

# Employers' Handbook on the Accessibility Standard for Customer Service

## For Businesses and Non-Profit Organizations

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This document is available in alternate formats on request.

Please contact the Disabilities Issues Office by email at [DIO@gov.mb.ca](mailto:DIO@gov.mb.ca) or by phone at 204-945-7613 (in Winnipeg) or toll free at 1-800-282-8069, ext. 7613 (outside Winnipeg).

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# The business case: Why accessible customer service matters

Manitoba's Accessibility Standard for Customer Service under The Accessibility for Manitobans Act means great customer service for everybody. Improving accessibility is the right thing to do. It's also the smart thing to do.

People with disabilities have an estimated spending power of \$55.4 billion across Canada. People with disabilities also represent a large pool of untapped employment potential. One out of every six Manitobans faces challenges with accessibility. When we make Manitoba accessible to people with disabilities, everyone benefits.

Having barrier-free access to goods and services means that all people have the same opportunity to access goods or services. Meeting accessibility needs can be simple and affordable.

The Accessibility Standard for Customer Service outlines what you need to do to provide goods and services in an accessible way to all, including people with disabilities.

As an employer in Manitoba, this handbook will help you create policies, practices and measures so that you welcome and better serve everybody. This handbook includes the following information:

- **Barriers to accessibility – Page 3**
- **Steps to compliance – Page 4**
- **Guide to providing accessible customer service – Page 6**

The compliance deadline for businesses and non-profit organizations is November 1, 2018.

Compliance monitoring related to the first standard is expected to start during 2019/20.

# Barriers to accessibility

Accessibility barriers are obstacles that make it harder for people with disabilities to participate fully in everyday life. Your organization may have barriers that prevent people with disabilities from shopping, being included in activities, or finding information about your goods or services. Here are some examples of accessibility barriers. More information is available at: [Barriers and Solutions](#).

Types of barriers	Examples
Attitudinal barriers result when people think or act based on false assumptions. Acting on attitudinal barriers leads to discrimination.	<ul style="list-style-type: none"><li>• Talking to a support person instead of the person with a disability, because of an assumption that the person with the disability cannot talk or understand.</li></ul>
Informational and communication barriers are created when information is offered in a form that suits some, but not all. They prevent people from being able to understand or access information.	<ul style="list-style-type: none"><li>• Print on a form that is too small or unclear can create a barrier for a person who is visually impaired.</li><li>• Technical language, long sentences and words with many syllables can create a barrier for a person with an intellectual disability.</li></ul>
Technological barriers occur when technology, or the way it is used, cannot be accessed by people with disabilities.	<ul style="list-style-type: none"><li>• A website that does not support screen-reading software can create a barrier for a person who is visually impaired.</li><li>• A website with photos or images without narrated audio descriptions can create a barrier for a person who is blind.</li></ul>
Systemic barriers arise from policies, practices or measures that result in some people receiving unequal access or being excluded.	<ul style="list-style-type: none"><li>• A no pet policy can create a barrier for a person with a service animal.</li></ul>
Physical or architectural barriers are aspects of physical spaces that make it difficult for some people to easily access a place.	<ul style="list-style-type: none"><li>• A hallway or doorway that is too narrow or cluttered can create a barrier for a person who uses a wheelchair, electric scooter or walker to pass through safely.</li><li>• Poor lighting can create a barrier for a person who is visually impaired.</li></ul>

# Steps to compliance:

Take the following steps to comply with the Accessibility Standard for Customer Service.

## Step 1: Learn and prepare

Learn your obligations under the law and prepare for change.

The law means that you:

- Identify barriers to accessible customer service.
- Remove barriers to accessible customer service.
- Prevent new barriers to accessible customer service from forming.
- Provide equivalent customer service.

The goal is to provide customer service in a way that allows people with disabilities to benefit from the same services, in the same place and in the same way or in a way similar to how others receive service.

**If a barrier cannot be removed or prevented, find another way to provide equivalent customer service.**

### Examples:

Goods and services are available online, professional services are offered through house calls or personal shoppers work with the customer when physical barriers cannot be removed.

## Step 2: Assess, create and act

Assess and identify the accessibility barriers in your customer service and choose actions you can take to remove them.

Create policies, practices and measures to remove barriers and prevent new ones from forming.

Act on your policies, practices and measures. Make changes to provide accessible customer service.

### **Step 3: Train**

Train your employees, volunteers and management and keep track and what the training covers and when it is offered.

It is management's responsibility to create awareness among employees and volunteers, and to attend training sessions.

### **Step 4: Share**

Let the public know about your accessibility and training policies. If you are a business or organization with 20 or more employees, you need to write down your accessibility and training policies. You also need to let the public know that your policies are available on request.

### **Step 5: Review and refine**

Regularly review and re-assess your policies, practices and measures. Improve them as you learn more and as you receive and respond to customer service feedback.

