

Accessible Customer Service Standard Regulation

Regulation Handbook

November 2025

This information is available in alternate formats on request.

Please contact the Manitoba Accessibility Office at MAO@gov.mb.ca or call 204-945-7613 or toll free at 1-800-282-8069, ext. 7613.

Legal Disclaimer

This handbook is not legal advice. It aims to assist organizations to meet the minimum requirements under Manitoba's Accessible Customer Service Standard Regulation. The handbook does not replace the content of [the Accessible Customer Service Standard Regulation](#) or [The Accessibility for Manitobans Act](#). If there is any conflict between this training resource and the regulation or the act, the latter two shall prevail.

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Introduction to The Accessibility for Manitobans Act

In this module, you will explore the [Accessible Customer Service Standard Regulation](#) and discover how your organization can introduce inclusive practices to provide accessible barrier-free customer service to people with disabilities.

The Accessible Customer Service Standard was the first regulated standard under The Accessibility for Manitobans Act. Under this standard, all Manitoba organizations with at least one employee, including businesses and non-profits, must create policies and procedures that help achieve respectful, barrier-free customer service. You will also discover how to recognize common accessibility barriers, communicate effectively and accommodate diverse needs to ensure everyone can access your goods and services.

The Need for Legislation

[The Accessibility for Manitobans Act](#) was enacted in 2013. The act has two main goals:

- **Goal 1:** identify, prevent and remove accessibility barriers to participation
- **Goal 2:** make progress towards achieving accessibility in Manitoba

Manitoba's efforts focus on awareness-raising, education and training obligated organizations to fulfill the requirements set out in the law. Like other laws, The Accessibility for Manitobans Act also sets out compliance and enforcement measures, including inspections, orders to comply and monetary penalties for non-compliant organizations.

Regulated Accessibility Standards

Accessibility standards, or regulations, are the building blocks of The Accessibility for Manitobans Act. Regulated accessibility standards outline who has to do what and by when, to enhance [accessibility](#).

The Manitoba government appointed the Accessibility Advisory Council to assist in developing five regulated standards under The Accessibility for Manitobans Act, which includes:

- [Accessible Customer Service Standard Regulation](#)
- [Accessible Employment Standard Regulation](#)
- [Accessible Information and Communication Standard Regulation](#)
- [Accessible Transportation Standard Regulation](#)
- [Accessible Outdoor Spaces Standard Regulation](#)

Requirements of the Accessible Customer Service Standard Regulation

The Accessible Customer Service Standard Regulation requires organizations to provide access to products and services in an efficient, fair and respectful way to all customers in a barrier-free manner.

Enacted in 2015, the Accessible Customer Service Standard Regulation was the first regulated standard under The Accessibility for Manitobans Act. This regulated standard requires all Manitoba organizations with at least one employee to create policies and procedures that help achieve respectful, barrier-free access to goods or services.

When establishing and implementing these measures, policies and practices, an organization must:

- identify any barriers within the organization that may make it difficult for the public to access goods or services
- remove any identified barriers, ensuring service recipients can access goods or services
- provide reasonable accommodations and not charge people with disabilities for these requests. If an accommodation request cannot be met, find an alternative way to provide access to goods or services
- ensure no new barriers are created
- ensure all staff and volunteers who interact with the public or other organizations in Manitoba receive training on accessible customer service
- provide a way for the public to give feedback on accessibility and have the organization respond upon request

The Human Rights Code

The Accessibility for Manitobans Act complements [The Human Rights Code](#) and offers proactive ways to ensure accessibility for everyone.

Reasonable Accommodations

[Reasonable accommodations](#) refer to adjustments or modifications made in the workplace, educational settings or other environments to ensure that people with disabilities or other protected characteristics, such as age or race, have equal opportunities and are not discriminated against. These accommodations are meant to remove barriers and provide necessary support, so that individuals can fully participate and perform to their best abilities.

Providing reasonable accommodations is a legal requirement and failure to reasonably accommodate an individual can result in a discrimination claim, under The Human Rights Code.

