



Step by Step

A Practical Guide to the Accessibility Standards
for Customer Service, Ontario Regulation 429/07

In partnership with:



Ontario



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Toolkit Overview

This toolkit was designed to provide Hotels, Motels, Restaurants and Tourism businesses with plain-language information and resources in order to comply with the Accessibility for Ontarians with Disabilities Act, 2005 and the Accessibility Standards for Customer Service, Ontario Regulation 429/07. The information and documents contained within the toolkit were designed based on legislative requirements.

The Toolkit Contains the Following Abbreviations:

AODA: Accessibility for Ontarians with Disabilities Act, 2005

Businesses: Hotels, Motels, Restaurants and/or Tourism businesses

Customer Service Standard: Accessibility Standards for Customer Service, Ontario Regulation 429/07

Staff: Employees, volunteers, agents, contractors and others who deal with the public or act on your behalf

Symbols Used Within the Toolkit:



Learn More: This symbol indicates websites and resources that contain additional information. If you are reviewing the toolkit in electronic form, you can click on the link to immediately open the website.



Legislative Requirement: This symbol indicates direct language used from the legislation and/or applicable laws.



Suggestions: This symbol indicates best practice ideas and solutions your business may want to consider. Suggestions are not mandated by the legislation. They are provided to assist your business in developing procedures and practices.



Tools: This symbol refers to an attached form, sample policy or template included in this guide that will help you meet the legislated requirements; however, you are not required to use any of the attached tools and may choose to design your own.

Definitions

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that guests bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to:

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons' Rights Act, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in Ontario Regulation 429/07, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in Health Protection and Promotion Act, Ontario Regulation 562, a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in Ontario Regulation 429/07, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.



1. Understanding the Legislation

A. Overview of the Accessibility for Ontarians with Disabilities Act, 2005

The AODA was designed to make Ontario more accessible by identifying, removing and preventing barriers for persons with disabilities. Under the AODA, accessibility standards are being developed that will place mandatory requirements on private and public sector businesses with at least one employee in Ontario. The standards include: Customer Service; Information and Communications; Employment; Transportation; and Built Environment.

Each standard will have rules that businesses must comply with, aimed at making Ontario accessible by 2025. All proposed accessibility standards were developed by Standards Development Committees. These committees were made up of people with disabilities or their representatives and representatives from the business community, broader public sector and Ontario government. Each committee set goals that included what needs to happen to remove barriers, along with an achievable timetable. When developing timetables, the committees considered the different types of businesses, economic conditions and associated costs. Once the committees developed their proposed accessibility standards, they were made available for public feedback, re-examined and revised by the committees and then submitted to the government for consideration as law.



To read the AODA, visit the following website by clicking on the link below or by entering the information into your web browser.

http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm

B. Overview of the Accessibility Standards for Customer Service

The Customer Service Standard is the first of the five accessibility standards to become law. This standard applies to all businesses and organizations with one or more employees in Ontario that provide goods and services to the public or to other businesses or organizations..

The goal of the Customer Service Standard is to ensure that people with disabilities are given the same level of customer service as everyone else. Businesses are expected to provide customer service under the principles of dignity, independence, integration and equal opportunity. The Standard also mandates measures surrounding policies, practices and procedures, communication, assistive devices, service animals, support persons, service disruptions, feedback and training.



To read the Customer Service Standard, visit the following website by clicking on the link below or by entering the information into your web browser.

http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07429_e.htm

C. Why Accessibility Makes Sense

Businesses with improved accessibility will appeal to a wider range of visitors and potentially open their business up to new revenue streams. Consider that accessibility is not just for your guests with disabilities but also for families visiting your establishment, older guests with different needs and potentially all of your guests in one way or another.

Making Ontario more accessible for guests with disabilities creates a win-win situation for both businesses and guests. By adapting and adopting the changes required under the AODA and the Customer Service Standard, the hospitality industry gains an important opportunity to tap into a larger market, and offer all guests the ability to access its goods and services, in a way that takes into consideration each guest's needs. Breaking down barriers to ensure that your business is open to all guests is not only legally required, but makes great business sense.

Important Statistics

- 1 in 7 Ontarians currently have a disability.
- Less than 2% of Canadians with a disability require the use of a wheelchair.
- The majority of disabilities are not readily apparent and may include non-visible disabilities such as: anxiety, asthma, developmental disabilities and diabetes.
- As the population ages it is expected that 1 in 5 Ontarians will have a disability.
- According to Statistics Canada, seniors make up the fastest growing age group in Canada and by 2017, will account for a larger share of the population than children 0-14.
- As the population ages, demand for accessible accommodations and inclusive tourism continues to grow.
- The Ministry of Tourism indicates that in 2007, 105 million total person visits were made in Ontario.
- According to the Martin Prosperity Institute, if accessibility has even a modest impact of 3% increase in tourism, this would represent \$700 million in additional tourism expenditures.

Improving accessibility will mean that more people will have access to shops, restaurants, hotels, motels and attractions which can result in a better bottom line. Increasing communication so that the needs of your guests are considered is not only a best good business practice but will also ensure business owners are aware of and responsive to guest requirements.

D. The Guest Experience: Understanding Barriers to Goods and Services

Every day guests arrive at your business to enjoy the services you provide. Each guest has different needs and requirements to be considered. Some people are born with disabilities, but others acquire a disability due to illness, accidents or simply from aging. Guests with disabilities will come in all ages and may have visible or non-visible disabilities such as: a child with cochlear implants, a teenager with asthma, a mom who is blind, a friend with anxiety, a father with diabetes and a grandparent that requires the use of a walker.

Barriers are obstacles that make it difficult, or sometimes impossible, for persons with disabilities to carry out everyday activities such as dining out, going on vacation or enjoying time out with friends and family. The AODA recognized common barriers that individuals with disabilities face on a daily basis and designed the standards to address and eliminate these barriers in order to make Ontario fully accessible. Barriers can be found in: attitude; information or communication; technology; and in physical or architectural surroundings. Barriers can also be systemic such as when policies, practices or procedures discriminate against people with disabilities.

The following examples are meant to provide you with a real world look at the barriers your guests might face while accessing your goods and services. Businesses must understand that guests with disabilities may have different needs and practices must be set up to ensure that goods and services are available to all guests, including those with disabilities. The provided examples and solutions are not mandated practices -- many of the requirements can be met through a variety of options. Your task will be to determine what your businesses will/can do to increase customer service accessibility.

Making the Decision to Visit Your Business

Before a guest arrives at your door, typically they spend time researching, talking about and considering where they want to go. During this stage they may visit your website, review printed materials and ask family and friends about their experiences or recommendations.

Websites and printed materials can be very frustrating to guests with vision loss, or with developmental or learning disabilities. Imagine trying to access information and not being able to read the text, understand where to click or differentiate from backgrounds and text. This process can create anxiety, stress and ultimately prevent the guest from visiting your premises. These situations would be considered **information and/or technological** barriers.

Solutions to Consider:

- Use large, clear text on your website such as Arial 14, Tahoma 16 or another variation.
- Limit or remove italics, bold and fully justified text from printed and online materials.
- Ensure there is a strong contrast between the background and text.
- Avoid using red, pink and light coloured text.
- Use images and symbols to support the text and message.
- Make the "Contact Us" section large and easy to find.

Making a Reservation/Booking

Now that the guest has decided to visit your establishment they may choose to contact your business to make a reservation or booking.

Guests with disabilities such as hearing loss can find this process challenging. Consider that when attempting to make a reservation or booking, your guest also needs to arrange assistance from a message relay service. They set the message relay service up and contact the business only to have no one answer or to get an automated message. Attempting to call again will involve the same effort and process. This situation is an example of an **systemic** barrier.

Perhaps the guest calls again and reaches an employee to make the reservation, only to have the individual not understand how to use a message relay service. During the process, the employee does not direct questions to the guest but instead to the operator. When the guest finally arrives, the same employee shouts at the guest because they are aware that the guest has difficulties hearing. This situation would be considered an **attitudinal** barrier -- without intending to, the employee is not treating the guest with respect and dignity.

Solutions to Consider:

- Allow guests to make reservations in a variety of ways such as through the website, email or by fax.
- Ensure employees taking reservations or bookings provide service in a manner that meets the guest's needs.
- Train staff on understanding disabilities including how to communicate with respect.
- Train staff on the types of devices that might be used to make bookings and on best practice customer service tips.

Arriving at Your Establishment

Guests arriving at your location may face many barriers before they even check in. For example, guests who rely on assistive devices for mobility may experience many challenges when making it into your establishment, from difficulties finding close parking, to manoeuvring walkways, or opening heavy doors. Guests with vision loss may find it difficult to find your establishment if the sign is hidden or not clearly marked and guests that rely on lip reading may find it challenging to understand employees if your business has low or dark lighting. These situations would be considered **architectural or physical** barriers.

Solutions to Consider:

- Let guests know what to expect on arrival, such as parking conditions, address and main entrance details.
- Ensure that pathways to your establishment are clear and easy to use.
- Make sure the entrance and front desk are well lit.
- Provide seating close to the front desk, ticket office and/or reservation desk.
- Ensure the door is easy to open, has automatic buttons or that an employee is available to assist with entry.

Enjoying Your Goods and Services

Now that the guest has arrived and is ready to enjoy the goods and services you offer, they may still experience unexpected barriers. For example, a guest may request accommodations such as specific seating or rooms, or have trouble understanding the menu. Employees that do not understand disabilities may only see the guest as difficult and may not provide them the same quality of service they typically give. Or an employee may recognize that a guest has a disability and overcompensate by doing things for the guest. These situations would be considered **attitudinal** barriers.

