

Disability Rights Commission

A Practical Guide for the Retail Sector

Part III of the Disability
Discrimination Act 1995:
What shop or store owners
need to know



Making rights a reality

Equality Commission

FOR NORTHERN IRELAND

Open 4 All campaign

1st October 2004 marks a landmark for disabled people. From this date anyone providing a service will have to address those physical features which make it difficult for disabled people to use their services.

This will mean that service providers – including shops and restaurants, pubs, clubs, gyms, swimming pools and hospitals – will all have to make ‘reasonable adjustments’ to their premises or the way they provide their services to ensure they are not unreasonably difficult for disabled people to use.

The Disability Rights Commission (DRC) has launched a campaign across England, Scotland and Wales to highlight what service providers should be doing to make their services accessible.

Disability Rights Commission

The DRC is an independent body, established by an Act of Parliament to eliminate the discrimination faced by disabled people and promote equality of opportunity. When disabled people participate – as citizens, customers and employees – everyone benefits. So we have set ourselves the goal of ‘a society where all disabled people can participate fully as equal citizens’.

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Foreword

**Dr Kevin Hawkins, Director-General,
British Retail Consortium**

Retailing is a service industry whose business success depends on good service to the consumer. Disabled people are an important part of our industry's customer base – always have been and always will be. Anything that we can do to make their retail experience more convenient will be done within reason.

This guidance, drafted by the British Retail Consortium (BRC) and the Disability Rights Commission (DRC) working together, is designed to help retailers comply with this requirement.

I hope that this guide will help those companies that have not yet considered their policies to take time and establish their obligations under the DDA. I hope it will also reassure those companies that have already gone to great lengths to ensure good access that what they are doing is appropriate. Above all I hope it will demonstrate the commitment of the industry to equality of access for all its customers, with whom it cannot survive.

A handwritten signature in black ink, appearing to read 'Kevin Hawkins', with a horizontal line underneath.

BRITISH RETAIL CONSORTIUM

Introduction

Bert Massie, Chair, Disability Rights Commission and Dame Joan Harbison Chief Commissioner, Equality Commission for Northern Ireland

2004 is a hugely significant year for both disabled people and business in the United Kingdom. For the first time businesses must consider making physical adjustments to their premises if disabled people cannot access their service. The DRC and ECNI believe this guide will be a valuable tool for businesses in Great Britain and Northern Ireland to ensure access for all.

However, legal requirements are only half of the story. There are around 10 million disabled adults in the UK and those who are more switched on within the business community have identified this as a significant business opportunity. Recent estimates suggest that the 'disabled pound' is worth at least £50 billion to the country's economy. This is a considerable figure and likely to grow further as

we see an increasingly ageing population.

Many more businesses are realising that adjustments to their premises benefit people with lifelong impairments, older people with mobility problems and even parents with young children and so ensure a safer environment for all. This can only increase an organisation's customer base and ultimately its profits.

This guide has been produced to explain these important new legal duties introduced by the Disability Discrimination Act, and to provide practical guidance to help retailers gain access to the huge spending power of disabled people, their partners, families and friends. It is based on continuous consultation with both disabled people and with businesses.

About this guide

This practical guide is intended to help retailers find ways of providing better access to goods and services for disabled customers. Under the Disability Discrimination Act 1995 (DDA), if you provide goods or services to the general public – whether paid for or free-of-charge – you have responsibilities.

The legal test to determine if a retailer has met its duties under the DDA is the same whether the retailer is a national, multi-store business or a small, family run corner shop. The Act does take into account the level of financial resources available to each retailer when determining what steps it is reasonable for a retailer to have to take. As such, a large multi-store retail chain could be considered to be more likely to fund physical adjustments to its premises, to

provide better access to its customers and may have to do more to meet its statutory obligations than a small retailer.

The guide starts by setting out the legal requirements on the retail sector and some common principles that will be applicable across all sizes of establishment. It is then divided into a section aimed at larger retailers, providing guidance on strategic decisions and a separate section aimed at smaller retailers.

