

PAS 88:2008

Guidance on accessibility of large hotel premises and hotel chains



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Foreword

This Publicly Available Specification (PAS) has been developed by the Disability Rights Commission (DRC), latterly the Equality and Human Rights Commission and VisitBritain in collaboration with The British Standards Institution (BSI). Acknowledgement is given to the following organizations that were consulted in the development of this specification.

- Accor Hotels
- Best Western
- The British Hospitality Association (BHA)
- Centre for Accessible Environments
- Department for Communities and Local Government
- Hilton International Hotels
- Institute of Hospitality
- InterContinental Hotels Group (IHG)
- Premier Inn (Whitbread Group plc)
- RNIB
- Tourism for All

Wider comments from other parties were invited by BSI. The expert contributions made from organizations and individuals

consulted in the development of this PAS are gratefully acknowledged.

All pictures used in this document have been kindly provided by Intercontinental Hotel Group.

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This PAS does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application.

Compliance with this Publicly Available Specification does not of itself confer immunity from legal obligations.

This Publicly Available Specification is not to be regarded as a British Standard.

Statement from the Commission

Standardizing accessibility and services offered by large hotel premises and chains will have a great impact on disabled people's opportunities to stay at hotels across Britain.

The Commission is keen that this guidance is used to improve good practice in all hotels, ensuring greater inclusion for disabled people and in increasing Britain's tourists numbers and the experience they have.

The recognition of good practice in hotels is a critical step in removing the barriers disabled people face in going about their daily lives.

Disabled people, their families, friends and colleagues can now be reassured that they can expect access to large chains comfortably, not have to plan minutia of detail in advance, justify their impairment related requirements in a crowded lobby or be turned away on arrival due to lack of access.

The UK's flourishing tourism industry generates over £85 billion a year for the British economy. It is one of our biggest employers, directly responsible for 1.4 million jobs, or one in every 20 people in work. The added benefit to the leisure and tourism industry is clear. London alone received 15.2 million visitors in 2006, spending £7.5 billion. Tourism is worth around £15 billion a year to the London economy and sustained increases over time result in an increase in the number of jobs

created for the economy. This is particularly encouraging in the lead up to the 2012 Olympic games when the tourism and cultural industries will be amongst the main economic beneficiaries and increased numbers of disabled people, their families and friends will be using Britain's hotels.

The London 2012 Olympic Games and Paralympic Games will be more than a major sporting occasion. They provide us with a unique opportunity to showcase all that Britain has to offer – both to visitors new to our country and to the large number of us who take at least some of our holidays at home. And it is a unique opportunity to ensure that our accommodation and tourist facilities match the best in the world.

Baroness Jane Campbell, the Equality and Human Rights Commission

Introduction

General

The British Standards Institution (BSI) worked together with the Disability Rights Commission (DRC), latterly the Equality and Human Rights Commission and VisitBritain to develop a Publicly Available Specification (PAS) that standardizes the accessibility and services offered by large hotel premises and hotel chains to disabled people or people with a long-term health condition in the UK. The PAS provides information for large hotel premises and hotel chains seeking to meet the requirements of the Disability Discrimination Act (DDA) 1995 [1].

This document contains principles of good practice based upon the duty to make reasonable adjustments and provide equal standards of service as contained in the DDA [1] as amended.

BSI worked with the DRC, latterly the Equality and Human Rights Commission, VisitBritain and significant key stakeholders, including disabled people and the British Hospitality Association (BHA) which represents many large hotel premises and hotel chains in this sector. It builds upon existing principles of good practice developed by market leaders within the hotel industry and has used VisitBritain's National Accessible Scheme (NAS) as the basis for its content.

Why invest in accessibility?

There are about 10 million disabled people in the UK spending an estimated £80 billion a year on goods and services and evidence shows that disability rates increase with age. Estimates by the Department for Transport predict that 40 per cent of the UK population will be over 45 by 2010. This means there will be an increasing need for accessible services and facilities in the future.

Demand for accessible accommodation is growing, and the hospitality industry is starting to recognize that disabled people form an important consumer group.

It is vital to recognize that disabled people do not use hotels purely for holidays but for a variety of reasons such as business trips, overnight stays whilst travelling, conferences, functions and leisure pursuits. By improving accessibility in all areas of the hotel and its services, hoteliers can ensure that they are opening their hotel to additional visitors. In the cases of families with disabled members the whole group can only use facilities when their accessibility needs are met.