Guests may also face barriers using your goods and services. For example, rooms that are designed with close seating or tables may make it difficult for a guest with a walker, wheelchair or scooter to manoeuvre. Candlelit tables, small washrooms, tight aisles and stairs can also create unwelcoming environments. These situations would be considered **architectural or physical** barriers.

Solutions to Consider:

- Ask guests how you can assist them. Remove excessive chairs, glasses, cutlery and placemats, increase lighting, assign them a room or provide them seating that is easily accessible to washrooms and exits.
- Install grab bars in washrooms to assist with sitting and standing.
- Ensure all stairways are well lit, with safety rails and anti-slip tread.
- Review your establishment to determine areas that may create barriers, determine practices or solutions and train employees on recognizing and responding to barriers.

Leaving Your Establishment

For some guests with disabilities, unintended barriers may be encountered leaving your establishment . Many hotels/motels for example will slide the bill under the guest's door; but, for some guests, bending over to pick up the bill could be next to impossible. Some restaurants provide the bill and expect the guest to take the bill to a cashier in order to pay; but, guests that have difficulties with mobility can find this task daunting. These situations would be considered **systemic** barriers.

Solutions to Consider:

- Ask the guest how you can assist them.
- Offer a variety of options for receiving and paying the bill such as taking cash or credit cards at the table or collecting the bill from the front desk.
- Ask the guest which is their preferred method.
- Arrange taxis for guests requiring them upon leaving.
- Allow flexibility in check out times.

E. Compliance and Deadlines

The Customer Service Standard applies to all public and private sector businesses that have one or more employees in Ontario and that provide goods or services to the public or other businesses or organizations. Public sector organizations were expected to comply by January 1, 2010. Private sector businesses, such as yours, need to comply by **January 1, 2012**.

i. Counting Employees

When you count how many employees you have you must include full-time, part-time, seasonal, temporary, and contract employees. Volunteers and independent contractors are not included in the count -- if you are not issuing paycheques then they are not considered employees.

ii. Increases/Decreases in Employee Numbers

Depending on your business there may be times of the year when you employ more staff members than usual, for example, during the summer months when tourism increases, you may hire additional staff. Compliance requirements mandate that businesses with 20 or more employees must complete additional paperwork and meet specific requirements. Today you may employ less than 20 employees; however, if this increases to 20 or more at any time, you will be required to comply with the additional requirements.

iii. Overview of Remaining Standards

Information and Communications: Designed to address and remove the barriers to accessing information and communications. This standard will look at information being provided in person, through print, a website or other means.

Employment: Designed to address and remove the barriers in paid employment practices. This standard will look at recruitment, hiring and retention.

Transportation: Designed to address and remove the barriers to public transportation.

A new Integrated Accessibility Regulation covers the above three accessibility standards. It harmonizes common requirements across the three standards and also includes specific requirements for each. This will make it simpler for organizations to comply, while making Ontario more accessible to people with disabilities. The requirements come into effect July 1, 2011.

The Integrated Accessibility Regulation applies to all organizations in the public, private and non-profit sectors that:

- provide goods, services or facilities directly to the public or to other businesses or organizations
- have at least one employee in Ontario
- are provincially regulated.

Requirements will be phased in between 2011 and 2021, giving businesses and organizations time to integrate the accessibility requirements into their regular business processes.

The Ontario government is now working to develop tools and resource materials to help organizations meet the requirements and will continue to work with key partner stakeholders. As materials are developed to help businesses achieve accessibility, they will become available on www.ontario.ca/AccessON.

Built Environment: Designed to address and remove the barriers of access into and within buildings and outdoor spaces. This standard is expected to build on Ontario's Building Code.

2. Requirements

A. Overview of the Requirements

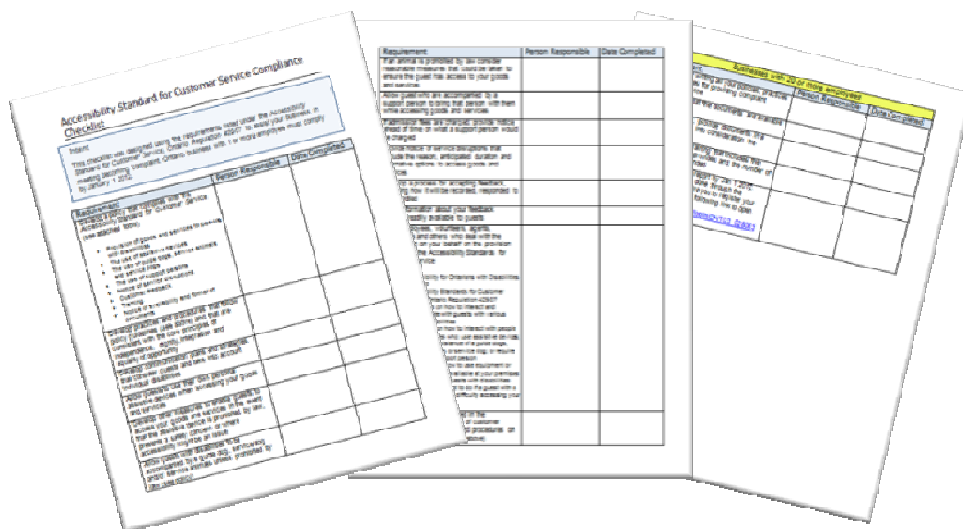
The Customer Service Standard requires businesses to:

1. Establish policies, practices and procedures on providing goods or services to people with disabilities
2. Ensure that your policies, practices and procedures are consistent with the core principles of dignity, independence, integration and equal opportunity.
3. Communicate with a person in a way that takes into account their disability.
4. Set a policy on allowing guests to use their own personal assistive devices when accessing your goods or services, including any other measures your business offers that will enable guests to access your goods or services
5. Allow guests with disabilities to be accompanied by their service animal in areas of your premises that are open to the public unless excluded by law. Develop measures that will enable guests to access your goods and services in the event that their animal is excluded by law.
6. Allow guests with disabilities who are accompanied by a support person to bring that person with them while accessing your goods or services. Clearly post admission fees, if any, for support persons.
7. Provide notice when facilities or services that guests with disabilities rely on are unavailable, including known details such as the reason, anticipated duration and alternative options to access goods and services.
8. Develop a process for accepting feedback relating to the provision of goods and services to guests with disabilities, including how it will be recorded, responded to and handled. Make information about your feedback process readily available to guests.
9. Train employees, volunteers, agents, contractors and others who deal with the public or act on your behalf on the provisions required by the customer service standard.
10. Train those who are involved in the development of customer service policies, practices, and procedures on the required provisions.
- 11. Businesses with over 20 employees will be required to:**
 - document in writing all policies, procedures, and practices for providing accessible customer service;
 - notify guests that the documents are available upon request;

- provide these documents in a format that takes into account the guest's disability;
- keep a record of training; and,
- complete the online report by the 2012 deadline (to be announced).



The Compliance Checklist was designed to keep your business on track when meeting the various legislative requirements. Some legislative requirements are specific and tell the business what is expected such as: develop a process for collecting feedback. Other legislative requirements are general and will require the business to determine how to best comply with the standard such as admission fees [note: admission fees are not a requirement. The requirement is that businesses must provide notice ahead of time on what the admission fee is, if there is any at all. I would remove the point about the requirements being general]. In order for your business to become fully compliant, time will need to be spent developing policies, practices, procedures and training.



A best practice suggestion is to form a team that will be responsible for assisting your business in becoming compliant. The team should include individual(s) who handle:

- Customer service on daily basis
- The development of policies, procedures and practices



To learn more about compliance, visit the following website by clicking on the link below or by entering the information into your web browser.

<http://209.167.40.96/page.asp?unit=cust-serv-reg&doc=workbook&lang=en>

B. Understanding the Core Principles

Businesses will need to make every reasonable effort to ensure that their policies, procedures and practices are consistent with the principles of dignity, independence, integration and equal opportunity. The Standard does not specify what “reasonable effort” means because every situation will be different and ultimately it will be up to the business to determine what they consider reasonable and unreasonable.

There is no one proven way to provide accessibility and often it can be achieved through a variety of methods including: adapting or changing practices, using assistive devices or simply asking the guest what they need. Businesses will need to determine how they can provide goods and services to guests with disabilities by considering what will work best today using their available resources and what can be adapted slowly over time.

i. Incorporating Dignity

Policies, procedures and practices that respect the dignity of a person with a disability are those that treat them as customers and clients who are as valued and as deserving of effective and full service as any other guest. They do not treat people with disabilities as an afterthought or force them to accept lesser service, quality or convenience. Service delivery needs to take into account how people with disabilities can effectively access and use services and show respect for these methods.

For example: A guest with a disability is attempting to pay their bill. They slowly take out their wallet and start counting their money. The cashier offers to assist the guest. When the guest indicates that they do not require help, the cashier does not rush the guest and allows the line behind the guest to grow. By respecting the guest’s wishes and not interfering, the business is respecting the guest’s dignity.

For example: A museum’s phone lines are usually answered in person. The museum has a TTY(Telephone Teletype) device for use by people who are Deaf or who have a speech impairment. However, the TTY line is left on its answering machine and the messages are only checked and responded to once a day. In this example, the customers who contact the museum using a TTY are expected to accept lesser service than people who use a telephone. This does not respect their dignity and does not meet the requirements of the customer service standard.

In the above situation, the business could consider a variety of methods to ensure each guest receives dignified service such as ensuring their website is accessible in order for guests to use screen reading software or allowing guests to also make reservations over the phone. The solution does not have to cost the business additional money -- it just needs to remove the barrier to goods and services.

ii. Incorporating Independence

In some instances, independence means freedom from control or influence of others – freedom to make your own choices. In other situations, it may mean the freedom to do things in your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor. A staff person should not hurry them or take over a task for them if they prefer to do it themselves in their own way.

