

Accessible Service Delivery Standard



BRITISH
COLUMBIA

*ACCESSIBILITY SERVICE DELIVERY
STANDARD*

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Introduction

What is a standard

A standard is a set of rules or guidelines. The Service Delivery Standard provides guidance on how to remove barriers for people with disabilities accessing goods or services from an organization. The goal is that events, activities, advice, and the purchasing process for goods are provided in accessible ways to include people with disabilities. After the Provincial Accessibility Committee finishes this standard, it will recommend the standard to the government and the government may adopt the standard in law as a regulation.

IN BRITISH COLUMBIA (B.C.), THE HUMAN RIGHTS CODE PREVAILS OVER OTHER LAWS. THE STANDARDS BEING DEVELOPED WOULD BE IN ADDITION TO THE HUMAN RIGHTS CODE.

Who would the standard apply to?

The Provincial Accessibility Committee is an advisory committee to government. Part of its role is to develop and recommend accessibility standards. Government is responsible for deciding which recommendations should apply to which organizations.

Making our communities more accessible, inclusive and equitable is important for all of us. Generally, the Provincial Accessibility Committee believes that all organizations in B.C. have a role to play to help make our province more inclusive and accessible. The committee also believes that many of the recommendations in this document make sense for a range of types of organizations. They also recognize that some of these recommendations may not be appropriate for all organizations. The Provincial Accessibility Committee will use the feedback from people and organizations to inform its recommendations to government.

When will organizations need to comply with the standard?

Some of the elements of the standards may be simple and quick to implement but other elements may take more time. The Provincial Accessibility Committee is interested in phasing the requirements of the standards and believes that most or all organizations could become compliant within about two years from when a regulation comes into force. The Provincial Accessibility Committee is interested in understanding which elements of the standard could be done faster and which might take longer.

What do we mean by organizations?

An organization is a group of people with a particular purpose. It can be a government, business, society or charity.

What are the next steps?

The input from this engagement will be used to help shape the standards that the Provincial Accessibility Committee will recommend to the Minister responsible for accessibility in 2025. Government will then decide whether to turn some or all of these recommendations into regulations.

Reconciliation

Accessibility standards will benefit all people in British Columbia including Indigenous Peoples. Indigenous Peoples are more likely to experience a disability. They may also face unique barriers that can magnify exclusion.

Indigenous Peoples and partners provided feedback during the development of the first two accessibility standards.

From these conversations, we have learned that many parts of the standard align with cultural beliefs of trusting and valuing the lived experience of others. We have also learned that standards may benefit those who have experienced trauma and the harms of colonialism.

There will be more opportunities for Indigenous Peoples and partners to provide feedback including on the draft regulations.

Intersectionality

The standards recognize that the same barrier may be experienced differently by people based on their identity factors. Multiple forms of discrimination such as racism, sexism, ableism and homophobia may be active at the same time in a person's life. When these types of discrimination intersect, they can compound the barriers a person faces.

Accessible Service Delivery Standard

The Provincial Accessibility Committee is proposing standards in 20 different topic areas.

ACCESSIBLE ORGANIZATIONS

General obligations

Organizations need to offer the same types of services for people with disabilities as they offer to everyone else. Organizations need to make sure that people with disabilities are treated with respect.

What are accommodations?

- » Accommodations are adjustments that remove a barrier for a person with a disability.
- » Some examples of accommodations are:
 - ◇ Providing an alternative form of communication
 - ◇ Allowing guide dogs and service dogs to enter the premises
 - ◇ Allowing people to use their assistive devices to remove barriers

Documentation

In this standard there are times when organizations need to write information down and save it. The formal information that organizations need to write down and save is called documentation. The circumstances when organizations need to document a situation have been described in each section of this document. For example, in the assistive devices section of the standard, if an organization cannot accommodate an assistive device, then they must document the situation.

Documenting information helps organizations keep a formal description or record of a situation. Documentation is important because it helps keep organizations and people accountable.

