



**Compliance Manual:  
Accessibility Standards for Customer Service,  
Ontario Regulation 429/07**

**Accessibility for Ontarians with Disabilities Act,  
2005 (AODA)**

**Ministry of Community and Social Services**

**October 2008**

## **PLEASE NOTE**

This Manual is not legal advice and should be read together with the official language of the Accessibility Standards for Customer Service, Ontario Regulation 429/07 (“the standard”) and the Accessibility for Ontarians with Disabilities Act, 2005. If there is any conflict between this Manual, the standard and the Accessibility for Ontarians with Disabilities Act, 2005, the standard and the Accessibility for Ontarians with Disabilities Act, 2005 are the final authorities.

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# Table of Contents

<b>1. Introduction .....</b>	<b>1</b>
<b>2. Quick Reference.....</b>	<b>2</b>
<b>3. Policies, Practices and Procedures .....</b>	<b>7</b>
<b>Requirements Checklist .....</b>	<b>7</b>
<b>Steps to Consider.....</b>	<b>7</b>
Step 1 List existing policies, practices and procedures.....	8
Step 2 Identify gaps.....	8
Step 3 Determine your approach to policies, practices and procedures.....	9
Step 4 Develop your new or revised policies, practices and procedures in keeping with the principles of dignity, independence, integration and equal opportunity.....	10
Step 5 Address the use of personal assistive devices and availability of other assistive measures.....	10
<b>4. Communication .....</b>	<b>12</b>
<b>Requirements Checklist .....</b>	<b>12</b>
<b>Steps to Consider.....</b>	<b>12</b>
Step 1 Think about and/or learn how people with disabilities communicate. .	12
Step 2 Consider approaches for making communication accessible.....	13
Step 3 Plan ahead.....	13
<b>5. Service Animals .....</b>	<b>14</b>
<b>Requirements Checklist .....</b>	<b>14</b>
<b>Steps to Consider.....</b>	<b>14</b>
Step 1 Identify those parts of your premises open to service animals.....	14
Step 2 Develop policies, practices, and procedures for serving people with service animals.....	15

<b>6. Support Persons .....</b>	<b>17</b>
<b>Requirements Checklist .....</b>	<b>17</b>
<b>Steps to Consider.....</b>	<b>17</b>
Step 1    Identify parts of the premises open to the public and other third parties. .....	17
Step 2    Think about how your services are used by people with support persons and provide direction on special situations and services. ....	18
Step 3    Identify any situations where you may require a support person to accompany a person with a disability. ....	18
Step 4    Develop your admission fee policy. ....	19
<b>7. Disruptions in Service .....</b>	<b>20</b>
<b>Requirements Checklist .....</b>	<b>20</b>
<b>Steps to Consider.....</b>	<b>20</b>
Step 1    Identify the facilities and services that people with disabilities rely on to use your services.....	20
Step 2    Prepare the template of a notice in advance. ....	21
Step 3    Decide how and where to provide the notice.....	21
<b>8. Training.....</b>	<b>23</b>
<b>Requirements Checklist .....</b>	<b>23</b>
<b>Steps to Consider.....</b>	<b>24</b>
Step 1    Consider who must be trained.....	24
Step 2    Determine the content of training. ....	25
Step 3    Decide on the format of training. ....	27
Step 4    Determine the timing of training.....	27
<b>9. Feedback Process.....</b>	<b>29</b>
<b>Requirements Checklist .....</b>	<b>29</b>
<b>Steps to Consider.....</b>	<b>29</b>
Step 1    Determine how to receive feedback. ....	30
Step 2    Determine how to respond to feedback, including complaints.....	30

Step 3	Determine how to make information about the process available to the public.....	30
<b>10.</b>	<b>Document Requirements.....</b>	<b>32</b>
<b>Requirements Checklist</b>	.....	<b>33</b>
<b>Steps to Consider.....</b>		<b>34</b>
Step 1	Prepare a master copy of the documents.....	34
Step 2	Identify ways to let your customers know about the documents.....	34
Step 3	Be prepared to make the required documents accessible.....	35
<b>Appendix A:</b>	<b>Barriers and Solutions .....</b>	<b>37</b>
<b>Appendix B:</b>	<b>Customer Service Policy Template .....</b>	<b>40</b>
<b>Appendix C:</b>	<b>Sample Documents for Notifying the Public about Disruptions in Service.....</b>	<b>44</b>
<b>Appendix D:</b>	<b>Sample Documents for Obtaining Feedback.....</b>	<b>45</b>
<b>Appendix E:</b>	<b>Sample Notices on the Feedback Process .....</b>	<b>47</b>
<b>Back Cover -</b>	<b>More Information.....</b>	<b>48</b>



# 1. Introduction

The **Accessibility Standards for Customer Service, Ontario Regulation 429/07**, [\[LINK\]](#) was created under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). [\[LINK\]](#) The standard came into effect on January 1, 2008. It sets out obligations for certain persons, businesses and other organizations to provide goods or services in a way that is accessible to people with disabilities in Ontario.

The standard applies to:

- Designated public sector organizations; and
- Every other person or organization that provides goods or services to the public or to other organizations (third parties) and that has one or more employees in Ontario.

Examples include stores, restaurants, bars, garages, manufacturers, wholesalers, travel agencies, provincial government ministries and places of worship.

This Manual is full of practical ideas and tips about how your organization may go about meeting the requirements of the **Accessibility Standards for Customer Service, Ontario Regulation 429/07** (referred to throughout the rest of this document as “the standard” or “the customer service standard”). The Manual includes requirements checklists and steps to consider, with suggestions on ways you might comply with the standard. The Manual is not a legal document.

The Manual should be used with the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07**. [\[LINK\]](#) The Guide explains the requirements of the standard, who must comply and the compliance dates. You will find links to sections of the Guide throughout the Manual. The Guide is not a legal document. You may wish to visit our website, [www.AccessON.ca/compliance](http://www.AccessON.ca/compliance), regularly for periodic updates to the Manual.

## Common terms in this Manual:

**Organizations** refers to persons, businesses or other organizations.

**Provider** refers to persons, businesses or other organizations that must comply with the standard.

**Staff** refers to employees, volunteers, agents and others who provide services on behalf of a provider.

**Customers** refers to people who receive goods or services.

## **Designated public sector organizations and organizations with 20 or more employees:**

Chapter 10 (Document Requirements) applies only to designated public sector organizations or other organizations with 20 or more employees. These organizations will be required to self-evaluate and certify their compliance with the standard by completing and filing an accessibility report with the Government of Ontario.

## **2. Quick Reference**

Here is a quick reference on meeting the requirements of the customer service standard. You may want to use this as a handy checklist as you review your organization's policies, practices and procedures and prepare to meet the requirements of the standard. The full text of this Manual contains many ideas and suggestions to assist your organization with compliance.

The first four points below are steps that you may begin to take now, so that when the compliance deadline arrives, your organization is ready to meet the requirements. The second set of six points summarizes additional ongoing obligations for your organization under the standard.

### **1. Establish policies, practices and procedures**

- Establish policies, practices and procedures for the provision of goods or services to people with disabilities.
- Use reasonable efforts to ensure that all your policies, practices and procedures are consistent with the principles laid out in the customer service standard (dignity, independence, integration and equality of opportunity).
- Establish a policy that deals with the use of assistive devices by people with disabilities to access your goods or services or the availability, if any, of other measures that enable them to access your goods or services.