For example: A clerk is helping a guest to buy lemonade which is served in a thin paper cup. The guest paying for the drink has very short arms. The clerk tries to hand the drink to the guest's companion. If this guest had asked for this service, this would be acceptable. Making the assumption that the guest can't handle the drink himself does not respect his independence. While paying, the guest asks the clerk to serve the drink in a double cup to strengthen the sides. He is then able to take the drink from the counter using his arms and by holding it against his chest.

For example: A zip lining business is running guests through their course. A guest arrives with very short arms. The staff members reviews the safety requirements to ensure the equipment can be adjusted to meet the guest's needs. The staff member works with the guest, as they would with every other guest and ensures that adjustments are made so that the guest can fully participate. By putting in a little extra effort, the business is giving the guest independence while providing complete access to its services.

iii. Incorporating Integration

Integrated services are those that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other guests. Integration means that policies, practices and procedures are designed to be accessible to everyone including people with disabilities.

Sometimes integration does not serve the needs of all people with disabilities. In these cases it is necessary to use alternate measures to provide goods or services. Alternate measures are ways of serving people with disabilities that are not completely integrated into the regular business activities of the organization. It might be that goods or services are provided to people with disabilities in a different place or in a different way than other guests. For example, using TTYs or e-mail to communicate with guests who are Deaf or have speech impairments is one way of offering phone services to them.

Alternative measures, rather than integration, might be necessary because the person with a disability requires it or because you cannot provide another option at the time. If you are unable to remove a barrier to accessibility, you need to consider what else can be done to provide services to people with disabilities.

For example: A bookstore provides services only through the Internet and doesn't have a physical location. If its website is fully accessible to customers who use screen readers (software that reads text aloud), its services are integrated as customers with low vision, for example, are able to access its goods in the same way as other customers. If the bookstore's website is not accessible to customers who use screen readers, but instead the bookstore makes its telephone customer service centre available to assist customers who have vision disabilities make purchases and review merchandise, it is providing an alternative measure to integration.

For example: A business has multiple floors; however, does not have an elevator. Guests who rely on assistive devices for mobility may not be able to access the additional floors. In these situations, the business will reserve dining tables or rooms on the first floor to ensure the guest can access and enjoy their goods and services. While the guest cannot fully access all floors, the business has developed an alternative measure to ensure accessibility.

iv. Incorporating Equal Opportunity

Equal opportunity means having the same chances, options, benefits and results as others. In the case of services it means that people with disabilities have the same opportunity to benefit from the way you provide goods or services as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or more inconvenience.

Sometimes this may mean that you have to treat individuals slightly differently so that they can benefit fully from your services. Equal opportunity can best be reached by taking steps to ensure that individual needs are taken into account when providing goods or services. Individuals do not have equal opportunity if they cannot have full benefit from your goods or services because of barriers to their access or participation.

Sometimes the principles need to be balanced in order to achieve the outcome that meets the needs of the person with a disability.

For example: A bakery advertises its products available for sale through visual displays. If its staff fail to assist people with vision disabilities to understand the variety of products available, they are preventing people with disabilities from having as much information as other customers who benefit from seeing a list of products. The bakery is not acting in accordance with the principle of equal opportunity.

For example: A coffee shop has a guest with a mental health disability that makes it difficult for him to be crowded by other people. The guest explains his disability-related needs and is offered a table apart from others. This supports the principle of equality of opportunity as it allows him to have the equal opportunity to enjoy his food and drink. While it may appear to be contrary to the principle of integration, it is not, as the person is most integrated by being allowed to sit apart.

v. Reasonable Effort

The principles are key components to achieving accessibility. Being consistent with the principles will help guide an organization in creating policies, practices and procedures that establish accessible services. The standard does not specify what “reasonable efforts” are because they may be different in each situation.

There is no single way to provide accessibility. Accessibility can often be achieved in a variety of different ways; by changing a procedure or installing an assistive device or simply by considering the needs of people with disabilities when you create services. Each organization needs to consider how they can provide goods or services to people with disabilities in light of their services, type of organization, resources and the options available for providing accessibility. In addition, what works best now may change over time and an alternate method might work better for the organization in the future.

Building accessibility into decision-making processes, short- and long- term planning, purchasing, and development of new systems or services, will help to ensure costly accessibility mistakes are not made nor that unintentional barriers to people with disabilities are created.

If there are accessibility measures that an organization wishes to use but can't make at the current time, they should plan for future implementation, and use other methods of providing accessibility in the short-term.

For example: A guest who is blind and reads Braille may need to know exactly what is on her bill but be unable to read a print copy. Different organizations may approach this situation in a range of ways.

At a small coffee shop, a waiter or cashier might read the bill to the person. A florist shop might offer to read a bill by phone. A mid-sized utility company might offer monthly bills in Braille to customers who register for the service and then might hire another company to print and send the Braille bills. A larger utility with more customers who use Braille and in-house technical expertise might determine that it is more cost effective to purchase equipment that lets the utility create its own monthly bills in Braille and may also offer an accessible website that allows bill viewing and payment online.

For example: A person with severe arthritis is unable to stand in a line-up for a length of time due to their disability.

A store with long line-ups at the cash register might offer a chair to the side and then serve the person in their order in the line. A non-profit service agency might offer to complete an intake form by phone rather than having the person travel to their site. A municipal office might install a separate service counter with a chair if putting a chair near the waiting line would result in blockage to the fire exit. A provincial ministry may be able to offer online service.

As you plan your policies, practices and procedures consider whether they address the principles which are each explained below.

C. Understanding the Difference between Policies, Procedures and Practices

Policies – Outline what you intend to do along with provisions for staff to follow.

For example: Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by your business. Depending on your business you may already have policies developed that address the provision of goods and services to guests such as: Customer Service Standards, Respectful Communication and Standards of Conduct. These policies should be reviewed to ensure that they are compliant with the principles of dignity, independence, integration and equal opportunity.

Developed Procedures – Outline what steps your business and employees will take.

For example:

1. Maintain a strong working knowledge of the presence and location of all assistive devices that are available on company premises, including (but not limited to):

- Elevator(s)
- Escalator (s)
- TTY telephones

- Wheelchair accessible ramps
- Automatic doors
- Wheelchair accessible tables
- Vibrating alarm clocks

2. Ask the guest if they will have any special requirements for their visit.

3. Provide guests with appropriate directions for the location of assistive devices on business premises.

4. Provide the guest with appropriate directions in the use of assistive devices located on business premises.

5. Upon request, accompany the guest to the location of the assistive device, and assist them in the correct use of the device.

Your business may also have set procedures that handle greeting guests, ordering, checking out and so forth. During the development of new or revised procedures you may consider starting with the procedures you currently have in place to determine what (if anything) needs to be revised.

Standard Practices – Are what you actually do on a daily basis.

For example: Employees always answer the phone by saying: "Good morning/ afternoon/ evening. Thank you for calling (Business Name) - how can I help you today"?

Many of the practices that your business already has in place could be routine standards that are simply done because that is the way it has always been done. Practices typically are harder to change because they are routine and often done without consideration or thought.



When looking at your business practices it is suggested that you consider having an employee responsible for regular customer service to review current practice and assist with recommendations. Since practices can vary from procedures, it is important to understand what actually happens on a daily basis.

D. Establishing Policies, Procedures and Practices

Businesses can consider a variety of options during the development of compliant policies, procedures and practices such as:

- **Updating existing practices:** Many businesses may already have policies, procedures and practices surrounding customer service standards. Consider reviewing your current standards and update them to be compliant with the new requirements.
- **Develop new standards:** Businesses may determine that developing new policies, procedures and practices will be easier. Businesses may choose to separate out each requirement or decide to combine everything into one comprehensive document.



A best practice standard would be to consider doing both. Develop new policies, procedures and practices that are needed but also spend time reviewing your current standards to ensure they are also compliant.

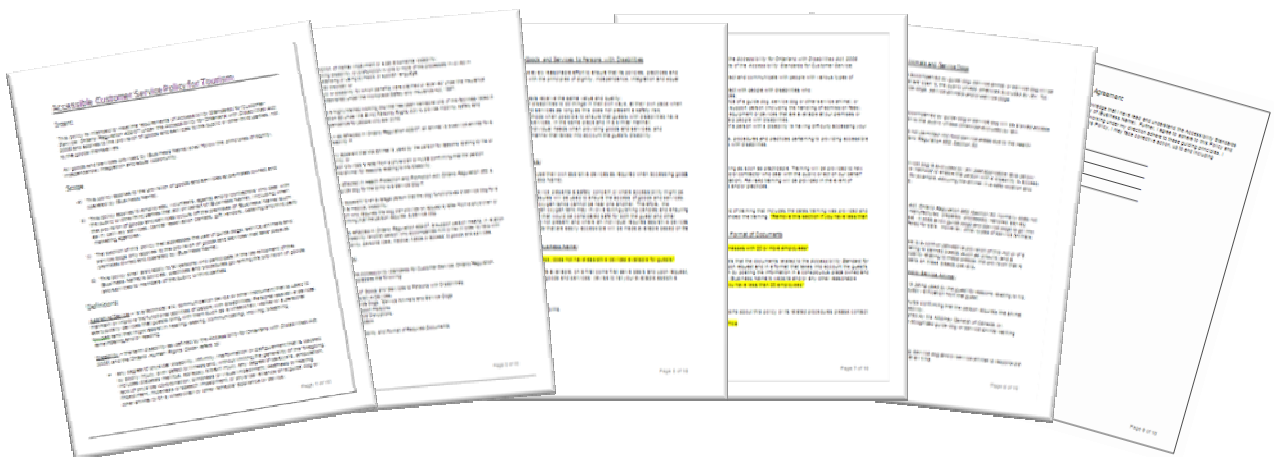
E. Develop a Policy

All businesses are required to develop a policy or policies that address the:

- Provision of goods and services to persons with disabilities
- Use of assistive devices
- Use of service animals
- Use of support persons



The toolkit contains three sample policies: Accessible Customer Service Policy – for hotel/motels, restaurants and tourism. You can choose to develop your own policies or download the sample policy that applies to your business. The difference between each policy is minor since the majority of the content is legislatively required; however, your unique business was considered when applying certain elements of the standard or when providing examples.



i. Using the Policy

The downloadable sample policy is 90% complete and will require slight revisions by your business.

