

PALADIN SECURITY GROUP – POLICY & PROCEDURE

Accessible Customer Service Policy

(In compliance with The Accessibility for Manitobans Act - Customer Service Standard Regulation)

PALADIN SECURITY GROUP – MANITOBA OPERATIONS

Policy Date: October 2018

Last Revised: June 2026

Approved By: Karen Nicastro, Director, People & Culture

Distribution: All Paladin employees within Manitoba

1. Purpose

Paladin Security is committed to providing accessible customer service in accordance with the **Accessibility for Manitobans Act (AMA)** and the **Accessible Customer Service Standard Regulation**. This policy outlines the practices and measures Paladin Security uses to ensure that all members of the public, including persons with disabilities, can access our services in a manner that respects their dignity, independence, integration, and equal opportunity.

As a contract security company operating in safety-sensitive environments, Paladin must also ensure that accessibility accommodation does not create hazards or compromise the safety of employees, contractors, clients, or the public.

This policy applies to all employees, supervisors, managers, contractors, and volunteers working in Manitoba.

2. Introduction

Paladin Security is committed to removing barriers wherever possible. When a barrier cannot be removed, we seek to provide alternate ways for individuals to access our services.

Our approach is guided by:

- Dignity
- Independence
- Integration
- Equal opportunity
- Safety for all people at client sites

3. Meeting Communication Needs

Policy Statement

We meet the communication needs of clients, visitors, and members of the public, including persons with disabilities.

Practices and Measures

- We offer alternative communication methods such as writing information down, reading information aloud, or taking additional time to explain details.
- We maintain paper, pens, and accessible seating for longer conversations.
- We provide quieter spaces when possible.
- We use plain language and clear signage.
- All publications include: *"This publication is available in alternate formats upon request."*
- We provide accessible formats or communication supports upon request.

4. Accommodating Assistive Devices

Policy Statement

We accommodate the use of assistive devices when individuals access our goods, services, or facilities.

Practices and Measures

- We do not touch or move a person's assistive device without permission.
- We maintain and train staff on assistive devices available on-site, such as:
 - Automatic doors
 - Doorbells
 - Video captioning (where applicable)
- If an assistive device presents a significant and unavoidable safety concern, we work with the individual to find alternative ways to provide service.

5. Welcoming Support Persons

Policy Statement

We welcome support people and ensure individuals have access to their support persons at all times.

Practices and Measures

- We address the client directly unless they request otherwise.
- We make space for support persons at all public-facing locations.
- We do not charge service fees to support persons.

- Any exceptions or site-specific limitations are communicated in advance.

6. Allowing Service Animals

Policy Statement

We allow service animals in all areas open to the public. By definition, a “service animal” means an animal that has been trained to provide assistance to a person with a disability that relates to that person's disability.

Practices and Measures

- We treat service animals as working animals and do not distract them.
- We identify service animals by harness, vest, or observed assistance.
- If it is unclear that an animal is a service animal, staff may ask whether the animal is trained to assist with a disability-related need, and the type of assistance it provides.
- We do not inquire about the individual's disability.
- If a service animal is not under control, we may ask the handler to correct the behavior or leave.
- If prohibited by law (e.g., sterile areas), we offer alternative service arrangements.

7. Maintaining Accessibility Features

Policy Statement

We maintain accessibility features to ensure barrier-free access to our services.

Practices and Measures

- We keep hallways, entrances, and reception areas clear of clutter.
- We maintain clear pathways for mobility devices.
- We ensure entrances are free of ice and snow.
- We use both audio and visual cues where applicable.
- When a location is not accessible, we provide service in alternative ways (e.g., meeting at an accessible entrance or alternate location).

8. Notifying the Public of Accessibility Feature Disruptions

Policy Statement

We notify the public when accessibility features are temporarily unavailable.

Practices and Measures

- We post notices explaining the disruption, reason, duration, and alternatives.
- Notices may be posted:
 - At entrances
 - On our website
 - At reception or security desks
- We work with individuals to find alternative ways to provide service.

9. Welcoming and Responding to Feedback

Policy Statement

We welcome feedback on the accessibility of our services and respond promptly.

Practices and Measures

- Feedback may be provided:
 - In person
 - By phone
 - By email
 - Through our website
- Paladin Security documents any actions it takes in response to feedback received on accessible customer service and, upon request, makes that documentation available in a manner suitable for persons disabled by barriers.
- Feedback is directed to the Manitoba Branch Management Team, who determine required actions.
- Feedback can be given to #1420 - 220 Portage Ave., Winnipeg, MB R3C 0A5; Phone: (204) 927-1200

10. Training Requirements

Policy Statement

We provide mandatory training on accessible customer service to all employees, contractors, and management.

Practices and Measures

Training includes:

- How to interact with people with disabilities
- How to support individuals using assistive devices, service animals, or support people
- An overview of:
 - The Accessibility for Manitobans Act
 - The Manitoba Human Rights Code
 - The Customer Service Standard

- Paladin's accessibility policies and updates
- Balancing accessibility with safety-sensitive duties

Training is:

- Provided during onboarding
- Refreshed annually
- Documented in employee files

11. Privacy of Information

Consistent with Paladin's existing accessibility and employment policies, we:

- Protect the privacy of personal and health information
- Collect only what is necessary to support accessibility needs
- Follow all applicable privacy legislation, including:
 - The Freedom of Information and Protection of Privacy Act (FIPPA)
 - The Personal Health Information Act (PHIA)

12. Safety-Sensitive Accommodation Principles

Because Paladin Security operates in safety-sensitive environments, accommodation must not compromise:

- Emergency response capability
- Radio communication
- Situational awareness
- Personal or public safety

Where an accommodation is unsafe, Paladin will:

- Work with the individual to find alternative ways to provide service.
- Document the assessment and rationale

13. Record Keeping

If requested, Paladin Security provides policy documentation related to accessible customer service in an accessible manner, within a reasonable time frame and at no cost to the individual.

We maintain written records of:

- Accessibility policies
- Training content
- Training completion dates

Policies are available to the public upon request and provided in accessible formats.

14. Review Cycle

This policy will be reviewed every two years or sooner if:

- Legislation changes
- Accessibility barriers are identified
- Feedback indicates improvements are needed

Approved By: Karen Nicastro
Director, People & Culture



Date of Next Review:
June 2028