

Accessibility Standard for Customer Service:

Employers' Handbook

Manitoba's new accessibility standard under *The Accessibility for Manitobans Act* means great customer service for everybody.

Accessible customer service is not necessarily about ramps or automatic door openers. It's about understanding that your customers and clients have a variety of needs.

The following topics in this handbook will assist you in developing policies and practices that will help you welcome and better serve everybody.

- 1. Understand what barriers prevent accessible customer service.
- 2. Identify the areas that require accessibility policies and practices.
- 3. Requirements for providing accessible customer service.
- 4. Learn about *The Human Rights Code*.
- 5. Sample policies

The Accessibility Standard for Customer Service applies to all organizations in Manitoba that:

- provide goods or services
- have one or more employees

There are different deadlines for compliance:

- Manitoba government, November 2016
- public sector organizations, November 2017
- private and non-profit organizations and businesses, November 2018

1. Understand what barriers prevent accessible customer service

What are accessibility barriers?

Many people think disabilities are the barriers, but that is not the case.

Barriers prevent people with disabilities from participating in everyday life. Once you understand what accessibility barriers are, it is easier to identify them. There are many types of barriers, both visible and invisible.

Accessibility barriers limit or prevent a person from being able to get information, service and goods or to enter a space or be part of an activity.

- Attitude, including stereotypes and assumptions, can be the biggest barrier.
 An example is thinking people who cannot communicate verbally have nothing to say.
- Physical barriers prevent people from accessing your service. Examples include store aisles too narrow for a person with a walker or wheelchair, or parking lots without spaces designated for people with disabilities.
- Communication barriers prevent people from understanding information.

 An example is a sign that is too small or confusing.
- Technology barriers often relate to information and communication. An
 example is a website that cannot be used by people who are blind and use
 a screen reader.
- Systemic barriers are those practices or policies that prevent many customers from accessing your service.

2. Identify the areas that require accessibility policies and practices

Develop and put into place measures, policies and practices that will help ensure barrier-free customer service for people with disabilities, seniors, and others with challenges to mobility, communication, understanding or health concerns.

Let your customers know your accessibility policies and procedures are available for their review.

Preparing for Accessible Customer Service

Put the customer first; let the principles of independence, dignity, access and equality guide you.

Obligations:

- identify barriers to accessible customer service
- remove barriers to accessible customer service
- prevent the creation of barriers to accessible customer service
- provide equivalent customer service

General tips on providing accessible customer service

If you're not sure what to do, ask your customers, "How can I help?" Your customers with disabilities know if they need help and how you can provide it.

Avoid stereotypes and make no assumptions about what type of disability the person has. Many disabilities are not visible, and asking personal questions is not appropriate.

Don't assume what a person can or cannot do. Take the time to get to know your customer's needs and focus on meeting those needs.

An active offer is a proactive way to ensure that your information and services are available and accessible to everyone.

For example, on documents, include the phrase: "Alternative formats available on request." If required, the customer may request larger print, an electronic version, or having the document read out loud. Braille is another possible request, though less likely.

Another place to include the active offer is on event posters and meeting notices: "Disability accommodations available by advance request." If required, the participant may request front row seating, a print copy of the presentation or another means of engaging in your events and services. Captioning (used by people who are hard-of-hearing to read what is spoken) and American Sign Language are other potential requests.*

3. Requirements for providing accessible customer service

To provide accessible customer service, the Accessibility Standard for Customer Service requires that organizations introduce measures, policies and practices to:

- a) meet the communication needs of clients
- b) allow assistive devices
- c) welcome support persons
- d) allow people with service animals
- e) review physical barriers to access
- f) let customers know when accessible services aren't available
- g) invite customers to provide feedback
- h) train staff on accessible customer service

^{*}Please see www.accessibilityMB.ca for resources and contacts to assist.

a. Consider a person's disability when communicating with them

There are many different types of disabilities, some visible, others invisible. Disabilities may affect mobility, balance, dexterity, vision, hearing, speech, language, learning, understanding or mental health.

TIPS:

- Consider how your organization can prepare to meet customers' communication needs. For example, have a pen and paper on hand.
- Ask your customers how you can best communicate with them. Every situation is different and depends on an individual's needs.
- ➤ Offer a chair if a longer conversation is required. Seat yourself to engage with someone using a wheelchair.
- ➤ Offer documents in accessible formats, if requested. You can work with your customer to find the right format. For example, you may direct them to your accessible website or read something aloud.
- ➤ Be patient. People with some kinds of disabilities may take a little longer to understand and respond. A good start is to listen carefully.

b. Allow assistive devices

An assistive device is any piece of equipment persons with disabilities use to help them with daily living. Some examples include: a wheelchair, screen reader, listening device, magnifying glass or cane.