Investing in accessibility in hotels and restaurants means investing in the whole experience, including the transport services to the destination, in order to make the stay for disabled people and their companions as accessible and convenient as possible. For the hotel industry it is not only a

question of competition and business but also a financial question. A number of the barriers can be overcome at little cost with careful planning and consideration. Therefore, it is important to raise awareness within the industry but also to provide information about how to make the facilities and services accessible.

Most adjustments needed to make goods and services accessible are not only relatively low-cost, but also benefit non-disabled customers alike. For example, customers with heavy luggage and parents with pushchairs will use level access or ramps into a hotel. Moreover a customer with a learning disability can better understand information such as signage that includes symbols and it will also be accessible to a wide range of other customers who may find jargon difficult to understand or for whom English is not their first language.

The Disability Discrimination Act 1995

Under Part 3 of the Disability Discrimination Act 1995 [1] hoteliers have a duty to ensure that access to their hotel facilities and services for disabled people is as close as reasonably possible to the standard normally offered to the public at large. Since the DDA [1] came into force in December 1996 it has been illegal to discriminate against disabled customers by:

- refusing service;
- providing a lower standard of service;

- providing the service on worse terms;
- failing to make reasonable adjustments.

The law uses the phrase 'reasonable adjustment' to allow different solutions in different situations. Service providers are required to make reasonable adjustments to policies or procedures that make it difficult for disabled customers to use their service, for example adjusting a no dogs policy to allow a customer to enter the premises with an assistance dog.

Service providers are also required to make reasonable provision of 'auxiliary aids and services' such as the provision of induction loops at enquiry desks or having members of staff available to assist disabled people.

Since October 2004, where a physical feature makes it impossible or unreasonably difficult for disabled persons to access your goods or services, your business is now required to take reasonable steps to:

- remove the feature; or
- alter it so it no longer has that effect; or
- provide a reasonable means of avoiding the feature; or
- provide an alternative method of making the service available.

However, the Code of Practice – Rights of Access: Services to the Public, Public Authority Functions, Private Clubs and Premises

2006 [2] does say that what is reasonable may vary according to:

- the type of services being provided;
- the nature of the service provider and its size and resources;
- the effect of the disability on the individual disabled person.

There are several factors that hoteliers should consider when determining what is reasonable. These include:

- whether taking particular steps would overcome a particular barrier to the disabled person accessing the service;
- how practicable it is to take the steps;
- the financial and other costs of this;
- how disruptive it would be;
- how much money and other resources they have available to spend on it;
- how much they have already spent on adjustments.

When assessing the provision for disabled guests in relation to this PAS the issues above may be relevant.

It is essential that hotels do not wait until a disabled person wants to use a facility before giving consideration to the duty to make reasonable adjustments. The duty to make reasonable adjustments is an anticipatory duty. Hotels should anticipate the requirements for disabled people and the adjustments that they may require. Failure to anticipate the need for adjustments may render it too late to comply with the duties.

It is also unlawful for hotels to pass on any cost of a reasonable adjustment. Where reasonable adjustments have been made to ensure that a certain facility or service is accessible for a disabled visitor this should be provided on a complimentary basis as part of a hotel's general expenses.

It is important to note that where third party procurement agreements have been entered into, e.g. the provision of shuttle buses, ensuring the accessibility of these facilities and services remains the obligation of the hotel. Additionally, where the hotel premises are leased by the current management/occupiers, issues of accessibility are the responsibility of the tenants providing the service to the consumers. This may involve seeking the permission of the landlord where the tenant wishes to remove or alter a physical feature of the premises. The landlord cannot unreasonably withhold consent to make the necessary adjustments.

For further detailed requirements of the law consult the statutory Codes of Practice, available at www.opsi.gov.uk.

Hoteliers should also be aware of their duties under Part 2 of the Disability Discrimination Act 1995 [1] which offers protection to disabled employees.

Does this document apply to you?

This document is for the use of large hotels and hotel groups and chains. The discussion of reasonableness in this introduction makes it clear that it is the resources of the business as a whole, rather than a particular establishment that will determine the legal duties. As a result, we would recommend that hotel businesses which have several small hotels should still refer to this guide. This would apply equally to smaller chains of well-resourced hotels.

