

# Accessible Customer Service Policy (ICM)

Effective: February 22, 2024

ICM is committed to establishing and maintaining an environment that is inclusive and takes into consideration the needs of all its community members. In adherence to the [Accessibility for Manitobans Act](#) and Manitoba's *Human Rights Code*, the International College of Manitoba (ICM) is committed to ensuring that our policies, practices, and environment (both physical and virtual) reflect our commitment to providing an accessible and welcoming space for members of our community as well as members of the University of Manitoba (UM) and Winnipeg communities inclusively.

ICM prioritizes the mental health and wellbeing of its community members and will strive to ensure that the experience of those who engage with us is one that reflects our commitment to equity, diversity, and inclusion. If there is a policy or practice that creates a barrier for any individual, ICM commits to ensuring that appropriate accommodations are made available to guarantee that the individual is still able to access services.

The most current Accessible Customer Service Policy document is published on the ICM website and is available in alternate formats upon request. ICM will ensure that the documentation or the information contained in it is given to the person in a manner that takes into account the barrier and within a reasonable time and at no cost to the person.

## SCOPE

This policy applies to all members of ICM staff including full-time, part-time, casual, sessional, and seasonal employees.

## POLICY CONTENT

This policy outlines the actions taken to ensure that members of the ICM community's needs are met when they seek assistance, information, or resources from our office. It ensures that barriers to service are identified and removed so that all community members can be serviced and accommodated in a way that keeps dignity, respect, and inclusiveness at the forefront.

## DEFINITIONS

The following are terms used in this Policy:

- a.) Assistive Devices- A tool that helps a person living with a disability to do their

daily tasks.

- b.) Barriers- Anything that interacts with a disability in a way that affects a person's full and effective participation in everyday life, including, but not limited to, attitudinal, information/communication, architectural/environmental, technological, or systemic barriers.
- c.) Disability- A person with a disability is a person who experiences mental, cognitive, physical, or sensory impairment that may require accommodation (2015).
- d.) Reasonable Accommodation- An adjustment to conditions, duties, rules, and practices made for an individual who requires it based on a disability. This accommodation is designed to assist the individual to be able to gain services as other members of the ICM community are able to without causing undue hardship to the college (Government of Manitoba).
- e.) "SAS"- Student Accessibility Services
- f.) Service Animals- An animal that has been trained to assist a person with a disability.
- g.) Support Persons- Any person who is either a volunteer, family member, friend, or paid individual who assists a person living with a disability with any needs they may have.
- h.) Undue Hardship- When accommodations go beyond what is within the duty to accommodate. When determining if an accommodation will cause undue hardship a number of factors including health and safety risk, disruption to a contract, financial costs, business efficiency, and impact on service providers and members of the ICM community (Government of Manitoba).

### ***Confidentiality***

Any information regarding a community member's disability will be confidential and not shared without the permission of the individual living with a disability.

### ***Communication Needs***

We recognize that individuals seeking assistance, information, and resources from our offices may have a range of needs when it comes to communication.

### **Inclusive Practices**

- We will make reasonable efforts to ensure that, when communicating with a person who self-identifies as being disabled by a barrier, the communication is done in a manner that respectfully takes into account the barrier.
- Individuals who are disabled by a barrier may use assistive devices to remove or reduce the barrier. ICM will reasonably accommodate the use of those devices (see 'Accommodate the Use of Assistive Devices').
- Individuals who are disabled by a barrier may be accompanied by a support person when seeking to obtain, use or benefit from ICM's goods or services (see 'Welcome Support Persons').

- We will engage in a range of communication methods, including but not limited to, writing information down, reading information aloud, speaking slowly and audibly when required, and repeating information more than once to confirm understanding.
- We will make a private space available for those individuals who need a safe space to talk and share information.
- We will ensure we have the materials required to share information through both written and spoken means. This includes, but is not limited to, pens, paper, computer screens, and printers.
- We will ensure that important information is displayed in a way that is accessible to all individuals. This includes ensuring font size is large enough to be read clearly, colors and contrasting colors are accessible to everyone, and that messages are not printed overtop images or patterns that make them difficult to read.
- Policy documents, posters, communications, and community facing documentation will be written in a way that is easy to understand for a wide range of reading levels.
- Individuals who require the use of a wheelchair will be met face-to-face whereby both parties are seated.

### ***Accommodate the Use of Assistive Devices***

We recognize that some individuals may require the use of assistive devices. We will accommodate the use of assistive devices by individuals who come to our offices.

