

Untapped Accessibility's key takeaways-

Service delivery standards

As the province's leading accessibility consulting agency, Untapped Accessibility is proud to share expert insight into the Government of BC's draft accessibility standards. Here is what we think you should know about service delivery.

Five major themes identified in the draft standards:

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Ensuring equitable access to services

Across all service delivery standards, there are prompts to ensure people with disabilities have the same access to the services as everyone else. This includes pre-planning for accessibility (before an accommodation request prompts action) and offering accommodations as needed.

Pre-planning to provide accessibility by default

The standard for Accessibility Features and Services asks organizations to have accessibility features easily available. To illustrate what this can look like, they share an example of an Autistic individual attending a hockey game. The individual receives noise-cancelling headphones from the customer service team and a representative shows them the arena's quiet room. With these accessibility features, accommodations are not needed.



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Accommodations to support equitable access

Regardless of how much pre-planning you do for accessibility, there will be accommodation needs. Being timely when responding to accommodation requests is highlighted in the General Obligations standard.

The Discounts and Fees Standard clarifies that discounts/special offers must offer the same benefit to people with disabilities. For example, a discount on hotel rooms must include accessible rooms.

Maintenance of Accessibility Features and Services asks providers to keep their accessibility tools functional and predictable through regular maintenance.

The Communications standard asks providers to create service communications in various formats so everyone can access the same information.

Standards for Support Persons and Alternatives ensure no extra cost is charged for support people or alternative service delivery.

Tips for implementation

- ✿ Break down the demands of your service activities and offer options for engagement (for example, use the [Untapped CAP Framework](#) to plan your service).
- ✿ Engage your Accessibility Committee in conversations around anticipating/planning for accessible service delivery.

Eliminating the need to prove disability

Standards focus on eliminating the need to prove disability to gain equitable access to services. The Evidence standard says that organizations cannot ask individuals to prove their disability or need for guide dogs, service dogs, assistive devices, or support persons.

Organizations can only request proof of disability if:

- Significant time or money is involved in providing an accommodation;
- Providing an accommodation would negatively impact someone else, or
- There are reasonable safety concerns.

The Support Persons standard and Guide Dogs and Service Dogs standard reinforce the removal of evidence/proof of disability requirements.



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Tips for implementation

- ✳️ Teams will need training on the social model of disability to understand the “why” behind this change.
- ✳️ There may be concern about the abuse of policies if medical evidence is not required. Encourage open conversations among your teams about these concerns, and challenge people to consider the access barriers that medical evidence requirements pose. Disney recently made adjustments to their [Disability Access Services](#) program, which provides an example of how an organization has managed such concerns.
- ✳️ Consider what conditions warrant proof of disability at your organization and give staff clear guidance.

Accessibility training

The standards emphasize ensuring all service delivery staff are trained on accessibility. The Providing Training standard asks organizations to train their employees on accessible service delivery, ensuring every employee receives basic training to reduce barriers for people with disabilities. The standard clarifies that employees in supervisor roles require an added level of training.

Tips for implementation

- ✳️ Review your current onboarding training for frontline staff to see if you need to add an accessibility component into your content.
- ✳️ Review leadership programs and consider how you are supporting supervisors and managers to provide accessible service.

Documentation and transparency

The Documentation standard asks organizations to record instances where accommodations are not fulfilled. For example, if an organization cannot accommodate a customer’s assistive device, they would record the details of the situation. Another standard requires organizations to document the details of their staff accessibility training.

For further transparency, many standards ask organizations to make their documented information publicly available – as well as other accessibility-related information. The Physical Environment, Virtual Environment, and Self-Service Interactive Devices standards ask organizations to share descriptions of their accessibility features,



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including locations of accessible options, photos/screen shots of accessible features, and any relevant emergency information. This information helps people with disabilities make decisions about their service engagement.

Tips for implementation

- ✳️ Create a system for monitoring and tracking all accessibility information at your organization (for example, barrier removal plans, accommodation documentation, accessibility features of your services, etc.). This ensures all your accessibility information is documented in one place.
- ✳️ Bring all unfulfilled accommodations that you have documented to your Accessibility Committee or Accessibility Leaders Working Group to discuss how the request could be handled in the future.

Accessibility representatives

The standards propose that organizations must have an accessibility representative. The representative would support the organization to identify, prevent, and remove barriers for people with disabilities, ensure compliance with accessibility laws, and provide accessibility training to staff.

They would also be available to the public as a clear “go-to” resource for accessibility-related questions and concerns. The standard clarifies that an organization’s Accessibility Committee can function as this representative.

All individuals who occupy a representative role (including all Accessibility Committee members, if the committee is the designated representative) require additional accessibility training.

The Emergency Response standard also highlights the representative as a key collaborator. The Events standard asks organizations to share the representative’s contact as part of event advertising and registration.

Tips for implementation

- ✳️ If you started an Accessibility Committee to comply with the Accessible BC Act, you may be asking yourself how to best utilize this group now that the plan is published. Consider if your committee can fulfill this role described in the standard.



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- ✱ If you launched an Accessibility Leaders Working Group to ensure operational alignment with the accessibility plan, consider if this group can also fulfill the accessibility representative role.



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