

CF Polo Park

Accessibility Policy

In Compliance with

The Accessibility for Manitobans Act

&

Accessible Customer Service Standard Regulation

May 2024

TABLE OF CONTENTS

Accessibility Policy	Error! Bookmark not defined.
1.0 Policy – Purpose and Scope.....	3
2.0 Definitions	3
3.0 CF Polo Park Statement of Commitment to Accessibility	4
4.0 Accessible Customer Service Policy	4
4.1 Communicating with People with Disabilities	4
4.2 Assistive Devices	5
4.3 Service Animals	6
4.4 Support Persons	7
4.5 Notification of Disruptions in Service.....	7
5.0 Information and Communication Policy.....	10
5.1 Website Accessibility.....	11
5.2 Availability of Information in Alternate Format	11
6.0 Employment Policy	11
6.1 Workplace Emergency Response Information.....	11
6.2 Individualized Emergency Response Plans for Cadillac Fairview Employees.	12
7.0 Training	12
8.0 Customer Service Feedback Process	12
10.0 Emergency Preparedness	13
11.0 Communication Plan and Availability of this Policy	14
12.0 Review Process.....	15

CF Polo Park

Accessibility Policy

1.0 Policy – Purpose and Scope

This policy, which has been established in accordance with The Accessibility for Manitobans Act (AMA), addresses the first of five key areas of daily living to establish CF Polo Park's "Customer Service Accessibility Standard."

The purpose of this policy is to understand and identify accessibility provisions required to ensure equal treatment for all people under the Human Rights Code through the AMA

2.0 Definitions

"Disability" means:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness, or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety.

The above includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

Information about any person's disability is personal and private and must be treated confidentially.

“Barrier”

For a person who has a physical, mental, intellectual, or sensory disability, a barrier is anything that interacts with that disability in a way that may hinder the person's full and effective participation in society on an equal basis.

examples of barriers:

- (a) a physical barrier.
- (b) an architectural barrier.
- (c) an information or communications barrier.
- (d) an attitudinal barrier.
- (e) a technological barrier.
- (f) a barrier established or perpetuated by an enactment, a policy, or a practice.

3.0 CF Polo Park Statement of Commitment to Accessibility

In fulfilling our mission, CF Polo Park always strives to provide its goods and services in a way that respects the dignity and independence of people with disabilities. CF Polo Park is committed to giving people with disabilities the same opportunity or reasonable alternative to access our goods and services and allowing them to benefit from the same or similar services, in the same place and in a similar way as other visitors.

It is the policy of CF Polo Park to promote accessibility for people with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness, and equality of opportunity.

CF Polo Park is committed to compliance with AMA and its accessibility standards established by regulation. We shall provide accessibility and accommodation for persons with disabilities through AMA's customer service standard regulation and in accordance with the requirements of the Human Rights Code.

4.0 Accessible Customer Service Policy**4.1 Communicating with People with Disabilities**

CF Polo Park shall take reasonable steps to communicate with persons with disabilities in ways that take into account their disability and accessibility needs.

CF Polo Park shall also ensure that all staff, volunteers, and others dealing with the public on behalf of CF Polo Park are properly trained in how to communicate with visitors with various types of disabilities.

4.2 Assistive Devices

For the purposes of this policy:

“Medical aid” means: An assistive device including respirators and portable oxygen supplies.

“Mobility assistive device” means: A cane, walker, or similar aid.

“Personal Assistive Devices” means: Any aids including communication, cognition, personal mobility, medical or technical aids that are used to increase, maintain, or improve the functional abilities of persons with disabilities. Assistive devices include, but are not limited to: wheelchairs, walkers, speech synthesizers, TTYs (Telephone Typewriters or Telephone Teletypes), computer technologies, canes and hearing devices.

CF Polo Park is committed to serving people with disabilities, who use assistive devices to obtain, use or benefit from its goods and services.

People with disabilities are permitted and encouraged to use their own personal assistive devices to access our facilities and goods and services. Assistive devices such as communication aids, cognition aids, personal mobility aids and medical aids are allowed to be used at all our facilities where access is possible at the venue.

CF Polo Park will ensure the public is informed of any and all assistive devices that are available for their use while at CF Polo Park including wheelchairs and strollers.