The rest of the guide provides some practical suggestions for improving the shopping experience for all customers – particularly disabled customers. This is not intended as a definitive checklist of potential adjustments but as a practical indication of the sorts of problems disabled customers routinely face, with

some practical suggestions for solving them.

The guide will help you:

- Understand the implications of the provisions in Part III of the DDA, and in particular the new requirement regarding accessibility of premises which comes into force from 1st October 2004.
- Think through how customers with different disabilities would access your premises, goods and services and how this might be improved.
- Understand the issues involved in order to provide guidance as your organisation makes strategic decisions.



The effect of the Disability Discrimination Act on retail services

What is the Disability Discrimination Act (DDA)?

The Disability Discrimination Act 1995 (DDA) introduces new legal rights aimed at ending the discrimination that many disabled people face. It affects virtually everyone who provides goods, facilities and services to the general public, whether paid for or not.

There are separate sections of the DDA that apply to the duties of employers, education and transport providers and those letting or managing residential property. This guide does not address these provisions.

Since the DDA 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.

Since October 1999 service providers have been 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 installation of induction loops at enquiry desks or providing members of staff to assist disabled people.

2004 duties – improving access to premises

From 1st October 2004, where a physical feature makes it impossible or unreasonably difficult for disabled persons to access your goods or services, your business is required to take reasonable steps to:

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

A failure to meet these duties may result not only in a legal challenge but, more importantly, potential damage to the reputation of the organisation concerned. Disabled

individuals will be entitled to financial compensation and other legal remedies where they are affected by a breach of these requirements. The Disability Rights Commission (DRC) and the Equality Commission for Northern Ireland (ECNI) can provide assistance to individuals in making legal challenges, and also has the power to launch strategic investigations if they believe that an organisation is in breach of the DDA.

For further guidance on the detailed requirements of the law consult the statutory Code of Practice, Rights of Access, Goods Facilities and Services available on the DRC website (www.drc-gb.org), from The Stationary Office/TSO Ireland (www.tso.co.uk) or the ECNI website (www.equalityni.org).

Please see Further sources section for contact details.

What is meant by reasonable?

The issue of reasonableness is critical in determining how far businesses are required to go in altering their premises and their method of service delivery. The

statutory Code of Practice lists a number of factors that will determine what is reasonable for a business. These are:

- Whether taking any particular measures would be effective in overcoming the difficulty that disabled people face in accessing the services in question.
- The extent to which it is practicable for the service provider to take these measures.
- The financial and other costs of making the adjustment.
- The extent of any disruption which taking the measures would cause.
- The extent of the service provider's financial and other resources.
- The amount of any resources already spent on making adjustments.
- The availability of financial or other assistance.

The Code makes it clear that the type, size and financial resources of a retailer will have an impact on what reasonable steps that particular retailer will be required

to take. Businesses with substantial financial resources will usually be expected to make more physical adjustments than those with more limited funds. What is not covered, are the resources available to the service provider as a whole as well as other calls on those resources. Where the resources of a service provider are spread across more than one business unit or profit centre, all of the demands are likely to be taken into account in assessing reasonableness.

Under section 21(5) of the Act, regulations could be passed capping the level of expenditure, though there is no financial cap as of June 2004.

Ultimately only a court can determine, in all the circumstances of a particular case, what is reasonable for a service provider to do. It is for each business to make a judgement as to what is reasonable for them. The courts will scrutinise the manner in which that decision is made.

This guidance will provide assistance to retail businesses making such judgements about how to approach their obligations

under the DDA and how to improve the attractiveness of their service to disabled customers, their friends and families.

Large or small – which are you?

The next sections aim to help large and small retailers review or prepare their plans to meet the legal duty from 1st October 2004 and thereafter on a continuing basis. This guide attempts to explain the different expectations that will be placed by the Act on large and small organisations and separate sections have therefore been prepared for each type of retailer. As larger retailers generally tend to have a more structured management system and therefore operate differently from small retailers, we have tailored the advice provided to each size of business with these differences in mind.