Duty to Accommodate

Organizations must take responsibility for providing accommodations, including covering associated costs, up to the point of [undue hardship](#).

Undue hardship means a serious problem, like very high costs or safety risks. Small inconveniences, personal preferences or reasonable costs usually don't count as undue hardship. The law doesn't give a clear definition of undue hardship, but past legal decisions show it must be based on real proof, not just opinions or assumptions.

If an accommodation request poses undue hardship, organizations must still work with the individual to find alternative solutions. With flexibility, openness and good [communication](#), most accommodations are simple, affordable and effective.

Requirements of the Accessible Customer Service Standard Regulation

The Accessible Customer Service Standard Regulation requires organizations and businesses with at least one employee to introduce policies and practices in the following areas:

- Communication - Alternate Formats and Supports
- Assistive Devices
- Support Persons
- Service Animals
- Maintaining the Built Environment and Notice of Temporary Disruptions
- Feedback Mechanisms
- Documentation of Policies and Practices
- Training for Staff, Volunteers and Training Documentation
- Accessible Public Events

Communication - Alternate Formats and Supports

Organizations must identify and remove communication barriers by ensuring they can meet the needs of customers, clients and members. A communication barrier is any obstacle that limits access to information and prevents people with disabilities from fully participating in society. Understanding the use of communication supports or alternative formats can help remove communication barriers.

What can you do to meet this requirement?

Understanding and responding to individual communication needs creates welcoming environments where everyone can participate.

- let the public know communication supports and alternative formats are available upon request

- respond promptly to requests for communication supports or [accessible formats](#)
- train staff to communicate respectfully and offer help by simply asking customers, “How can I help?”
- treat all members of the public with respect, avoid making assumptions and listen to their needs

Assistive Devices

Organizations must allow [assistive devices](#) such as wheelchairs, walkers and oxygen tanks and ensure they don’t charge additional fees for permitting or accommodating these devices. An assistive device may be used by a person with a disability to help remove or reduce [barriers](#).

What can you do to meet this requirement?

Assistive devices help people with disabilities access services and complete everyday tasks. From canes and hearing aids to speech-generating devices and cell phones, these tools support independence and inclusion. Staff should be trained to recognize, respect and assist with these devices to ensure a welcoming experience for all.

- never move or touch assistive devices without permission
- let customers know if assistive devices are available (e.g., wheelchairs, accessible checkout features)
- learn how to use and explain any assistive devices your organization provides

Support Persons

Organizations must welcome support persons who are there to assist customers. Support persons may assist a person with a disability with a variety of tasks, including but not limited to communication, mobility, personal care, medical needs or access to goods and services. The individual and their [support person](#) must be allowed to remain together. If an admission fee is required for the support person to enter, advance notice must be provided.

What can you do to meet this requirement?

Support persons assist individuals with disabilities in accessing services and making informed decisions. Staff should understand their role, communicate directly with the customer and ensure privacy, dignity and respectful engagement.

- always speak directly to the customer, not the support person
- ask for consent before discussing private matters in front of a support person
- avoid charging fees for support persons whenever possible and provide advance notice if a fee must be charged
- train staff to understand and respectfully engage with support persons

Service Animals

Organizations must allow [service animals](#). A service animal is any working animal that is trained to meet the disability-related needs of their handlers. A service animal might wear a harness or vest. Many, but not all handlers carry documentation, such as a letter from a health professional or service animal trainer, which states that they require the animal because of a disability-related need.

A service animal handler is never required to disclose any personal diagnosis or health information.

Organizations must allow service animals in all areas open to the public, unless the animal is out of control or poses a health or safety risk.

Organizations must ensure that staff are trained to interact respectfully with individuals accompanied by service animals. Training should include recognizing service animals, understanding when it is appropriate to ask questions and knowing how to respond to accessibility-related feedback. A feedback process should be in place and communicated to the public.

What can you do to meet this requirement?