### **2. Establish a training program and train staff**

- Design a training program that includes the following:
  - A review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
  - How to interact and communicate with people with various types of disabilities

- How to interact with people with disabilities who use an assistive device, service animal, or a support person
  - How to use equipment or assistive devices available on your premises, or that you otherwise provide, that may help with the provision of goods or services to people with disabilities
  - What to do if a person with a particular type of disability is having difficulty accessing your goods or services
  - Your customer service policies, practices, and procedures governing the provision of goods or services to people with disabilities.
- Ensure that every person who deals with the public or other third parties on your behalf receives training, whether the person is an employee, agent, volunteer or otherwise.
  - Ensure that every person who participates in developing your policies, practices and procedures governing the provision of goods or services to members of the public or other third parties receives training.

### **3. Establish a feedback process**

- Establish a process for receiving and responding to feedback about the way you provide goods or services to people with disabilities.
- Ensure your feedback process allows people to provide feedback in person, by telephone, in writing, by email, online, on disk or by another method.
- Ensure that your feedback process specifies the actions that you or your staff must take when a complaint is received.
- Make information about the feedback process readily available to the public.

### **4. Prepare documentation**

- If your organization is a designated public sector organization, or is a provider of goods or services with 20 or more employees, prepare one or more documents that include the following information:
  - Description of your customer service policies, practices and procedures on the provision of goods or services to people with disabilities. This should include a policy on the use of personal assistive devices by people with disabilities to access your goods or services and the availability of any other assistive measures you offer to enable them to do so.
  - Description of your policies, practices and procedures with respect to the entry of service animals and support persons to those areas of the

premises where you provide goods or services that are owned or operated by you and are open to the public or other third parties, including:

- When you may exclude service animals because of another law, if applicable
- Alternative measures available to enable a person with a disability to access your goods or services if an animal is excluded by law
- If admission is charged, what amount will be charged for support persons
- If, and under what circumstances, it may be necessary to require a person with a disability to be accompanied by a support person to protect the health or safety of the person with a disability or the health or safety of others on the premises.
- The steps that will be taken in connection with a temporary planned or unexpected disruption to facilities or services that people with disabilities usually use to access your goods or services, including:
  - Under what circumstances notice will be provided about a temporary disruption and where it will be posted
  - Information required by the standard to be included in the notice of a temporary disruption
  - What alternative facilities or services, if any, will be made available during the temporary disruption to continue to provide service to people with disabilities.
- Your policy on providing training on accessible customer service, including:
  - A summary of the contents of the training
  - Details of when that training is to be provided.
- Description of your process for receiving and responding to feedback on the manner in which you provide goods or services to people with disabilities, including:
  - How you will accept feedback
  - What actions you will take if a complaint is received.

## **Additional Ongoing Requirements for Compliance**

The following actions may be integrated into the way you provide goods or services in order for you to comply with the customer service standard.

### **1. Welcome service animals and support persons**

- Allow guide dogs and other service animals to accompany people with disabilities on parts of your premises that are open to the public or other third parties, except where excluded by law.
- If guide dogs or other service animals are excluded by law, provide alternate ways for people with disabilities to access your goods or services.
- Allow people with disabilities to be accompanied by a support person when on parts of your premises that are open to the public or other third parties.
- Provide notice in advance about what admission fee will be charged for support persons, if applicable.

### **2. Provide notice of temporary disruption**

- Provide notice to the public when there is a temporary disruption (planned or unexpected) of facilities or services that are usually used by people with disabilities to access your goods or services.
- Include information in the notice about the reason for the disruption, its duration and a description of alternative facilities or services, if available.
- Place the notice in an obvious place on your premises, post it on your website, if you have one, or post it by another method that is reasonable in the circumstances.

### **3. Provide training**

- Train new staff who deal with members of the public or other third parties or who participate in developing your policies, practices and procedures on the provision of goods or service to the public or other third parties in accordance with the training requirements set out in the standard. Provide the training as soon as it is practicable after they are assigned applicable duties.
- Provide ongoing training in connection with changes to your policies, practices and procedures governing the provision of goods or services to people with disabilities.

### **4. Communicate with people with disabilities**

- When communicating with a person with a disability, do so in a manner that takes into account the person's disability.

## **5. Feedback**

- Accept feedback on the manner in which goods or services are provided to people with disabilities.

## **6. Provide documentation**

- If your organization is a designated public sector organization or is a provider of goods or services with 20 or more employees, you must:
  - Notify your customers that the documents required under the standard are available upon request by posting the notice at a conspicuous place on the premises you own or operate, by posting it on your website or by another method that is reasonable in the circumstances.
  - Provide a copy of the required documents to anyone who asks for them.
  - When providing documents required by the customer service standard to people with disabilities, do so in a format that takes into account the person's disability.

### 3. Policies, Practices and Procedures

This chapter focuses on requirements to establish policies, practices and procedures governing how you provide goods and services to people with disabilities. There are additional requirements in other sections of the standard related to policies, practices and procedures that are addressed in subsequent chapters.

#### Requirements Checklist

- Establish policies, practices and procedures for the provision of goods or services to people with disabilities.
- Use reasonable efforts to ensure that your policies, practices and procedures are consistent with the principles laid out in the customer service standard (dignity, independence, integration and equality of opportunity).
- Establish a policy that deals with the use of assistive devices by people to access your goods or services or the availability, if any, of other measures that enable them to access your goods or services.

If your organization is a designated public sector organization or is a provider of goods or services with 20 or more employees:

- Prepare one or more documents describing your customer service policies, practices and procedures on the provision of goods or services to people with disabilities. This should include a policy on the use of personal assistive devices by people with disabilities to access your goods or services as well as the availability of any other assistive measures you offer to enable them to do so, if applicable. Provide this documentation on request. See Chapter 10 of this Manual for more information [\[LINK\]](#).

Further explanation of this requirement can be found in Chapter 6 of the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07** [\[LINK\]](#).

#### Steps to Consider

See a customer service policy template in Appendix B [\[LINK\]](#). The following are some steps to consider when developing policies, practices and procedures to address accessibility:

## Step 1 List existing policies, practices and procedures.

List your organization's existing policies, practices and procedures. In the customer service standard, "policies, practices and procedures" refer to how a business or organization provides goods or services to people with disabilities. Your existing policies, practices or procedures may be formal and written or informal and verbal. They will be shaped by the size, complexity, values, nature of your business or organization and how you and your sector (hospitality, retail, medical, etc.) usually do business. Here are basic definitions of the terms in this section of the standard and some examples to guide you:

**Policies** are what you intend to do, including any rules for staff.

**Example:** A clothing store that has a written "no refunds, credit only" policy decides to include exceptions for customers with disabilities in its policy because its fitting rooms are not wheelchair accessible.

**Procedures** reflect your policies and describe how you will go about providing service or the steps staff are expected to take in certain situations.

**Example:** A college establishes procedures to address the needs of students, including students with disabilities, in registration for courses. Students can register in person, online, by mail or through an electronic telephone service. Students may also contact the Registrar's office for assistance.

**Practices** are what you do on a day-to-day basis, including how your staff actually offer or deliver services. These may be informal or written.

**Example:** A grocery store with very narrow aisle space establishes a practice of keeping display racks and products out of the middle of its aisles to make the store accessible for customers using wheelchairs and walkers.

