



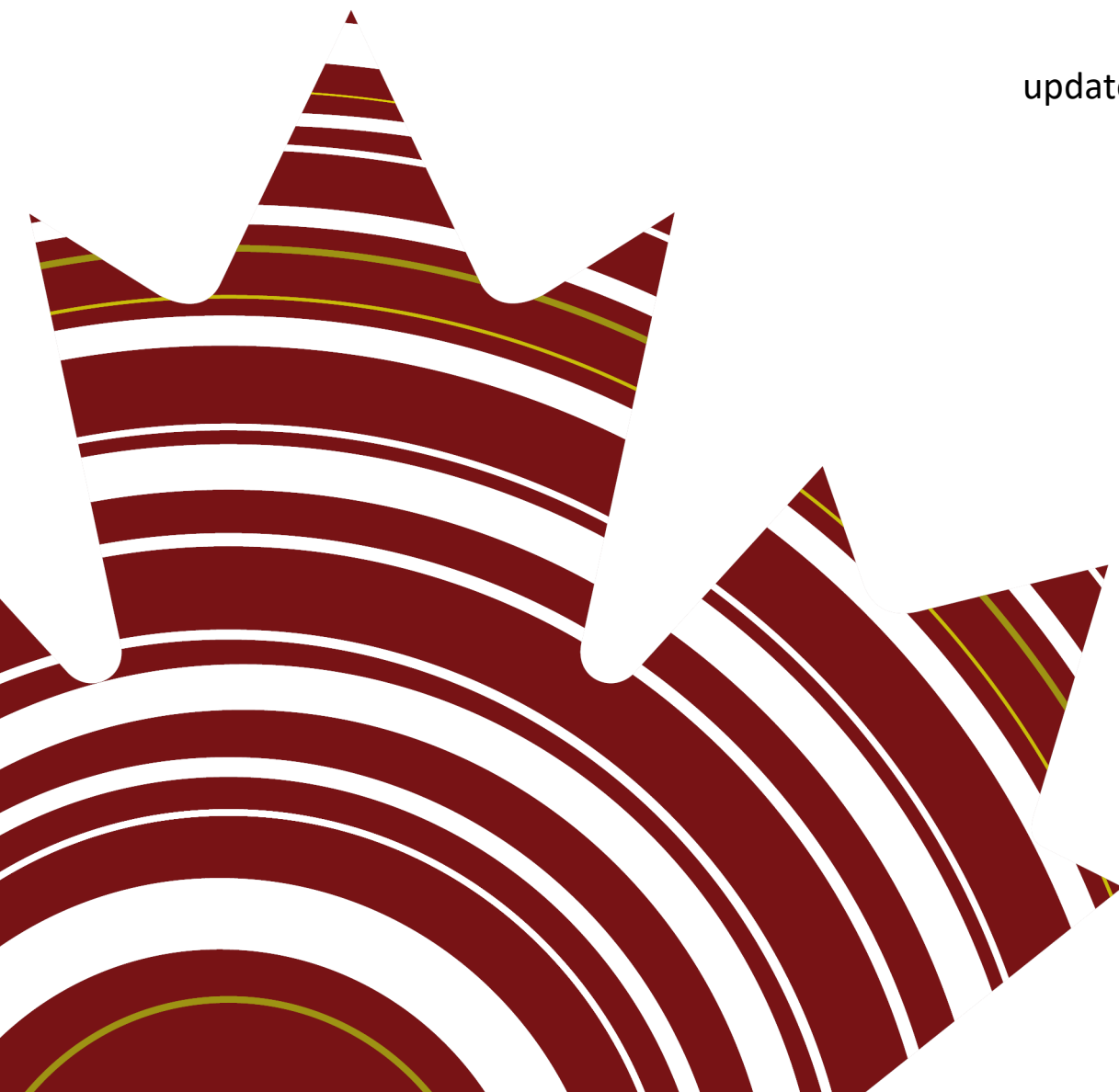
Canadian
Transportation
Agency

Office
des transports
du Canada

Accessible Transportation — Communicating with Persons with Disabilities: A guide

Canadian Transportation Agency

updated March 2023



Canada 

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1. Purpose

This guide explains the obligations of transportation service providers, under the *Accessible Transportation for Persons with Disabilities Regulations* (ATPDR), regarding communication with persons with disabilities. In particular, this guide describes:

- what information they must publish;
- their obligation to provide information in alternative formats; and
- more specific communication obligations related to:
 - individual communication needs;
 - telephone calls;
 - websites;
 - public announcements inside terminals; and
 - automated self-service kiosks.

