

Improving accessible customer service standards — 2024 initial recommendations report Feedback form

Deadline January 9, 2025

Establishment of accessibility policies

The requirements for establishing accessibility policies under the customer service standards and general requirements are intended to ensure that all organizations establish policies on how they will meet their obligations under the *Integrated Accessibility Standards Regulation (IASR)*.

The committee discussed accessibility policy requirements and training requirements under both the customer service standards and general requirements. Duplication and gaps across these requirements were discussed, and recommendations on measures and policies to improve the requirements were developed.

Read the initial recommendations on [establishment of accessibility policies](#).

1. Do you agree with the recommendations in this category?

Agree / Disagree

2. What would you add, remove or change about the recommendations?

Accessible training

The accessible training requirements under the customer service standards and general requirements are intended to ensure that all organizations train employees, volunteers, all those who participate in developing the organization's policies, and all others who provide goods or services on behalf of the organization, about the requirements in the *Integrated Accessibility Standards Regulation (IASR)*, as well as the *Ontario Human Rights Code* as it relates to people with disabilities.

The committee discussed overlapping training requirements under the customer service standards and general requirements that may cause confusion for organizations about their staff training obligations. The committee also discussed the need for organizations to deliver updated, ongoing staff training to ensure it is current with best practices and any updates to regulations that come into effect.

Read the initial recommendations on [accessible training](#).

3. Do you agree with the recommendations in this category?

Agree / Disagree

4. What would you add, remove or change about the recommendations?

Accessibility plans

The accessibility plans under the general requirements are intended to ensure that obligated organizations develop a multi-year accessibility plan in which they outline their strategies to prevent and remove barriers to accessibility. Once developed, organizations must maintain their accessibility plan.

The committee discussed the need for government to support obligated organizations in developing multi-year accessibility plans, and for organizations to update the plans more frequently. The committee also discussed ways to build further accountability into plans by having organizations include information on how they will measure and track against their accessibility commitments.

Read the initial recommendations on [accessibility plans](#).

5. Do you agree with the recommendations in this category?

Agree / Disagree

6. What would you add, remove or change about the recommendations?

Feedback process

The requirements for providing an accessible public feedback process are under the customer service standards. The requirements involve providers creating a process to receive feedback on how they provide goods, services and facilities to people with disabilities and specifying actions they will take if they receive a complaint.

The committee discussed duplication with these requirements and related ones under the [information and communications standards](#). The committee also discussed the need for organizations to prioritize responses to public feedback based on the severity of the issue and to provide a response timeframe. There was also discussion about the need for government to create additional guidance materials to support organizations in establishing their accessible public feedback process.

Read the initial recommendations on [feedback process required](#).

7. Do you agree with the recommendations in this category?

Agree / Disagree

8. What would you add, remove or change about the recommendations?

Format of documents

The requirements for format of documents are under the customer service standards. They are intended to ensure that, when requested, people with disabilities receive documents in a suitable accessible format or with communication support in a timely manner, at no additional cost than that charged to other people.

The committee discussed the opportunity to streamline [existing requirements within the *Integrated Accessibility Standards Regulation \(IASR\)*](#) and build on recommendations from the Information and Communications Standards Development Committee. The committee also discussed the need to respond to requests for accessible formats more quickly.

Read the initial recommendations on [format of documents](#).

9. Do you agree with the recommendations in this category?

Agree / Disagree

10. What would you add, remove or change about the recommendations?

Procuring or acquiring goods, services or facilities

The requirements for procuring or acquiring goods, services or facilities under the general requirements is intended to ensure that all designated public sector organizations incorporate accessibility design, criteria and features into their procurement practices so that goods, services and facilities are more accessible to people with disabilities, unless it is not practicable to do so.

The committee discussed the need to align procurement-related requirements spread across both the general requirements as well as the [information and communications standards](#), which may cause confusion for organizations. The committee also discussed the opportunity for alignment with federal accessibility standards and the need for more education and guidance from government to assist organizations with implementing accessible procurement requirements.

Read the initial recommendations on [procuring or acquiring goods, services or facilities](#).

11. Do you agree with the recommendations in this category?

Agree / Disagree

12. What would you add, remove or change about the recommendations?

Notice of temporary disruptions

The requirements for notice of temporary disruptions are under the customer service standards. They are intended to ensure that providers of goods, services and facilities give reasons and next steps if there is a temporary disruption in facilities or services.

The committee discussed the impacts of various types of disruptions on people with disabilities and how these disruptions are communicated. The committee also discussed the need for organizations to use various current communication options (e.g., social media, websites and email) to publicize notices of temporary disruptions. As well, the committee felt that organizations should lay out a plan for complying with current and any future notice of disruption requirements in order to help verify the organization's compliance.