## Step 2 Identify gaps.

Identify any gaps in your policies, practices and procedures and how those gaps impact your ability to provide goods or services to customers with disabilities. Think about what people with different types of disabilities will need in order to be able to access your services and what, if anything, you could do differently so that they can access your goods or services. Here are some ideas to help you develop your approach:

### **Review feedback from customers.**

You may use customer feedback (e.g. satisfaction surveys, complaints) about barriers to accessibility when deciding what changes could be made. Note that the absence of complaints does not necessarily mean that there are no barriers. For example, people

with disabilities may not have used your services because they were not able to access them or they may not have been able to complain because of a lack of access to your complaints process. In addition, people with disabilities may have chosen not to complain about barriers they have encountered.

A barrier prevents a person with a disability from participating fully in society because of his or her disability. A barrier may not be apparent, and therefore, the best method to remove the barrier may not be obvious. See Appendix A for more information on barriers and solutions that may be developed through policies, practices and procedures [\[LINK\]](#).

**Consult with your staff who deal with the public.**

You can use the knowledge and experience of your frontline staff who deal directly with the public. Consider consulting with them regularly to identify situations where a person with a disability came across a barrier when attempting to access your goods or services. Ask them how to change policies, practices and procedures to improve accessibility.

**Anticipate customers' needs.**

It is difficult to anticipate the needs of all customers. However, learning about the experiences of customers with various disabilities and the barriers they face may improve your ability to anticipate their needs and to offer accessible services. See Chapter 4 of this Manual [\[LINK\]](#) for more information.

**Step 3 Determine your approach to policies, practices and procedures.**

Your policies, practices and procedures on serving customers with disabilities may be stand-alone or integrated into existing customer service policies, practices and procedures, or a combination of both. It depends on what works for your business or organization. There may be a variety of ways to make your goods and services accessible and some flexibility in your policies, practices and procedures can go a long way.

Some key policies and procedures to think about are those that involve planning and purchasing. For example, consider taking into account the impacts on customers with disabilities when planning a new initiative or when purchasing new equipment or technology.

## **Step 4      Develop your new or revised policies, practices and procedures in keeping with the principles of dignity, independence, integration and equal opportunity.**

In developing your policies, practices and procedures, the standard requires you to use reasonable efforts to ensure that they are consistent with the principles of dignity, independence, integration and equal opportunity.

**Dignity** - service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.

**Independence** - when a person with a disability is allowed to do things on their own without unnecessary help or interference from others.

**Integration** - service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless an alternate measure is necessary to enable a person with a disability to access goods or services.

**Equal opportunity** - service is provided to a person with a disability in such a way that they have an opportunity to access your goods or services equal to that given to others.

Further explanation of the principles may be found in Chapter 6 of the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07** [\[LINK\]](#).

## **Step 5      Address the use of personal assistive devices and availability of other assistive measures.**

Assistive devices are used by people with disabilities to help with daily living. They include a broad range of products such as wheelchairs, walkers, white canes, oxygen tanks, portable chalk boards and electronic communication devices that people may bring to your premises. Here are three suggested steps to develop your organization's policy:

### **1. Set a clear policy on how you will serve customers who use personal assistive devices.**

The standard does not outline what your policy must say. You must however:

- Have a policy that addresses the use of assistive devices by people with disabilities to access your goods or services
- Use reasonable efforts to ensure the policy is consistent with the principles outlined in Step 4 of this chapter.

The wording may be general, such as, “It is our policy to allow people to use their personal assistive devices to access our services.”

**Example:** Janet can walk short distances and uses a scooter. It is often difficult to find space in a busy restaurant to park her scooter. She finds it helpful when staff suggest parking options and make space.

**2. Identify what, if any, assistive measures your organization will offer to people with disabilities.**

For example:

**Assistive devices:** TTY service, telephones with large numbers, amplifiers, lifts, utensils with modified handles.

**Services:** Sign language interpretation, oral interpretation, real-time captioning.

**Alternate service methods:** Assistance of a staff person to complete a transaction, providing home delivery of goods or service in another location.

**3. Set a clear policy on the availability of any assistive devices or other measures you offer.**

Your policy should address how customers with disabilities can access any assistive devices, services or alternate service methods.

**Note: If you are a designated public sector organization or a provider with 20 or more employees, see Chapter 10 of this Manual for document requirements.**

## 4. Communication

This chapter deals with the specific requirement of communication and helps you to think about what you can do to make your communication more accessible to people with disabilities.

### Requirements Checklist

- When communicating with a person with a disability, do so in a manner that takes into account the person's disability.

### Steps to Consider

Communication is a process of providing, sending, receiving and understanding information. Information is often shared in written, spoken or picture form. There is not only one way to meet the requirement to communicate in a manner that takes a person's disability into account. Each provider may offer different types of information and may communicate with customers in different ways.

The key to making communication accessible is flexibility. In planning your approach, it may help to consider the following steps:

#### **Step 1 Think about and/or learn how people with disabilities communicate.**

If one form or method of communication cannot be used by a person with a disability, they may be able to use another form or method, or a combination. A form of communication could be writing, speaking or the use of pictures. A method of communication could be in person, over the phone or online. If an organization can communicate in a variety of ways, it is more likely to meet the needs of people with a variety of disabilities. For example, a small store might have prices on its products, but a store clerk could also read them out loud to a customer with vision loss.

Detailed information about barriers that people with different disabilities face and how to address them is available directly from disability organizations. The best way to determine a person's communication preferences is to find out from the person directly.

## **Step 2 Consider approaches for making communication accessible.**

Depending on the situation and the person's needs, there are a variety of ways to make communications more accessible:

### **1. Make the original communication more accessible for people with disabilities.**

Sometimes communication can be made accessible if the needs of people with disabilities are considered during the planning stage. Using plain language can help to make a document easier to understand for people with certain types of disabilities.

### **2. Change the usual method of communication to meet an individual's need.**

Communication that occurs as part of providing goods or services can occur in a variety of ways such as in person, by phone and online. Another way of making communication accessible is to offer the information in a different format.

**Example:** If staff in a store needs to communicate with a person who is Deaf or hard of hearing about a product, rather than talking, they may want to write or type information back and forth. A written handout of commonly used information, such as a return policy, might also assist in the communication. This changes the format from a verbal conversation to a communication that uses text.

### **3. Use assistive equipment or devices.**

A provider may want to use assistive equipment or devices in communicating with customers with disabilities.

**Example:** An organization that offers conferences might offer real-time captioning services (on-screen typing of what speakers are saying), assistive listening systems, or sign language interpreters or intervenors upon request so that people who are Deaf, deafened, oral deaf, hard of hearing or deafblind may participate effectively.

## **Step 3 Plan ahead.**

The standard does not specify a particular way to communicate with a person with a disability. Different ways will work for different people and in different circumstances.

## 5. Service Animals

This chapter presents steps to consider when complying with the rules about guide dogs and other service animals. A guide dog is defined in section one of the Blind Persons' Rights Act [\[LINK\]](#) To be considered a service animal under the standard, it must either be readily apparent that the animal is being used because of a person's disability or the person with a disability must provide a letter from a physician or nurse confirming that it is required because of his or her disability.

### Requirements Checklist

- Allow guide dogs or other service animals to accompany people with disabilities on parts of your premises that are open to the public or other third parties, except where excluded by law.
- If guide dogs or other service animals are excluded by law, provide alternative ways for people with disabilities to access your goods or services.

If your organization is a designated public sector organization or is a provider of goods or services with 20 or more employees:

- Document policies, practices and procedures regarding service animals and make them available to anyone who asks to see them. See Chapter 10 on document requirements [\[LINK\]](#).

Further explanation of this requirement can be found in Chapter 7 of the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07** [\[LINK\]](#).