Transportation service providers not covered by the ATPDR may have other obligations for communicating with persons with disabilities. For more information consult the [Accessible Transportation Guides – Introduction](#).

This is not a legal document. The explanations and definitions it provides are for general guidance purposes only. The obligations for communicating with persons with disabilities can be found in the [ATPDR](#), Part 1 and in [Annex A](#) of this guide. In case of differences between this guide and legislation or regulations, the legislation and regulations prevail.

Nothing in the Regulations or this Guide is to be construed as

- (a) limiting the duty to accommodate under the *Canadian Human Rights Act* or any other Act of Parliament; or
- (b) requiring any person to do anything that jeopardizes security, public health or public safety.

2. Information to be published

It is important that transportation service providers give persons with disabilities the information they need for travel planning. This includes what accessibility services travellers can request and the level of accessibility of transportation equipment and terminals they can expect.

Transportation service providers must publish the following information:

- A notice listing their obligations (specifically, which ATPDR provisions apply);
- The services they offer to persons with disabilities and any conditions on those services; and
- The complaint resolution services that they offer and how a traveller can access them.

Communication requirements apply only to Canadian carriers subject to the ATPDR:

- The communication requirements in the ATPDR do not apply to foreign carriers, except that they are required to publish a notice identifying that they are subject to the ATPDR and listing their obligations (specifically, which ATPDR provisions apply).

Recommended practice:

It is recommended that transportation service providers inform travellers about the dispute resolution services offered by the CTA.

Transportation service providers with a website must publish this information on it. Transportation service providers without a website must publish this information in another way that travellers can easily find, such as in a travel brochure.

Examples of acceptable service conditions include requiring travellers to make requests for certain accessibility-related services in; to provide documentation as part of certain service requests; or to provide written instructions for the disassembly and reassembly of a mobility aid. For more information consult [*Advance Notice/Supporting Documentation When Requesting Services for Persons with Disabilities: A Guide*](#).

3. Alternative formats

Transportation service providers are responsible for ensuring that persons with visual or hearing disabilities can receive publicly available information about the providers' services or facilities (including equipment) in ways that are accessible to those travellers. This means offering that information in alternative formats – in addition to conventional print and video formats – such as:

- accessible electronic text formats
- large print
- audio formats
- Braille

Information on **websites** or in other **electronic formats** must be compatible with adaptive technology, including software that converts text to voice (screen readers) for persons who are blind or have low vision.

Transportation service providers must also provide the following information about transportation-related services in alternative formats, upon request by a person with a disability:

- Information available in **an audio format must be made available, on request, in a visual format and vice versa**. Meeting this requirement can be as simple as telling someone what is conveyed visually, such as on an

arrivals/departures monitor in an airport, or writing down information from an announcement or other audio format.

- Information provided only **on paper** must be available, on request, in large print (usually 16 font and sans serif), Braille, and in an electronic format.

Transportation service providers should make all reasonable preparations so that they can provide information in the alternative format requested without delay.

4. Individual communication needs

Good communication between transportation service providers and travellers helps ensure a smooth trip. It can be even more important when a traveller needs services for a disability.

A transportation service provider must ensure that their personnel (including those delivering services for them under contract) who interact with travellers consider the following when communicating with a person with a disability:

- The nature of the person's disability, particularly if the person has a vision, hearing or communication disability;
- Whether the person uses a device to help them hear, see, or communicate;
- Whether a person uses a particular method of communication, such as sign language;
- Whether there are ways to support communication with the person, such as gestures or plain language; and
- Whether accepting a verbal declaration as opposed to a signature on forms is appropriate.