Read the initial recommendations on [notice of temporary disruptions](#).

13. Do you agree with the recommendations in this category?

Agree / Disagree

14. What would you add, remove or change about the recommendations?

Self-service kiosks

The self-service kiosk requirement under the general requirements is intended to ensure that all organizations that offer services and/or products through self-service kiosks take steps to make them accessible, on a go-forward basis, to people with disabilities so they can be used independently and securely.

The committee discussed the need to streamline requirements by adding a specific section on self-service kiosks under existing procurement requirements (section 5) within the *Integrated Accessibility Standards Requirement* (IASR). The committee also discussed the need for government guidelines on accessible kiosks and features that should be included that align with potential future federal guidelines for manufacturers.

Read the initial recommendations on [self-service kiosks](#).

15. Do you agree with the recommendations in this category?

Agree / Disagree

16. What would you add, remove or change about the recommendations?

The use of service animals

The requirements for the use of service animals are under the customer service standards. They are intended to ensure that providers of goods, services or facilities permit a person with a disability accompanied by a guide dog or other service animal to bring their animal with them into areas open to the public or third parties, unless they are prohibited by another law.

The committee discussed the ongoing barriers for people with disabilities when accessing facilities and services with a service animal. In relation, they discussed the need to provide organizations with resources to strengthen their knowledge on how to interact with people using service animals and the circumstances in which it is appropriate to ask for proof of documentation. The committee also discussed how creating resources for organizations could ease confusion regarding service animal requirements under different laws. The committee also discussed challenges with using ride share services when using a service animal and ways to improve the process both for customers and the ride share companies.

Read the initial recommendations on the [use of service animals](#).

17. Do you agree with the recommendations in this category?

Agree / Disagree

18. What would you add, remove or change about the recommendations?

The use of support persons

The requirements for the use of support persons are under the customer service standards. They are intended to ensure that providers of goods, services or facilities permit a person with a disability accompanied by a support person to bring that person with them while accessing goods, services or facilities in areas open to the public.

The committee discussed the importance of organizations consulting with a person with a disability on options for accommodation before imposing the requirement of a support person. Situations in which admission fees or fares for support persons should not be charged was also discussed, as was the need for consistent requirements for support persons across Canadian jurisdictions.

Read the initial recommendations on the [use of support persons](#).

19. Do you agree with the recommendations in this category?

Agree / Disagree

20. What would you add, remove or change about the recommendations?

Purpose, application and definitions; scope and interpretation

As the customer service standards became the first accessibility standards in regulation under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) in 2008, they preceded the creation of *Integrated Accessibility Standards Regulation* (IASR) in 2011 as a stand-alone regulation. Following the review of the accessible customer service standards in 2016, these requirements, including the scope, interpretation and definitions sections, were merged into the IASR, which resulted in redundancies.

As a result, the committee reviewed these sections for duplication and gaps with the goal of better streamlining requirements.

Read the initial recommendations on [purpose, application and definitions; scope and interpretation](#).

21. Do you agree with the recommendations in this category?

Agree / Disagree

22. What would you add, remove or change about the recommendations?

Additional feedback

23. Share any additional feedback for the Customer Service Standards Development Committee.

Demographic questions (optional)

This information helps the committee understand who is giving feedback, and therefore how accessibility barriers might affect specific demographic groups in Ontario.

This optional information will be collected by the ministry, anonymized and shared with the committee. The Ministry for Seniors and Accessibility is subject to the Freedom of Information and Protection of Privacy Act and will manage your survey responses in a secure manner.

24. Type of Respondent

Are you submitting feedback on behalf of yourself or an organization?

- Myself
- On behalf of an individual
- On behalf of an organization
- I prefer not to answer

25. Do you identify as a person with one or more disabilities?

Disability includes physical, mental and learning disabilities, hearing or vision disabilities, substance use dependencies, environmental sensitivities, as well as other conditions that limit activities of daily living.

- Yes - Please specify the nature of your disability or disabilities if you are comfortable doing so.
- No
- I prefer not to answer

26. Where do you live?

- Greater Toronto and Hamilton Area
- Southwest Ontario
- Northern Ontario
- Eastern Ontario
- Southern Ontario
- I do not live in Ontario
- I prefer not to answer

27. Do you identify as First Nations, Métis and/or Inuit? If yes, select all that apply.

- Yes, First Nations
- Yes, Métis
- Yes, Inuk/Inuit
- No
- I prefer not to answer