TIPS:

- Consider how your organization can prepare to serve customers who use assistive devices.
- Offer the space and time that may be required to modify your services to meet the needs of customers using assistive devices.
- Can you offer helpful measures, such as carry-out service or delivery?

c. Welcome support persons

Support persons help individuals with disabilities perform daily tasks. Often people who have support persons are not able to do things by themselves, such as eat meals, use the washroom or change their clothes. Without support, they may be unable to access your organization.

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

TIPS:

- Consider how your organization can prepare to service customers who have a support person.
- Avoid charging fees for the support person.
- ➤ If you charge admission, clearly state the admission fee, if any, for support persons.

d. Allow service animals

Service animals assist people with disabilities. A person with a service animal has the right to enter any place where the public is allowed.

It may be obvious that the animal is trained to assist with a disability that is visible (the person is blind or deaf). It may be less obvious if the animal is trained to assist with a disability that is invisible (example: post-traumatic stress disorder or diabetes). On rare occasions, access to a person with a service animal may be restricted (example: access to a sterile laboratory or operating room). Generally, these types of facilities are not considered public areas.

TIPS:

- Welcome service animals into public areas of your workplace or business.
- Consider how your organization can prepare to serve people with service animals.
- > Do not apply standard pet policies to service animals.

Feedback is welcome.

e. Review your physical space

Customers with disabilities need easy access to your premises. Sometimes this requires long term planning, but there are many simple and inexpensive ways to make your organization more accessible.

TIPS:

- Organize the space so there is room for wheelchairs, scooters and walkers.
- If clients must wait to be served, consider seating options.
- Use auditory as well as visual queuing systems to tell customers when they will be served.
- Keep signage simple with large lettering.
- Replace door knobs with door levers.
- Use removable or permanent ramps in place of steps.
- Provide accessible parking and sloped curbs near doors.
- Keep pathways clear of snow and ice.
- Are there any dangers on your premises and how can you address them? For example, is there a stand-alone display that may be knocked over?

f. Accessible services temporarily not available

Sometimes accessibility features or services require repair or are temporarily out of service (example: an elevator or accessible washroom). When this happens, notify your customers. This should be done whether the disruption is planned or unexpected. Notification on websites is also recommended.

TIPS:

- ➤ Make a list of the accessible facilities and services some people rely on.
- > Prepare a template notice in advance.

Sorry for the inconvenience.
This elevator is temporarily out of order.
Please visit our reception desk for more information.

Feedback is welcome.

- Include: the reason for the disruption, and if possible, how long the service will be unavailable and what alternative facilities or services are available, if any.
- ➤ Post the notice in a place where people are most likely to find it (example: the entrance door to your business or another high traffic area, or on your website). Also, if you have one, include an announcement on the public address system.

g. Invite customers to provide feedback

To learn about barriers that exist in your workplace, invite customers to give feedback on how well you provide accessible customer service.

TIPS:

- ➤ Determine how you want to receive feedback (example: in person, by telephone, in writing or by email).
- ➤ How will you respond to feedback, including advice?
- How will you let customers know about the process?

h. Conduct accessible customer service training

Training is the key to great customer service. That is why training is at the heart of the Accessibility Standard for Customer Service.

See Training Tips for Employees to get you started.

Who you need to train

You must provide training to:

- all employees and volunteers who interact with the public (paid and unpaid, full-time and part-time positions)
- persons involved in developing policies for your organization (including managers, senior leaders, directors and owners)
- anyone who provides goods or services or facilities on your behalf (such as volunteers or contractors)

Feedback is welcome.

The most effective training will be customized to the needs of your organization and must include:

- an overview of *The Accessibility for Manitobans Act* (2013), the requirements of the Accessibility Standard for Customer Service, and Manitoba's human rights legislation (*The Human Rights Code*)
- reasonable accommodation as set out by The Human Rights Code
- your organization's measures, policies and practices to provide accessible customer service

TIPS:

- Train new staff soon after they are hired and provide on-going training, as new accessibility standards are introduced. Keep track of who has been trained and when.
- Ensure all staff has a copy of, or access to, Tips for Employees.
- Make use of training and disability etiquette tools of organizations like yours by searching the web. Visit wwww.contactmb.org to search for disability organizations to provide in-person training for your staff.
- For more information and tools, visit www.accessibility.mb.ca

4. Learn about The Human Rights Code (Manitoba)

The importance of human rights legislation in Manitoba

The Human Rights Code (Manitoba) prohibits unreasonable discrimination on specific grounds, including physical and mental disabilities. Manitobans are encouraged to take steps to make reasonable accommodations. Reasonable accommodation means adjusting a rule, a policy or even a physical space to allow for changes to the way things are usually done.

