



Canadian
Transportation
Agency

Office
des transports
du Canada

Accessible Transportation — Personnel Training for the Assistance of Travelers with Disabilities: A Guide

Canadian Transportation Agency

Canada 

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1. Purpose

This guide explains the obligations of transportation service providers covered by the *Accessible Transportation for Persons with Disabilities Regulations* (ATPDR), regarding the development and implementation of training programs in respect of persons with disabilities. In particular, this guide explains:

- Which transportation service provider personnel must be trained;
- The topics that training programs must cover;
- Timelines for training;
- Supervision of untrained personnel;
- The duty to inform personnel of new developments impacting persons with disabilities;
- The preparation of training programs, including consultation with persons with disabilities; and
- The provision of information about training programs on request.

Transportation service providers not covered by the ATPDR may still have obligations for training personnel to provide assistance to persons with disabilities. For more information consult [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 training are established 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. Personnel required to be trained

The ATPDR require that transportation service provider personnel receive proper training to ensure that persons with disabilities have equal access to transportation services and receive the assistance they require to meet their disability-related needs in a manner that is safe and respects their dignity.

While foreign carriers are not subject to the training requirements set out in Part 1 of the ATPDR, all carriers are encouraged to provide training for their personnel, to ensure that persons with disabilities receive services in a manner that is safe, respects their dignity and supports their human rights.

personnel, for the purposes of these regulatory requirements, means

- (a) any employees of a carrier or terminal operator or of CATSA or the CBSA, as the case may be;
- (b) any persons, except a travel agency, that have entered into an agreement or arrangement with a carrier or terminal operator or with CATSA or the CBSA, as the case may be, to provide services on their behalf; and
- (c) any employees of the persons referred to in paragraph (b)

Examples of personnel who would be required to be trained include:

- Reservation agents;
- Personnel who interact with passengers at a terminal or on-board transportation equipment, such as check-in agents, gate agents and flight attendants;
- Personnel who handle mobility aids;
- Personnel who develop policies or operational manuals regarding the requirements of the ATPDR;
- Personnel who participate in making decisions related to the transportation of persons with disabilities, such as: executives, managers, supervisors and pilots;
- Third party contractors who provide wheelchair assistance; and
- Third parties that have entered into an agreement or arrangement with the carrier or terminal to provide services on their behalf, such as taxi and car rental companies

Note: The training requirement does not apply where there is no agreement/arrangement to provide services on behalf of the transportation service provider – for example, in the case of terminals where ground transportation providers can pick up or drop off passengers without having a contract with the terminal operator, or where passengers summon ride-share operators. Nonetheless, transportation service providers should endeavor to ensure that accessible services are available and are encouraged to consider offering training as a best practice.

3. Contents of training

There are a variety of roles and responsibilities in the provision of transportation services that impact access by persons with disabilities. For this reason, there can be no one-size-fits-all approach to training. Although there will be some common elements, training must be tailored to ensure that personnel receive training appropriate to their jobs. For example, a reservations agent needs different training than someone who assembles and disassembles mobility aids. Regardless of their roles, all personnel need to understand some key accessibility principles.

General training

Underpinning the training requirements in the ATPDR are principles that form the foundation of personnel training. All personnel who are required to be trained must receive an adequate level of knowledge in respect of the following principles:

- All persons must be treated with dignity regardless of their disabilities;
- All persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities or how their disabilities interact with their personal and social characteristics;

- All persons must have barrier-free access to full and equal participation in society, regardless of their disabilities; and
- All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities.

In addition to these principles, training must provide personnel with an adequate level of knowledge in respect of:

- the different types of barriers that may hinder equal access to transportation services;
- the various types of assistance that may be needed by persons with disabilities and the duties of transportation service providers in relation to those needs, including: the type of assistance they must provide, the assistive devices that are commonly used, and the methods of communication that may be used by, or may facilitate communication with, persons with disabilities, such as sign language, augmentative or alternative communication systems, and clear, concise and plain language;
- the communication requirements in the ATPDR and how to interact with persons with disabilities in a manner that respects their autonomy and dignity (see the [Accessible Transportation — Communicating with Persons with Disabilities: A Guide](#));
- the role of a support person; and
- the role and needs of a service dog (see the [Accessible Transportation — Service Dogs: A Guide](#)).