### Steps to Consider

The following steps may help you to develop your own approach to meeting the requirements related to service animals:

#### **Step 1 Identify those parts of your premises open to service animals.**

##### **Premises open to the public**

Clearly identify the areas of your premises where you provide goods or services that are open to the public. These are areas where service animals must be permitted unless otherwise excluded by law.

If there are any areas of your premises that are not open to the public or other third parties, or any areas where animals are excluded by law (e.g., regulations under the Health Protection and Promotion Act and the Food Safety and Quality Act), these areas can be identified as off-limits to service animals. If you need more information on this exception, please see the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07** [\[LINK\]](#).

### **Premises open to third parties**

In the case of other third parties, you may have areas of your service location that are not open to the public, but are open to other third parties (other businesses or organizations) to whom you provide goods or services. These must also be open to third parties who use service animals unless the service animal is otherwise excluded by law from that area.

**Example:** Retailers (third parties) who purchase their goods from your head office usually enter your showroom and office areas that are not open to the public. You would allow a retailer with a service animal to enter the same areas unless access was otherwise excluded by another law.

## **Step 2      Develop policies, practices, and procedures for serving people with service animals.**

In some organizations, allowing animals may already be a common practice. In others, changes may need to be made to policies and practices to meet the requirements of the customer service standard. See a sample policy template in Appendix B [\[LINK\]](#).

An organization whose entire premises will be accessible to people with service animals may have a short policy about allowing service animals. An organization such as a university that has a wide variety of areas where it provides services (e.g., residences, change rooms, classrooms and kitchens) may need different or more detailed policies, practices and procedures for different locations or situations.

### **Be prepared to deal with special situations.**

In developing policies, practices and procedures on service animals you should anticipate situations that may require special instructions. Some examples:

#### **Situation 1 - When you are serving a customer who has a service animal and a customer who has an allergy to animals**

It may be helpful for your staff to have direction on how they might provide service in such a situation. For example, staff could be advised that they should discuss the situation with both customers and make every effort to meet the needs of both individuals.

## **Situation 2 - When service animals are restricted by law**

Where an animal is excluded by law from your premises, you must still take steps to make sure other measures are available to enable the person with a disability to access your goods or services. You need to consider the needs of the person with a disability if his or her service animal is excluded. Explain to the individual why the animal is excluded and see what other arrangements can be made.

Some options to consider include:

- Bringing goods or services to the person in a part of your premises where the animal is not restricted;
- Offering a safe location where the service animal can wait, if the person is able to be separated from the animal while obtaining the service, and offering assistance to the person with a disability while they are separated from the service animal. For example, a person with vision loss might need someone to guide him or her.

## **Situation 3 - When you have policies on pets**

Some organizations do not allow pets, or have special policies relating to them - for example, a hotel that allows pets and requires a special deposit or additional fee in the event of damage.

Service animals are not pets – they are working animals. They are used by people with disabilities to overcome barriers much like assistive devices such as a white cane or a wheelchair.

**Note: If you are a designated public sector organization or a provider with 20 or more employees, see Chapter 10 of this Manual for document requirements.**

[\[LINK\]](#).

## 6. Support Persons

This chapter talks about the requirement to allow people with disabilities and their support persons to enter those areas of your premises where you provide goods or services and that are open to the public or other third parties.

### Requirements Checklist

- Allow people with disabilities to be accompanied by a support person when on parts of your premises that are open to the public or other third parties.
- Provide notice in advance about what admission fee will be charged for support persons, if applicable.

If your organization is a designated public sector organization or is a provider of goods or services with 20 or more employees:

- Document your policies, practices and procedures regarding support persons and make them available to anyone upon request. See Chapter 10 of this Manual on document requirements [\[LINK\]](#).

Further explanation of the standard's requirements about support persons can be found in Chapter 4 of the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07** [\[LINK\]](#).

### Steps to Consider

The following steps may help you develop your approach to meeting the standard's requirements on support persons:

#### **Step 1 Identify parts of the premises open to the public and other third parties.**

You will likely have done this in preparing your policies, practices and procedures for the requirements on service animals. Identify those areas of your premises where you provide goods or services that are open to the public and those areas that are open to other third parties (businesses or other organizations).

## **Step 2 Think about how your services are used by people with support persons and provide direction on special situations and services.**

Providers may need to consider spaces that only allow for one person at a time, and consider how a person with a support person could be served.

**Example:** A department store may have change rooms with a space for one person at a time. The store might allow a person with a disability to purchase the clothes and return them after trying them on at home.

### **Some providers may have special services or situations to consider.**

#### **Privacy and consent issues**

Providers should be aware of their obligations under privacy laws that might apply to them. There may also be issues of confidentiality or professional obligations that providers have to consider. In some situations, a support person may need to agree to requirements of service just as the person with a disability does. For example, a service agency that offers group counselling may require participants to keep the group discussions confidential and may ask the support person to meet this requirement as well.

#### **Appropriate behaviour**

Appropriate behaviour should be expected of a support person just as it is of the customer with the disability and all other customers. For example, a support person in a university residence would be expected to follow the rules of the residence.

## **Step 3 Identify any situations where you may require a support person to accompany a person with a disability.**

Under the standard, this would only occur where requiring a support person is the only means available to allow the person to be on the premises and, at the same time, protect the health or safety of the person with a disability or of others on the premises.

**Example:** A child with a physical disability who requires assistance transferring from her wheelchair, toileting assistance and other personal care will be attending an overnight camp. The lifting and toileting activities would not be safe for the camp counselors to perform as they are not trained in proper techniques and may not have the physical fitness to do so safely. The counselors may consider it necessary that a support person accompany the child to protect the child's health and safety.

## **Step 4      Develop your admission fee policy.**

If you charge a fee for admission, the standard requires you to provide advance notice of the admission cost for support persons so that customers with disabilities know what to expect.

**Note: If you are a designated public sector organization or a provider with 20 or more employees, see Chapter 10 of this Manual for document requirements [\[LINK\]](#).**

## 7. Disruptions in Service

This chapter talks about how to comply with the requirement about giving notice of service disruptions. This requirement applies to unexpected disruptions as well as those you know about ahead of time.

### Requirements Checklist

- Provide notice to the public when there is a temporary disruption of your facilities or services (planned or unexpected) that are usually used by people with disabilities to access your goods or services.
- Include in the notice information about the reason for the disruption, its duration, and a description of alternative facilities or services, if available.
- Place the notice in an obvious place on your premises, post it on your website, if you have one, or provide it by another method that is reasonable in the circumstances.

If your organization is a designated public sector organization or is a provider of goods or services with 20 or more employees:

- Document the steps you will take in connection with a temporary disruption and provide a copy of the document to anyone who asks. See Chapter 10 of this Manual on document requirements [\[LINK\]](#).

Further explanation of the requirements of the standard, can be found in Chapter 8 of the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07** [\[LINK\]](#).

### Steps to Consider

The following steps may help you plan for disruptions of services or facilities used by people with disabilities:

#### **Step 1 Identify the facilities and services that people with disabilities rely on to use your services.**

Consider identifying your facilities, services or systems that people with disabilities rely on to access your goods or services. Escalators and elevators, for example, are important for some people with physical disabilities because they may be the only way

for them to reach your premises. You may also have other systems or services designed to meet the needs of people with disabilities, such as accessible washrooms, amplification systems, ramps and TTY services.

## **Step 2 Prepare the template of a notice in advance. See Appendix C [\[LINK\]](#).**

The notice must include the information required by the standard, that is:

- The reason for the disruption
- Anticipated duration
- A description of what alternative facilities or services are available, if any.