All accessibility devices are free to use and include, manual wheelchairs, electric mobility scooters, walkers and power chairs, (require a refundable credit card deposit with valid id). All devices can be located at the Guest Services office, located on the lower level, east wing, between centre court and entrance # 4.

Please note, device quantity is limited, and are available on a first come first serve basis.

CF Polo Park will also ensure the public is informed of accessibility features available for their use while at CF Polo Park including elevator and accessible washroom locations.

CF Polo Park shall also ensure that staff knows how to use assistive devices that are available to customers of CF Polo Park and where to locate elevators and accessible washrooms within the facility.

CF Polo Park shall also ensure that all staff and agents serving the public on behalf of CF Polo Park are properly trained and familiar with various assistive devices that may be used by customers with disabilities while accessing its goods and services.

4.3 Service Animals

For the purposes of this policy a:

“Guide Dog” means: A guide dog as defined in section 1 of the *Blind Persons Rights’ Act*.

“Service Animal” means: An animal that is of service to a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability. Verification of a service animal’s status can be provided by way of government certification or by a letter from a physician or nurse confirming the animal is required for reasons relating to the disability. It is *“readily apparent”* that an animal is a service animal when it is obvious by its appearance or by what it is doing. For example, it may be readily apparent that an animal is a service animal if it is wearing a harness, saddle bags, a sign that identifies it as a service animal or has a certificate or identification card from a service animal training school. It may also be readily apparent if a person is using the animal to assist him or her in doing things, such as opening doors or retrieving items.

A visitor to CF Polo Park is permitted to be accompanied by his or her guide dog or other service animal within all areas of CF Polo Park except where areas are restricted to employees or prohibited by law.

Example: Animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold, or offered for sale. It does make an exception for service dogs to allow them to go where food is normally served, sold, or offered for sale.

There may be rare circumstances where, for the reasons of health and safety of another person, allowing a person with a disability to enter a premises and be accompanied by

their service animal needs to be considered. In the rare situation where another person's health and safety could be seriously impacted by the presence of a service animal on premises open to the public, CF Polo Park's Acting Manager, John Kabaluk, Security & Life Safety shall be immediately notified. The Manager, Security & Life Safety shall fully analyze all options for safely allowing the service animal and must consider all relevant factors and options in trying to find a solution that meets the needs of both individuals.

4.4 Support Persons

For the purposes of this policy a:

“Support Person” means: Any one person who accompanies a person with a disability in order to help that individual with communication, mobility, personal care or medical needs or with access to goods or services.

A support person may assist a person with a disability in using the washroom or change room or assist a person with speech impairment to facilitate communication. A support person may be a paid professional, a volunteer, a family member or friend of the person with a disability.

A visitor to CF Polo Park is permitted to be accompanied by his or her support person in order to access our goods and services. At no time shall a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on CF Polo Park premises.

4.5 Notification of Disruptions in Service

Persons with disabilities often rely on specific facilities and services at CF Polo Park and as such, disruption in their operations may negatively affect the customer experience while visiting the Centre. Elevators, Personal Elevating Devices, Perimeter Access, Barrier Free Washrooms, Water, and Heating & Air-conditioning are among those services and as such; disruption in their operations must be communicated appropriately.

All CF Polo Park administration staff, customer service and building operations personnel will be informed immediately upon identifying that one of the above facility services are disrupted.

4.5.1 Notice of a Planned Service Disruption to Base Building Accessibility Services

- 1) Internal Department heads for Operations and Security & Life Safety shall notify of any planned or future disruptions in advance of 7 days.
- 2) Members of Operations, Security & Life Safety or Guest Services shall notify Tenants by way of e-mail and / or written memorandum of the disruption.
- 3) The tenant communication shall contain the following information.
 - i) How long the disruption is expected to last.
 - ii) What alternative facilities or services exist.
- 4) Individual tenants will communicate internally to its staff and advise staff to contact stakeholders and clients scheduled for appointments about the service disruption as applicable.
- 5) As a general rule, planned disruptions shall be communicated to affected tenants in advance of seven days. Tenant contacts are responsible for their respective internal communications.
- 6) Upon restoration of the service members of Operations, Security & Life Safety or Guest Services shall notify the tenant contacts via email or written memorandum and advise that the service disruption has ended.
- 7) CF Polo Park shall notify the public in advance of any planned service disruptions, by way of posting on the property's website any planned or future work that may affect these services and posting signage at the entrances closest to facility affected by the planned disruption. Notice should include:
 - i) the reason for the disruption (Escalator is temporarily unavailable due to seasonal maintenance).
 - ii) its anticipated duration (The escalator is expected to be available for use on (date).
 - iii) a description of alternative facilities or services if available (If you have accessibility needs, please use the elevator located at [indicate location]).
 - iv) For questions or concerns, please contact 204-784-2501