#### Inclusive Practices

- All staff are required to complete accessible customer service training as part of their onboarding, including information on what is an assistive device and how to accommodate individuals who use assistive devices.
- We seek permission before touching or moving any individual's assistive device.
- If we are unsure about an individual's assistive device, we will seek clarification from the individual and avoid making assumptions.

### ***Welcome Support Persons***

We welcome all support persons to our space including translators, mentors, emotional support people, etc. Support Persons are permitted to enter the building and stay with the person they are supporting for the entirety of their visit.

#### Inclusive Practices

- When a person comes in with a support person, we are addressing the ICM community member.
- We provide enough space to accommodate both the ICM community member and the support person at our locations.

- In the event that a support person is required to accompany a student in any of our classrooms, we will work with the instructor and/or classroom scheduler to accommodate that person.
- Additional fees will not be charged for support persons. If a support person is required to pay an amount to be admitted to or present at its premises, ICM will ensure that advanced notice is given of the amount payable in respect of the support person, if any.

### ***Allow Service Animals***

Like other locations on the UM campus, we allow service animals into our space.

#### Inclusive Practices

- We acknowledge that all service animals are working.
- We do not distract the service animal by calling it, petting it, feeding it, or trying to play with it.
- If we have any questions about the training or behaviour of the service animal, we will ask the individual who is handling the service animal. We will not inquire about the disability.

We expect that the individual who is handling the service animal can maintain control of the animal. In circumstances where the animal is misbehaving, we may provide a warning to have the handler control the animal and, in cases where the behaviour continues, ask the person handling the service animal to leave.

### ***Maintain Accessibility Features***

We prioritize the maintenance of all our accessibility features to guarantee that they can be utilized as intended by those who need them. Each semester we do an assessment as part of our Workplace Health and Safety Site Inspections to ensure that our office space and classrooms are safe and accessible for all students. In the event that they are not, we will bring the discrepancy to the attention of the appropriate department to correct the issue as soon as possible.

#### Inclusive Practices

- Our office space is accessible for those who require wheelchairs for mobility. Our doors open wide enough and there is a clear passageway to the front desk for individuals using wheelchairs to get up to the desk.
- On the occasion where an individual using a wheelchair needs to access a private advising space, they are able to access the office and the advising rooms with ease.
- The seating in our waiting room is movable and adjustable to accommodate for members of the ICM community of different sizes and needs.
- Our signage does not block entryways.
- In the event that a person with visual or auditory needs requires specialized

assistance, the advising team will take necessary measures to accommodate this need.

- In the case where an individual is unable to physically attend the office for services, virtual or phone services will be provided. Likewise, if an individual is unable to attend a class for one of their courses due to the space not being accessible, the class will be moved to a room that is accessible and the inaccessibility will be reported to the Associate Registrar & Director of Systems.
- The areas that are impacted by this policy are areas leading to or where ICM services are offered, including but not limited the hallways, sliding front access doors, waiting area space, seating facilities, classrooms, study spaces, and advising offices.

### ***Letting Individuals Know Why an Accessibility Feature Is Not Available***

In the case that an accessibility feature is not available, we will inform ICM community members of why and for how long we expect it to be unavailable. We will also investigate as to whether or not alternative ways to access services are available and inform community members of the process needed to obtain these services.

#### Inclusive Practices

- In the case that an accessibility feature becomes unavailable, we will ensure that the community members are made aware of the lack in service, the reason this service is unavailable, and the estimated duration of the unavailability, as well as any alternative resources that can be accessed in the meantime.
- Individuals will be made aware of the disruption of accessibility services through:
  - Social media and the ICM Student Portal Announcements page.
  - Physical posters posted at the ICM front desk.
  - Classroom visits and instructors, if necessary (via announcements in classes).

### ***Welcome and Respond Promptly to Feedback***

We welcome the feedback on the accessibility of our services, resources, and facilities. If feedback is received on our services, resources, or facilities, we will respond promptly to the feedback and inform the individual who provided the feedback of any actions that will be taken to improve the area of concern.

#### Inclusive Practices

- Feedback can be provided to ICM in the following ways:
  - In person by visiting our office and discussing in person to our ICM front desk staff member.

- Contact us by phone at 1-204-474-8479, or by email at [reception@icmanitoba.ca](mailto:reception@icmanitoba.ca).
- Alternative methods of providing feedback will be considered, based on individual need.
- In the event that feedback requires follow-up, it will be determined who the appropriate individual or department is appointed to look into the matter. The person who has registered the feedback will be informed of who will be following up and be provided an expected date by which they can expect a response.
- When responding back to the individual, we will ensure that the method used will meet the communication needs of the individual.
- If necessary, we will ensure that all members of the ICM community are made aware of any amendments or improvements of our accessibility services as a result of the feedback provided.
- ICM will document resulting actions and make that documentation available upon request, ensuring any personal information is anonymized for confidentiality purposes.