Documentation about a situation needs to include:

- » Information about what happened with the organization and a person
- » Reasons why the organization was not able to offer accommodations to a person
- » Different options that the organization offered to a person
- » Whether a person agreed to the different services that the organization offered

Organizations are in charge of documenting information about a situation and storing the information safely. Organizations also need to:

- » Share documentation with the person it is about, in a way that is accessible to them (as much as possible)
- » Tell people that they can ask for documentation about their situation
- » Include documentation about the situation in formal feedback processes
- » Share the documentation with an Accessibility Representative or Accessibility Committee if the organization has one

Accessibility committee/representatives

Organizations need to have at least one person, or representative, who:

- » Helps the organization identify, prevent and remove barriers for people with disabilities
- » Helps the organization follow accessibility laws and rules
- » Makes sure other staff in the organization get training about accessibility

Organizations can have more than one person as a representative if they want. Any representative needs to get extra training about accessibility.

Organizations need to share the work contact information for the person (or people) who can help people with disabilities get accommodations or answer questions about accessibility.

Some organizations already have to follow the Accessible B.C. Regulations. These organizations need to write plans about accessibility. In their plans they need to include information on how effective the Accessibility Representative is. Also, if an organization already has a Accessibility Committee, the committee can act as the Accessibility Representative. Otherwise, the Accessibility Committee and the Accessibility Representative can work together.

What is the Accessible B.C. Regulation?

The Accessible B.C. Regulation requires the over 750 organizations in the public sector to establish:

1. An Accessibility Committee
2. An accessibility plan
3. A tool to receive feedback on accessibility

Organizations in the Accessible B.C. Regulation include local governments, municipal police, school districts and other organizations.

Example:

Margaret uses a wheelchair. Today, they would like to sign up for a swimming class at their local recreation centre. Margaret needs to know if the recreation centre has a lift that can help them get in the swimming pool.

Margaret goes to the recreation centre's website and finds the email for Zahir, who is the recreation centre's Accessibility Representative. Margaret emails Zahir and asks if the swimming pool has a lift. Zahir says that it does, and that they will make sure the instructor for Margaret's swimming class knows how to use the lift safely. Margaret is able to sign up for the swimming class.

Evidence

Generally, organizations are not allowed to ask people to prove that they have a disability. Organizations are also not allowed to ask people to prove that they need guide dogs or service dogs, assistive devices, support persons or other types of support.

Organizations are only allowed to ask for proof of a disability if:

- » They have to spend a lot of time or money
- » There are two people who need accommodations, but what works for one person would make things worse for the other person
- » They are reasonably worried about safety

Providing training

Organizations need to:

- » Train their employees about how to provide services in an accessible way
- » Give a minimum level of training, so every employee gets at least some training about how to reduce barriers for people
- » Give extra training for employees who have special roles, such as managers

Example:

Indra is blind and uses braille to read. Today, Indra goes to a restaurant. Every employee at the restaurant was trained on how to remove barriers for people. Indra asks for a menu in braille. The manager, Fatima, explains that the restaurant does not have a braille menu. Fatima offers to read the menu out loud to Indra. Or, if Indra would prefer, Fatima can give them a link to the restaurant's website with an accessible version. Indra chooses to use the accessible version on the website, because they have a screen reader on their phone, which will read the menu to them.

Documenting training

Organizations need to write down information about the training their employees receive. Organizations need to include:

- » Information about training rules or policies
- » What topics their employees get training on
- » How many employees have taken training

Organizations need to share this information about training when someone asks for it. Organizations also need to let people know that anyone can ask for training information.

Organizations listed in the Accessible B.C. Regulation already have to write a plan about accessibility. Organizations that need to write a plan about accessibility also need to include information on training in their plan.

Example:

Marc has a service dog. Bagel Mart is a large organization that sells baked goods. Marc wants to know what type of training Bagel Mart employees get about people who use guide dogs and service dogs.