Inevitably there is no simple way of determining whether a particular retail business is large or small in size or financial worth.

A medium-sized department store with a large annual turnover but limited financial reserves and profits might be considered to be

'small' for the purposes of this guide and would thus have to do less to show it has acted reasonably in meeting its statutory duties than a store which is much smaller in floor area, employee numbers and turnover but which generates significant profits year on year. If you are in any doubt as to whether your business would be considered for the purposes of this guide to be 'large' or 'small', we suggest that it would be sensible for you to read both sections that follow.

The discussion of reasonableness above makes it clear that it is the resources of the business as a whole, rather than a particular retail outlet, that will determine the legal expectations. As a result, we would recommend that retailers which have strings of small retail outlets should refer to the section in this guide aimed at large businesses.

Principles to bear in mind for large and small retailers

Equality, dignity and respect

Ideally, disabled people should be able to obtain goods and receive services in just the same way as all

your customers. However, given the constraints of operating from existing buildings, there will be some situations where the same treatment will not be reasonable. In such cases, you will need to decide how best to serve your disabled customers: whatever solutions you come up with should respect their dignity and convenience. There is, of course, nothing to prevent you from making extra provision for your disabled customers.

Inclusive approach

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 shopping trolleys and parents with pushchairs will use level access or ramps, into a shopping centre. An induction loop at a busy booking office not only benefits hearing aid users as clear and effective communication but it also means transactions take less time so other customers can also be served more quickly. 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 a second language.

The key to success is staff attitude

Disabled people repeatedly report that staff attitudes are the key to a quality experience. Well-designed buildings can be rendered inaccessible by hostile or ignorant staff, and equally some buildings with poor physical access can still be a pleasure for many disabled customers if staff are helpful and courteous. Training staff in understanding and respecting the needs of disabled customers is the essential starting point for all retailers.

Rethinking use of space

It may be possible to improve access to goods and services for disabled customers by rearranging the layout of the premises (with little or no physical alteration) to maximise use of accessible areas. For example, in a shop where customer enquiry areas for the public are needed, it may be possible to relocate this function from an upper floor to the ground floor.

Refurbishment

Ensure that any features that assist access are retained and that opportunities for improvements are considered when undertaking routine maintenance or refurbishment.

Anticipatory Duty

The DDA duty requires service providers to anticipate potential difficulties that disabled customers might experience. It thus requires retailers to be proactive in examining their services and premises for potential problems. This guide will help with this process.

The duty applies regardless of whether the organisation knows that a particular customer has a disability. Service providers are required to anticipate likely needs so that when a disabled customer requests a service, reasonable steps will already have been taken to ensure that they can be served without difficulty.

In some situations it may not be reasonable for a business to anticipate a particular problem; however, once a disabled

customer's particular need becomes apparent reasonable steps must be taken to resolve the problem. The DDA duty thereby suggests the vital need for planning and preparation.

Policies and procedures

You will be responsible for actions of staff unless you have taken 'reasonable steps' to prevent discrimination, for example by informing your staff of the legal duties and providing them with additional training where appropriate – this extends to volunteers or anyone involved in delivering your service. If you have not taken these steps and your staff discriminates unfairly against a disabled customer, then the organisation will be liable. Retailers are more likely to be able to meet their duties if they:

- have a positive policy on inclusion that is communicated to all staff and monitored for implementation and effectiveness
- inform all staff dealing with the public that it is unlawful to discriminate against disabled people

- train staff so that they understand what discrimination means, their duties under the Act, what is expected of them in their workplace and how to serve disabled customers
- address discrimination as part of disciplinary rules and procedures
- have a customer complaints procedure which is easy for disabled customers to use.

You might wish to consider consulting with local disability groups for their views on performance and development – the duty to make reasonable adjustments is owed to all disabled people, not just individuals, so it is important to consider accessibility widely.

Also regularly review and respond to findings relating to the accessibility of services, and the effectiveness of reasonable adjustments.