### ***Provide the Required Training to Employees, Volunteers, and Management***

We will ensure that staff are trained on accessible customer service policies and practices instruction about:

- How to interact and communicate with persons disabled by barriers;
- How to interact with persons disabled by barriers who use an assistive device or require the assistance of a support person or service animal;
- How to support students who require academic accommodations;
- How to use any equipment or assistive devices that may be available to assist persons disabled by barriers; and
- What to do if a person disabled by a particular barrier is having difficulty accessing a good or service.

We will ensure that we are providing regular overviews of the Accessibility for Manitobans Act, the Human Rights Code, and the Customer Service Standard as part of employee onboarding. On-going training is provided in connection with changes to ICM's measures, policies and practices respecting providing barrier-free access to the goods or services it provides. These sessions will be streamlined through our Workplace Health and Safety Committee.

### **Inclusive Practices**

- All new staff are made aware of the Accessible Customer Service Policy during the first thirty days of onboarding.
- We place the Accessible Customer Service Policy as well as the Employment Accessibility Policy on our ICM Website and BambooHR site for staff to reference whenever they require.



- ICM documents its training offerings, including a summary of the content of the training, when the training was provided, and who attended.

## REVIEW

Policy review shall be conducted every two (2) years. The next scheduled review date for this Policy is February 22, 2026.

# Accessible Customer Service Procedure (ICM)

Effective: February 22, 2024

From an equity standpoint, it is important that members of the ICM community feel supported and are provided with reasonable accommodations when required. ICM prioritizes the health and wellbeing of its community members and is committed to providing a supportive environment that is inclusive and aware of the needs of its members. Community members requiring accommodations that will assist them in their day-to-day commitments are encouraged to come forward and make these needs known so that they can be accommodated.

The Accessible Customer Service Policy and Procedure documents are available in alternative formats upon request.

## SCOPE

This policy applies to all members of ICM staff including full-time, part-time, casual, sessional, and seasonal employees.

## PROCEDURE CONTENT

This procedure outlines the actions taken to adhere to the Accessible Customer Service Policy, thereby ensuring that members of the ICM community's needs are met when they seek assistance, information, or resources from our office.

### ***In Class Accommodations***

#### Students Requesting Accommodations for In-Class Course Work

Students who are living with a disability that impacts their academics are encouraged to inform ICM at the time of applying. This will assist the ICM team in directing the student to the appropriate channel early so they are able to start the process of obtaining the necessary accommodations. It is important that students provide the necessary documentation with regards to their disability so we are best able to support the student.

Students requesting to receive accommodation for academic courses should register with Student Accessibility Services (SAS) at UM. Students can do this by completing the [Student Accessibility Services Disability Assessment Form](#).

As per the Student Accessibility website, (2023), accommodations can include but are not limited to the following:

- Alternate seating arrangements in the classroom
- Sign Language interpretation
- Assistive Devices



- Note Takers (Anonymous in-class volunteer)
- Transcriptionists
- Alternative spaces for exams
- Alternate seating for exams (ergonomic)
- Extended exam time (25%, 50%, 75%, 100%).

After the form has been received from SAS, approved students will meet with an accessibility advisor who will assist them with understanding what accommodations will be provided, how the student can go about obtaining the accommodations, and the timeframe from which the student can expect to access the accommodations. It is important to be aware that with the student's permission, SAS will reach out to the students' instructors to make them aware of the accommodation being provided. **It is important that students are aware that they must reapply for accommodation each term. Accommodations do not carry on from term to term.**

#### Rights and Responsibilities of Students

- Students wishing to obtain academic accommodations through SAS are required to register with SAS. Students who need assistance with the registration process can meet with an ICM Student Success Advisor for guidance.
- Students will be asked for the following information upon registering: Name, contact information, student number, name of the doctor who provided a diagnosis, dates of their clinical assessments that determined their disability, how the disability impedes learning or accessing of services, duration of the disability, and any recommendations that have been put forward (2015).
- Students will be required to meet with an advisor from SAS to discuss their accommodation requests and gain a better understanding of the procedures that will follow.
- Students who meet with an advisor at SAS to discuss their accommodations will be provided with a Letter of Accommodation which outlines the accommodations the student requires. This letter can be shared with instructors, so they are able to understand what the student is requiring.
- Students will also be provided with a Tests/Exams Particular Form that will be created by SAS for every exam the student requests accommodations for.