(Brackets) = indicate areas where you will either need to incorporate your business name or revise the content to contain details that are applicable in your environment.

Highlights = indicate areas that you may want to remove or update; either because you have less than 20 employees or because you have developed a different practice.

The sample policy also includes two sections that are not mandated by the legislation: Administration and Acknowledgement & Agreement. Below we have included details surrounding these sections and how they can be beneficial to your business.

ii. Administration

Businesses must review this policy in the event that changes have been made to the legislation. The Accessibility for Ontarians with Disabilities Act, 2005, allows for the development and implementation of accessibility standards to meet the goal of an accessible Ontario by 2025. Staying on top of changing and new legislation could involve updating the policy as required. This policy also contains other pieces of legislation such as the Health Protection and Promotion Act and Dog Owners' Liability Act, Ontario. A best practice measure would be to bookmark key websites to review them periodically for changes and revisions.

iii. Acknowledgement & Agreement

The Acknowledgement & Agreement should be signed by all employees, volunteers, agents and/or contractors that have read and understood the policy. Signed papers can be filed within employee files and/or a main file for the business. Having these signed documents not only shows the business has done their due diligence but also can protect the business from future issues.

For example: If you have an employee, volunteer, agent and/or contractor who does not follow the policy, the business can hold them accountable for their actions through reminding them of the policy, showing them their signed commitment along with considering measures such as progressive discipline or removing the volunteer, agent and/or contractor from acting on their behalf depending on the severity of the violation. Not having proof such as the signed agreement can make this process difficult and make it harder to prove that the business properly trained the volunteer, agent and/or contractor on the legislation and their responsibilities.

F. Communication Plans

Communication is a process of providing, sending, receiving and understanding information. This section of the regulation is a specific requirement to communicate with an individual with a disability in a way that takes the person's disability into account. This means that you must consider how the disability affects the way that the person expresses, receives or processes communications. The goal is to communicate in an effective way.

Taking someone's disability into account requires you to take that particular individual's needs and circumstances into consideration. Don't make assumptions based on his or her disability. What may be a very effective way of providing information for one person with a disability may not be for another. Different people with the same type of disability may communicate in different ways because of different skills or resources. For example, only a small percentage of people who are blind use Braille. Where possible, it is helpful to ask the person directly how to communicate with them.

i. Accessible Communication

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

- Making the original communication more accessible
- Changing the usual method of communication
- Using assistive devices or services.

ii. Make the Original Communication More Accessible

Sometimes communication can be made accessible if the needs of people with disabilities were considered during the planning stage of services. Using plain language can help to make a document easier to read for people with certain learning disabilities and including captioning or sign language windows to television advertisements or videos allows many people who are Deaf or hard of hearing to understand these communications.

For example: Internet websites are a key channel of communication for many organizations. Many people with disabilities use computers and the internet. Some people with disabilities use assistive devices such as screen readers (devices that speak the contents of the screen), speech input systems (which allow you to talk into a microphone to control the computer and enter text) and a variety of other devices to operate the computer. If Internet sites and applications are created in a way that considers how assistive devices operate and how people with disabilities use them, the sites will be accessible to people with disabilities.

iii. Change the Method of Communication to Meet an Individual's Need

Communications that occur as part of providing goods or services can occur in a variety of ways such as in person, by phone, online, through print signs, handouts, brochures and through television or media advertisements. A second method of making communications accessible is to offer the information in a different medium. For example, if a staff person 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 handwrite 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.

Other examples include offering alternate formats of print documents such as:

- Large print for people who have low vision;
- Audio format such as cassettes or digital audio format;
- Braille used by some people who are blind or deaf-blind;
- Videos that may be helpful to people with certain learning disabilities; and
- Easy-read, simplified summaries of materials for people with developmental or intellectual disabilities.

In addition, strategies such as offering phone service rather than requiring in person service, or email rather than postal notices are other methods of using alternate channels to provide accessible communications.

iv. Use Assistive Devices or Services

There are a variety of assistive devices or services that a provider might want to consider in communicating with guests with disabilities. For example, an amusement park that has glassed ticket booths may want to add amplification devices to the booths to assist people who are hard of hearing. An organization that offers conferences might offer real-time captioning services (on-screen typing of what speakers are saying), sign language interpreters or deaf-blind intervenors upon request so that people who are hard of hearing, Deaf, deafened or deaf-blind may participate effectively in the conference seminars. A government office that provides detailed and sometimes lengthy information by phone might use a TTY to communicate with its clients who are Deaf, hard of hearing, have speech impairments or are deaf-blind.

v. Consider the Nature of the Communication

Finding a suitable communication method may require consideration of the situation or circumstances of the provider and of the person with a disability.

Quite often, a person with a disability will have a range of ways in which they can communicate. Someone who is unable to speak or has difficulty speaking, for example, may use gestures, pen and paper or typing back and forth, when the information being exchanged is simple or straightforward. Other people with speech disabilities may use electronic communication systems, and though it might be difficult to understand the synthetic voice, taking the time to listen carefully or to observe a visual display of the information will often allow effective communication. In some situations, where the information being exchanged is complex, lengthy or very important, it may be more effective to involve someone who can facilitate or interpret the communication.

Where options exist, a provider may use any communication method that takes into account the person's disability in the particular situation.

For example: A hotel provides its schedule of events electronically to a senior with a vision disability so that he can use his computer's screen reader to understand the information. When another guest with a vision disability asks for the schedule in Braille, the hotel explains that it does not have it available in Braille, but can provide it electronically. As this guest has an accessible computer and is able to read the electronic document, they accept the offer of an electronic document although it was not their preferred format.

For example: A tour operator provides sign language interpreters to Deaf guests who use American Sign Language (ASL) or langue des signes québécoise (LSQ). When a Deaf guest signs up for the tour who does not understand ASL or LSQ, the tour operator learns from her that she is comfortable reading lips and communicating back and forth in writing or by typing. The tour operator is therefore taking into account the guest's disability and preferred method of communicating.

In the case of individuals who have limited options of communication or where ongoing services are required, such as an individual who will be receiving weekly services for an extended period of time, not all providers may be able to meet the communication need. The provider would need to assess the situation and consider all options and resources available to them before making such a decision.

When referring to someone with a disability, it is extremely important that you put **the person first** and not address or identify them by the disability.

The key to developing communication plans [not sure why you need a communication plan – how to interact with customers with disabilities should be part of training] that are flexible and considerate of all guests will be to:



- Understand disabilities
- Incorporate best practice tips for customer service
- Consider alternative approaches to make communication accessible
- Always ask the guest what they need

G. Types of Disabilities

Most people think of disabilities as physical disabilities such as an individual who uses a wheelchair. In fact, there are numerous other disabilities including many that are non-visible or episodic and disabilities can vary in degree and seriousness. Regardless of the severity of the disability, the many types can be summarized in this list:

- **Vision**
- **Hearing**
- **Deafblind**
- **Physical**
- **Speech or language**
- **Mental Health**
- **Intellectual, Developmental**
- **Learning**

i. Interacting with someone who has Vision Loss


Vision loss reduces a person's ability to see clearly. Few people with vision loss are totally blind. Many have limited vision such as tunnel vision, where a person has a loss of peripheral or side vision, or a lack of central vision, which means they cannot see straight ahead. Some people can see the outline of objects while others can see the direction of light.

Vision loss can restrict your guests' abilities to read signs, locate landmarks or see hazards. Some of these guests may use a guide dog or white cane, but others may not. Sometimes it may be difficult to tell if a person has vision loss.

Types of assistance your guests might use:

- Braille
- Large print
- Magnification devices
- White cane
- Guide dog
- Support person such as a sighted guide.

Customer Service Tips

- 
- Don't assume the individual can't see you.
 - Don't touch your customer without asking permission.
 - Offer your elbow to guide the person. If he or she accepts, walk slowly, but wait for permission before doing so. Lead – don't pull. See below for tips on guiding a customer who has vision loss.
 - Identify landmarks or other details to orient your customer to the environment around him or her.
 - Don't touch or speak to service animals – they are working and have to pay attention at all times.
 - Don't leave your customer in the middle of a room. Show him or her to a chair, or guide them to a comfortable location.
 - If you need to leave your customer, let him or her know you are leaving and will be back.
 - Identify yourself when you approach your customer and speak directly to him or her, even if he/she is accompanied by a companion.
 - There is generally no need to raise your voice because the person does not necessarily have hearing loss. Say your name even if you know the person well as many voices sound similar.
 - Be clear and precise when giving directions, e.g., two steps behind you, a metre to your left, etc. Don't use "over there" or point in the direction.
 - If you're uncertain about how to provide directions, ask the person how to do so.
 - Do not be afraid or embarrassed to use words such as "see", "read" and "look." People with vision loss also use these words.
 - When providing printed information, offer to read or summarize it.
 - Offer to describe information. For example, verbally itemize the bill or explain what the specials are or what is on the menu.