Alternative options could include providing a map with directions to another elevator or accessible washroom, or asking customers to tell you when they will visit so you can provide services outside of the usual facilities, if possible.

**Example:** An escalator in a shopping mall suddenly breaks down. The mall closes the escalator for repairs and posts a notice on its website. It also posts a large sign at the base of the escalator and at the front entrance. The sign states that the escalator is closed for emergency repairs, estimates when the repairs will be complete and suggests where customers can find another escalator.

## **Step 3 Decide how and where to provide the notice.**

How you notify the public of service disruptions may vary and may depend on your organization's size, the type of goods or services you provide, the nature of the facility/service disrupted and the nature of your business. In deciding how to provide notice, choose a conspicuous place and a method that is reasonable in the circumstances. For example, if you usually communicate with your customers online, you might post a notice online. If there is more than one entrance to your premises, you might post a notice at each entrance. For sample documents on notifying the public, see Appendix C [\[LINK\]](#).

You may also want to consider the best way of making your notice effective and helpful for people with disabilities. For example, placing a notice of disruption on your website or your telephone message, if it is reasonable to do so, can help people with disabilities avoid the time and cost of going to your premises during a disruption.

**Example:** A cultural institution usually offers audio guides to visitors with vision loss. Before new exhibits are opened, all of the audio guides must be updated. When this happens, notices are posted on the institution's accessible website ahead of time. Staff also inform visitors as they enter the centre that audio guides are not available and that guided tours will be offered instead.

Consider which people with disabilities will be most affected by the disruption. For example, if your elevator is temporarily unavailable, you could post a sign at all entrances and at a height that will allow a person using a wheelchair to read it.

**Note: If your organization is a designated public sector organization or a provider of goods or services with 20 or more employees, see Chapter 10 of this Manual for document requirements [\[LINK\]](#).**

## 8. Training

This chapter deals with the provision of training. The standard requires providers to train staff on how to provide customer service to people with disabilities. Training should help to dispel myths, misconceptions, stereotypes and fears about people with disabilities.

### Requirements Checklist

- Design a training program that includes the following:
  - A review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
  - How to interact and communicate with people with various types of disability
  - How to interact with people with disabilities who use an assistive device, service animal or a support person
  - How to use the equipment or assistive devices available on your premises or that you otherwise provide that may help with the provision of goods or services to people with disabilities
  - What to do if a person with a particular type of disability is having difficulty accessing your goods or services
  - Your customer service policies, practices and procedures governing the provision of goods or services to people with disabilities.
  
- Ensure that every person who deals with the public or other third parties on your behalf receives training, whether the person is an employee, agent, volunteer or otherwise.
  
- Ensure that every person who participates in developing your policies, practices and procedures governing the provision of goods or services to members of the public or other third parties is trained.
  
- Train new staff who deal with members of the public or other third parties or who participate in developing your policies, practices and procedures on the provision of goods or services to the public or other third parties in accordance with the training requirements set out in the standard. Provide the training as soon as is practicable after they are assigned applicable duties.

- Provide ongoing training in connection with any changes to your policies, practices and procedures governing the provision of goods or services to people with disabilities.

If you are a designated public sector organization or a provider with 20 or more employees:

- Document your training policy. Include a summary of the contents of your training program and details of when the training will be provided. See Chapter 10 of this Manual for document requirements [\[LINK\]](#).
- Keep records of the training provided, including the dates on which training was provided and the number of people who were trained. See Chapter 10 on document requirements [\[LINK\]](#).

Further explanation of the standard's requirement on training can be found in Chapter 9 of the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07** [\[LINK\]](#).

## Steps to Consider

If you already have a training program for customer service in place, assess whether it covers customer service for people with disabilities. Accessibility could be integrated into regular training.

The following outlines some steps to consider when developing your training program:

### Step 1 Consider who must be trained.

Training must be given to everyone in your organization who deals with members of the public or other third parties (other organizations) as well as to others who deal with members of the public or other third parties on your behalf. This could apply even if it is not in the person's job description, and could include, for example, people who provide directions to customers, answer questions and give information about your goods or services.

#### Staff

**Example:** A library has full- and part-time staff who do a variety of tasks such as front-counter services, stocking shelves and making calls to clients about overdue books. A janitor is on-site to take care of the building and to close the library. He does not deal with the public on library-related services. All library staff except the janitor receive training to meet the requirement of the customer service standard as they deal with members of the public on behalf of the library.

You must provide training to staff serving people with disabilities even if you do not have physical premises that customers with disabilities may visit.

**Example:** An Ontario company that manufactures electronics operates a toll-free number for customer service. The call centre staff is given training about providing services to people with disabilities even though no customers visit the call centre. The manufacturer's training policy is documented as required because it has more than 20 employees. In addition, the company has chosen to include training in the staff handbook.

### **Management**

Training must be provided to everyone who is involved in developing policies, practices and procedures on providing goods or services. This could include management and senior leaders. If they direct, monitor, evaluate or approve policies on how goods or services are provided, it is important that they too understand what must be covered in the training.

**Example:** The chair and board members of a municipal public health agency must receive training because they approve the agency's policies, practices and procedures.

### **Volunteers**

Volunteers who deal with the public or other third parties must be trained.

**Example:** A charity that uses volunteer security officers for fundraising events provides them with training by giving them a handout on accessible customer service because they will likely have interaction with the public.

### **Agents or otherwise**

If you contract out all or some aspects of your customer service to agents who act on your behalf, the standard requires that you ensure the agents receive training about the provision of those services to customers with disabilities.

**Example:** A mattress store has a contract with independent movers to assist with the delivery of its products. The store manager ensures members of the moving staff are trained.

## **Step 2 Determine the content of training.**

Training content may vary depending on who is receiving the training and the nature of your services and your organization. For example, you may have some unique training needs for different groups, whether they be web development staff, senior management

or policy staff. Training provided to staff who deal with the public could be more focused on person-to-person interaction than the training provided to staff who have less contact with customers. Each provider can choose the particular content of the training and the way each of the topics described below is addressed.

The bolded headings below are required content of your training program:

- **A review of the purposes of the Accessibility for Ontarians with Disabilities Act (AODA) [\[LINK\]](#) and the requirements of the customer service standard -**

In addition to training staff on the specific requirements, you may find it effective to invite people with disabilities or representatives from disability organizations to share their customer service experiences.

- **Instructions on how to interact and communicate with people with various types of disability** - You may consider holding a group discussion during which staff are asked to share their specific accessible customer service practices and ideas on what the provider can do to improve access for customers with disabilities. It might also be helpful to include a discussion on barriers during which staff can learn how to identify and respond to barriers to customer service. See more information in Chapter 4 of this Manual [\[LINK\]](#).

Instructions on how to interact with people with various types of disability who use assistive devices

Instructions on how to use equipment or assistive devices available on your premises or that you otherwise provide

- **Instructions about how to interact with and serve people with disabilities who require the assistance of a guide dog or other service animal** - For more information on service animals, see Chapter 5 of this Manual [\[LINK\]](#).
- **Instructions about how to interact with and serve people with disabilities who require the assistance of a support person** - For more information about support persons, see Chapter 6 of this Manual [\[LINK\]](#).
- **Instructions on what to do if a person with a disability is having difficulty accessing your goods or services** - Try to provide examples of appropriate responses, specific to the type of goods or services that you provide.

If you work in an environment where there is a high volume of direct customer service interactions, you may want to think about building in extra time that may be needed to deal with customers with disabilities. Use your knowledge of customer patterns, preferences, queries and concerns to anticipate ways in which you might address such needs. For example, if there is a long lineup, you may want to consider adjusting the availability of other staff to help out as needed.