Flexibility

All disabled customers will benefit from flexibility in your rules and procedures. Your very best plans, measures and procedures will

never cover all eventualities, so having adaptability will always be necessary.

Getting physical adjustments right

Where improvements to premises are made (or new works carried out) retailers can have most confidence that they will withstand any legal challenge and meet the needs of disabled customers if they are carried out to the standards set out in best practice design guidance BS 8300:2001 **Design of Buildings and Their Approaches to Meet the Needs of Disabled People – Code of Practice** (available from British Standards Institute) and **Approved Document M of the Building Regulations** (applies to England and Wales only), and relevant building standards in Scotland (Building (Scotland) Act 2002) . For Northern Ireland, retailers should consider the following guidance related to the Building Regulations (Northern Ireland 2000 Technical Booklet R). This is currently under review.

Landlords

The DDA prohibits landlords from unreasonably refusing consent to

reasonable adjustments. Your landlord may be entitled to charge you for such work if this is permitted under your lease. If your landlords have public access to common areas of the building, they have their own responsibilities for considering access under the DDA.

Stores with shared environments

Many stores and shops operate in premises where they do not have responsibility for the immediate external environment – for example a store or shop in a shopping mall, or located in part of a commercial estate. Shops also do not always have their own forecourt, but pavement furniture and layout directly affect their disabled customers.

In such cases, if you identify physical features that may create difficulties for disabled customers, you should consider:

■ **Making contact with whoever does have control over the space:**

For example your landlord or a neighbouring business. Explain the problem and ask if there is anything they can do to

make access easier to your premises.

■ **Talking to the local authority roads department/
Department of Local Environment in Northern Ireland (or the local access officer if there is one):**

See what can be done to tackle problems such as uneven paving surfaces, lack of dropped kerbs at street crossings, unclear street signs and awkwardly placed street furniture. You may have a stronger case if you get together with other local businesses – perhaps through a local chamber of commerce or business association – to lobby the council. You may request more major alterations to the external environment, such as raising the level of a length of pavement so as to create level or near-level access to a row of shops (which may or may not be technically possible, depending on the circumstances).

This section is based upon best practice of organisations whose plans are more likely to lead to successful business, and avoidance of serious legal challenge.

The anticipatory nature of the law (as explained in Section 1) makes it essential that larger retail businesses take a strategic approach to meeting their duty. This is reinforced by the way in which courts will assess whether or not a particular adjustment was 'reasonable'. The courts will take into account (amongst other factors) the amount of resources already spent on making adjustments. Where a retailer has a planned process for improving access over a fixed period of time and can show that overall this is a reasonable approach (and is in fact being implemented), then a court will take this into account when examining the reasonableness of a request for a particular adjustment.

Taking a strategic approach thus allows retailers to prioritise those adjustments that in their view are most important to improving services to disabled customers.

Where to start

Disabled people are (or could be with the right approach) a significant proportion of your customer base. Their requirements need to be considered in a strategic way in the context of broader business developments.

Ultimate responsibilities for ensuring policies are implemented and actions undertaken should rest at board level. The DRC/ECNI recommends appointing a 'disability champion' at senior level with responsibility for driving the issue across all aspects of the business.

Communication and ownership

The importance of developing and delivering accessible services needs to be understood by everyone in the organisation. Staff will be far more likely to take issues of accessibility seriously if they believe there is top-level commitment, especially in organisations with competing priorities and pressures.

All employees need to understand the legal obligations towards disabled customers and that these apply to everyone in the organisation, not merely a named individual or a specific department. At the same time they need to be aware of the potential business benefits that increased accessibility can bring to the organisation. The key to achieving this is disability awareness training.

Developing a strategy

The DRC/ECNI recommend adopting a specific strategy for improving service delivery to disabled customers, and potential customers.

The starting point of such a strategy should be establishing the business' aspirations in relation to its disabled customers. For example, that they should feel as valued as all other customers and experience the same high levels of satisfaction with the service.