Inevitably there is no simple way of determining whether a hotel business is large or small in size or financial worth. As a guide, large hotels will tend to have formal accommodation with full service, a more structured management system, a large team of staff, and a minimum of six bedrooms (but more likely to have more than 30 bedrooms) and usually additional facilities such as bars, restaurants, leisure or conference suites.

Likewise a hotel group/chain is suggested as being a chain of six or more hotels with central reservations (on or offline) and a clear overall brand identity, as well as or instead of individual hotel identities. If you are a smaller group or chain of hotels or a hotel with less than 30 bedrooms, you may still find parts of this guide will apply to you and/or offer best practice to you in making your business accessible to disabled customers.

If you are in any doubt as to whether your business would be considered to be 'large', we suggest that it would be sensible

for you to follow the clauses of this guide that would reasonably apply to your operation.

How to use this document

There are several key principles underpinning this document.

1. The nature of the Disability Discrimination Act 1995 [1] is one that does not promote the concept of **minimum standards** in terms of **compliance**.

This is because it is not possible to determine a single point at which 'compliance' is achieved, and the legislation itself does not specify what would be considered a minimum standard of service access for disabled people. It is ultimately for the courts and tribunals to determine whether or not someone has breached the Act [1].

The interpretation of disability legislation both in practice and by the court evolves over time, taking into account:

- changes in technology;
- the ever improving standards of existing service provision;
- the expectations of disabled people.

The implementation of the DDA [1] also relies upon:

- developing case law that clarifies points of law;
- the principle of 'reasonableness' that underpins the act;

- the concept of reasonable adjustments in relation to the individual;
- the **anticipatory** duty on providers of services to make reasonable adjustments in advance of a disabled person attempting to access the service;
- the requirements of all disabled people.

For these reasons, it is **not possible** to set a minimum standard for provision of services in this sector in regard to DDA [1] compliance.

The Court of Appeal, however, has said that the policy of the Act [1] is not a minimalist policy of simply ensuring that some access is available to disabled people; it is, so far as is reasonably practicable, to approximate the access enjoyed by disabled people to that enjoyed by the rest of the public.

In considering cases of discrimination, the courts have to take the Codes of Practice into account and may also take existing guidance issued/commissioned by the DRC/Equality and Human Rights Commission, including this document, into account when making its decisions in relation to disability discrimination claims.

In order to meet the needs of disabled consumers, it is **strongly** recommended that providers of services undertake a regular policy and practice review to determine whether their existing

and future practice standards appropriately evolve as case law and other practice standards emerge.

2. In referring to BS 8300:2001, BSI recognizes that this particular standard gives recommendations for the design of new buildings and their approaches to meet the needs of disabled people. The recommendations given in this British Standard also apply for assessing the accessibility and usability of existing buildings and, where practicable, as a basis for their improvement.

It is important for hotel service providers to consider access in all their building stock and the recommendations made in this document are setting good practice. For existing building stock, providers may wish to use this document to inform their buildings audits and refurbishment programmes.

3. This PAS provides hotels with guidance on how to make their facilities and services as accessible as possible. It is designed as an aspirational document which hotels work towards in order to improve and enhance their accessible features and services. This PAS aims to provide guidance on all areas of hotel premises and service. Where hotels do not currently have a physical feature or a certain service detailed in this document, consideration should be made to their provision, but where not applicable these clauses can be disregarded.
4. The terminology used throughout this PAS has been used consistently in the following way:

- The word 'should' is used to indicate a recommendation (this can be aspirational).
- The word 'may' is used to express permissibility.
- The words 'can' and 'could' are used to reflect when there is more than one recommended means of meeting an objective.
- Paragraphs marked 'Note' are for guidance in understanding or clarifying the associated recommendation.

This PAS has been developed through active consultation across a range of stakeholders.

Other guidance documents

This PAS has been developed to assist hotels in meeting their obligations under the DDA [1]. Users of this PAS will find **BS 8300:2001 Design of buildings and their approaches to meet the needs of disabled people – Code of Practice** a vital resource to be used in conjunction with this PAS. BS 8300 gives recommendations for the design of new buildings and their approaches to meet the needs of disabled people. This PAS however aims to give additional guidance on the physical features and services provided by both new and existing hotels. In line with this, it is vital that accessibility issues are carefully considered when designing or renovating any part of the hotel,

e.g. avoiding large expanses of glass which may confuse or impede visually impaired visitors.