Service animals support people with disabilities by helping them access services safely and independently. Staff should understand how to interact respectfully, maintain safety, and clearly communicate policies to ensure a welcoming and inclusive environment.

- never touch, feed or distract a service animal
- animals must remain under the handler's control and always issue respectful warnings if needed
- communicate clearly and state that service animals are welcome
- train staff on the role of service animals and how to interact respectfully

Maintaining the Built Environment and Notice of Temporary Disruptions

Organizations must ensure that existing accessibility features in the [built environment](#), including ramps, automatic doors and elevators are maintained and functioning as intended. These features are essential for providing barrier-free access to goods and services. Organizations are required to let the public know when an existing accessibility feature is unavailable. If a feature is unavailable, an organization must let the public know why it is unavailable, when the feature is expected to be operational again and provide alternate ways to access goods or services in the meantime.

What can you do to meet this requirement?

A well-organized and hazard-free environment helps everyone, especially those using mobility aids, access services safely and comfortably.

- keep entryways and aisles clear of clutter to allow easy navigation for everyone, including those using mobility aids
- arrange furniture and displays to provide sufficient room for customers using assistive devices such as wheelchairs, walkers or scooters
- keep indoor floors clean and dry and ensure outdoor areas including ramps and walkways are regularly cleared of snow, ice and other hazards to support safe and easy access
- if a feature such as an automatic door or elevator breaks down, arrange for repairs as soon as possible.

Feedback Mechanisms

Organizations must provide the public with an opportunity to share feedback, including complaints or questions about their accessible customer service policies and practices. The organization must also document any feedback received, related responses and actions taken. An organization must provide this documentation to the person who provided the feedback, upon request.

What can you do to meet this requirement?

Feedback helps organizations improve accessibility and customer service. Under the Accessible Customer Service Standard Regulation, businesses must offer accessible ways for customers to share feedback, document responses and make this information available upon request.

- clearly communicate that feedback on accessible customer service is welcomed and encouraged
- record all feedback received, along with any actions taken or responses provided

- make feedback records available to the person who provided the feedback and available in accessible formats, upon request
- train staff and volunteers to ensure the organization understands how to receive, document and respond to feedback respectfully and appropriately
- train staff and volunteers on what to do if a person is having difficulty accessing the organization's goods and services.

Documentation of Policies and Practices

Public sector organizations and other large employers, [defined under Section 11.4](#) of the Accessible Customer Service Standard Regulation, are required to document their policies, practices and measures for providing accessible customer service, including a summary of training content and when training is provided. They must also let the public know that these documents are publicly available. This can include posting the documents on the organization's website or in another visible place where the individual can easily access the documents.

If a person with a disability makes a request to get a copy of the organization's accessible customer service policy, the organization must provide the document to the person within a reasonable amount of time and, upon request, in an accessible format. The organization is not allowed to charge a fee for providing the document.

What can you do to meet this requirement?

Although the Accessible Customer Service Standard Regulation places policy documentation requirements on certain organizations, it is considered a best practice for all organizations to have written accessible customer service policies. Having a documented policy let staff and volunteers know that they are expected to provide barrier-free customer service and also supports organizational compliance with regulatory requirements.

- let customers know accessible customer service policies and practices are available and let them know how to view the documents
- post policies and practices on public facing websites or in another visible place where customers can easily access the documents
- write policies in clear, plain language to ensure they are understandable to customers
- provide policies and practices documentation in [alternate formats](#) for customers, upon request
- ensure staff respond promptly and respectfully to any requests for accessible formats
- keep accurate records of training content, delivery timelines and any updates to accessible customer service policies and practices and ensure the public facing documentation remains current

- actively seek feedback on policies and practices from customers with disabilities to identify barriers or improvements to services

Training for Staff, Volunteers and Training Documentation

Under the Accessible Customer Service Standard Regulation all organizations are required to ensure their employees and volunteers complete accessibility training on the regulated standard as soon as possible, or when there have been updates to the organization's accessibility measures, policies or practices.