The next step will be to develop an understanding of the importance of disabled customers to your particular business. It may be helpful to identify such things as:

- the percentage of existing customers who are likely to be disabled, including those with hidden impairments
- the value of these customers to the business
- the potential for cross-selling additional, accessible, goods and services to these customers
- the potential to increase the existing customer base by improving accessibility.

Consulting disabled people

The most important source of information regarding the access needs of disabled people will be disabled people themselves. There are a number of ways in which organisations can obtain information from disabled people, including:

- ask your disabled staff
- include disabled people in customer focus groups
- ensure market research specifically includes representative numbers of disabled people
- ask for suggestions on customer feedback forms

- speak to local access groups.

It is important that you speak to a wide range of people with different impairments to meet the needs of different types of disabled person.

Auditing access to services

It will be helpful to identify all points at which customers interact with the business. For example:

- face to face
- by telephone
- on the internet
- by mail.

Once these interactions have been identified, the retail business may need to carry out an audit to identify which elements, if any, may currently be inaccessible to some disabled customers.

For an access audit to be useful it needs to identify not only the physical barriers but also the services that are inaccessible as a result. For example:

- Is it impossible for a wheelchair user to get into and around the premises because of issues like heavy doors or steps?

- Would someone with a visual impairment or a learning disability find it hard to locate facilities because of poor signage?

In addition to the physical features of your premises two other areas that need to be considered are the provision of information and product and service design:

- Are telephone services accessible to hearing impaired callers?
- Is your website accessible to visually impaired customers?
- Can information about the products or services be provided in alternative accessible formats such as large-print, audiotape, electronic or in Braille?

Even if all disabled customers are able to get access to your goods or services, are the goods or services themselves accessible? If not, you may wish to adapt or redesign them in order to enable effective use.

Professional advice

Access audits must be carried out by those who are suitably qualified

or experienced and it is vital that a pan-disability approach is used that includes the needs of a wide range of disabled people. In many situations building professionals who you are already dealing with such as your surveyor may be able to give you advice.

The auditor will produce a full access audit of your building and the DRC/ECNI suggest that you ensure that they also focus on access to services rather than just the building; this is because sometimes an improvement can be achieved by altering the service and not simply the building.

Using the information gathered by such audits will enable an organisation to consider the full range of options that might be available to overcome or avoid any barriers to service identified.

For information about how to get the best results out of an access audit the DRC/ECNI recommend you obtain the guidance produced by the Centre for Accessible Environments.

www.cae.org.uk

The DRC/ECNI strongly suggest that businesses utilise the National

Register of Access Auditors. www.nrac.org.uk or voluntary organisations in Northern Ireland.

If a claim of disability discrimination does occur, a service provider who has commissioned and followed the recommendations of an access audit may use this in their defence.

Addressing the barriers once they have been identified

Once barriers have been identified a business should prioritise those that need to be addressed in the short, medium and longer term.

Short-term priorities should, wherever possible, include barriers which can be addressed relatively simply, and produce 'quick wins'. This is important because it demonstrates that improvements can often be achieved at low cost with little or no disruption.

Medium-term priorities will include those actions that require planning and budgets to be established before expenditure can be made. In a large organisation this could include the acquisition and installation of

specialist equipment across multiple sites and the removal of physical barriers as part of a rolling programme or a complete revision of existing customer care policies.

Long-term priorities will include those barriers that require significant systemic or major structural change and cannot realistically or reasonably be achieved more quickly.

- Seek advice to construct a corporate level access statement for your main stores. Such statements will need to reflect your aspiration for disabled customers at each stage of their customer journey.
- Consult at national level with disability groups about your plans and your corporate level access statement.
- Use internal surveyors or architects, or external consultants to apply the corporate level access statement to each location. Ensure good quality advice where some alternative provision is going to be required.

Ongoing review and consultation:

Many large businesses find it difficult to deal with all aspects of the DDA. There is no single point at which 'compliance' is achieved. This is because the standard develops over time with changes in technology, provision by service providers and the expectations of disabled people. It is necessary, therefore, to have a regular process of review and consultation. This is quite consistent with any other form of quality service development; large and multiple stores are constantly following trends in fashion as they refurbish their premises.