Note: The ATPDR contain requirements regarding the transportation of support persons and service dogs. These are defined as:

support person means a person, other than a travel companion, who is needed to provide assistance to a person with a disability, after departure and before arrival with:

- eating meals, taking medication, using the washroom;
- transferring to and from a passenger seat;
- orientation or communication; and
- responding to an emergency, including an evacuation or decompression.

service dog means a dog that has been individually trained by an organization or person specializing in service dog training to perform a task to assist a person with a disability with a need related to their disability.

For more information about travelling with a support person or a service dog, please see the CTA's [Accessible Transportation — Additional Seating and the One Person, One Fare Fare Requirement for Domestic Travel: A Guide](#) and [Accessible Transportation — Service Dogs: A Guide](#).

Best practices for providing assistance to persons with disabilities

CTA has published a draft guide – [Best Practices for Interacting with Persons with Disabilities: A Guide](#) – which contains best practices for personnel who provide assistance to persons with disabilities.

Note: The training requirement does not apply where there is no agreement/arrangement to provide services on behalf of the transportation service provider. For example, in the case of an open-curb, or where passengers summon ride-share operators. Nonetheless, transportation service providers should endeavor to ensure that accessible services are available and are encouraged to consider offering training as a best practice.

Training with respect to physical assistance to persons with disabilities

Personnel who are required to provide physical assistance to persons with a disability must receive training that provides them with adequate knowledge and skills to perform that function. This includes training on how to:

- seek information from a person as to their preferred method of assistance and any other measures to ensure their safety and comfort;
- manoeuvre mobility aids through doors and on irregular and multi-level surfaces, steps, curbs, and elevators;
- transfer a person between their own mobility aid and a mobility aid provided by the transportation service provider and between a mobility aid and the person's passenger seat. This training must include appropriate lifting techniques to perform a variety of transfers with maximum consideration for a person's dignity, safety and comfort;
- guide and orient a person whose impairment affects their mobility (for example, a traveller who is blind or who has a cognitive disability); and
- assist a person who has limitations in balance, agility or coordination that affect their mobility.

Training on the handling mobility aids

Personnel who are required to handle mobility aids must receive training that provides them with adequate knowledge and skills to perform that function, including with respect to:

- the different types of mobility aids; and
- the requirements and appropriate methods for transporting and storing mobility aids, including the disassembling, packaging, unpackaging and reassembling of mobility aids.

Training on using or assisting with the use of special equipment

Personnel who are required to use, or assist persons with a disability in using, special equipment, must receive training that provides adequate knowledge and skills to perform that function.

Special equipment includes:

- telecommunication devices for persons who are deaf or have any other hearing impairment;
- lifts, ramps, and other devices designed to assist with moving between levels in a terminal or on transportation equipment;
- on-board electrical power supplies;
- devices for the connection of on-board auxiliary respirator systems;
- accessible on-board entertainment systems; and
- accessible automated self-service kiosks.

4. Timelines for training and supervision of untrained personnel

Personnel must receive training that meets the requirements of the ATPDR within 60 days of assuming their functions. Until they receive the training, they must be under the direct supervision of a person who has already completed the training. Personnel must receive refresher training at least once every three years.

5. Duty to inform personnel

It is inevitable in the transportation sector's complex operating environment that there will be changes to, or the addition of, services, facilities, technology, and policies and procedures that impact persons with disabilities. Transportation service providers must inform personnel of these changes without delay, unless they are not relevant to their functions. These changes should also form part of the refresher training provided to personnel.

6. Preparation of training programs including consultation with persons with disabilities

Transportation service providers must consult persons with disabilities in the development of training programs, including the principal teaching methods to be used when delivering the training to personnel.

Best practices for developing and implementing training programs

Effective consultations:

- Consult with persons or organizations representing a broad spectrum of persons with disabilities to ensure that all types of disabilities are covered by the training program.
- Get input from persons with disabilities and others with relevant expertise on the scope and content of the training program; for example,

on how to provide guiding assistance to a person who is blind in a manner that meets their disability-related needs and respects their dignity.

- Get input from persons with disabilities and others with relevant expertise on which teaching methods to use; for example, on-line training, classroom training, experiential training, and video-based training.