Note 1 Users should be aware that legislation, building regulations and British Standards are subject to revision and care should be taken to ensure that the most recent version is being referred to.

Note 2 Details of other valuable resources can be found in the bibliography.

1 Scope

This Publicly Available Specification (PAS) gives guidance on how large hotel premises and hotel chains can improve their accessibility to disabled people or people with a long-term health condition in the UK.

Note 1 For further information regarding the applicability of this PAS please see the section headed 'Does this document apply to you?' within the introduction.

This PAS will assist large hotel premises and hotel chains seeking to meet the requirements of the Disability Discrimination Act (DDA) 1995 [1].

It can also be used as guidance on how to make the facilities and services of large hotels and hotel chains more accessible for all users, including older people and those with luggage.

Note 2 This PAS aims to provide guidance on all areas of hotel premises and service. Where hotels do not currently have a physical feature or a certain service detailed in this document as part of its offering to members of the general public consideration should be made to their provision but where not applicable these clauses can be disregarded.

Note 3 Attention is drawn to the following regulations:

Building Regulations Approved Document Part B 2006 [3];

Building Regulations Approved Document Part E 2003 [4];

Building Regulations 2000 [5];

Building Regulations Approved Document Part M 2004 [6];

Building (Amendment) Regulations (Northern Ireland) Part R 2006 [7];

Building Regulations (Northern Ireland) 2000 [8];

Building (Scotland) Regulations 2004 [9];

Disability Discrimination Act 2005 [1];

Fire (Scotland) Act 2005 [10];

Regulatory Reform (Fire Safety) Order 2005 [11].

2 Normative references

The following normative documents are indispensable for the application of this Publicly Available Specification. For dated references, subsequent amendments to, or revisions of, any of these publications do not apply. For undated references, the latest publication referred to applies.

PAS 78, Guide to good practice in commissioning accessible websites.

BS 5588-8, Fire precautions in the design, construction and use of buildings. Code of practice for means of escape for disabled people.

BS 5588-12, Fire precautions in the design, construction and use of buildings. Managing fire safety.

BS 8300: 2001, incorporating Amendment No 1, Design of buildings and their approaches to meet the needs of disabled people. Code of practice.

Note 1 At the time of publication of this PAS, BS 8300 was under review.

Note 2 DD 9999, BS 5588-8 and BS 5588-12 will be replaced by BS 9999 in 2008.

3 Terms and definitions

For the purposes of this PAS, the following terms and definitions apply.

3.1 accessible

able to be used by disabled people

3.2 access guide

written, clear and accurate description of the current facilities and services offered by the hotel (see 9.2)

Note This guide can also be known as an access statement.

3.3 access strategy

outline of barriers to services and facilities within hotel and plan for removing/overcoming them, taking into account financial and practical aspects (see Clause 4)

3.4 adult changing facilities

private designated area providing disabled visitors with a safe, clean place in which to wash, and change soiled articles of clothing (see 18.3.2)

3.5 assistance dog

dog that is specially trained to help disabled people with everyday tasks

Note Assistance dogs can be referred to as service dogs and can include, amongst others, guide dogs, hearing dogs, emergency/seizure alert dogs and mobility dogs.

3.6 customer focus group

facilitated group discussion in which ideas, opinions and experiences are shared

3.7 disability

physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities

3.8 Easy Read

form of written and pictorial information that has been drafted in such a way that it is easily understandable, for example by people with a learning disability

3.9 impact assessment

study of the current or potential impact of policies and practices, or the likely impact of policies and practices, on access for disabled people

Note Identify, for example, where access may be improved.

3.10 inclusive environment

environment that can be used by everyone, regardless of age, gender and disability

3.11 induction or hearing loop

large loop of wire that can be plugged into an assistive listening system or amplifier, a radio, TV, some computer speakers and some telephones that generates a magnetic signal that can be “heard” by the telecoil and amplified by the hearing aid

Note The sound generated via a telephone may be amplified by an inductive coupler in the telephone earpiece when used in association with a hearing aid with the ‘T’ switch set in the appropriate position.

3.12 large print

use of a larger font (at least 16 point size) and sans serif typeface when presenting information

Note Tiresias, Arial or Univers are recommended.