Tips for guiding a guest who has vision loss

- Ask first if your guest wishes to be guided. If the answer is "yes," offer your arm. Ask which arm is better. Walk at a normal pace. The person will walk about a step behind. Announce handrails, doors (to the right/left, push/pull to open, etc.) and describe the surrounding areas such as what is in an aisle.
- If you are guiding towards stairs:

- Let the guest know if they have to walk up or down
- Approach the stairs head on, not at an angle and come to a full stop in front of the stairs
- Lead or guide your guest to the rail side to allow them to take hold of it
- Let them find the first step and then start to climb or descend the stairs
- Try to be one step ahead and announce the last step.
- If you are going through a narrow doorway or a passage, go first, after explaining the circumstances and describing the area.
- Upon entering a room, offer to describe the dimensions and the location of people and furniture.
- If the person wishes to sit, offer to guide him/her and place his/her hand on the back of the chair.
- Keep the person informed when others approach or leave.
- If you must leave the individual alone, do not leave them standing in the middle of the room, with nothing to hold onto. If they are not seated, guide them to a door, wall, or piece of furniture to stand next to. This will help the person to stay spatially oriented.
- Before opening the door for a guest with vision loss, ask if they want you to open it. Indicate whether the door opens to the right or left and whether the door will be pushed or pulled. They may be using the door's location as a reference point.

ii. Interacting with someone who is deaf, deadened or hard of hearing

People who have hearing loss may be Deaf, oral deaf, deafened or hard of hearing. People who are profoundly deaf may identify themselves as culturally Deaf or oral deaf. In Deaf culture, indicated by a capital "D," the term is used to describe a person who has severe to profound hearing loss, with little or no hearing.

Oral deaf is a term describing a person who was born deaf or became deaf before learning to speak, but is taught to speak and may not typically use American Sign Language.

The term "deafened" describes a person who has lost their hearing slowly or suddenly in adulthood. The person may use speech with visual cues such as captioning or computerized note-taking, speech reading or sign language.

The term "hard of hearing" describes a person who uses their residual hearing (hearing that remains) and speech to communicate. The person may supplement communication by speech reading, hearing aids, sign language and/or communication devices.

Types of assistance your guests might use:

- Hearing aid
- Paper and pen
- Personal amplification device (e.g., Pocket Talker)
- Phone amplifier
- Relay Service
- Teletypewriter (TTY)
- Hearing ear dog
- Support person such as a sign language interpreter.

Customer Service Tips

- Attract the customer's attention before speaking. Generally, the best way is by a gentle touch on the shoulder or with a gentle wave of your hand.
- Ask how you can help. Don't shout.
- Move to a well-lit area, if available, where your customer can see your face.
- Don't put your hands in front of your face when speaking. Some people read lips.
- If necessary, ask if another method of communicating would be easier, for example, using a pen and paper.
- Be patient if you are using a pen and paper to communicate. American Sign Language may be your customer's first language. It has its own grammatical rules and sentence structure.
- Look at and speak directly to your customer. Address your customer, not the interpreter or support person.
- Be clear and precise when giving directions, and repeat or rephrase if necessary. Confirm that your customer understands you.
- If the person uses a hearing aid, reduce background noise or move to a quieter area, if possible, so the person can hear or concentrate better.
- Don't assume that the customer knows sign language or reads lips.

iii. Interacting with someone who is deafblind

A person who is deafblind can neither see nor hear to some degree. This results in difficulties in accessing information and managing daily activities. Many people who are deafblind will be accompanied by an intervenor, a professional who helps with communicating.

Types of assistance your guests might use:

- Braille
- Large print
- Print on paper (using black felt marker on non-glossy white paper or using portable white and black boards)
- Communication boards
- Hearing aid with built-in FM system
- Magnification equipment such as monocular or magnifier
- Teletypewriter (TTY)
- White cane
- Service animal
- Support person, such as an intervenor.

"Being disabled should not mean being disqualified from having access to every aspect of life."

--Emma Thompson

Customer Service Tips

- Don't assume what a person can or cannot do. Some people who are deafblind have some sight or hearing, while others have neither.
- A customer who is deafblind is likely to explain to you how to communicate with him or her or give you an assistance card or a note explaining how to communicate with him or her.
- Identify yourself to the intervenor when you approach your customer who is deafblind, but then speak directly to your customer as you normally would, not to the intervenor.
- Don't touch or address service animals – they are working and have to pay attention at all times.
- Don't suddenly touch a person who is deafblind or touch them without permission.

iv. Interacting with someone who has a physical disability

There are many types and degrees of physical disabilities, and not all require a wheelchair. People who have arthritis, heart or lung conditions or amputations may also have difficulty with moving, standing or sitting. It may be difficult to identify a person with a physical disability.

Types of assistance your guests might use:

- Elevator
- Mobility device (i.e., wheelchair, scooter, walker, cane, crutches)
- Support person.

Customer Service Tips

- Speak naturally and directly to your customer, not to his or her companion or support person.
- If you need to have a lengthy conversation with someone in a wheelchair or scooter, consider sitting so that you can make eye contact.
- Ask before you help. People with physical disabilities often have their own ways of doing things.
- Respect your customer's personal space. Do not lean over him or her or on his or her assistive device.
- Don't move items or equipment, such as canes and walkers, out of the person's reach.
- Don't touch assistive devices without permission. If you have permission to move a person in a wheelchair, remember to:
 - o Wait for and follow the person's instructions
 - o Confirm that your customer is ready to move
 - o Describe what you're going to do before you do it
 - o Avoid uneven ground and objects
 - o Don't leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.
- Let your customer know about accessible features in the immediate area (i.e., automatic doors, accessible washrooms, elevators, ramps, etc.).


v. Interacting with someone who has a speech or language disability

Some people have problems communicating because of their disability. Cerebral palsy, hearing loss or other conditions may make it difficult to pronounce words or may cause slurring or stuttering. They also may prevent the person from expressing themselves or prevent them from understanding written or spoken language. Some people who have severe difficulties may use communication boards or other assistive devices.

Types of assistance your guests might use:

- Communication board
- Paper and pen
- Speech generating device
- Support person.

Customer Service Tips

- 
- Don't assume that because a person has one disability, they also have another. For example, if a customer has difficulty speaking, it doesn't mean they have an intellectual or developmental disability as well.
 - Ask your customer to repeat the information if you don't understand.
 - Ask questions that can be answered "yes" or "no" if possible.
 - Try to allow enough time to communicate with your customer as they may speak more slowly.
 - Don't interrupt or finish your customer's sentences. Wait for them to finish.

vi. Interacting with someone who has a mental health disability

Mental health disabilities are not as visible as many other types of disabilities. You may not know that your guest has a mental health disability unless you're informed of it.

Examples of mental health disabilities include schizophrenia, depression, phobias, as well as bipolar, anxiety and mood disorders.

A person with a mental health disability may have difficulty with one, several or none of these:


- Inability to think clearly
- Hallucinations (e.g., hearing voices, seeing or feeling things that aren't there)
- Depression or acute mood swings (e.g., from happy to depressed with no apparent reason for the change)
- Poor concentration
- Difficulty remembering
- Apparent lack of motivation.

If someone is experiencing difficulty controlling his or her symptoms, or is in a crisis, you may want to help out. Be calm and professional and ask your customer how you can best help.

Types of assistance your guests might use:

- Service animal
- Support person.

Customer Service Tips

- 
- Treat a person with a mental health disability with the same respect and consideration you have for everyone else.
 - Be patient.
 - Be confident and reassuring. Listen carefully and work with your customer to try to meet their needs.
 - If someone appears to be in a crisis, ask him or her to tell you the best way to help.

vii. Interacting with someone who has an intellectual or development disability


People with intellectual or developmental disabilities may have difficulty doing many things most of us take for granted. These disabilities can mildly or profoundly limit the person's ability to learn, communicate, socialize and take care of their everyday needs. You may not know that someone has this type of disability unless you are told.

As much as possible, treat your guests with an intellectual or developmental disability like anyone else. They may understand more than you think, and they will appreciate that you treat them with respect.

Types of assistance your guests might use:

- Communication board
- Speech generating device
- Service animal
- Support person.

Customer Service Tips

- 
- Don't assume what a person can or cannot do.
 - Use plain language and speak in short sentences.
 - To confirm if your customer understands what you have said, consider asking the person to repeat the message back to you in his or her own words.
 - If you cannot understand what is being said, simply ask again.
 - Provide one piece of information at a time.
 - Be supportive and patient.
 - Speak directly to your customer, not to their companion or support person.

viii. Interacting with someone who has a learning disability

The term “learning disability” describes a range of information processing disorders that can affect how a person acquires, organizes, expresses, retains, understands or uses verbal or non-verbal information.

Examples include dyslexia (problems in reading and related language-based learning); dyscalculia (problems in mathematics); and dysgraphia (problems in writing and fine motor skills).


It is important to know that having a learning disability does not mean a person is incapable of learning. Rather, it means they learn in a different way.


Learning disabilities can result in different communication difficulties for people. They can be subtle, such as difficulty reading, or more pronounced. They can interfere with your guest’s ability to receive, express or process information. You may not know that a person has a learning disability unless you are told.

Types of assistance your guests might use:

- Alternative technology for writing
- Calculator
- Scanning or reading technology
- Tape recorders, mini pocket recorders.

Customer Service Tips

- 
- When you know someone with a learning disability needs help, ask how you can help.
 - Speak naturally, clearly, and directly to your customer.
 - Allow extra time if necessary – people may take a little longer to understand and respond.
 - Remember to communicate in a way that takes into account the customer’s disability.
 - Be patient and be willing to explain something again, if needed.



To learn more about disabilities, visit the following websites by clicking on the links or by entering the information into your web browser.