- **Training on policies, practices and procedures relating to the provision of goods and services to people with disabilities** - Staff should be aware of your policies, practices and procedures that relate to the provision of goods or services to people with disabilities. Staff should also understand what you are doing specifically to meet the requirements of the standard. For example, familiarize staff with the feedback process you have established to deal with comments and complaints regarding accessibility of your services to people with disabilities. See more on the feedback process in Chapter 9 of this Manual [\[LINK\]](#).

On an ongoing basis, you must train staff on changes to your policies, practices and procedures on the provision of goods or services to people with disabilities.

### **Step 3      Decide on the format of training.**

Providers can decide on a training format that is appropriate for them and that reflects the needs of the people being trained. It can be formal or informal. Training could be provided through workbooks, videos, handouts such as fact sheets or brochures at an orientation session, through a mandatory online module, in a classroom setting or other format.

Training could be delivered as a separate program specifically about providing goods or services to people with disabilities or as part of a larger training program, such as basic orientation, training on effective communication or general customer service.

### **Step 4      Determine the timing of training.**

Provide training to all applicable staff by the date that you are required to comply with the standard. This is either January 1, 2010 for designated public sector organizations or January 1, 2012 for all other providers.

As training should include information on your policies, procedures and practices, these will have to be developed before training can take place. Providers will therefore need to begin developing policies, practices, procedures and related training with enough advance time to carry out training prior to the required compliance date.

The standard requires that training must be provided “as soon as practicable,” or as soon as it can be done in the circumstances, after someone is assigned to the applicable duties. Training must also be ongoing, so when someone new is hired, or is assigned duties for which training is required, they need to be trained as soon as practicable. When your policies, practices or procedures change in any significant way, training will need to be carried out in relation to these changes.

**Example:** Appropriate staff of a restaurant receive training as required by the standard when they first start. When the restaurant adds TTY service (teletypewriter or text-based telephone communication service), all staff who use the TTY to communicate with the public or other third parties on behalf of the provider are trained on how it works. This is because the restaurant's policies, practices and procedures changed as a result of acquiring new equipment and ongoing training is required in connection with these changes.

**Note:** If you are a designated organization or a provider with 20 or more employees, see Chapter 10 of this Manual for document requirements [\[LINK\]](#).

## 9. Feedback Process

The customer service standard requires that a process be in place for receiving and responding to feedback about how you provide goods or services to people with disabilities. This chapter gives you some ideas on receiving and responding to feedback in a way that takes a person's disability into account. A sample document for obtaining feedback is available in Appendix D [\[LINK\]](#).

### Requirements Checklist

- Establish and implement a process for receiving and responding to feedback about the way you provide goods or service to people with disabilities.
- Ensure that your feedback process allows people to provide feedback either in person, by telephone, in writing, by email, online, on disk or by another method.
- Ensure that your feedback process specifies the actions you or your staff must take when a complaint is received.
- Make information about the feedback process readily available to the public.

If your organization is a designated public sector organization or is a provider with 20 or more employees in Ontario:

- Prepare a document describing your feedback process and give a copy of this document to anyone who asks for it. See Chapter 10 of this Manual for document requirements) [\[LINK\]](#).

Further explanation of the above section of the standard can be found in Chapter 10 of the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07** [\[LINK\]](#).

### Steps to Consider

You may already have a process that allows you to receive and respond to feedback from customers. If you already have such a process, you may build on it or adjust if necessary to meet the requirements of the standard.

The following steps may be considered in designing a feedback process:

### **Step 1 Determine how to receive feedback.**

People with disabilities may use different communication methods because of their disability. To make your feedback process as accessible as possible, you could accept comments in different formats. The standard provides for a variety of options, such as in person, by telephone, written feedback, email, electronic text on disk or other methods. See Chapter 4 of this Manual for more information on options for making communicating with people with disabilities more accessible.

**Example:** Joanna owns a large pet supply store. She accepts feedback in person, by phone, fax, suggestion box, the store's website and by email. She also posts a sign that says she welcomes feedback. Her website order form also explains her policy regarding accepting feedback and the various ways in which it can be provided.

### **Step 2 Determine how to respond to feedback, including complaints.**

The standard does not require a response to be provided for all feedback. You could have a policy to assess whether or not you plan to respond to various comments. You can choose your own process for responding to feedback, including complaints. The process could include having management address feedback, e.g., a store manager, an owner or someone from head office, as they often have the ability and responsibility to address such issues. You will need to determine what actions you will take if a complaint is received. Information about the feedback process must be readily available to the public.

**Example:** Jayden is the manager of a shoe store. Customers can provide feedback in person, by telephone or by email. A customer left Jayden a phone message that said an employee treated her disrespectfully, making it seem like an inconvenience to move some shoeboxes so that she could manoeuvre her wheelchair around the store. Jayden contacts the customer within two business days for more details. Jayden might want to use this example in future staff training as an action to address the complaint.

### **Step 3 Determine how to make information about the process available to the public.**

Information on your feedback process could include the following:

- Where, and in what ways, the public can provide feedback
- What information a customer should provide in making a complaint
- Who is responsible for receiving feedback

- What actions will be taken if a complaint is received
- Whether or not customers who provide feedback can expect an answer
- How long it should take to receive a response.

**Example:** A clinic shared by four physiotherapists welcomes feedback regarding accessibility. The clinic has notices in the reception area and on its website to let visitors know how feedback can be submitted. The clinic also provides feedback forms at the reception desk and online. The forms include details about how complaints will be handled.

Information about the feedback process must be readily available to the public. You may make this information available in a variety of ways. For example, you could post a sign in your place of business and/or include a notice on your website. Please see Appendix E for sample notices [\[LINK\]](#).

**Note: If you are a designated public sector organization or a provider with 20 employees or more, see Chapter 10 of this Manual for document requirements.**

## 10. Document Requirements

This chapter deals with the requirement in the standard for designated public sector organizations and other providers with 20 or more employees to prepare documentation in relation to service animals, service disruptions, training and other issues.

To meet these requirements, providers will need to prepare the documents, have a way to let the public know about the documents, and be able to provide the documents by the following dates:

- By January 1, 2010, for designated public sector organizations;
- By January 1, 2012, for other providers of goods or services that have 20 or more employees.

The requirements to prepare documents apply to several areas of the standard. The following is a summary of the five sections of the standard that require providers to create a document and the information that you should provide in each one is outlined:

### **Section 3(5) Policies, practices and procedures on the provision of goods or services to people with disabilities** [\[LINK\]](#)

- Description of customer service policies, practices and procedures on the provision of goods or services to people with disabilities. This should include a policy on the use of personal assistive devices by people with disabilities to access your goods or services and the availability of any other measures you offer to enable them to do so.

### **Section 4(7) Service animals and support persons** [\[LINK\]](#)

- Description of your policies, practices and procedures with respect to the entry of service animals and support persons to those areas of the premises that are owned or operated by you, where you provide goods or services, and that are open to the public or other third parties, including:
  - When you may exclude service animals by law, if applicable, and the measures that will be available in those situations to enable a person with a disability to access your goods or services
  - If admission is charged, what amount will be charged for support persons
  - If, and under what circumstances, it may be necessary to require a person with a disability to be accompanied by a support person to protect the health or safety of the person with a disability or the health or safety of others on the premises.