Add policies, measures and practices as new standards become law.

Re-train employees, volunteers and management on any changes.

**Accessibility benefits all Manitobans.**

**Ensure you are meeting the Accessibility Standard  
for Customer Service.**

# Guide to providing accessible customer service

The Accessibility Standard for Customer Service requires you to introduce policies, practices and measures to help you:

1. Meet communication needs.
2. Accommodate the use of assistive devices.
3. Welcome support persons.
4. Allow service animals.
5. Maintain accessibility features.
6. Let the public know when and why an accessibility feature is unavailable.
7. Welcome and respond promptly to feedback.
8. Provide the required training to employees, volunteers and management.
9. If you have 20 or more employees, keep a written record of your accessibility and training policies.

Use this guide and the [Sample Accessible Customer Service Policy](#) to help you assess, create and act on your policies, practices and measures. Each requirement is explored below.

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## 1. Meet communication needs.

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Communication barriers prevent people from being able to understand or access information. Respectful communication that meets individual needs means great customer service for everyone.

### Suggestions:

- Assess your written material, such as signs, forms and documents.
- Think about how your employees, volunteers and management talk and engage with people who experience communication barriers.
- Consider how your organization currently meets communication needs.
- Brainstorm new ways to meet these needs. There are simple and inexpensive ways to meet communication needs, such as writing things down, reading things out loud and taking extra time to explain things.

### **Example:**

Maxim has a visual impairment. At his gym, he asks an employee for assistance in reading the new winter class schedule. The gym employee reads the new hours out loud to Maxim.

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## **2. Accommodate the use of assistive devices.**

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Assistive devices are any pieces of equipment that people use to help them with daily living and include:

- equipment that people bring with them, such as wheelchairs, canes, walkers, electric scooters or magnifiers
- equipment that businesses and organizations have on-site, such as video captioning, wheelchairs or automatic doors

### **Suggestions:**

- Make a list of any assistive devices you currently offer to help people access your services.
- Plan to train all employees, volunteers and management so that they know how to use the assistive devices you have on-site.
- Brainstorm other measures you can take to ensure all Manitobans can access your goods, services or facilities.
- Think about ways to modify your space, time or services to meet the needs of people using assistive devices.
- Consider any possibilities where an assistive device could present a significant and unavoidable health or safety concern.

### **Example:**

Luisa uses an oxygen tank. An open flame could be dangerous. When she goes to her massage therapy appointment, the front desk staff ensure that all candles are blown out prior to bringing her into the treatment area.

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### 3. Welcome support persons.

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Some people with disabilities need to use support persons to help them perform daily tasks related to mobility, personal care or medical needs. Without this support, they may not be able to access your goods or services.

A support person does not have to be a paid support worker. She or he can be a family member or a friend.

#### **Suggestions:**

- Make it your policy to address the person with disabilities, not the support person – unless asked to do otherwise.
- Consider waiving or reducing admission or service fees for support persons who accompany people with disabilities.
  - o If you cannot waive or reduce fees for support persons, ensure you let the public know about the fees in advance (e.g., through online notices and on-site posters).
- Consider how you can better serve individuals who use support persons (e.g., ensuring their access to support persons at all times by providing additional seating).

#### **Example:**

Omar wants to go to a movie and uses a support person. The theatre's website says that support persons may be charged half price for admission when accompanying a person with a disability. The ticket window posts the same information on-site. The employee at the ticket window is aware of the price reduction for the support person, and talks to and provides the tickets to Omar directly.

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### 4. Allow service animals.

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Service animals assist people with various types of disabilities.

Service animals may assist people with disabilities that are obvious, such as guiding a person who is blind, pulling a person who uses a wheelchair or carrying and picking up things for people with mobility impairments.





People with less obvious disabilities may also use service animals, such as service animals who provide medical alert service to people with epilepsy or support to children with autism.

Dogs are the most common service animal, but other animals may be trained to provide assistance to people with disabilities.

**Service animals are welcome in places on your premises that are available to the public.**

A key consideration to ask is whether the general public is allowed to be in the place. In rare cases, service animals may not be allowed (e.g., a sterile laboratory, an operating room or food preparation area). Generally, members of the public are not allowed in those places either.

**If you are not sure if an animal is a service animal:**

- You should not make assumptions about whether an animal is a service animal.
- You may ask if the animal has been trained to help a person with a disability-related need.
- You may not ask about the person's disability.

**Suggestions:**

- Remember that service animals have a job to do. They are not pets.
- Be sure all employees, volunteers and management know they should not pet, feed or distract the service animal.
- Review any existing no pet policies and be sure they exempt service animals.
- Review any fees and be sure you do not charge extra for the presence of a service animal.
- Review the guideline on service animals set out by the Manitoba Human Rights Commission to learn more about rights and responsibilities related to service animals. For example:
  - Review what you can do if the service animal shows signs of not being controlled.
- Brainstorm ways to better serve people with service animals.