Marc goes to Bagel Mart's website, where they find the page about accessibility. The webpage says that anyone can ask for information about the accessibility training that Bagel Mart's employees get. Marc clicks on the link on the accessibility webpage and it takes them to a page of information about Bagel Mart's accessibility training. Now Marc knows that Bagel Mart's employees are trained about how to serve people who use guide dogs and service dogs.

Availability of accessibility features and services

What are common accessibility features and services?

Accessibility features and services are any objects, equipment, alternative measures and services provided by organizations that remove barriers for a person.

This can include:

- » Elevators, lifts and ramps
- » Door openers and chairs
- » Audio loops, beacons and wayfinding
- » Accessible washrooms

Some organizations offer accessibility features and services for people to use while accessing services.

Organizations need to make sure that accessibility features and services they offer to people are:

- » Easy for people with disabilities to use for themselves without having to ask for help, unless the feature or service is not able to be used properly or safely without help
- » Free for people to use (as much as possible for the organization)

If an accessibility feature or service needs employees to help, organizations need to make sure:

- » Employees are trained about how to safely use accessibility features and services
- » People who ask for accessibility features and services do not have to wait a long time for employees to help them
- » People who reserve accessibility features and services in advance get them (as much as possible for the organization)

Example:

Mika has autism and gets anxious in loud places. Julia is Mika's mom. Today, Julia and Mika are going to watch a hockey game, which will be loud. Julia asks the hockey arena's customer service team to see if there are accommodations that will help Mika. Annie, who is on the arena's customer service team, lets Mika borrow a pair of noise-cancelling headphones. Annie also shows Julia and Mika a quiet room that they can use. Julia and Mika do not need to pay to borrow the headphones or to use the quiet room.

Maintenance of accessibility features and services

Organizations need to make sure that the accessibility features and services they offer to people work well and are safe to use. Organizations need to:

- » Check features and services when someone says that they are broken or not working the way they are supposed to
- » Regularly check accessibility features and services to make sure they are safe and working the way they are supposed to
- » Fix or replace accessibility features and services as quickly as possible when they break

Organizations need to write down information about how they make sure accessibility features and services are working. Organizations need to write down information about:

- » The last time every accessibility feature and service was checked
- » The next time that every accessibility feature and service is scheduled for maintenance, repairs or replacement
- » Any time someone reports that an accessibility feature or service is broken or not working the way it is supposed to work

Example:

Olu sometimes uses a wheelchair, but they don't have a car to bring one with them everywhere they go. Today, Olu is going to Filly's Amusement Park. Filly's Amusement Park has wheelchairs for people to borrow while they are there. Filly's Amusement Park has a plan to make sure that the wheelchairs are working. Mary is an employee of Filly's Amusement Park. Once a month, Mary checks the wheelchairs: she checks if the wheels need to be replaced, and if the brakes work safely. Today, when Olu goes to Filly's Amusement Park, they ask to use a wheelchair. Mary gives them one, but Olu notices that it is not working. Mary offers Olu a different wheelchair and makes a call for a repair worker to fix the broken wheelchair.

Disruption of services

Sometimes, organizations experience problems with the way they normally give services. For example, a coffee shop that runs out of cups will find it hard to serve coffee to people. This type of problem is called a disruption.

When organizations deal with problems, or disruptions, they need to:

- » Offer different ways for people to get services (as much as possible for the organization)
- » Warn people about the disruption in ways that are accessible for people with disabilities
- » Let people know if there are different ways to get services

Organizations also need to share information about the disruption as soon as they can. Organizations need to include information about:

- » How long the disruption will last
- » How the organization is going to deal with the disruption
- » The training the organization's employees have about disruptions

Example:

Jaswinder works at Bear Land, a toy store in the local mall. Bear Land is on the second floor of the mall. The mall needs to fix the elevator that takes people to the second floor and has to close the elevator for a week. Jaswinder puts a warning on Bear Land's website that people will need to use the stairs for the next week. Jaswinder also prints a sign to put on the first floor so that people can ask for help.