3.13 neuro-diversity

spectrum of neurological conditions concerning how effective an individual is in processing information and includes conditions such as Dyspraxia, Dyslexia, Asperger’s Syndrome, ADHD

Note Statistics in the UK suggest that at least 10 per cent of the population are on the continuum for a neuro-diverse condition.

3.14 refuge

place of relative safety where people whose abilities or impairments might cause delayed evacuation can await assistance from building management with the next part of their movement to a place of ultimate safety

3.15 plain English

using simple, clear language which improves the understanding of the information provided

3.16 risk assessment

overall process of risk analysis and risk evaluation

3.17 self contained shower area

open shower area with level entry containing no screens or barriers

3.18 setting down point

area allocated to allow for short-term stops by vehicles for the safe and convenient drop off of passengers near to entrances

3.19 textphone

telecommunications device for the deaf (TDD) used for telephone communications by deaf persons and those with other hearing impairments

3.20 visual contrast

perception of a difference visually between one element of a building and another by reflectance to their light reflective values (LRV)

4 Access strategies

4.1 Benefits of an access strategy

Access strategies are a way of demonstrating that design, refurbishment and product selection decisions have, or will, address the requirements of the Disability Discrimination Act 1995 (DDA) [1]. It should not be seen as a stand alone document but should take into account and inform all relevant hotel organizational policies and procedures.

A correctly developed access strategy provides an opportunity for hotel developers, designers and hotel businesses to demonstrate their commitment to ensuring accessibility in the work they undertake. The strategy should document:

- how they are meeting, or will meet, the various duties placed on them by legislation;
- how they will continue to manage and promote accessibility throughout the delivery of the services they provide or the employment opportunities they create.

Even when there are no requirements relating to planning or building regulations, an access strategy is a useful document to produce. It should be viewed as a document which 'grows' with a project. Starting at the strategic level, the strategy should

record and explain decisions on accessibility associated with the planning, design and ongoing management of a hotel. It should also provide a convenient vehicle by which particular design decisions that do not follow published best practice still, nonetheless, meet obligations under the DDA [1].

The development of an access strategy ensures that an evolving duty is placed on those who manage the hotel. In the event of any legal challenge, the access strategy may be called upon as evidence to determine whether reasonable steps have been taken to overcome accessibility issues. The strength of any justification for design decisions taken may be tested in the courts. Therefore, it should be viewed as a potential defence document as well as a record of events.

When employing external auditors/consultants, their suitability to advise on access should be carefully considered and checked.

4.2 Contents of the access strategy

The exact form of an access strategy will depend upon the size, nature and complexity of the hotel. However, each strategy should, insofar as it is relevant, contain the following information:

- a brief explanation of the hotel policy and approach to access, with particular reference to the inclusion of disabled people;

- a description of how the sources of advice on accessibility and technical issues will be, or have been, followed;
- details of any consultations undertaken or planned, including the number of users, particular user need groups (for example, visually impaired, deaf or hard of hearing, learning disability and mental health) and the degree to which the process has been influenced by it;
- involvement of disabled people in the development and ongoing review of the access strategy;
- details of any professional advice that has been followed, or will be sought, including recommendations from access audits or appraisals;
- an explanation of any specific barriers affecting accessibility to, or within, the particular environment and the service provision;
- details of access solutions adopted to overcome any issues, including those which deviate from recognized sources of good practice;
- where good practice cannot, or may not, be met, the access strategy should say why and describe the implications for the users, and detail what other steps are being taken to lessen the impact;
- details of the management and maintenance management policies adopted, or to be adopted, to maintain accessible features (for example, lighting, colour and luminance

contrast, door closing forces etc.), specialist equipment (for example, induction loops, audible and visual fire alarm systems etc.), and staff training;

- a plan of the environment illustrating features such as routes in, out and around the outside of the hotel, vertical and horizontal circulation routes, positions of accessible car parking bays, the location of public transport, and any other relevant features;
- how the access strategy will be monitored and reviewed and who will be responsible including key strategic personnel at corporate and hotel level;
- details of any intended work together with timescales and appropriate quotes.

Improving access should be seen as an ongoing process, not a one-off exercise. The access strategy and planning process encourages continuous improvements.

Note Further guidance on access strategies and technical access statements can be found in **Access Statements** [12] by the Equality and Human Rights Commission.

5 Risk assessments

All risk assessments undertaken should include the needs and requirements of disabled people, as the responsibility for the safety of all visitors and users of the hotel lies with the hotel owners and management.