Using technology

There is a wide variety of technology available to support communication with persons with disabilities. There are many personal devices a person can use to help them hear, see or communicate. But helpful technology can also be included in the infrastructure of buildings and other facilities.

One best practice is the use of an assistive listening system, such as a hearing loop. These are designed to wirelessly send sound directly to a person's hearing aids while eliminating background noise. These systems can be very useful at counters or desks, which are key places to find transportation information, but are often noisy environments.

Transportation service providers are encouraged to learn more about the types of technology available to support communication, and how they may be included in their services and facilities.

5. Telephone systems

Using a telephone is challenging for some persons with disabilities. Transportation service providers with a telephone number the public can call to make reservations or get information about their transportation-related services or facilities must also provide other options:

- Offer the option of doing so either by means of email, or telephone or video relay service; and
- Publish the appropriate e-mail address, or the telephone number to access the telephone relay services, and describe how to access a telephone or video relay service.

Telephone and video relay services

Relay services will allow a traveller who has a hearing or communication disability to have a phone conversation using a third-party operator.

With a telephone relay service, the traveller uses a teletypewriter (TTY) or other device to type their conversation and transmit it live over a telephone line to an operator, who reads it to the other person. The operator then types the reply back to the traveller.

Video relay service is similar, except the operator uses sign language to facilitate the traveller's conversation.

Both of these services are available at no charge in Canada. Additional information can be found on the [Canada Video Relay Service's website](#).

6. Websites

Transportation service providers must make their websites - including any mobile sites, platforms, and similar applications - accessible to persons with disabilities.

Transportation service providers sometimes have a website where travellers can access a client account, travel itinerary, travel schedule or trip status; get contact information; make or modify a reservation; or check in. If so, the transportation service provider must offer persons with disabilities the option of doing these things by another means that is accessible to them (such as telephone, email, or telephone or video relay service options).

Although a web-site is available 24/7, the other means of communication, such as a telephone or telephone or video relay services may only be available during normal business hours, such that the transportation service provider should make available information regarding the hours of operation for these alternative services.

Any time a transportation service provider publishes its web address to access the services or information above, they must publish their phone number and email address, as well as the telephone number for telephone relay service or a link to access a video relay service. They must also provide information describing how to access the relay services. If a transportation service provider uses a TTY instead of a relay service, they must publish the TTY number. While the transportation provider may choose any of these alternative means, it must provide information about the alternative means available to persons with disabilities.

Publishing includes advertising online and in print media such as newspapers and magazines. Recognizing that there may be limited space in some types of advertisements, such as banner ads, it is acceptable for the advertisement to link to an accessible website that contains all of the contact information (phone number or email address, or the telephone number for telephone relay or a link to access a video relay service).

Website accessibility:

Transportation service provider websites and apps must conform to the World Wide Web Consortium's [Web Content Accessibility Guidelines](#) (WCAG), and must be accessible to, at minimum, Level AA of the latest version of WCAG. The WCAG guidelines are updated periodically. It is the responsibility of the transportation service providers to ensure that they are referring to the most recent version.

7. Public announcements in terminals

Many travellers are anxious about potentially missing announcements regarding safety and security or changes to departure times, boarding gates or tracks. This can be especially true for travellers who have vision or hearing disabilities. These travellers need to receive this information at the same time as other travellers.

Transportation service providers must use both audio and visual formats to make safety and security announcements in a terminal, and announcements about a departure, gate or track to travellers waiting at a boarding area. They could do this, for example, by way of messages on display monitors as well as audio announcements.

If there are no safety announcements made in a particular area of a Terminal (i.e. curbside locations or parking lots), there is accordingly no obligation to make them available in an audio and visual format.

Recommendation:

Audio announcements should be of good quality, in plain language, with clear enunciation, and spoken slowly enough to be easily understood. Messages should be repeated. Prerecorded messages should be used as often as possible, to improve the likelihood that travellers will catch what is being said. Providing pens and paper at key points throughout a terminal allows personnel to make announcements to travellers with hearing impairments in an accessible way. Electronic devices such as tablets could also be used.