Understanding Disabilities:

<http://www.customerwaiting.ca/index.php?module=blog&page=blog-view&bid=45>

The National Quality Institute: <http://www.peopleaccess.ca/>

The Coalition for Persons with Disabilities: <http://www.disabilityaccess.org>


The Council of Canadians with Disabilities: <http://www.ccdonline.ca>

H. Speaking with Guests by Phone

When speaking with guests by phone, you do not have the opportunity to visibly identify guests with disabilities although some types of disabilities may be apparent. Good customer service should apply to all individuals whether in person or over the phone.

All guests should be treated equally, with patience and respect.


Customer Service Tips

- 
- Speak naturally, clearly and directly.
 - Don't worry about how the person's voice sounds. Concentrate on what they are saying.
 - Don't interrupt or finish your customer's sentences. Give your customer time to explain or respond.
 - If you don't understand, simply ask again, or repeat or rephrase what you heard and ask if you have understood correctly.
 - If a telephone customer is using an interpreter or a Relay Service, speak naturally to the customer, not to the interpreter.
 - If you encounter a situation where, after numerous attempts, you and your customer cannot communicate with each other due to the customer's disability, consider making alternate arrangements.

I. Providing at Home Services, Personal or Room Deliveries

Regardless of where the customer service is happening it should be professional, respectful and dignified. Providing at-home services and personal or room delivery to guests with disabilities can mean additional time. Remind yourself that it might take a guest with a disability hours to get ready just to visit the store and that home delivery allows them access to goods and services that they might not otherwise have.

Customer Service Tips

- 
- Confirm the details of your arrival time in advance. Don't arrive unexpectedly.
 - Be patient. You may need to wait a few moments for your customer to open the door.
 - Introduce yourself clearly. Some customers may not be able to read identification cards and may want you to use a password. Check before you visit.
 - Keep your customer informed of what you're doing.
 - If you need to move some of your customer's possessions, make sure that you leave the house exactly as it was when you arrived. For example, someone with vision loss will expect that their furniture is in the same place and could trip if you've moved the sofa.
 - If you cannot complete the job, clearly explain what will happen next. Make another appointment, and leave contact information in case there are problems or questions arise.


J. Assistive Devices

When it comes to the Customer Service Standard there are few factors that businesses need to consider: the guest's assistive device and devices that are available by the business for guests to use.

Persons with disabilities should not be prohibited from using their own devices when accessing goods and services provided by your business.

Guests might also need assistive devices to help them access service. Assistive devices enable your guest to do everyday tasks such as moving, communicating, reading or lifting by eliminating barriers. Here are few examples of devices that could be used: wheelchairs, walkers, listening devices, portable oxygen tanks, laptops with screen-reading software and communication programs, canes, hand held devices and hearing aids.

Tips for Working with Assistive Devices

- 
- Never refuse to work with the device.
 - Don't stare or gawk at the device.
 - Never touch or move the device without asking permission from the guest.
 - Ensure the customer and assistive device have the appropriate amount of space.
 - Don't block, knock or bump into assistive devices.
 - Offer assistance if the customer is having trouble working with their device.
 - Keep walkways, entrances and parking lots clear of ice, snow and other debris.
 - Make eye contact and if required, consider pulling up a chair to meet guests at their level.

i. Interacting with Guest's with Assistive Devices

- Many guests with disabilities will have their own personal assistive devices, such as wheelchairs, scooters or walkers. Don't touch or handle an assistive device without permission.
- If you have permission to move a person in a wheelchair remember to:
 - Wait for and follow the person's instructions.
 - Confirm that your guest is ready to move.
 - Describe what you are going to do before you do it.
 - Try to avoid uneven ground and objects.
 - Don't leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.
- Don't move items or equipment, such as canes and walkers, out of your guest's reach.
- Respect your guest's personal space. Don't lean over him or her or on his or her assistive device.

- Let your guest know about accessible features in the immediate environment (e.g., automatic doors, accessible washrooms, etc.).

ii. Addressing Safety Concerns

In cases where the assistive device may present a safety concern, the business will be required to look at and implement other measures in order to ensure the guest still has access to goods and services.

For example: Assistive devices may present a safety concern for the guest, other patrons or the business depending on known risk factors. Oxygen tanks and open flames cannot be near one another because of the risk of flammability. In these situations, businesses should look at ways to eliminate the risk by blowing out candles and seating the guest in a location that is considered safe.

iii. Addressing Accessibility Concerns

In cases where accessibility might be an issue or where some assistive devices are hindered due to structure, the business will be required to look at and implement other measures in order to ensure the guest still has access to good and services.

For example: Accessibility might be an issue if your business has areas that are tight or do not support the use of particular assistive devices. If your business has stairs but not an elevator, guests requiring assistive devices to assist with mobility, will have problems accessing your goods and services. In these situations, businesses should look at alternative ways to offer their goods and services.

iv. Assistive Devices Available at Your Location

The Customer Service Standard does not expect or mandate you to make assistive devices available for your guests. Some businesses do offer certain devices that assist with the provision of goods and services such as scooters, electric wheelchairs, walkers and/or screen reading devices. If you have assistive devices available, they must be listed within the policy. If you do not, you can remove that section from the downloaded policy or revise it to state that: "(Business Name) currently does not have any assistive devices available for its guests". Your staff will need to know how to operate any assistive devices that your business has available for guests and should become part of orientation and offered training.

K. Guide Dogs, Service Animals and Service Dogs

Think of a service animal as an animal with a job to do for a person with a disability. Examples include guide dogs and animals trained to alert an individual to an oncoming seizure and lead them to safety.

The Accessibility for Ontarians with Disabilities Act, 2005 refers to the definition of “guide dog” under the Blind Persons’ Rights Act, which states that: a guide dog is a dog that has been trained as a guide for a blind person at one of the facilities listed in Ontario Regulation 58 under the Blind Persons’ Rights Act. The Ministry of the Attorney General may issue identification cards to identify a person who is blind and his or her guide dog.

The customer service standard requires you to let people with disabilities use their service animals on the parts of your premises open to the public or to third parties unless the animal is otherwise excluded by law from the premises.

Under the standard, an animal is a service animal if it is readily apparent that the animal is used by the person for reasons relating to his or her disability, or if the person has a letter from a physician or nurse verifying that the animal is required for reasons relating to his or her disability. If it is not obvious that the animal is a service animal, you are not required to allow the animal on your premises if the person does not have a letter from a physician or nurse, or an identification card from the Ministry of the Attorney General.

Guests with a disability who are accompanied by a guide dog, service animal or service dog must be allowed access to premises that are open to the public unless otherwise excluded by law regardless of "no pet" policies. "No pet" policies do not apply to guide dogs, service animals and/or service dogs. Businesses are required to allow access to guide dogs, service animals or service dogs unless otherwise excluded by law.

The following chart lists some types of service animals, key tasks they perform and those who use service animals.

Service Animal	Key Tasks	Users
Autism assistance or service dog	<ul style="list-style-type: none">Keeps a child from running into danger and provides assistance when sensory stimulus is heightened. Dog is attached to the child’s waist by a belt and a leash held by an adult	People with autism or other developmental/ intellectual disabilities
Guide dog, dog guide or seeing eye dog	<ul style="list-style-type: none">Follows directions of owner, alerts owner to changes in elevation (e.g., curbs, stairs) and	People with vision loss

	obstacles	
Hearing ear, hearing, sound alert or hearing alert dog, cat or animal	<ul style="list-style-type: none"> Alerts owner to sounds often by a nudge or pawing and leads him/her to the source of the sound. May use a special signal to alert owner to fire alarm 	People who are Deaf, oral deaf, deafened or hard of hearing
Psychiatric service dog	<ul style="list-style-type: none"> Retrieves and prompts the person to take medicine, retrieves or activates medical alert, leads person out of crowds, etc. 	People with mental health disabilities
Service or mobility dog or animal, special skills dog or animal (Small ponies or miniature horses are used but are not as common).	<ul style="list-style-type: none"> May pull wheelchairs, carry objects, pull items, turn handles or push buttons such as door openers. Larger dogs may provide balance support. 	People with physical disabilities
Seizure, seizure alert, seizure assist or seizure response dog or animal	<ul style="list-style-type: none"> Steers owner from danger during a seizure, activates medical alert Can alert owner to an oncoming seizure 	People who have epilepsy

The standard doesn't require that service animals be formally trained, but most service animals in Ontario are trained at organizations in Canada or in the United States. Service animals are used in many countries around the world and so visitors to Ontario may also use service animals.

Tips on interacting with a guest who uses a service animal

- Remember that a service animal is not a pet. It is a working animal.
- Avoid touching or addressing service animals – they are working and have to pay attention at all times.
- Avoid making assumptions about the animal. Not all service animals wear special collars or harnesses. If you're not sure if the animal is a pet or a service animal, ask your guest.
- Remember your guest is responsible for the care and supervision of their service animal. You are not expected to provide care or food for the animal. However, you could provide water for the animal if your guest requests it.

Tips for Working with Guide Dogs, Service Animals and Service Dogs

- Never separate the guest and their animal.
- Don't touch, pet or talk to the animal – when the animal is out with the guest it is working and should not be distracted.
- Do not feed or offer treats to the animal.
- If you are unsure if the animal is in fact providing a service to the guest, ask.
- It is okay to provide water to the animal as long as the guest requests it.
- If other guests are approaching the animal to pet it, politely stop them and explain that they should ask permission before petting the animal.

How do I serve a guest if their animal is not allowed because of another law?

Where an animal is excluded by law from your premises, consider explaining why the animal is excluded. Explore or discuss with your guest another way of providing goods or services. For example:

- Bring goods or services to the person in a part of your premises where the animal is not restricted.
- Offer 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 offer assistance to the person with a disability while he or she is separated from the service animal.