### **Example:**

Belle uses a service dog. When she goes to dinner at a local restaurant, like all customers, she is asked if she wants to sit inside the restaurant or outside on the patio. She chooses to sit inside. When Belle requests that her service dog be allowed to sit at her feet, the server accommodates the request by removing a chair to make space for the service dog beside Belle.

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## **5. Maintain accessibility features.**

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Accessibility features – supports and structures in your physical space – help people with disabilities and others access your goods and services (e.g., elevators, ramps and accessible washrooms).

A key component of Manitoba's law is to find another way to provide the good or service if a barrier cannot be removed or prevented. There are many simple and inexpensive ways to make your organization more accessible.

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## **6. Let the public know when and why an accessibility feature is unavailable.**

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Sometimes accessibility features or services require repair or are temporarily out of service. When this happens, you need to notify the public. Consider putting a notice on your website for long-term disruptions.

### **Suggestions:**

- Make a list of your accessibility features.
- Think about alternate plans you can create in advance to continue to provide goods and services if an accessibility feature becomes unavailable.
- Make a template so it is easier to provide notice to the public when the accessibility feature is not available.
- Brainstorm ideas on how to take your goods and services to the individual if your accessibility feature is not available or if the barrier cannot be removed or prevented.
- Consider the best places and ways to provide information on disruption, so that people are likely to find it (e.g., entrances, high traffic areas, website, social media, newsletters, signs, posters, verbal messages or public address system).

### **Example:**

Daphne uses a wheelchair. To ensure accessible customer service, her physiotherapy clinic provides online information about its accessibility options and encourages clients to contact them to discuss their needs. When Daphne calls the clinic to book an appointment, she is provided with options, including receiving treatment at their accessible satellite office or receiving in-home treatment.

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## **7. Welcome and respond promptly to feedback.**

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To learn about barriers that exist in your organization and the positive impact of your new initiatives, invite people to give feedback on how well you provide accessible customer service.

### **Suggestions:**

- Consider ways you can receive feedback on the accessibility of your goods and services (e.g., in person, by email, on your website or using existing feedback forms).
- Modify existing feedback processes to include space for accessibility customer service.
- Decide who will be responsible for tracking, documenting and responding to feedback.
- Think about how you will let people know their feedback has been addressed.

### **Example:**

A vehicle rental agency has an existing feedback form that can be completed and submitted online. The form asks customers to provide comments on their experience, including rating timeliness, staff knowledge and professionalism, fee transparency and overall service satisfaction. Prior to November 1, 2018, the agency modifies the form to add “accessibility of customer service” as a new rating category.

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## **8. Provide the required training to employees, volunteers and management.**

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Training is the key to great customer service.

It is management's responsibility to ensure all employees, volunteers and management receive training. You need to ensure training is taken by:

- all employees and volunteers who interact with the public (including paid and unpaid, full-time and part-time positions)
- people involved in developing policies for your organization (including managers, senior leaders, directors and owners)

Training must include:

- how to provide accessible customer service, as required by the Accessibility Standard for Customer Service
- an overview of The Accessibility for Manitobans Act (2013), The Human Rights Code (Manitoba) and the Customer Service Standard
- your organizational policies, practices and measures, including updates or changes

There are a number of organizations that provide a variety of online and in person training options that may be customized to meet your organization's needs.

Visit MB211 to find local organizations who provide training: click the People with Disabilities quick link, and select the Accessibility Awareness sub-link.

For information about free basic training, please see additional resources at [www.AccessibilityMB.ca](http://www.AccessibilityMB.ca) or [Training and Workshops](#).

### **Suggestions:**

- Train new employees, volunteers and management soon after they are hired and when there are changes to policies, practices, measures and legislation.
- Ensure employees, volunteers and management are also trained in the policies, practices and measures of your organization.
- Consider adding accessibility training to your routine organizational training.
- Keep track of who has been trained and when training is offered.

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## 9. Keep a written record of accessibility and training policies.

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If you have 20 or more employees, you need to keep a written record of your accessibility and training policies and let the public know that your policies are available on request.

### Suggestions:

- You can use the sample accessibility policy at [Accessible Customer Service Policy insert link to template page].
- Be sure to include a summary of any training material you use and when training is offered.
- Consider how you will let the public know that you will provide a copy of your written policies on request.
- Think of the best places and ways to provide this notice, so that people are likely to find it (e.g., entrances, high traffic areas, website, social media, newsletters, signs, posters, verbal messages or public address system).

If you have fewer than 20 employees, you must still comply with the Accessibility Standard on Customer Service. It is up to you whether to write down your policies.

For more information contact:

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Legal disclaimer: This information complements the application of the regulations under The Accessibility for Manitobans Act (AMA) and is not legal advice. For certainty, please refer to the [AMA](#) and the [Customer Service Standard Regulation](#).

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