Today, Stefan wants to go to Bear Land to get a gift. Stefan uses a walker and is not able to use the stairs in the mall. Stefan did not check Bear Land's website this morning, but they see the sign that Jaswinder printed. Stefan phones Bear Land to explain what they would like to buy, and Jaswinder brings down the toy for them.

Communications

Organizations share information with people about many things, like the hours they are open and what food they sell. Organizations share this information in many different ways like writing signs and reading out menus to people. When organizations share information, they are communicating.

Organizations need to make sure they communicate in ways that work for people with disabilities. Organizations need to practice accessible communications as much as possible. If a person with a disability needs to communicate in a specific way, organizations need to do their best to communicate with the person in the way that they choose.

To communicate accessibly, organizations need to offer different ways of communicating. Organizations can offer different ways of communicating that:

- » Describes visual information such as images and text
- » Describes audio information such as loudspeaker announcements
- » Works with different types of assistive devices and assistive technology
- » Provides information in a clear and simple way, called plain language
- » Are in more than one format, such as audio and written museum tours

Some organizations have rules or policies about communication. Organizations need to include considerations about accessibility in their rules or policies.

Example:

A retailer with both a brick-and-mortar store and online store offers customers the option to provide feedback about their shopping experience. The feedback process is offered in multiple formats including in person, in writing, by email or by any other communication technology as required. The organization notes that persons with disabilities can ask to give their feedback using an alternative method.

Discounts and fees

Sometimes, organizations offer discounts to people. Organizations need to make sure that people with disabilities can get the same type of discounts as everyone else.

Organizations need to:

- » Make sure that discounts and special offers are accessible for people with disabilities
- » Offer the same discount for accessible options as they do for other options

Organizations are not allowed to:

- » Charge people with disabilities extra money for accessible options or using accessibility features and services

Example:

Ravi uses a wheelchair. They're going on a trip next month and want to book an accessible room using a travel website. The hotel is offering a 10 per cent discount promotion for booking online, but the website does not let people book rooms that are accessible for wheelchairs. Ravi calls the hotel directly. Staff book the accessible room for Ravi at the same price as the website and apply the 10 per cent discount.

Empowering people with disabilities and honouring them as experts in their own experience

Alternatives

Sometimes the way organizations offer services is not accessible for everyone.

Organizations need to offer different ways of serving people, called alternatives, as much as possible. Organizations need to provide:

- » An active offer for alternatives
- » Alternatives that reduce barriers for people with disabilities
- » Alternatives without additional costs
- » Alternatives that are agreed on by both the organization and the person requesting the alternative

Alternatives can be very similar to the way organizations offer services most of the time, or they can be different. When someone needs an alternative, the organization needs to ask people what alternatives work best for them. Sometimes an alternative can be a virtual option like ordering online. It might also be a physical alternative like coming into the office to book an appointment. When it is possible an alternative should be available in both a physical and virtual environment.

When an organization cannot reasonably accommodate a person, they must try to offer an alternative. If they cannot provide an alternative, then they need to document the situation. This is described in the documentation section.

What is an active offer?

An active offer is a message that an organization will provide accommodations as best they can when someone asks for them.

This can include asking:

- » Is there anything I can do to make your experience more accessible today?
- » It is important to us that our event and materials are fully accessible to everyone. If you require any assistance, please contact us.

Physical environment

The physical environment is a building or space. It might be inside, like a shop, or outside, like a farmer's market. Sometimes there are barriers in the physical environment that stop people from being able to use a service like stairs in front of a shop entrance.

When these barriers can be removed for very little or no money, organizations need to remove those barriers as much as possible. This could be as simple as moving furniture out of the way so someone can move through a room.