### **Section 5(4) Notice of temporary disruptions** [\[LINK\]](#)

- The steps that will be taken in connection with a temporary planned or unexpected disruption to facilities or services that people with disabilities usually use to access your goods or services, including:
  - Under what circumstances notice will be provided about a temporary disruption and where it will be posted
  - Information required by the standard to be included in the notice of a temporary disruption
  - What alternative facilities or services, if any, can be made available during the temporary disruption to continue to provide service to people with disabilities.

### **Section 6(5) Training** [\[LINK\]](#)

- Description of your policy on providing training on accessible customer service including:
  - A summary of the contents of the training
  - Details of when the training will be provided.

### **Section 7(4) Feedback process** [\[LINK\]](#)

- Description of your process for receiving and responding to feedback on the manner in which you provide your goods or services to people with disabilities, including:
  - How you will accept feedback
  - What actions you will take if a complaint is received.

Further explanation of the standard's requirements for documents can be found in Chapter 11 of the **Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07**. [\[LINK\]](#)

## **Requirements Checklist**

- Prepare one or more documents describing your policies, practices and procedures with respect to the provision of goods or services to people with disabilities, including all the topics listed in the standard.
- Notify your customers that the documents required under this standard are available upon request by posting the notice in a conspicuous place on the premises you own or operate, by posting the notice on your website, or by another method that is reasonable in the circumstances.

- Provide a copy of the required documents to anyone who asks for them.
- When providing documents required by the customer service standard to a person with a disability, do so in a format that takes into account the person's disability.

## **Steps to Consider**

The standard identifies five key topics that must be covered in the documentation. Some providers might include all the information mentioned in the standard in one document and others may use different documents for each section of the standard. It is up to you how you package and present the information.

The following steps are not required but are a suggested approach to meeting the documentation requirements of the standard:

### **Step 1 Prepare a master copy of the documents.**

#### **Make the original accessible and simple.**

Most providers will prepare a master copy of their documents on a computer. If you make your original electronic document in an accessible format, it will be easier to make an alternate format (e.g., large print) if requested.

When writing your document, try to use plain, everyday language. Keep sentences short and avoid jargon. Keep your text justified to the left and use a plain, sans serif font such as Arial or Verdana. Use different font sizes for headings.

You could make the original more accessible for some people with disabilities by avoiding graphics and complex tables. Simple tables can be used if they are created so that assistive devices such as screen readers can read them. Check the manufacturer's website for your word processing software for more information on making an accessible electronic document.

An accessible electronic document can be provided on disk, CD-ROM, by email or posted on an accessible website. It can also be printed in large print. This document will also be an effective starting point for creating a braille copy and can be used to make an audio copy.

### **Step 2 Identify ways to let your customers know about the documents.**

Once you have prepared your documents, you will need to decide how you will provide notice of the availability of the documents to your customers. The notice must tell customers how they can obtain the documents.

The standard does not specify how you must inform the public, but provides options such as posting information in a conspicuous place on your premises, posting it on your website or by another method that is reasonable in the circumstance. Though it is not required, using several methods will help you make the notice conspicuous to people with a variety of disabilities.

For example, you can post it electronically on your website if you have one, on written signs in your service locations, in certain key documents or brochures, or by having an article about it periodically in a newsletter. Staff can mention it to people at certain times, you can include information on an interactive voice response system if suitable, in TTY calls and in any other way you communicate information. It will also be important that your staff know how to respond to requests about obtaining the documents.

### **Step 3 Be prepared to make the required documents accessible.**

The standard states that the provider and the person with a disability may agree on the format. If you are unable to provide the requested format, you may consider explaining why and try to find a suitable alternative. Different organizations will choose different approaches to making the required documents available in a format that takes into account the person's disability.

Some considerations are:

- The usual methods of communication your organization offers (e.g., if you are mainly a store-front service or a telephone service)
- Your internal resources for making alternate formats
- What, if any, formats you might want to have already prepared (e.g., braille)
- What, if any, service information may be requested in alternate format
- What types of alternate format requests organizations similar to your own receive.

Other points to keep in mind:

- An alternate format that might be useful for a short and simple document may not be what a person with a disability would find appropriate for a longer and more complex document. For example, a person who reads braille may find an audio version of a document useful for a simple and short document but may find a braille document more useful for a longer training document.

- Allowing someone who needs a document in an alternate format to wait significantly longer than someone requesting standard print does not respect their dignity, which is one of the principles set out in the standard.

## Appendix A: Barriers and Solutions

Possible Barriers	Possible Solutions
<b>Vision loss</b>	
Staff are not aware of the need to describe goods or services when a person cannot read a sign.	<ul style="list-style-type: none"> <li>▪ Make it standard practice to describe to customers the goods or services offered if they are unable to view them due to vision loss</li> </ul>
<b>Deaf, deafened, oral deaf or hard of hearing</b>	
Telephone services not accessible for customers who are Deaf, deafened, oral deaf or hard of hearing	<ul style="list-style-type: none"> <li>▪ Incorporate use of TTY and Relay services in your telephone service policies.</li> <li>▪ Ensure staff are trained in, and practice using, TTY and Relay services.</li> </ul>
Staff are not aware of the need to paraphrase or repeat more slowly what is said to customers when the customer has not understood the message.	<ul style="list-style-type: none"> <li>▪ Establish the practice of paraphrasing and repeating communications more clearly to customers upon request or using other means such as passing notes back and forth.</li> </ul>
Speaking to customers with hands covering the mouth which does not allow for lip-reading	<ul style="list-style-type: none"> <li>▪ Establish the practice of speaking clearly and making sure that nothing is covering the mouth when communicating with customers who lip-read.</li> </ul>
Loud music and poor acoustics, making hearing difficult for people using hearing aids	<ul style="list-style-type: none"> <li>▪ Establish the practice of having pen and paper available and communicate through note-writing.</li> </ul>
<b>Intellectual/Developmental disability</b>	
Use of complicated or technical language in customer service	<ul style="list-style-type: none"> <li>▪ Establish the practice of using plain language and avoid technical language when communicating.</li> </ul>

<b>Possible Barriers</b>	<b>Possible Solutions</b>
Ignoring customers who are more reserved or afraid to ask for help	<ul style="list-style-type: none"> <li>▪ Establish the practice of building in extra time to deal with customers who need it and adjust the availability of other staff to help out as needed.</li> </ul>
<b>Learning disability</b>	
Providing complicated documents to customers without explanation or opportunity to discuss or ask questions	<ul style="list-style-type: none"> <li>▪ Establish the practice of discussing and explaining any documentation provided to customers.</li> </ul>
Employees who are not flexible in offering alternative communication strategies or adequate time in providing service	<ul style="list-style-type: none"> <li>▪ Make it a standard procedure to break up lengthy conversations into a series of shorter ones. This may assist customers who need additional time to process certain types of information.</li> </ul>
<b>Mental health disability</b>	
Negative stereotypes about people with mental health disabilities resulting in disrespectful or impatient treatment.	<ul style="list-style-type: none"> <li>▪ Add a training component to the regular training that staff receive on the needs of people with mental health disabilities.</li> <li>▪ Make it a standard procedure to break up lengthy conversations into a series of shorter ones and speak more slowly so that some customers will not feel overwhelmed with the information. This may help to prevent anxiety in some customers.</li> </ul>
<b>Physical disability</b>	
Failure of staff to offer assistance when some services require particular agility and/or motor skills	<ul style="list-style-type: none"> <li>▪ Develop a policy that requires staff to assist customers in handling or reaching goods when requested.</li> </ul>
Failure of staff to set aside convenient seating (close to rest rooms or exits)	<ul style="list-style-type: none"> <li>▪ Establish the practice of setting aside convenient seating for people with physical disabilities.</li> </ul>
<b>Speech impairment</b>	
Verbal speech is the only form of communication used to interact with customers.	<ul style="list-style-type: none"> <li>▪ Develop a policy that requires staff to have pen and paper on hand and communicate through note-writing when requested to do so.</li> </ul>

If any of these or other barriers exist in your business or organization, think about how you can remove them in the development of new or revised policies, practices and procedures.