Training on the Accessible Customer Service Standard Regulation must be provided to any employee or volunteer who interacts with the public or with other organizations in Manitoba, or who is involved in developing accessible customer service policies and procedures for their organization.

This training must address and include a review or overview on:

- The Accessible Customer Service Standard Regulation
- The Accessibility for Manitobans Act
- The Human Rights Code
- Any internal organizational policies and practices

Training for employees and volunteers must include how to respectfully and effectively interact with individuals who experience barriers to accessibility. This includes how to engage with people who use assistive devices, how to address support people or individuals with service animals. Staff and volunteers should also be familiar with procedures for assisting individuals who are having difficulty accessing goods or services, ensuring a dignified and supportive experience.

Public sector organizations and other large employers, defined under [Section 11.4](#) of the Accessible Customer Service Standard Regulation, must document their accessibility training plans and make them publicly available.

What can you do to meet this requirement?

Effective accessibility training empowers employees and volunteers to provide accessible customer service.

- ensure staff and volunteers who interact with the public or other organizations, or are involved in developing accessible customer service policies and procedures complete customer service training and discuss how it applies to the organization
- create a safe space for questions and feedback during training to encourage honest conversations about accessibility
- feature the voices and stories of people with lived experiences to highlight the real-world impact of accessibility barriers

- train staff on how to use any assistive devices and accessibility features that your organization offers
- make accessibility training part of onboarding and keep training plans updated

Accessible Public Events

Public sector organizations must make [public events](#) accessible. This includes providing notice of the event in an accessible format. The event must be held in an accessible meeting space. The physical and communication needs of attendees with disabilities must be met and any requested supports must be provided.

Public events include public meetings, hearings and consultations.

What can you do to meet this requirement?

- Planning accessible public events ensures everyone can participate fully and comfortably.
- use plain language to promote the event
- let people who may attend the event know that the organization is committed to meeting the physical and communication needs of attendees, upon request
- offer event materials in accessible formats upon request
- let attendees know about any pre-arranged accessibility accommodations in event notices (e.g., [American Sign Language](#) (ASL), closed captioning, wheelchair access)
- choose an accessible event location free of barriers with accessible washrooms and clear signage
- ensure space for mobility devices and offer accessible feedback options
- train staff and volunteers on accessibility accommodations, emergency procedures and how to provide assistance to people with disabilities

Creating Accessibility for Customers

This section focuses on the practices that organizations and their employees can take to create accessible customer service for their customers.

Practices covered:

1. Check Your Assumptions
2. Offer Assistance
3. Listen to Your Customers
4. Focus on Barriers, Not on Disabilities
5. Types of Barriers

Check Your Assumptions

Never judge a person's abilities based on appearance alone. Disabilities come in many forms and many are not visible. For example, someone may have difficulty hearing and require a [sign language interpreter](#) or they may live with asthma, memory challenges or chronic pain, none of which are immediately apparent.

Making assumptions can lead to exclusion. Instead, approach each customer with openness and respect. Always be prepared to offer support tailored to their individual needs.

Accessibility begins with awareness. Recognizing where barriers may be present and taking steps to remove them is a vital step toward creating inclusive environments.

Offer Assistance

If a customer is having trouble accessing goods or services, do not hesitate to help. A warm, respectful attitude and the simple gesture of asking, "How can I help?", can go a long way in making someone feel welcome and supported. Even if the customer declines the offer, they will likely appreciate the effort.

Proactive offers of help communicate a commitment to accessibility, inclusion and ensure customers that goods and services are available to everyone.

Remember, great customer service is not just about solving problems, it is about creating an environment where everyone feels valued, respected and empowered.

Listen to Your Customers

Accessibility is not one-size-fits-all. Every customer is unique and the best way to meet their needs is to ask, listen and adapt. Customers are the experts on their own experiences. What works well for one person may not work at all for another.

Encourage feedback and be open to suggestions. Often, the solution is simple and easy to implement and a willingness to accommodate will be genuinely appreciated. Even small adjustments can make a big difference in someone's ability to access goods and services on an equal basis.