Organizations need to tell people about their physical environment. This lets people make informed choices about if it is accessible for them. Organizations need to share information like:

- » Descriptions of the space
- » Locations of accessibility features
- » Photographs of the space
- » Information about emergency exits and other emergency plans

Virtual environment

Some services happen in a virtual environment like on a website, over email or by phone. These services also need to be accessible to people with disabilities.

If organizations can provide the same types of services in person, they need to offer people that option when virtual services are not accessible. For example, if there is an online booking form for appointments, people can also book an appointment through the reception desk.

When organizations are deciding on the virtual environment for their service, they need to choose accessible options as much as possible.

When someone needs a specific type of technology to access an organization's virtual services, organizations need to make sure that they advise people about the type of technology they will need to access services.

When an organization provides a service over the phone, the phone needs to be accessible to a range of assistive services and devices. These services might be Video Relay Services or Video Remote Interpreting.

Self-service interactive devices

Many organizations use self-checkouts, self-service kiosks and other types of self-service machines that people use independently. This includes machines for tickets or passes, sharing information and payment.

There are already guidelines for the design of this technology: "ASC/CSA B651.2, Accessible design for automated banking machines and self-service interactive devices". This standard provides guidelines for the design, manufacture, site preparation and installation for lots of self-service machines.

Organizations need to:

- » Offer other ways of getting a service that are not self-service machines. This might be an online option, a checkout cashier or some other option
- » Let people know about other ways of getting services when self-service machines are not accessible for them
- » Maintain self-service machines (as much as possible for the organization)

Some self-service interactive machines have features that make them more accessible, like audio descriptions of images and text. Organizations need to maintain those features.

When it is time to buy new self-service machines, organizations need to think about accessibility and buy machines that have more accessibility features than their current self-service machines.

Organizations also need to have photographs and a written description of their self-service machines available.

Emergency response

Lots of organizations have plans for what to do in emergencies, like a fire or an earthquake. When organizations make plans for emergencies, they need to:

- » Plan how to remove barriers for people with disabilities in all elements of the service
- » Identify different ways of letting people know there is an emergency, like alarms that flash lights for people who are Deaf
- » Think about people with different kinds of disabilities and what they need in emergencies
- » Work together with the Accessibility Representative or Accessibility Committee, if the organization has one

Emergency planning must go beyond leaving people with a disability in refuge areas. This could include, but is not limited to investigating other options for evacuation; establishing a communication protocol to ensure that emergency responders are alerted; or placing equipment in refuge areas to support people during an emergency.

Example:

A hotel has a plan for how to respond to a fire. The plan includes how they will:

- » Let their guests know about the emergency and keep guests informed
- » Help guests evacuate the hotel
- » Keep guests safe once they have evacuated
- » Make sure guests are able to return to their rooms when it is safe

Removing barriers experienced by people with disabilities

Events

Sometimes organizations have events, like parties, presentations and conferences.

Organizations who are hosting events need to:

- » Make sure that people with disabilities can join in the event like everyone else
- » Share invitations or notices about the event in ways that work for people with disabilities
- » Offer different ways for people to be included in the event
- » Share the work contact information for an Accessibility Representative, or someone else who can answer questions and provide accommodations to people with disabilities
- » Follow all the rules about accessible service delivery in other parts of the standard

Example:

Gold's Flower Shop will host a customer appreciation party next week for the people who shop there. Jane works at Gold's Flower Shop and is planning the party. They choose a venue that has a ramp and an elevator, because they know some of their customers use walkers or wheelchairs. Jane sends out an email to the store's customer list and puts up a sign inside the shop. They also invite people to the party when they are in the shop.

Assistive devices

What is an assistive device?

Any device that removes or reduces a barrier for a person.

This can include:

- » Mobility aids (wheelchairs, walkers, canes, prosthetics)
- » Assistive technology (screen readers, voice recognition tools)
- » Computer or mobile phone software or hardware

Some people with disabilities use assistive devices to make sure they can access services.