## Appendix B: Customer Service Policy Template

This is a policy template on providing customer service to people with disabilities. You can use it to form the basis of your own policy or to give you ideas on what to include in your policy.

This sample policy template contains items that meet the requirements of the customer service standard, and also items that are not specifically required, but are good practices. Note that the policy may be revised as other standards are introduced under the Accessibility for Ontarians with Disabilities Act, 2005.

### **Customer Service Policy Statement:** **Providing Goods and Services to People with Disabilities**

#### **1. Our mission**

The mission of **[insert name is provider]** is to **[insert mission of provider]**.

#### **2. Our commitment**

In fulfilling our mission, **[insert name of provider]** strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. **We** are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

#### **3. Providing goods and service to people with disabilities**

**[Insert name of provider]** is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

##### **3.1 Communication**

We will communicate with people with disabilities in ways that take into account their disability.

We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

### **3.2 Telephone services**

We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

We will offer to communicate with customers by **[insert other means of communication that apply, e.g. email, TTY, relay services]** if telephone communication is not suitable to their communication needs or is not available.

### **3.3 Assistive devices**

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. **We** will ensure that our staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

**We** will also ensure that staff know how to use the following assistive devices available on our premises for customers: **[insert list of assistive devices available on premises]**

### **3.4 Billing**

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: **[insert formats, for example, hard copy, large print, e-mail, etc., in which provider will provide invoices]**.

**We** will answer any questions customers may have about the content of the invoice in person, by telephone or email.

**3.5 [Insert any other policies, practices or procedures the provider will establish that are specific to the nature of the goods and services offered]**

## **4. Use of service animals and support persons**

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. **We** will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

**We** are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter **[insert name of provider]**'s premises with his or her support person. At no time will 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 our premises.

***[Fees will not be charged for support persons] or [insert amount] [will be charged to the support person]*** for admission to **[insert name of provider]**'s premises. Customers will be informed of this by a notice that will be posted in **[insert name of provider]**'s premises and **[include any other means by which provider will notify customers of fee]**.

## **5. Notice of temporary disruption**

**[Insert name of provider]** will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances and service counters on our premises.

## **6. Training for staff**

**[Insert name of provider]** will provide training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures. Individuals in the following positions will be trained:

**[Insert list of positions that require training, for example, customer service representatives, sales associates, managers etc.]**

This training will be provided **[insert how long after hiring staff that training will be provided]** after staff commence their duties.

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the [name equipment or devices , e.g. TTY, wheelchair lifts, etc., available on provider's premises or otherwise that may help with the provision of goods or services to people with disabilities]
- What to do if a person with a disability is having difficulty in accessing **[Insert name of provider]**'s goods and services

- **[Insert name of provider]**'s policies, practices and procedures relating to the customer service standard.

Applicable staff will be trained on policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

## **7. Feedback process**

The ultimate goal of **[insert name of provider]** is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way **[insert name of provider]** provides goods and services to people with disabilities can be made by **[insert the ways feedback can be provided, for example, e-mail, verbally, suggestion box, feedback card, etc.]**. All feedback will be directed to **[insert title of person responsible for receiving feedback]**. Customers can expect to hear back in **[indicate number of days]**.

Complaints will be addressed according to complaint categories already established in our company's complaint management procedures.

## **8. Modifications to this or other policies**

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Any policy of **[insert name of provider]** that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

## **9. Questions about this policy**

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, **[insert title of supervising staff]** of **[insert name of provider]**.

## **Appendix C: Sample Documents for Notifying the Public about Disruptions in Service**

### **Sample 1**

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Dear Customers,

The east elevators will be out of service from April 1 to 15 for routine maintenance. To access the upper level of the shopping centre, please use the elevators at the west end of the building next to the food court. We regret any inconvenience this may cause. If you have questions or concerns, please call [phone number].

Thank you.

Management

---

### **Sample 2**

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Dear Guests,

Our accessible washroom is out of service due to a broken pipe. A repair person will be on the premises tomorrow to fix it. In the interim, we have made arrangements for our guests to use the accessible washroom at 123 Main Street, which is located next door to our premises. We apologize for any inconvenience.

Thank you.

Management

---

## Appendix D: Sample Documents for Obtaining Feedback

### Sample 1

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#### Customer Feedback Form

Thank you for visiting [company name]. We value all of our customers and strive to meet everyone's needs.

Please tell us the date and time of your visit:

Did we respond to your customer service needs today?  YES  NO

Was our customer service provided to you in an accessible manner?

YES  SOMEWHAT  NO (please explain below)

Did you have any problems accessing our goods and services?

YES (please explain below)  SOMEWHAT (please explain below)  NO

Please add any other comments you may have:

Contact information (optional)\*:

Thank you.

Management

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**\*Please note:** There may be privacy implications for organizations collecting personal information. Providers should seek their own legal advice regarding the privacy implications of collecting personal information in this manner.

## Sample 2

---

### Record of Customer Feedback

Date feedback received:

Name of customer **[optional]**:

Contact information (if appropriate)\*:

Details:

Follow-up:

Action to be taken:

Staff member:

Date:

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\*Please note: There may be privacy implications for organizations collecting personal information. Providers should seek their own legal advice regarding the privacy implications of collecting personal information in this manner.

## **Appendix E: Sample Notices on the Feedback Process**

### **Feedback process on provision of goods or services to people with disabilities**

#### **Sample 1**

---

Dear Valued Customers,

We strive to improve accessibility for our customers with disabilities. We would like to hear your comments, questions and suggestions about the provision of our goods or services to people with disabilities. Please contact Customer Service in person, by mail or at [phone number] or by email [email address] to share your comments.

Thank you.

Management

---

#### **Sample 2**

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Dear Valued Customers,

We strive to improve accessibility for our customers with disabilities. We welcome your feedback. Please call [phone number] or email [email address] to share your comments, or request a copy of our accessibility policy.

Thank you.

Management

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## Back Cover - More Information

### Compliance assistance resources

You can order a copy of the customer service standard or get more information about it by contacting the following:

Accessibility for Ontarians with Disabilities Act (AODA) Contact Centre ServiceOntario  
Toll-free: 1-866-515-2025  
TTY: 416-325-3408 / Toll-free 1-800-268-7095  
Fax: 416-325-3407

You may also want to refer to the Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07. [\[LINK\]](#)

Further information that will help providers comply with the standard may be found on the Accessibility Directorate's compliance assistance website at [www.AccessON.ca/compliance](http://www.AccessON.ca/compliance).

#### **To read the Accessibility for Ontarians with Disabilities Act:**

1. Go to the website [www.AccessON.ca/compliance](http://www.AccessON.ca/compliance)
2. Click on the link [Accessibility for Ontarians with Disabilities Act, 2005](#)
3. This will take you to the act.

#### **To read the customer service standard:**

1. Go to the website [www.AccessON.ca/compliance](http://www.AccessON.ca/compliance)
2. Click on the link [Accessibility Standards for Customer Service Regulation, O. Reg. 429/07](#)
3. This will take you to the customer service standard.