8. Automated self-service kiosks

Automated self-service kiosks allow travellers to access travel-related services such as check-in, seating assignment, printing of boarding passes and baggage tags, and ticketing. Transportation service providers have a number of obligations to ensure persons with disabilities can access an automated self-service kiosk. They must follow these requirements with respect to any kiosks whose hardware and/or software they own, operate or control:

- As of June 25, 2022, kiosks will have to meet certain requirements in the National Standard of Canada's [Accessible design for self-service interactive devices](#). Generally, these cover kiosk design and performance, hardware (such as the acceptable heights for controls and screens), software, and location. See Annex B for more information.
- In the meantime, if some of their kiosks already meet these standards, transportation service providers must mark them with signs giving persons with disabilities priority access. There is no requirement for signage that indicates priority access if all the kiosks owned and operated by the transportation service providers are accessible.
- Transportation service providers must make their accessible kiosks visually and tactilely identifiable by putting an International Symbol of Access on the front of the kiosk. The International Symbol of Access should be placed within easy reach of a person with a disability standing at the kiosk or seated in a wheelchair.
- Transportation service providers must keep kiosks in good working order. When repairs are necessary, they must make them as soon as possible. Until the repairs are complete, transportation service providers must:
 - Direct a person with a disability to the nearest working kiosk that offers the same service; or

- Let that person move to the front of the line at a counter where they will receive the same service that the kiosk would have provided.
- Transportation service providers must always provide assistance, without delay, to a person with a disability using a kiosk if the person requests assistance.

Note: Self service kiosks include parking kiosks that are owned, operated or controlled by the terminal.

9. We're here to help

For more information and guidance about accessible travel and the CTA's dispute resolution services, please contact us at info@otc-cta.gc.ca.

Annex A: Regulatory references

Communication requirements in the Accessible Transportation for Persons with Disabilities Regulations

Application

Carriers, terminal operators, CATSA and CBSA

3 (1) This Part applies to the following entities (each of which is referred to in this Part as a “transportation service provider”):

- (a) every carrier to which Part 3 applies;
- (b) every terminal operator to which Division 1 of Part 4 applies;
- (c) CATSA; and
- (d) the CBSA.

Application of paragraph 5(a)

(2) Paragraph 5(a) applies to every carrier to which Part 2 applies and every terminal operator to which Division 2 of Part 4 applies, in addition to the entities mentioned in paragraphs (1)(a) to (d).

Communication of information to persons with disabilities

General information — alternative formats

4 (1) If a transportation service provider makes available to the public information about any transportation-related service or facility, the transportation service provider must ensure that

- (a)** if the information is made available in an electronic format, the format is compatible with adaptive technology that is intended to assist persons with disabilities;
- (b)** if the information is made available only in a paper format, it is made available, on request, in large print, in Braille or in an electronic format;
- (c)** if the information is made available in an audio format, it is made available, on request, in a visual format; and
- (d)** if the information is made available in a visual format, it is made available, on request, in an audio format.

Timing

(2) If a person with a disability makes a request referred to in any of paragraphs (1)(b) to (d), the transportation service provider must provide the information in the requested format without delay.

Information to be published

5 A transportation service provider must publish, including on its website, the following information:

- (a)** a notice that it is subject to these Regulations and the provisions of these Regulations that apply to it;
- (b)** the services that it offers to persons with disabilities and any conditions that apply to those services; and
- (c)** the complaint resolution services that it offers and how a passenger may access those services.

Communication

6 A transportation service provider must ensure that members of personnel who interact with passengers in the course of carrying out their functions take in account the following when communicating with a person with a disability:

- (a)** the nature of the person’s disability, particularly if the person is blind or deaf or has any other visual or hearing impairment or if the person has a communication impairment;
- (b)** whether the person uses an assistive device to assist them to hear, see or communicate; and
- (c)** whether there are methods of communication that may be used by the person or that may facilitate communication with the person, such as an augmentative or alternative communication system, sign language or clear, concise and plain language.