Applicable Laws:

The Health Protection and Promotion Act, Ontario Regulation 562 Section 60, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

To read the applicable laws, visit the following websites by click on the links or by entering the information into your web browser.

HPPA: http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h07_e.htm

DOLA: http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90d16_e.htm

i. Identifying a Guide Dog, Service Dog and/or Service Animal

If it is not readily apparent that the animal is being used by the guest for reasons relating to his or her disability, the business may request verification from the guest.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

ii. Handling Exclusions

If a guide dog, service animal or service dog is excluded by law, the business will need to consider alternative methods to ensure the guest with a disability has access to goods and services.

For example: A guest staying at a hotel has arrived with a service animal that is not a dog. The guest would like to make reservations at the restaurant. The staff member lets the guest know that the service animal cannot be permitted into the restaurant because of the health protection and promotion act. The staff member offers the following solutions: that a staff member can assist the guest to their table and provided additional assistance if needed, that the restaurant can provide room service so that the guest and service animal are not separate and/or ask the guest if they have any suggestions or ideas.

For example: During a local tour a guest arrives with a guide dog. One part of the tour involves going into the kitchen of a local restaurant. At that part of the tour, the tour operator offers to secure the dog and guide the guest into the restaurant so that they are able to enjoy the complete experience.

iii. Handling Competing Needs and Rights

If the needs or rights of a guest with a guide dog, service animal or service dog compete with the needs and rights of another individual, for example in the form of a severe allergy to the animal, the business will have to make all reasonable efforts to meet the needs of all individuals.

For example: You may encounter a situation where there is guest accompanied by an animal and another guest or employee with a severe allergy to the animal. Accommodation plans might include keeping the guest with the animal and the individual with the allergy separate to avoid allergic reactions.

For example: You may encounter a situation where there is a guest accompanied by a guide dog and another guest has religious beliefs that considers the animal impure resulting in an uncomfortable environment. Accommodation plans might include keeping the guest with the animal and the other guest in separate areas, so both guests can comfortably enjoy your services.

iv. Reasonable Efforts

What constitutes a reasonable effort will be decided upon by the Business, based on each individual circumstance. If possible, it is encouraged that the business accommodates all individuals.

L. Support Persons

A support person is an individual hired or chosen to accompany a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or access to goods or services.

Personal care needs may include, but are not limited to, assistance with eating or using the washroom. Medical needs may include, but are not limited to, monitoring someone's health conditions, providing injections and providing support when someone has moderate to severe seizures.

The support person can be a paid personal support worker, volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.

Guests with disabilities must be allowed to use their support persons while accessing your organization's goods or services on the parts of the premises open to the public or third parties. If your organization charges for admission, you are required to have a policy regarding what amount, if any, is charged for support persons. Advance notification of a fee, if any, is required.

Functions of support persons

The following chart contains some examples of functions performed by support persons:

Person with a Disability	Support Person's Functions
Person who is deafblind	To guide, to provide transportation and adaptive communication such as tactile or adapted American Sign language, large print notes, print on palm or two-handed manual signing
Person who is Deaf, deafened, oral deaf	To provide sign language or oral interpretation services – to translate conversation, not to participate in it
Person with a learning disability	To help with complex communication or note-taking
Person with an intellectual/developmental disability	To help with travel, daily activities, prompting medication, complex tasks, or to keep them from dangerous situations

Person with a mental health disability	To help with communication tasks such as completing complex forms. To help in environments such as crowded, noisy settings or high-stress situations such as interviews
Person with a physical disability	To provide services related to travelling, personal care such as toileting or eating, monitoring medical conditions
Person with a seizure disorder	To assist in the event of a seizure, e.g. to protect the individual from falls
Person with a speech impairment who uses an augmentative or alternative communication system (symbol board, electronic communication system)	To relay or interpret a person's communications
Person with vision loss	To read or to guide

Tips on interacting with a guest who has a support person

- A guest with a disability might not introduce their support person. If you are not sure which person is the guest, take your lead from the person using or requesting your goods or services or simply ask.
- Once you have determined who your guest is, speak directly to them, not to their support person.
- Be familiar with your organization's policies, practices and procedures about providing accessible customer service.

Tips for Working with a Support Person

- If you are unsure of which person is the guest, politely ask.
- Introduce yourself to both the customer and support person.
- Talk directly to the guest, even if the support person is responding.
- Address the guest appropriately: "How can I help you today?" as opposed to "Can you find out what they need?"
- Don't try to have side conversations with the support person.
- Provide any written materials to both the guest and support person.
- Never separate the guest and their support person.



i. Seating and Availability

There may be times where seating and availability might prevent the guest and support person from sitting beside each other. In these situations, the business should make every reasonable attempt to resolve the issue.

ii. Admission Fees

The Customer Service Standard requires that businesses provide notice ahead of time on what fee, if any, will be charged for a support person. What your business decides to charge will be your decision. This statement was designed to give your business the flexibility to waive or charge fees for support persons.

For example: While restaurants may not have admission fees, they might consider leaving this statement in the policy to allow them to charge admission fees in the event that they hold a special event such as a New Year's Eve gala that requires guests to purchase tickets at a set price.

For example: Hotel/Motels might charge full fees for separate rooms but waive any applicable dual occupancy charges if the guest and support person are sharing a room.

For example: Businesses that charge admission fees or per seat prices might consider reducing or waiving fees for limited access to support persons or during specific dates and times.

iii. Confidentiality

In situations where confidential information might be discussed, consent should be obtained from the guest, prior to any conversation where confidential information might be discussed. Consent could range from a nod to a signed letter provided from the guest. When obtaining consent it should be in a manner that takes into account the guest's disability.

M. Service Disruptions

Guests visiting your business may need certain facilities, services or systems in order to access your goods and services. Elevators, automatic doors, accessible washrooms and ramps are important to guests with disabilities. Service disruptions happen for many reasons and can cause serious upset, hardship and disappointment to your guests. Responding and handling service disruptions in a way that supports and informs guests is important for maintaining solid relationships and offering great service.

Service disruptions can include: a broken elevator, cancelled programs, unplanned closures, construction barriers, sick employees and inaccessible parking. Businesses must provide notice of disruptions -- even those that are unplanned or might not be your fault such as construction

outside that is blocking the use of a ramp. Once you become aware of a service disruption, notice will need to be provided as soon as possible. The customer service standard does not mandate how you provide notice; just that it must be posted where guests are likely to find it.

i. Content of Notifications

In the event that a notification needs to be posted the following information should be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable;
- reason for the disruption;
- anticipated duration;
- a description of alternative services or options.

ii. Alternative Services or Options

When possible, businesses must indicate any alternatives that are available to allow guests with disabilities to access your goods and services during the disruption. Some service disruptions such as an elevator malfunction may not have alternative options because the business only has one elevator. Business will be expected to consider the disruption and how service can still be provided including looking beyond your services.

For example: A tour provider has one accessible bus that is in the shop for repairs, it may recommend alternative dates and other companies that the guest could consider.

For example: Part of the main entrance is blocked due to construction, preventing guests with mobility disabilities from being able to enter the building. Alternatives could be having the guest enter through another door or requesting that guests requiring assistance call ahead, so that an employee is ready assist them.

For example: The accessible washroom is out of service. Alternatives could be indicating where the closest accessible washroom is located either within the building or offered at a nearby location.

Posting Options to Consider

- At the main entrance and the nearest accessible entrance to the service disruption
- At the point of disruption such as; on the elevator or washroom door
- On the Business website or website frequently used by guests
- Contacting guests with reservations
- Verbally notifying guests when they are making a reservation





The toolkit contains a Notice of Service Disruption Form. This form is not mandated by the customer service standard, however, was designed to assist your business in tracking and responding to service disruptions. If and how, you decide to use this form, will be up to your business.

Notification	Area	Date Completed
<input type="checkbox"/>	All employees	
<input type="checkbox"/>	Location of service disruption	
<input type="checkbox"/>	Management	
<input type="checkbox"/>	Customer service agents	
<input type="checkbox"/>	Other	
<input type="checkbox"/>	Other	

iii. Using the Form

The downloadable form could be used in variety of ways such as:

- Employees could complete part of this form to notify the business or appropriate individuals of a service disruption;
- The business could also use the form to record who was contacted, alternative options and where the disruption was posted;
- The completed form could be given to the front desk, reservation center and/or any individual that might be handling guests in person or over the phone;
- Once the disruption is over, this form could be used to ensure that all areas where the disruption was posted were updated to remove the notice of disruption.



The toolkit contains a Notice of Service Disruption Posting. This template was designed to making posting notice of service disruptions quick and easy. Your business may decide to develop its own template that reflects your unique branding.

(Insert Your Logo)

Dear Valued Customers,

The (insert goods or services that are unavailable) will be out of service for (insert reason for disruption) from (insert appropriate date) until (if known insert appropriate date).

The following alternative services and options are available:

- (list options)

We regret any inconvenience this may cause. If you have questions or concerns, please contact (Name, Title, E-mail, telephone).

Thank you for your understanding and patience. We appreciate your business, and look forward to seeing you again soon!

Management

iv. Using the Template

The downloadable template is 90% complete and will require slight revisions by your business in order to reflect the service disruption.

(Brackets) = indicate areas where you will either need to incorporate your business name, logo or revise the content to contain details that are applicable to the situation.

Tips for Handling Service Disruptions

- Any service disruptions should take top priority.
- Check to ensure no one is trapped or stuck because of the disruption.
- Notify the appropriate individuals to ensure a timely response.
- If required, post notifications in designated locations.
- Apologize to visiting guests for the inconvenience.
- Determine if an accommodation plan can be implemented to enable the guest to access your goods and services.