Focus on Barriers, Not Disabilities

A barrier is anything that interacts with a disability in a way that may hinder a person's full and effective participation in society on an equal basis. Most barriers are not intentional and arise because the needs of people with disabilities are not considered from the beginning. For example, Mike has low vision. He is given a book with a font size that he cannot read. Mike's low vision is not the barrier. The small print size is the barrier. If Mike had a book with larger print, he would be able to read the material.

While most barriers have not been set up on purpose, awareness is critical to ensuring everyone has equal access to goods and services.

Types of Barriers

An accessibility barrier is anything that limits or prevents a person from being able to receive information, services and goods, or access to spaces or activities.

Physical Barriers

There are assumptions of what a physical or structural barrier may be, for example steps, curbs or narrow passageways. Heavy doors or doorknobs, versus levers, are also structural barriers that affect many people for various reasons and disabilities. It is important to incorporate [universal design](#) when considering the build of new spaces.

Information and Communication Barriers

Barriers to information and communication are easy to miss, if they do not affect you, but are present in almost every aspect of daily life.

Barriers to information and communication occur when not everyone can understand or access the message being delivered.

For example, in-person communication may be especially important in situations where a location is noisy, such as a busy reception area or construction site—and a person is hard-of-hearing or experiences anxiety. In these cases, face-to-face communication allows for the use of visual cues like facial expressions, gestures, or lip reading, which can help ensure the message is clearly understood and reduce stress for the individual.

Technology Barriers

Technology can enhance access by offering alternative ways for participation and tools that address barriers. For example, computers now allow people to have online work accommodations, which addresses some forms of anxiety and physical mobility barriers.

Use of or reliance on technology can also create disabling barriers. For example, an organization that only allows customers to contact the organization or provide feedback through an online contact form may exclude people who face barriers that prevent them from using a computer.

Systemic Barriers

Barriers are systemic when they are a result of an organization's policies or usual practices. For example, a store policy that requires that customers bag their own groceries is a systemic barrier, as not all customers are physically able to do so.

Organizations can often remove systemic barriers by being willing to make changes to a rule, policy or practice in order to accommodate a person who is experiencing a barrier.

Attitudinal Barriers

Attitudinal barriers result when people think and act based on false assumptions. For example, a bank teller would be wrong to think a client who is unable to express herself verbally cannot make a financial decision. Breaking myths and stereotypes is the first step to creating the foundation of a fully inclusive society.

Attitudes are the greatest barrier of all. With the right attitude, most barriers can be avoided.

Compliance and Enforcement

[Manitoba's Accessibility Compliance Secretariat](#) is responsible for compliance with The Accessibility for Manitobans Act and its regulated accessibility standards

The Accessibility Compliance Secretariat conducts accessibility audits to ensure that Manitoba organizations are meeting the requirements as outlined in the Accessible Customer Service Standard Regulation. These audits help to identify compliance gaps and promote continuous improvement in accessibility practices.

The Accessibility Compliance Secretariat also plays a key role in enforcement. It actively receives and reviews complaints, concerns and questions from members of the public who believe an organization may not be complying with accessibility standards. These complaints are taken seriously and may trigger further investigation or corrective action.

Together, these mechanisms help uphold the principles of accessibility and ensure that services are inclusive and equitable for all Manitobans.

When audits and inspections are conducted, the aim is to provide organizations with constructive feedback and to share information about the regulation as well as free tools to assist organizations to comply.

If this approach is ineffective, activities may be escalated to include sanctions, such as orders to resolve accessibility violations and administrative monetary penalties.

Compliance Dates

The Accessible Customer Service Standard Regulation was enacted in November 2015 and came into force for all obligated Manitoba organizations on November 1, 2018. Compliance with the regulation was a phased approach with different compliance deadlines for sectors.

The Manitoba government was the first organization to be required to comply with the Accessible Customer Service Standard Regulation. The deadline for compliance was November 1, 2016, for the Manitoba government.