4.5.2 Notice of an Unplanned (Unexpected or Emergency) Disruption to Base Building Accessibility Services

Once an unplanned disruption of base building services has been identified, notice should be provided as soon as possible to ensure timely notification to Tenant Contacts.

- 1) CF Polo Park's Internal Department Heads are to notify Manager, Security & Life Safety and Operations Manager of any unplanned disruptions.
- 2) The Members of Operations, Security & Life Safety or Guest Services shall notify Tenant Contacts by way phone and/or written communication.
- 3) The tenant communication and / or Emergency Notification System message shall contain the following information.
 - v) How long the disruption is expected to last.
 - vi) What alternative facilities or services exist.
- 4) Individual tenants will communicate internally to its staff and advise staff to contact stakeholders and clients about the service disruption as applicable.
- 5) Upon restoration of the service disruption Members of Operations, Security & Life Safety or Guest Services shall notify the tenant contacts via email or written memorandum and advise that the service disruption has ended.

4.5.3 Tenant Service Disruption – Isolated to specific Tenant / Floor

- 1) CF Polo Park's Tenant or applicable representative to notify Operations Manager and/or Manager, Security & Life Safety of the disruption.
- 2) Manager, Security & Life Safety to begin investigation to determine if the service disruption is isolated or building wide.
- 3) If the disruption is identified as being isolated, tenant notifications shall be made to the affected areas by way of email or written memorandum.
- 4) The tenant communication and / or Emergency Notification System message shall contain the following information:
 - vii) How long the disruption is expected to last.
 - viii) What alternative facilities or services exist.

- 5) If the disruption affects the tenant's capability of conducting business, Operations Manager and / or Manager, Security & Life Safety shall also provide notification within the Common Area of the affected devices with the intent of notifying visitors of the disruption prior to attending the tenant suite.
- 6) Individual tenants will communicate internally to its staff and advise staff to contact stakeholders and clients scheduled for appointments about the service disruption as applicable.
- 7) Upon restoration of the service disruption, the Manager, Security & Life Safety shall notify the tenant contacts via email or written memorandum and advise that the service disruption has ended. All applicable signage shall be removed at such time.
- 8) CF Polo Park will inform members of the public who are on-site of any unplanned disruptions in the following ways:
 - Facilities and Service disruptions will be posted on the CF Polo Park website; <https://shops.cadillacfairview.com/property/cf-polo-park>
 - Signage will be posted at all public exterior entrances to the mall.
 - Signage will be posted in the interior of the mall where customers may have entered through stores that have public exterior entrances.

5.0 Information and Communication Policy

For the purposes of this policy an:

"Accessible Communication Supports" means: Captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

"Accessible Formats" means: large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

"Extranet website" means a controlled extension of the intranet, or internal network of an organization to outside users over the Internet.

"Internet website" means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

“Intranet website” means an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.

“New internet website” means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

“New intranet website” means either an intranet website with a new domain name or an intranet website with an existing domain name undergoing a significant refresh.

5.1 Website Accessibility

Beginning January 1, 2014, any new website design, new internet website or intranet website, or web-based applications that Cadillac Fairview controls directly or through a contractual relationship that allows for modification of a product will also conform to W3C WCAG 2.0 Level A.

5.2 Availability of Information in Alternate Format

CF Polo Park information will be made available to the public in an accessible format or via accessible communication support upon request. Timeframes for providing these formats will be dependent upon the format requested but will be provided as soon as is practicable.

6.0 Employment Policy

Accommodation **shall** be provided to applicants selected to participate in assessment or selection process, upon request. Suitable accommodation **shall** be provided in manner that takes applicant’s accessibility needs.

Successful applicant **shall** be informed of availability of accommodation and **shall** be provided with accommodation policy when making offer of employment.

6.1 Workplace Emergency Response Information

Workplace Emergency procedures, plans and safety information will be made available to CF Polo Park staff in an accessible format or via accessible communication support

upon request. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable.