Please refer to the end of Section 5 for case studies giving examples of good practice involving large and multiple retailers. These can be found after the Frequently Asked Questions, under the heading Further Illustrations.



Planning improvements in small shops

If you are the owner of a small shop, the broad principles outlined in Section One apply, but the DDA recognises the difference in the level of resources available to you. This section aims to help you consider what you will need to do, as you plan for, and start to undertake further measures.

Whereas a large chain of stores or shops might be expected to have a comprehensive strategy like that described in Section Two, your own plan need not be as complex, but it should still aim to give the same level of access wherever possible.

Responding to your duties under the DDA means coming up with solutions that are reasonable in all the circumstances and which result in as many disabled customers as possible being able to access your goods and services.

For small retailers the emphasis is likely to be on practical, low-cost adjustments, although you should also consider more major physical alterations to improve access to your premises if feasible and affordable.

Certainly, when you undertake major refurbishments, or when seeking new premises, the ease of access for all customers should be a major consideration.

Disabled customers can benefit from a range of improvements, some of which can be relatively easy to implement, such as a suitably positioned handrail, clearer signs or a well planned, logical layout within premises.

Other sources of guidance available include:

- How to Make Access to your Services Easier For Disabled People.
- Self-appraisal Toolkit for Small Businesses.
- Disability Discrimination Act 1995: An Introduction for Small and Medium-Sized Businesses.
- Bringing the DDA to Life for Small Shops (a series of booklets).
- Open for Business: a best practice guide on access.

See **Section 6 – Further sources** for details.

Meeting the needs of your disabled customers

It is a good idea to consult with your disabled customers and ask them to identify any particular problem areas.

Do however bear in mind that solutions suggested by one disabled person may need adjustments to work for others who have an apparently similar impairment. Think broadly about the wide range of disabilities including:

- sight impairments
- hearing impairments
- physical/mobility impairments
- experience of mental health problems
- learning disabilities.

If you currently have few disabled customers, this could simply be a reflection of how difficult access to your premises and goods and services is. So, in addition to your existing customers, give some thought to what improvements you can make for people who may become new customers. Consider contacting a local disability or access group for guidance on this.

Timing of improvements:

- **Making a start:** you will probably find that you have already implemented some of these ideas anyway; some you might be able to apply quickly and at very little or no cost. Others may be things you want to plan for the future, perhaps incorporating them when you are undertaking routine maintenance, next redecorating, or re-planning the interior of your premises. They do not necessarily have to be done all at once, but the important thing is to get started.
- **Taking a long-term view:** it is a good idea to have a long-term plan of gradual improvements to make it easier for disabled customers to access your goods and services.
- **Getting input and advice:** you will find that you will be able to implement many adjustments yourself. Others may require more technical advice from professionals, such as access auditors. For information about how to get the best results out of an access audit

we recommend you obtain the guidance produced by the Centre for Accessible Environments.

www.cae.org.uk

The DRC/ECNI strongly suggests that businesses utilise the National Register of Access Auditors.

www.nrac.org.uk

or voluntary organisations in Northern Ireland.

One option could be to link up with other businesses in your area and share the costs of an access audit or see whether your local Chamber of Commerce would like to employ an auditor for a couple of days because many businesses will often have exactly the same issues.

Non-physical adjustments

- **Making services available by alternative methods:** as well as making physical improvements that is, removing or altering physical features that present obstacles, access can be improved by providing a means of avoiding the features or providing reasonable alternative

methods of making services available to disabled people.

- **The way you run your business:** the day-to day management of your business and premises will have a huge impact on how easy they are to use by disabled customers. Staff management and policies and attitudes towards serving disabled customers are just as important as the premises themselves.
- **Staff awareness:** ensure that all staff are aware of the DDA and that training in how to meet the needs of disabled customers is provided as appropriate.