Government agencies, health authorities, cities, universities, colleges and school divisions were required to comply by November 1, 2017.

All other organizations that meet both of the following criteria were required to comply by November 1, 2018. This includes:

- an organization that provides goods or services directly to the public or to another Manitoba organization, and
- has one or more employee in Manitoba

Accessible Customer Service Tools and Resources

Additional resources related to the Accessible Customer Service Standard Regulation are available on the [Manitoba Accessibility Office website](#).

Glossary Terms

Accessible Customer Service Standard Regulation

A regulated accessibility standard under The Accessibility for Manitobans Act. The Accessible Customer Service Standard Regulation addresses policies, practices and training to provide better customer service to people with disabilities.

Accessibility

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

American Sign Language

Like English, American Sign Language (ASL), is a language with its own vocabulary, sentence structure, grammar and rules. It is used throughout Canada and the United States. It is a true language, used primarily by ASL users as well as interpreters to provide equal access to communication. The Manitoba government also recognizes Quebec Sign Language (LSQ) and Indigenous Sign Languages used across Canada.

Accessible or Alternate Formats

Information provided or presented in another manner than originally presented to remove a barrier. This can include large print, recorded audio and electronic formats, Braille and other formats usable by people with disabilities.

Assistive Devices

Assistive devices refer to tools, technologies or equipment used by individuals with disabilities to help them perform tasks, access services or communicate more effectively. These devices support independence and remove barriers in customer service environments. Some examples of assistive devices include wheelchairs, walkers, canes, hearing aids, FM systems, screen readers, magnifiers, communication boards, speech-generating devices and adaptive computer hardware or software.

Barriers

A barrier is anything that interacts with a disability in a way that may hinder a person's full and effective participation in society on an equal basis.

Built Environment

The built environment encompasses all physical elements of a space, such as entrances, washrooms, hallways and meeting rooms. Under the Accessible Customer Service Standard, the built environment must be maintained and available for use as intended. If a feature that removes barriers is not available, notice must be provided. This notice must include information on why the

feature is not available, when the feature will be operational once again and alternate means to access goods or services.

Communication

The transfer of information between two or more persons or entities or any combination of the two.

Public Event

A public event includes a public meeting, hearing or a legally required consultation process. The Manitoba government, universities and colleges, health authorities, cities and school divisions are all required to make any hosted public events accessible according to the Accessible Customer Service Standard.

Reasonable Accommodations

Reasonable accommodations refers to adjustments or modifications to ensure that people with disabilities or other protected characteristics, such as age or race, have equal opportunities and are not discriminated against. These accommodations are meant to remove barriers and provide necessary support so that individuals can have equal access to goods and services.

Service Animal

Defined by The Human Rights Code (Manitoba), a service animal is trained to assist a person with a disability. The work or task a service animal performs must be directly related to a person's disability. Animals that provide comfort and companionship, but are not trained to assist with a person's disability, are not service animals.

Sign Language Interpreter

A sign language interpreter is a person who translates from English to sign language, using gestures and physical expressions. Interpreter services are critical to ensure accurate communication between individuals who are Deaf and hearing people who do not use sign language.

Support Person

A support person is someone who accompanies a person with a disability and aids when required. They will support the individual with a disability in obtaining, using or benefiting from a good or service provided by an organization. They may also assist the individual with a disability in addressing their communication, mobility, personal care or medical needs.

Undue Hardship

Undue hardship is related to the concept of reasonable accommodation. Reasonable accommodation requires organizations to take responsibility for an accommodation, including bearing the costs up to the point of demonstrable undue hardship. Undue hardship may be met when there are extreme costs or significant health and safety risks to provide an accommodation. Inconvenience, preferences or some costs do not usually qualify as undue hardship.

Universal Design

Universal design refers to making things safer, easier and more convenient for everyone. It involves a broad range of design concepts including design of products, spaces and environments, to provide access in a way that respects all abilities.

Contact Information

If you have any questions or require this information in an alternate format, please contact the Manitoba Accessibility Office:

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