6 Involving disabled people

6.1 Benefits of involving disabled people

The most important source of information regarding access needs is disabled people themselves. Including disabled people and gathering information on the accessibility of the hotel is an important part of the process of achieving greater equality for disabled people. Those gathering the evidence should understand its purpose and the broader context and this should also be explained to those who are asked to disclose the information.

Collecting the correct information will allow hotel managers to:

- assess the effectiveness of the present accessibility measures taken;
- carry out effective impact assessments;
- identify barriers to good performance and actions for improvement;
- review progress and adjust actions as appropriate;
- set targets for improving outcomes;
- ensure services and facilities are meeting the needs of disabled visitors.

6.2 Methods of involving disabled people

It is important to consult disabled people with a broad range of impairments in order to meet the needs of different users. Consultation should also include people who choose not to visit a place in order to find out why. There are a number of ways to obtain information from disabled people which include:

- asking disabled staff;
- including disabled people in customer focus groups;
- ensuring market research specifically includes representative numbers of disabled people;
- asking for suggestions on visitor feedback forms;
- speaking to local access groups and disability organizations.

The methods of consultation should be accessible to people with a wide range of impairments.

6.3 Results of consultation

The results of consultation should be used to assess and improve the accessibility of the hotel. People who have given time to share their views and expertise should be provided with feedback about any changes or developments that have happened as a result of their contribution. Ongoing contact with people is important to ensure that they feel their input is valued and to review subsequent ideas and changes.

Note Further guidance on the practical issues involved in consultation can be found in **Guidance on the DED and involving disabled people** by the Equality and Human Rights Commission [13] and **The Disability Equality Duty, Guidance on gathering and analysing evidence to inform action** [14] which is aimed at public bodies but provides useful information for all businesses.

7 Staff training

7.1 Disability equality training

Disability equality training is designed to increase the understanding of disability and access issues. Training should be ongoing, linked with other skills development, and provided for all managers and staff. Staff should be provided with comprehensive disability equality training appropriate to their role and responsibilities and the level of their interaction with the public. Training programmes should include some sessions focused on specific impairment groups such as hearing or visual impairments, as well as general awareness and disability etiquette e.g. use of language. They should include a form of evaluation to assess understanding. A record should be maintained to ensure that all employees undertake this training regularly. Disability equality training should be incorporated during the induction of all new staff and refreshed on a regular basis.

It is crucial that everyone in the hotel team understands that they have a part to play in improving access, and that the hotel manager supports and encourages this sense of shared responsibility. Nominating a champion for access can help this process, but they should have sufficient seniority and the

support of colleagues at all levels of the organization.

Staff should be trained to understand the importance of being flexible in the service provision to disabled people and to not make assumptions about disabled people and their requirements.

Note An example of this could be that a disabled person may not require or want to use a room with full accessible features. For example a standard room could be made accessible for a person with a hearing impairment by providing a portable hearing loop for use in the bedroom.

Where technical equipment to aid communication and accessibility, e.g. induction loops, has been installed these facilities should be well advertised, tested regularly and all front line staff trained in its use. This is particularly important with equipment used during evacuation procedures. All maintenance staff should be fully trained in the use, testing and maintenance of such equipment and a method of communicating in case of an emergency.

Note Methods of communicating could include flashing lights, vibrating pads, pendants with alarms, in room alarms etc.

7.2 Communication

Staff need to communicate with visitors about a range of issues relating to the facilities and services on offer. Methods of

ensuring clear communication with disabled people will vary according to the type of impairment and staff should be trained to address the communication needs of all disabled people. For example, to assist lip-readers and those with hearing impairments, staff should be trained to look straight at visitors and not cover their mouth when they are speaking. This will benefit people who use any level of lip-reading, including many who would not consider themselves to have a hearing impairment. Allowing extra time and repeating things back to the visitor to check accuracy and understanding can benefit visitors with learning disabilities and speech impairments.

In situations where it is not effective to use an induction loop or other type of voice enhancement system it may be acceptable to communicate in other ways, such as exchanging written notes with visitors.

Details of the accessible features of the hotel including dimensions of accessible areas should be available to any staff responsible for hotel bookings and at reception to ensure that staff can accurately answer any queries.