N. Feedback

Businesses are required to develop a feedback process so that anyone can offer comments on the provision of goods and services to people with disabilities. The customer service standard does not mandate how you collect and respond to feedback, just that you have to develop a process and make it publically available. The developed process must include how you will respond to complaints and indicate what actions were or will be taken. The process must permit persons to provide their feedback by email, telephone or in person. Offering a variety of methods will ensure that all guests have an opportunity to provide feedback.

i. Responding to Feedback

The Customer Service Standard mandates that businesses:

- Establish and implement 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, on disk or by another method.
- Ensure your feedback process specifies the actions you or your staff will take if a complaint is received.
- Make information about the feedback process readily available to the public.

Tips for Handling Feedback in Person or Over the Phone

- If a guest approaches or calls to provide feedback, explain the methods that are available to them and ask which option would work best.
- Use a feedback form to ensure that you are capturing the right information.
- Read back what you have written for accuracy.
- After the customer has agreed with the recorded information, let them know the process for addressing and resolving issues.

ii. Developing a Process

Businesses will need to develop a process for handling, responding and resolving guest complaints. The process should consider:

- **Time frame:** How long will it take from when the guest provides formal feedback to when they will receive an acknowledgement and/or follow up. When developing timeframes it is important to really consider your environment and select a timeframe that is attainable such as 72 hours.
- **Responsibility:** Depending on your business you may want to select one or two staff members to be responsible for overseeing the process. Having many individuals involved can result in missed feedback and forgotten deadlines.
- **Confidentiality:** Guests who provide feedback are also providing your business with confidential information such as their address and/or phone number. Make sure that the process respects confidentiality and that the staff members collecting information are trained on your confidentiality standards.



The toolkit contains a Customer Service Feedback Form. The form was designed to assist your business in collecting feedback; however, this form is not mandated. You can choose to develop your own form or incorporate key questions into your existing feedback process.

iii. Using the Form

The downloadable form can be used in a variety of ways such as:

- Staff could use this form when taking in person or over the phone feedback;
- The questions could be incorporating into your existing feedback methods;
- The questions could be used to design a feedback survey on your website;
- The feedback form could be emailed out to guests after they have visited your establishment.



The toolkit contains a Record of Customer Feedback template. Part of the requirement is recording, tracking and responding to guest complaints as they relate to the provision of goods and services. The Excel tool was designed to work alongside the Customer Service Feedback Form.

RECORD OF CUSTOMER FEEDBACK

Location	Customer Name	Contact Details	Satisfactory Customer Service	Comments	Provided Accessible Service	Comments	Problems accessing goods and services	Comments	Additional Details	Actions Taken	Did the Customer Receive Follow Up?
ABC Restaurant, York Rd	Jane Doe	123-456-7891	Yes	No	Yes	Server assisted me	Yes	I couldn't read the menu	server assisted, consider some menus with larger font	Creating large print word doc menus	Yes

iv. Using the Template

The Excel tool was designed to work alongside the Customer Service Feedback Form. If required, the password is "abc".

Feedback received from guests should be considered confidential. Completed forms contain private details about the guest and as such should be stored in a secured location with limited access.

The Excel tool contains the following columns:

- **Month:** drop down list to select the appropriate month
- **Day:** drop down list to select the day service was provided
- **Year:** drop down list to select the current year
- **Location:** location is only required if you want to specify the internal location or external sites. If this is not needed you can remove it from the excel workbook.

For example: Dining room, front desk, housekeeping or the premise and location

- **Customer Name:** needs to be completed based on the information provided
- **Contact Details:** needs to be completed based on the information provided
- **Satisfactory Customer Service:** drop down list: yes, no or somewhat
- **Comments:** needs to be completed based on the information provided
- **Provided Accessible Service:** populated drop down list: yes, no or somewhat
- **Comments:** needs to be completed based on the information provided
- **Problems with Accessing Goods and Services:** drop down list: yes, no or somewhat
- **Comments:** needs to be completed based on the information provided
- **Additional Details:** needs to be completed based on the information provided
- **Actions Taken:** needs to be completed based determined next steps
- **Did the Customer Receive Follow Up?** drop down list: yes or no
- **Month:** drop down list to select the month follow up was provided
- **Day:** drop down list to select the month follow up was provided
- **Year:** drop down list to select the month follow up was provided

O. Training

Training needs to be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of your business; and,
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

i. Who Needs Training

When making the decision about who to train, businesses will have to look closely at what each person does and if they have any public interaction. Relying solely on job descriptions may not meet compliance guidelines.

For example: Some of your employees such as security guards, kitchen, housekeeping and maintenance staff might not on first glance appear to deal with the public; however, upon closer inspection, depending on the situation and set-up, any of these staff members could come across guests and be asked questions relating to service, direction and/or assistance.

For example: If you are a business that has a team or group that provides entertainment to your guests and the team or group communicates with the press, public and/or guests you will need to provide them training on the legislation.

ii. Agents, Contractors and Other External Companies

Businesses are required to train or ensure that agents, contractors and other external companies who deal with the public on their behalf have been trained. This might include:

- Caterers
- Central Reservation Centers
- Central Ordering Centers
- Delivery Drivers
- Event Operators
- Food Vendors
- Gift Shops/ Other Vendors working at your establishment
- Third Party Marketing Agents

For example: If you are a restaurant or business that uses an external company to offer home deliveries to your guests, you will need to train all drivers on the legislation.

For example: If you are a hotel/motel or business that uses a third party or central reservation centre to assist your guests in making reservations, you will need to provide training to all individuals that might be communicating on your behalf.

For example: If you are a restaurant or business that uses a third party or central reservation centre to assist your guests in making reservations and ordering food, you could request that the business train their employees and include the condition within your service agreement.

iii. Training Provisions

Training must cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - use a guide dog, service dog or other service animal; or
 - use a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at your premises or that you provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- Your business' policies, procedures and practices pertaining to providing accessible customer service to guests with disabilities.

iv. When to Provide Training

Businesses should provide training as soon as practicable or by **Jan 1, 2012**. Training will also need to be provided to new employees, volunteers, agents and/or contractors who deal with the public or act on your behalf. When training new hires consider developing information that is included in orientation materials that are handed by your business. Revised training will need to be provided in the event of any changes to the legislation or your procedures and practices.

v. Format of Training

The customer service standard did not mandate the format of training. Businesses will be responsible for reviewing their environment and selecting an option or multiple options that will work best for them. This might include:

- Online Training
- Classroom Training – someone standing at the front providing training
- Written Documents
- 1:1 Training



To learn more about the training requirement, visit the following website by clicking on the link or by entering the information into your web browser.

<http://209.167.40.96/page.asp?unit=cust-serv-reg&doc=training&lang=en>

P. Businesses with 20 or more Employees

All businesses are expected to comply with the new legislation; however, businesses with less than 20 employees are exempt from complying with the documentation requirements such as keeping a record of training, making the required documentation available in formats that take into consideration the guest's disability and completing an online report.

i. Written Documents

Businesses with 20 or more employees will need to document their policies, procedures and practices pertaining to the customer service standard in writing.

ii. Notification of Available Documents

Businesses with 20 or more employees must post the information relating to the customer service standard in a conspicuous place and let guests know that the documents are available upon request. You are not mandated on where this information must be posted, just that it should be easy for your guests to find and/or request the information.

Posting Options to Consider



- On main information bulletin boards
- On the business website or website frequently used by guests
- In guest information booklets
- In waiting areas

iii. Format of Requested Documents

Businesses with 20 or more employees will be required to provide the requested documents in a format that takes into consideration the guest's disability. The Customer Service Standard does not mandate what businesses need to do to achieve this requirement -- just that businesses will have to look at alternative options to ensure that documentation is provided in a format that takes into account the guest's disability. The provider and the person with a disability may agree upon the format to be used for the documentation or information provided.

Formats to Consider



- Printing in a large font
- Email the guest
- Have a staff member read through the policy with the guest
- Record the information in an mp3 file that could be played and reviewed
- Ask the guest what format they would prefer

iv. [Record of Training](#)

Businesses with 20 or more employees are required to keep a record of training that includes the dates training was provided and the number of employees who attended the training.

v. [Online Report](#)

Businesses with 20 or more employees will need to complete the online report deadline to be announced. Additional instructions will be given to businesses closer to the reporting date.

Click below, to learn more about the report:

<http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/ComplyingStandards/customerService/howToFileAccessReport.aspx>

Click below, to review a sample report:

http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/ComplyingStandards/customerService/toolsToHelpYouComply_accessReportCSStandards.aspx



3. Referenced Documents

Referenced Documents

The following organizations, sites and documents were references or used during the creation of the Step by Step: A Practice Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07.

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Health Protection and Promotion Act, Ontario Regulation 562
- Martin Prosperity Institute, Releasing Constraints: Projecting the Economic Impacts of Increased Accessibility in Ontario
- Ministry of Transportation
- Ontario Human Rights Code, 1990
- Ontario Restaurant Hotel & Motel Association
- Statistics Canada
- Tourism Industry Association of Ontario

Referenced Websites, used throughout the guide:

- http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07429_e.htm
- http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm
- <http://209.167.40.96/page.asp?unit=cust-serv-reg&doc=workbook&lang=en>
- <http://www.customerwaiting.ca/index.php?module=blog&page=blog-view&bid=45>
- <http://www.peopleaccess.ca/>
- <http://www.disabilityaccess.org>
- <http://www.ccdonline.ca>
- http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h07_e.htm
- http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90d16_e.htm
- <http://209.167.40.96/page.asp?unit=cust-serv-reg&doc=training&lang=en>
- http://www.ontario.ca/en/login/ONT03_026063
- <http://ontario.ca/AccessON>