#### Instructors Receiving Accommodation Requests

In the event that a student discloses to an instructor that they require accommodations for a class, the instructor should:

- Ask the student if they have applied for academic accommodations through SAS. If the student has not, they can be directed to the ICM administration offices to meet with an advisor who will assist them in accessing the "Disability Assessment Form" and arranging to get the termly accommodation in place. If the student indicates that they have made arrangements for accommodations

through SAS and the instructor has not yet been contacted by a member of the SAS team, they can reach out to [instructorsupport@icmanitoba.ca](mailto:instructorsupport@icmanitoba.ca) and ICM administration can look into it with SAS. Alternatively, instructors can reach out to SAS directly by contacting: [student\\_accessibility@umanitoba.ca](mailto:student_accessibility@umanitoba.ca)

### Rights and Responsibilities of Instructors

- Instructors should ensure that the academic integrity of the course is not compromised during the accommodation of the students.
- If an instructor feels the accommodations set forth may compromise the academic integrity of the course content, the instructor may reach out to the advisor at SAS or ICM through the [instructorsupport@icmanitoba.ca](mailto:instructorsupport@icmanitoba.ca) email.
- Evaluate students who have requested accommodations along the same relevant academic standards, evaluating the student's performance, competencies, and learning outcomes alongside those of other students in the course.
- Adapt an appropriate method to accommodate the student.
- Include information about accommodation processes and procedures in all course outlines.
- In the event of a disagreement or discrepancy between the instructor and student with regards to the accommodations, the instructor will reach out to the ICM office [instructorsupport@icmanitoba.ca](mailto:instructorsupport@icmanitoba.ca) and/or SAS.

### ***Community Members Requiring Accommodations When Visiting the ICM Offices***

In the event that a community member living with a disability requires accommodations in order to visit the office they can inform us ahead of time so we can be prepared for their visit. In the event that a community member does not notify us ahead of time, ICM staff will still ensure that the community member is accommodated in order to receive the services they have come to ICM office to obtain. This can include but is not limited to:

- A person who uses a wheelchair who needs to meet with an ICM staff member in the advising room can inform us of this so we can ensure that adequate space is available to accommodate. Requests can be sent to [reception@icmanitoba.ca](mailto:reception@icmanitoba.ca), alternatively a phone call be made to our front office 204-474-8479.
- A person who requires to bring their translator or support person to be present during advising appointments can inform us at the time of booking their in-person appointment through the Calendly link, through calling our reception office, or in the case of drop in, can inform the front desk staff at time of triage. This will ensure that staff are prepared, and that adequate room is available.
- A person who is living with a visual impairment and who may have trouble viewing computer screens during their advising appointment may also specify when booking their appointment or registering at the front desk for a drop-in

session so that ICM Student Success Advisors are able to provide necessary information in a format that meets the person's needs, including but not limited to adjusting image and font sizes.

If any other accommodation is required that has not been listed prior to a community member visiting our offices, requests can be made by emailing [reception@icmanitoba.ca](mailto:reception@icmanitoba.ca) or by calling our reception office at 204-474-8479.

### ***Accessibility Training for Staff***

ICM will ensure that all frontline staff are trained on [The Province of Manitoba's Accessible Customer Service training](#). All frontline staff should complete the learning module within thirty days of this Policy/Procedure's launch, and all new staff should complete the learning module within the first thirty days of onboarding.

The Workplace Health and Safety Committee will collect certificates of completion from all staff and record completion to keep track of who has completed and who has yet to finish the training.

### ***Appeals***

If at any point a community member living with a disability is denied accommodations, they do have the right to appeal. Appeals regarding the accessibility of ICM's reception area, advising spaces, student lounge, or in class accommodations can be made in writing to the Associate Director (Student Experience and Wellness). Appeals regarding the accessibility of classroom spaces can be made to the Associate Director (Academic and Student Success). Once the appeal has been received, it will be acknowledged in writing (or other preferred format) with an estimated time of resolution. The accommodation will be investigated and any additional information that is obtained during that time will be relayed to the community member who has filed the appeal.

### **REVIEW**

Policy review shall be conducted every two (2) years. The next scheduled review date for this Policy is February 22, 2026.

## References

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[https://accessibilitymb.ca/pdf/sample\\_accessible\\_customer\\_service\\_policy\\_june\\_2021.pdf](https://accessibilitymb.ca/pdf/sample_accessible_customer_service_policy_june_2021.pdf)

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