Collaboration with other transportation service providers:

- Explore the development of training on generic subjects with other transportation service providers, as a means of enhancing the quality and consistency of training.

Teaching methods:

- Teaching methods should be appropriate for the type of service or assistance. For example, personnel who handle mobility aids, including assembly and disassembly, may benefit from hands-on training with mobility aids rather than on-line training.
- Trainers who have appropriate knowledge and skills should deliver the training. This could include personnel who have received training that meets the requirements of the ATPDR and who have experience providing services and assistance to persons with disabilities, persons with disabilities, persons with expertise in disability matters, or subject matter experts such as, for example, persons with specific mobility aid expertise.

Safety and dignity:

- The training should emphasize the importance of safety for persons with disabilities and respect for their dignity. For example, personnel who assist with transferring passengers between mobility aids and passenger seats need the right kind of training to ensure that the transfer is done in a manner that protects the passenger from injury and respects their dignity.

Testing:

- The knowledge and skills of personnel who have received training should be tested to ensure that they are ready to perform their functions or to identify additional training needed.

7. Information about training programs

Transportation service providers must make available, as soon as possible, information about their training programs to anyone who requests it.

The information required to be provided is set out in Schedule 1 of the [ATPDR](#). It covers various aspects of the training program, including:

- the name and title of the person responsible for managing the training program;
- a list of the occupational categories of personnel who must complete the training program;
- the subject matter covered in the training program;
- a description of the teaching methods used;
- the qualifications and titles of persons who provide the training; and
- the means used to consult persons with disabilities in the development of the training program and the principal teaching methods.

Note: Transportation service providers should provide as much information as possible about their training program to anyone who requests it. However, they are not required to share an individual's personal information or confidential business information.

8. 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

Part 1 : Requirements applicable to transportation service providers

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.

Personnel training for the assistance of persons with disabilities

Application

15 A transportation service provider must ensure that members of personnel receive the training that is required under sections 16 to 19.

Interaction with public, etc.

16 (1) If a member of personnel may be required to interact with the public or to participate in making decisions or in developing policies or procedures in relation to the requirements of these Regulations, they must receive training that provides an adequate level of knowledge and skills to carry out those functions, including training with respect to the requirements of these Regulations and the

policies and procedures of the transportation service provider with respect to persons with disabilities.

Contents of training

(2) The training referred to in subsection (1) must provide an adequate level of knowledge in respect of

(a) the following principles:

- (i)** the principle that all persons must be treated with dignity regardless of their disabilities,
- (ii)** the principle that all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities or of how their disabilities interact with their personal and social characteristics,
- (iii)** the principle that all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities, and
- (iv)** the principle that all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;

(b) the different types of barriers that may hinder equal access to transportation services for persons with disabilities;

(c) the various types of assistance that may be needed by persons with disabilities and the duties of the transportation service provider in relation to those needs, including

- (i)** the type of assistance that they must provide to persons with disabilities, and

- (ii) the assistive devices that are commonly used by persons with disabilities and the methods of communication that may be used by, or may facilitate communication with, persons with disabilities, such as an augmentative or alternative communication system, sign language or clear, concise and plain language;
- (d) communication with persons with disabilities in accordance with section 6 and how to interact with them in a manner that respects their autonomy and dignity;
- (e) the role of a support person; and
- (f) the role and needs of a service dog.

Physical assistance

17 If a member of personnel may be required to provide physical assistance to a person with a disability in the course of carrying out their functions, they must receive training that provides an adequate level of knowledge and skills to carry out those functions, including training on how to

- (a) seek information from the person with respect to their preferred method of assistance and any other measures they may require to ensure their safety and their comfort;
- (b) manoeuvre mobility aids through doors and on irregular and multi-level surfaces, steps, curbs and elevators;
- (c) transfer the person between their own mobility aid and a mobility aid provided by the transportation service provider and between a mobility aid and the person's passenger seat, including performing appropriate lifting techniques to perform various types of transfers of the person with maximum consideration for their dignity, safety and comfort;

- (d) guide and orient a person whose impairment affects their mobility; and
- (e) assist a person who has limitations in balance, agility or coordination that affect their mobility.