6.2 Individualized Emergency Response Plans for Cadillac Fairview Employees

CF Polo Park's staff with disabilities that may require assistance in an emergency situation are encouraged to identify their accessibility needs to their immediate supervisor so that individualized emergency accommodation plans can be created. Individualized plans will be created using the company's template. The emergency response plan may include other employees assisting the person with the disability. With the consent of the employee requesting assistance, the emergency response plan shall be shared with individuals designated to provide assistance. This information will be maintained confidentially.

7.0 Training

In maintaining CF Polo Park's commitment in ensuring the "customer experience" to all visitors, a training program will be initiated for all customer service and security personnel. The training program is internet based and provides information on providing assistance to persons with various disabilities.

CF Polo Park will maintain ongoing training with all employees on an as needed basis.

8.0 Customer Service Feedback Process

In ensuring the CF Polo Park maintains the highest level of service to visitors; a process of receiving customer service feedback has been established.

Upon receipt of any complaint, the employee receiving the complaint shall immediately forward it to the Manager, Security & Life Safety. An initial response will be made as soon as possible, normally within three business days acknowledging receipt and that the complaint is being reviewed. CF Polo Park will take into account a person's accessibility needs when communicating, receiving and/or responding to the complaint.

Corporate Communications is available to provide support if additional assistance is required. In such cases, please contact **Corporate Communications @ [416-598-8200](tel:416-598-8200)**.

All inquiries, customer feedback and complaints may be submitted in one of the following ways:

In person (Orally): CF Polo Park, Guest Services Centre, east wing, located between centre court and entrance # 4

Monday – Friday	10:00am – 9:00 pm
Saturday	10:00am – 6:00pm
Sunday	11:00am – 6:00pm

By telephone: CF Polo Park
Guest Services
204-784-2501

In writing: CF Polo Park,
Administration Office
233-1485 Portage Avenue
Winnipeg, MB
R3G 0W4

Electronic Mail: polguestservices@cadillacfairview.com

Customers with disabilities are welcomed to provide feedback in any manner deemed most convenient. Responses to feedback received from customers with disabilities will be provided in alternate formats or alternate communication supports upon request.

10.0 Emergency Preparedness

Management of incidents involving persons with disabilities is covered in the respective property Emergency Response Plan, and in case of fire, under the specific Fire Response Plan. These plans describe the operational and personnel requirements for assisting persons with disabilities and their support parties or animals.

10.1 Emergency Procedures, Plans and Public Safety Information

Emergency procedures, plans and public safety information that are available to the public, including any relevant updates, will be made available to the public and in an accessible format or via accessible communication support upon request. Timeframes

for provision of this information will be dependent upon the format requested but will be provided as soon as is practicable.

CF Polo Park staff will be trained in emergency response policies and procedures as they relate to people with disabilities, including how to communicate emergency information, how to offer evacuation assistance to people with disabilities and how to identify accessible and safe evacuation routes.

In addition to the existing plans, it is prudent to maintain some basic equipment on site that may be of use to persons needing assistance because of disabilities.

Site specific equipment includes:

- a) Manual Wheelchairs
- b) Powered chairs
- c) Electronic Walkers
- d) Electronic mobility scooters
- e) Writing materials

11.0 Communication Plan and Availability of this Policy

CF Polo Park shall notify the public of the availability of these policies and procedures and of our compliance with Accessible Customer Service Standard Regulation.

Therefore, if any person requests a copy of this policy, we will provide a copy taking into account the person's accessibility needs. This may include, but is not limited to, using the following formats:

- Large print, Braille,
- Audio format such as CD or digital audio format.
- Easy-read, simplified summaries of materials.

CF Polo Park has its own provider for alternate formats. To arrange for alternate formats for this policy for people with disabilities upon request, please contact:

Guest Services

Tel. 204-784-2501

Email: polguestservices@cadillacfairview.com

A copy of this policy will also be posted on the CF Polo Park website

<https://shops.cadillacfairview.com/property/cf-polo-park> in an accessible format (i.e. accessible PDF)

12.0 Review Process

At minimum, this policy will be reviewed annually by appropriate CF Polo Park staff.

LAST UPDATE: May 2024

RESPONSIBLE DEPT: CF Polo Park Administration