Telephone system

7 If a transportation service provider makes a telephone number available to the public that may be used to make travel reservations or obtain information about the provider’s transportation-related services or facilities, it must

- (a)** offer to persons who are deaf or have any other hearing impairment, or who have a communication impairment, the option of doing those things by means of an email or a third party’s telephone relay or video relay service; and
- (b)** publish, in every instance that it publishes a telephone number that may be used to do those things, along with that telephone number, a description of how a person may access the services referred to in paragraph (a), including the transportation service provider’s email address and the third party’s telephone number for telephone relay or video relay service.

Website

8 If a transportation service provider makes a website available to the public that may be used to access a client account, travel itinerary, travel schedule or trip status, to obtain contact information for the transportation service provider, to make or modify a reservation or to check in, it must

- (a)** offer to persons with disabilities the option of doing those things by means of a communication system that does not require the use of a website, such as by means of a telephone, an email or a third party's telephone relay or video relay service; and
- (b)** publish, in every instance that it publishes the address of the website that may be used to do those things, along with that website address, a description of how a person may access the services referred to in paragraph (a), including the transportation service provider's telephone number and email address and the third party's telephone number for telephone relay or video relay service.

Website — requirements

9 A transportation service provider must ensure that every website that it owns, operates or controls and that is made available to the public — including any mobile site that contains other platforms, such as applications — meets the requirements for a Level AA conformance that are set out in the Web Content Accessibility Guidelines.

Public announcements inside terminals

10 (1) A carrier must ensure that any public announcement relating to a departure or a gate or track assignment that is made for passengers waiting at a boarding area inside a terminal is made in an audio format and in a visual format.

Public announcement — safety or security

(2) If a transportation service provider makes any public announcement relating to safety or security inside a terminal, they must make that announcement in an audio and visual format.

Automated self-service kiosks

11 (1) If a transportation service provider owns, operates or controls the hardware components of an automated self-service kiosk that is available for public use in a terminal, or owns, operates or controls the software components of such a kiosk, the transportation service provider must ensure that the hardware components or the software components, as the case may be, meet the requirements set out in clauses 1.4 and 3 to 7 and Annexes B and C, excluding the notes accompanying those clauses, of the National Standard of Canada CAN/CSA-B651.2-07 (R2017), entitled *Accessible design for self-service interactive devices*, published in January 2007 by the Canadian Standards Association, as amended from time to time.

Requirements

(2) If a transportation service provider owns, operates or controls the hardware components of an automated self-service kiosk referred to in subsection (1), the transportation service provider must ensure that the kiosk is visually and tactilely discernible by an International Symbol of Access that is affixed to the front of it.

Temporary application

12 For a period of two years beginning on the day on which this section comes into force, if a transportation service provider owns, operates or controls the hardware components of an automated self-service kiosk that is available for public use in a terminal and meets the requirements of section 11, that kiosk must be marked with signage that specifies that persons with disabilities have priority access.

Assistance with use of self-service kiosks

13 A transportation service provider must, on the request of a person with a disability, assist the person, without delay, to use any automated self-service kiosk referred to in section 11.

Accessible self-service kiosks

14 (1) A transportation service provider must ensure that any automated self-service kiosk referred to in section 11 is in good working order and is properly maintained.

Repairs

(2) If the automated self-service kiosk is not in good working order, the transportation service provider must ensure that it is repaired without delay and, until it is repaired, the transportation service provider must provide the following services to a person with a disability:

- (a)** directing the person to the nearest working automated self-service kiosk that offers the same service as that provided by the kiosk that is not in good working order and, on the request of the person, assisting the person in using that kiosk; or
- (b)** permitting the person to advance to the front of the line at a counter where they will be provided the same service as that provided by the automated self-service kiosk that is not in good working order.

Annex B: Standards for automated self-service kiosks

As of June 25, 2022, automated self-service kiosks must meet the National Standard of Canada's [Accessible design for self-service interactive devices](#) (CSA-B651.2-07); specifically sections 1.4 and 3 to 7, and Annexes B and C of the Standard, as amended from time to time.