Handling mobility aids

18 If a member of personnel may be required to handle mobility aids in the course of carrying out their functions, they must receive training that provides an adequate level of knowledge and skills to carry out those functions, including training with respect to

- (a) the different types of mobility aids; and
- (b) the requirements and appropriate methods for transporting and storing mobility aids, including the disassembling, packaging, unpackaging and reassembling of mobility aids.

Using or assisting with special equipment

19 (1) If a member of personnel may be required to use, or to assist a person with a disability in using, any special equipment in the course of carrying out their functions, they must receive training that provides an adequate level of knowledge and skills to carry out those functions.

Definition of special equipment

(2) In this section, **special equipment** includes

- (a) a telecommunication device for persons who are deaf or who have any other hearing impairment;
- (b) a lift, a ramp and any other level-change device;
- (c) an on-board electrical power supply;

- (d) a device for the connection of on-board auxiliary respirator systems;
- (e) an on-board entertainment system that is accessible to persons with disabilities; and
- (f) an automated self-service kiosk that is accessible to persons with disabilities.

Initial training — timeline

20 (1) A transportation service provider must ensure that a member of personnel has completed training suitable to the requirements of their functions within 60 days after the day on which that member assumes those functions.

Supervision of untrained personnel

(2) Until a member of personnel has completed the training that is suitable to the requirements of their functions, the transportation service provider must ensure that they carry out their functions under the direct supervision of a person who has completed that training.

Refresher training

21 A transportation service provider must ensure that members of personnel who have received training that is required by this Part also receive, at least once every three years, refresher training that is suitable to the requirements of their functions.

Duty to inform personnel

22 If a transportation service provider introduces any new policy, procedure or technology with respect to persons with disabilities or offers any new transportation-related service or facility to assist persons with disabilities, the transportation service provider must, without delay, inform members of

personnel of that new information, unless it is not relevant to the requirements of their functions.

Preparation of training programs

23 (1) A transportation service provider must implement and maintain each training program for members of personnel in accordance with the following requirements:

- (a)** the training program must include the information set out in Schedule 1;
- (b)** the training program must be available for inspection by the Agency; and
- (c)** any new information that is referred to in section 22 must be incorporated in the training program without delay.

Consultation

(2) A transportation service provider must consult persons with disabilities in the development of each training program and the principal teaching methods.

Information about training program

(3) A transportation service provider must, without delay, make available any information about a training program that is set out in Schedule 1, except any personal information or confidential business information, to any person who requests that information.

Schedule 1

Training program information

(Name, address and description of transportation service provider)

Date:

- 1.** Name and title of person responsible for managing the training program for the transportation service provider.
- 2.** List of the occupational categories of members of personnel who must complete the training program under the Regulations (*specify*):
 - (a)** occupational categories of members of personnel who interact with the public;
 - (b)** occupational categories of members of personnel who participate in making decisions or developing policies or procedures in relation to the requirements of these Regulations;
 - (c)** occupational categories of members of personnel who provide physical assistance;
 - (d)** occupational categories of members of personnel who handle mobility aids; and
 - (e)** occupational categories of members of personnel who use, or assist a person with a disability in using, special equipment.
- 3.** Description of the subject matter covered in the training program.
- 4.** Description of the principal teaching methods and the types of educational and support materials used in the training program.

5. Number of hours of training provided to members of personnel in the initial training program.
6. Average period between a member of personnel's assumption of their functions and the initial training program.
7. Frequency and nature of refresher training programs and the number of hours of refresher training provided to members of personnel.
8. Qualifications and title of any person who provides the initial training and refresher training programs.
9. Means used to consult persons with disabilities in the development of the training program and the principal teaching methods.
10. Means used to ensure that members of personnel receive training that is suitable to the requirements of their functions and that provides an adequate level of knowledge and skills to carry out those functions.
11. Means used to ensure that members of personnel complete the initial training and refresher training programs within the timelines that are specified by these Regulations.
12. Means used to record and monitor the completion of the initial training and refresher training programs by each member of personnel, including the dates on which the initial training and refresher training programs were completed.
13. If the transportation service provider enters into any agreement or arrangement with a person for the provision of transportation-related services or facilities, a list of the transportation-related services or facilities that are provided under each agreement or arrangement.

(Signature, name and title of authorized representative of transportation service provider)