Service providers should respond to an accommodation request by communicating with the person or group that made the request. Ask what the need is and how it can be best met. Good communication, flexibility and cooperation are very important. The facts of each situation and the specific needs of the individual or group must be considered.

In most cases, accommodation is simple and affordable. With flexibility and good communication, accommodation solutions are usually possible.

The duty to reasonably accommodate is often described in human rights law as accommodation short of undue hardship. Inconvenience or some financial cost does not usually qualify as undue hardship. However, if accommodation does result in undue hardship, other alternatives still must be explored.

Organizations and businesses should develop a reasonable accommodation request process.

The rights and responsibilities covered by *The Human Rights Code* overrides any other law, unless that law specifically says otherwise.

Make sure you and your staff is familiar with *The Human Rights Code* and the meaning and practice of reasonable accommodation. www.manitobahumanrights.ca

5. Sample Policies

The following are three sample policies that relate to the Accessibility Standard for Customer Service. These are only examples; policies should reflect your own organization or business.

Service Animals

Policy Statement: A person with a service animal has the right to access to the public areas of Company X. The kitchen area is not considered public.

Implementation:

- Management's Responsibilities
 - Educate employees about company policy affecting the Service Animals and Reasonable Accommodation Policy under *The Human* Rights Code.
 - Support employees in explaining company policy to customers.

- Employees' Responsibilities
 - Welcome the customer with the service animal, but do not interact with the animal, as it can distract the animal from its work.
 - o If relevant, respectfully inquire whether the animal is trained to assist with a disability, but do not ask about the disability.
 - Respond respectfully to concerns raised by other customers, but refer to company policy and *The Human Rights Code* as reasons to welcome service animals. Call management if further discussion is required.
 - Advise the customer when the service animal's behaviour is inappropriate, such as repeated barking, whining, snapping or defecating. If poor behavior persists, respectfully ask the customer to leave. Call management if further discussion is required.
- Customer's Responsibilities
 - o Ensure the service animal is under control at all times.

Accessible Customer Service Training

Policy Statement: All current and new employees will receive training on accessible customer service, including *The Human Rights Code (Manitoba)*.

Implementation:

- Management's Responsibility:
 - Attend training, be familiar with the content, and ensure that their employees are trained.
 - Include training as a part of the orientation of new staff the first week of employment.
 - o Offer updated training to all employees once a year.
- Employees' Responsibility
 - Attend training and offer accessible, respectful customer services as advised.

- Customer's Responsibility
 - In some cases, make requests for accessibility accommodation in advance (example: public event), and in others, allow a reasonable time delay (example: Braille format in place of print document)

Notice of Temporary Service Disruption

Policy Statement: In the event of a planned or unexpected disruption of services, the public will be notified about the disruption, the reason for the disruption, its anticipated length and a description of alternative facilities or services, if available.

Implementation:

- Management's Responsibility
 - If the temporary disruption of services is unanticipated, such as during an electrical outage, place a notice on the front entrance of the building and where customers circulate. Include in the notice where to go for more information.
 - o If an audio announcement system is available, regularly announce the disruption and alternative service.
 - If the disruption of service is known in advance, post notices at the front entrance, on the website, and on the telephone answering service. Include the reason for repairs, a time line and where to go for more information.
 - If there is alternate access (example: public elevator is under repair, but service elevator is available), inform customers and offer assistance to use the alternate access.
- Employees' Responsibilities
 - Understand the policy and assist management in fulfilling its responsibility, as outlined above.
 - Personally inform customers who may be affected by the disruption of services and offer assistance if possible.

Available in alternate formats upon request

Resources

Visit www.AccessibilityMB.ca to learn more.

For more information contact:

Disabilities Issues Office (DIO)

630-240 Graham Avenue Winnipeg, Manitoba, R3C 0J7

Phone: 204-945-7613 Fax: 204-948-2896 dio@gov.mb.ca

Join the #AccessibleMB conversation on Twitter and Facebook

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