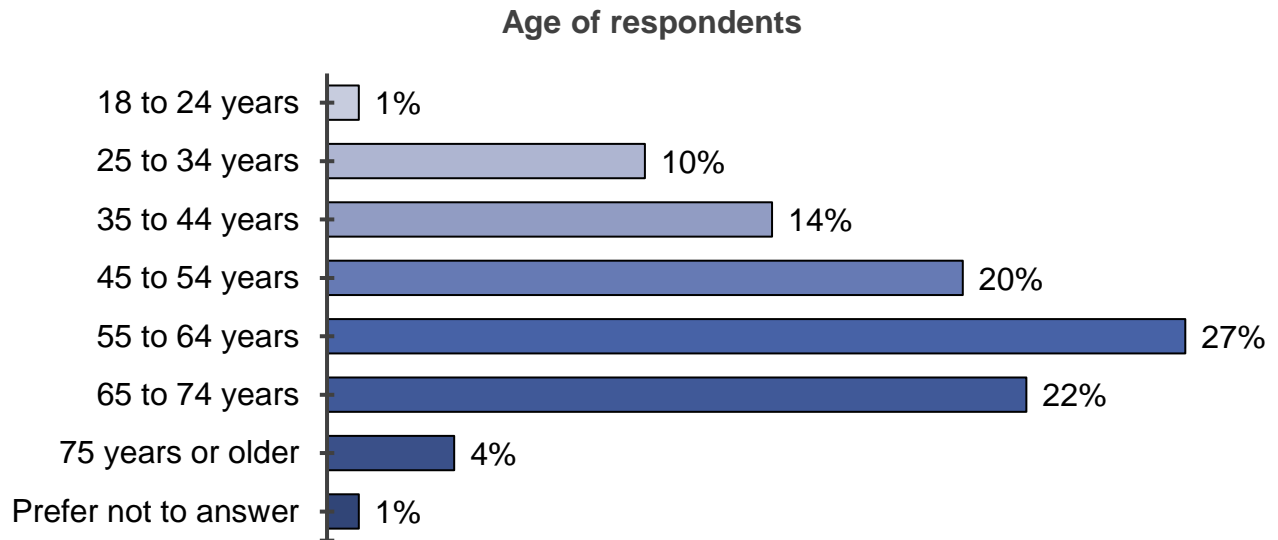


Figure 13: Pie chart showing the age of respondents. Most respondents answered this voluntary question (n=1020).

The majority of the Manitoba respondents (60 per cent) live in the Winnipeg capital region, followed by Southern Manitoba (17 per cent) and then Western Manitoba (nine per cent).

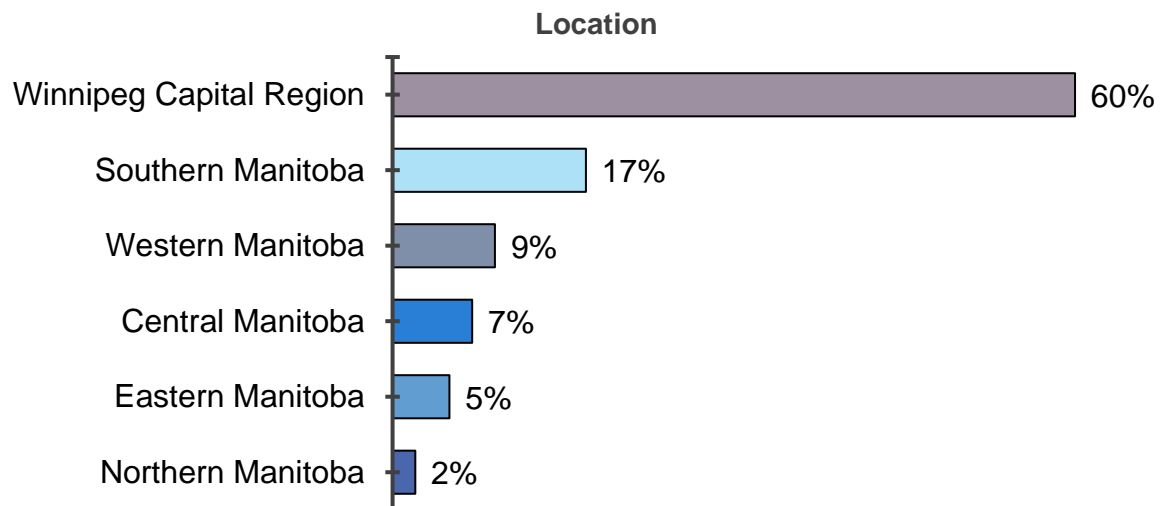


Figure 14: Pie chart showing the location of respondents. Most respondents answered this voluntary question (n=1020).