8 Accessible formats

Hotels should make information available in a variety of accessible formats. This could include, amongst other material, promotional information, check-in/out paperwork, user instructions, maps and guides, details of emergency procedures and in-room information folders or interactive TV facility. Downloadable information should also be available in accessible formats, e.g. Word documents and text files, to allow disabled users to alter the format to suit their own requirements.

All information provided should be produced following the principles of Plain English.

Note 1 Further information on the accessibility of electronic information can be found in **PAS 78 Guide to good practice in commissioning accessible websites**.

Note 2 There are a range of accessible formats in which information can be presented including large print, Easy Read, pictorial, BSL DVD, audio and Braille.

Note 3 Further guidance on the use of Easy Read can be found in Equality and Human Rights Commission's **How to use easy words and pictures** [15].

Note 4 Further guidance on accessible design and layouts can be found in RNIB's **See it Right** [16].

9 Pre-arrival

9.1 Promotional material and websites

Promotional material, websites and booking confirmation documentation should contain information on the availability, location and dimensions of facilities and equipment for disabled visitors. This information should be available upon request in a range of accessible formats such as large print and Braille.

Hotel websites should follow the guidance given in **PAS 78 Guide to good practice in commissioning accessible websites** or **Web Content Accessibility Guidelines (WCAG)** [17] developed by W3C.

Promotional material, websites and booking confirmation documentation should contain information relating to accessible phone numbers, e.g. type talk, text direct, email or fax, and hotel brochures should be available in accessible formats, e.g. large print, Braille or audio upon request.

9.2 Availability of the access guide

An access guide is a written, clear and accurate description of the current facilities and services offered by the hotel. It is

designed to enable a potential visitor to make an informed decision as to whether a particular hotel meets their particular access requirements. For this reason, the guide should include details of potentially inaccessible areas as well as accessible features and should be made available on the hotel website or in alternative formats upon request.

Potential inaccessible areas that could be included in the access guide could include such issues as the use of a separate inaccessible facility for meal provision or a height restriction in a car park.

Note 1 If this separate dining facility is owned by the hotel it is the responsibility of the hotel to ensure that it is accessible.

Note 2 Further information on access guides can be found at www.visitbritain.com/accessstatements.

9.3 Enquiries and booking procedures

Visitors should be given the option to submit enquiries and/or book, including accessible rooms, via telephone, textphone, website, email, fax or post.

Where a central reservations system or call centre is used by the hotel it is important to ensure that those providing this service receive the necessary training to ensure that they have sufficient knowledge of the accessible features and facilities of the hotel

and the expertise to answer queries accurately. It is important to note that the service provided by the call centre remains the responsibility of the hotel.

Where a third party agent can accept bookings on behalf of the hotel, strong consideration should have been given to providing the agent with the access guide of the hotel to ensure that the accessible features and issues of the hotel are accurately represented.

The time of booking is an ideal and important opportunity to identify any particular access needs of the visitor. Prompts should be designed to ascertain the requirements of the individual without being unnecessarily personal. These could include questions such as 'Do you have any particular requirements?' and/or 'Is there anything else I could help with?'

Note 1 Particular requirements could include issues such as dietary requirements, facilities for assistance dogs, alternative formats or the need for auxiliary aids.

Note 2 It may be helpful to provide staff with a list of terminology and acceptable terms.

Where the necessary facilities or services are not available recommendations of other suitable accommodation should be provided. It should be noted however, that this would not necessarily negate any duties placed on that hotel under the DDA [1].

Where valet parking is the only parking service offered at the hotel, visitors should be made aware of this at the time of booking (see **11.8**). Where valet parking is used it is vital that additional information such as the distance from the hotel to the car parking facility, the availability of accessible taxi services and alternative Blue Badge parking in the area also be available.

Where a visitor has specific requirements that are best met by the allocation of a certain room, this room should be reserved specifically for them and this room booking should not be altered or released. Where a non-disabled visitor books an accessible room which is shortly to be used by a disabled visitor, the non-disabled visitor should be warned that in the event that they extend their stay they will be required to move to another room if required.

Flexible arrangements with other accommodation providers in the local area could be negotiated to provide facilities and equipment when required.

Where disabled visitors travel with a support worker or carer, the hotel should have a policy in place to cover carers accommodation. Examples of policies include providing accessible twin bedrooms, interconnecting rooms, adjacent rooms, multiple room suites and/or pricing packages for additional rooms.