Organizations need to:

- » Let people use their assistive devices
- » Make sure that people who use assistive devices get the same service as everyone else
- » Make rules or policies that let people use their assistive devices
- » Share or tell people about their rules or policies that let people use their assistive devices

When an organization is not able to accommodate people who use assistive devices, the organization needs to:

- » Do what they can to get rid of barriers for people who use assistive devices
- » Write down some information as described in the documentation section

Example:

Joe always uses their phone to make text bigger so they can read it. They use their phone to help them fill out forms.

Today, Joe is at the hospital. The hospital must let Joe use their phone to help them fill out forms. The hospital does not let people use phones in the unit Joe is in because phones can be a problem for privacy. Joe needs to fill out a form, so the hospital needs to give Joe a different way to fill out the form. Someone reads the form to Joe and helps them fill it in. After, the hospital writes down the reason Joe could not use their phone and the solution found to help them.

Support persons

Who counts as a support person?

Support persons provide people with a disability with supports to access service or help with their needs.

Support person(s) can include:

- » Attendants
- » Sighted guides
- » Intervenors
- » Other people

Support persons can be paid or unpaid.

Sometimes people need a support person, or more than one support person, to help remove barriers for them.

Organizations need to:

- » Respect that some people have support persons
- » Let people come in with their support persons and let people stay with their support persons all the time

Organizations are not allowed to:

- » Ask people to prove that they need support persons
- » Ask people to prove how support persons help them

Organizations that are included in the Accessible B.C. Regulation are not allowed to charge people extra money when they have support persons.

Example:

Mei sometimes needs help from their child, Tao. Mei goes to the local swimming pool with Tao as their support person. The swimming pool lets Mei and Tao in together, and lets them use the family changeroom. Mei only has to pay for a single entry fee to the swimming pool. Tao can come in for no additional fee as their support person.

Guide dogs and service dogs

What counts as Guide Dog or Service Dog?

According to the Guide Dog and Service Dog Act:

- » A guide dog is a dog that is trained as a guide for a blind person and is certified as a guide dog.
- » A service dog is a dog that is trained to perform specific tasks to assist a person with a disability and is certified as a service dog.

In B.C. we have a law about guide dogs and service dogs called the Guide Dog and Service Dog Act. This standard would complement the Guide Dog and Service Dog Act. The Guide Dog and Service Dog Act includes rules that all organizations have to follow including letting people with guide dogs or service dogs into public spaces without charging an extra fee.

Organizations need to:

- » Make sure that any signs, rules or webpages that say “no dogs” or “no pets” are changed to say “no dogs, except guide dogs or service dogs” or “no pets, except guide dogs or service dogs”

Organizations are not allowed to require formal proof or identification (ID) from people who use a guide dog or service dog. When an organization is not able to serve people with guide or service dogs in other ways, the organization needs to write down the information that is described in the documentation section.

If an organization has rules or policies about accessibility, then the rules or policies need to state:

- » The organization follows the Guide Dog and Service Dog Act
- » The organization does not ask people who use a guide dog or a service dog to give formal proof of ID
- » Anywhere that dogs are not normally allowed still needs to be accessible for guide or service dogs

Example:

Yaseen uses a guide dog. Today, Yaseen goes into a clothing store. The clothing store needs to let Yaseen bring their guide dog with them around the store. The clothing store is not allowed to ask Yaseen to give proof that they need a guide dog. The clothing store can expect that Yaseen’s guide dog will behave well.

SUPPORT TO IMPLEMENT THE STANDARDS

The Provincial Accessibility Committee wants to make sure that organizations have the information and guidance they need to implement any regulations that arise from these standards. The Provincial Accessibility Committee is interested in understanding the type of resources that would help organizations. This could include things like checklists, model policies, training and other supports.

NEXT STEPS

Thank you for reviewing these recommendations. There are lots of ways for you to provide your feedback. Please visit: <https://Engage.gov.bc.ca/AccessibleBCActStandards/> for more information.

The Provincial Accessibility Committee will use all of the input provided to inform its final recommendations to government.