The survey asked participants if they face limitations in daily activities related to a range of types of disabilities. Respondents could select more than one option. Just over half of the respondents (52 per cent) stated that they did not have a disability. Mobility was the most common type of disability (23 per cent), followed by chronic pain (19 per cent). Ten per cent of respondents were affected by mental health, and the same number had disabilities related to hearing.

The survey also asked respondents whether a household member faced limitations in their daily activities. Half the respondents (50 per cent) responded no, while 40 per cent of respondents stated someone in their household had a disability.

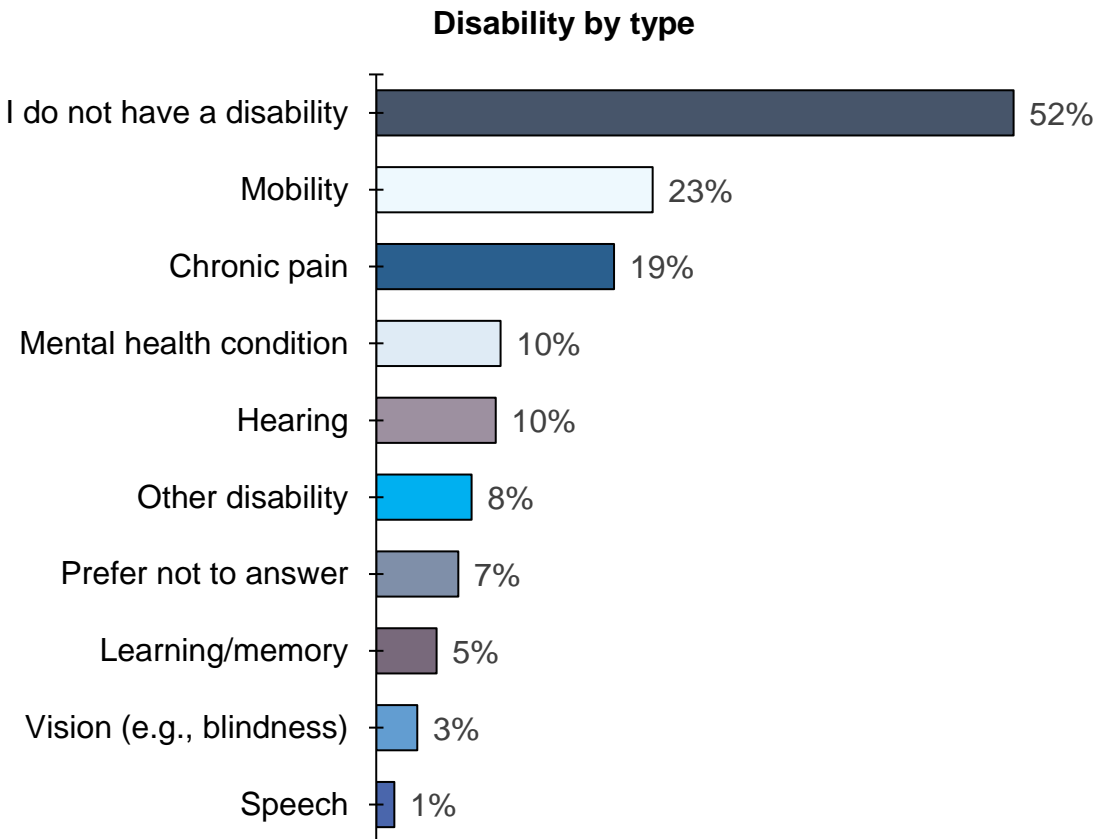


Figure 15: Q. Do you face limitations in your daily activities related to any of the following? Please select all that apply. Totals equal more than 100 per cent (n=1014).

Household Member with Disability

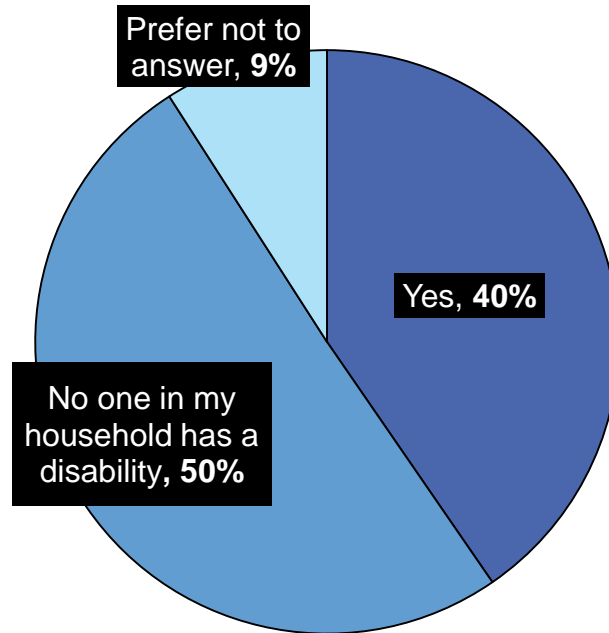


Figure 16: Q. Does a member of your household face limitations in their daily activities? (n=1015).

Next Steps

The Accessibility Advisory Council has used the data collected to prepare its report and recommendations to the Minister of Families, with a deadline of September 2021.

Questions?

If you have questions or comments, please contact the Accessibility Advisory Council at access@gov.mb.ca.

Appendix D: Virtual Town Hall Forums Poll Results

During the two virtual town hall forums on May 13th, 2021, all participants were asked the following poll questions.

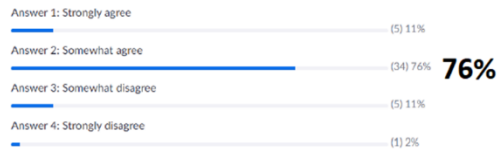
Question 1: Do you agree or disagree that more organizations are now offering accessible customer service?

- In session 1:
 - 76 percent somewhat agree.
 - 11 percent strongly agree.
 - 11 percent somewhat disagree.
 - Two percent strongly disagree.
- In session 2:
 - 94 percent somewhat agree.
 - Six percent strongly agree.

Question 1: Do you agree or disagree that more organizations are now offering accessible customer service?

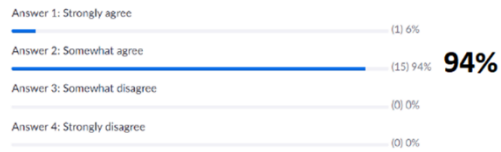
Session 1:

1. Do you agree or disagree that more organizations in Manitoba are now offering accessible customer service? (Single Choice)



Session 2:

1. Do you agree or disagree that more organizations in Manitoba are now offering accessible customer service? (Single Choice)



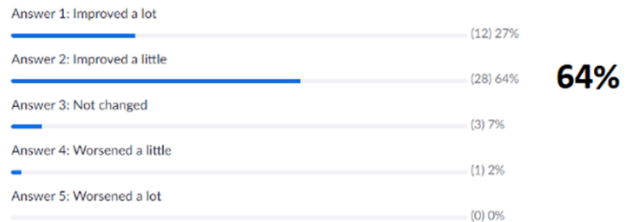
Question 2: During the past five years, has awareness among businesses and organizations of the Standard?

- Session 1:
 - 64 percent felt it improved a little.
 - 27 percent believed it improved a lot.
 - Seven percent unchanged.
 - Two percent answered it worsened a little.
- Session 2:
 - 93 percent felt it improved a little.
 - Seven percent believed it improved a lot.

Question 2: During the past five years, has awareness among businesses and organizations of the Accessibility Standard for Customer Service in Manitoba...?

Session 1:

1. During the past five years, has awareness among businesses and organizations of the Accessibility Standard for Customer Service in Manitoba...? (Single Choice)



Session 2:

1. During the past five years, has awareness among businesses and organizations of the Accessibility Standard for Customer Service in Manitoba...? (Single Choice)