SECTION 4

**Practical suggestions
for improving the
customer experience**

Each business needs to consider the experience of disabled customers at every stage of the customer journey. What will be reasonable for large businesses will often differ from what would be reasonable measures for a smaller business with fewer resources. The principles, however, are the same. The points below simply illustrate issues that you, or your access auditors, will need to consider.

Your literature and website

Consider who your customers are, how they identify with your business and how they find out about your services. Literature that uses large typefaces as standard, and websites which are designed to be accessible make sense for any business; where good-sized, clear print and good pictorial design are used, all customers find it easier to get the message.

Your web site may, for example give details of shopping alternatives that are available such as on-line shopping or other general information about accessibility.

For guidance on accessible web sites visit the 'Bobby web site'. (bobby.watchfire.com)

Approaching the premises

Shop owners, or managers, should ensure that ease of access to the store is maintained and that there are no obstructions.

Practical suggestions:

- Better lighting.
- Paths and other routes: consider the surface of routes to the premises and ensure that this is suitable and well maintained.
- Car parking: if car parking is offered ensure that there is provision for a disabled customer to manoeuvre a wheelchair in and out of a car, as specified by BS8300 and Part M of the Building Regulations (England and Wales only), relevant building standards in Scotland (Building (Scotland) Act 2002) and Development Control Advice Note II from the Northern Ireland Planning Service. It is also advisable to locate the disabled car parking space as close to the entrance as possible. Where possible,

ensure regular inspections are carried out so that drivers who are not disabled do not occupy bays intended for disabled customers.

Entering the premises

The best solution to initial access is one that allows independent entry for a disabled customer without requiring additional assistance. Disabled customers will feel more valued if they are able to use the main entrance along with everyone else.

Practical suggestions:

Step (or steps to entrance door)

Major barriers to independent access for many people with mobility impairments are steps – particularly wheelchair users. If you have a step or steps to your main entrance door, consider:

- Raising the pavement or other approach up to the level of the entrance.
- Installing a permanent external ramp, in addition to the steps rather than as a replacement.

These types of solutions may or may not be possible depending on a range of factors such as planning or listed building restrictions. In these cases, and particularly for smaller shops, a temporary ramp might be a reasonable alternative.

There are other relatively easy changes that can make a real difference for your disabled customers:

- Fit handrails to any steps that remain at the main entrance (particularly useful for people with arthritis or limited mobility).
- Mark the edges of steps with strong contrast (for people with visual impairments).
- Try to allow as much natural light at an entrance as possible.

If independent access through the main entrance cannot reasonably be provided, it is important to:

- Designate an alternative entrance with level access.
- Fit a call bell or an entry phone system if the layout of your premises means that staff inside the building cannot easily see if someone needs assistance to get in.

- Offer assistance over the step where stepped access cannot be avoided. This may be one option considered, particularly by some small shops.
- Offer alternative methods of providing services: such as bringing merchandise to an accessible part of the building, delivering to people's homes or through the post.

Making doors easier to use

Doorways and doors can be another barrier for disabled customers, whether because of their width, heaviness of operation, or difficulties in operating the door handles. While automatic sliding doors are ideal, it is recognised that they are not always possible.

Practical suggestions:

- Position the door handle: at a height 1000mm from the ground.
- Replace the door handle if necessary: by one that is easier to grip, such as a D-shape handle, and one with better colour contrast.

- Make the door easier to open
- Check that entrance mats are flush
- Glazed doors: adding safety markings to these.
- Maintain doors: to ensure that door closers are opening and closing smoothly.

Finding a way around

Practical suggestions:

Make signs easier to read, for example:

- Use clear symbols.
- Use mounted-tactile text in large font sizes.
- Use different colours effectively –white or yellow on black are good – lack of colour contrast is poor.
- Use induction loops particularly where hearing aid users will find them of most benefit to help them get around, for example at the enquiry desk.
- Offer personal shopper assistance.
- Ensure aisles and displays are not blocked and do not limit access.

Lighting

Improving lighting conditions in your premises can be of particular benefit to customers with partial sight and it is important that good lighting remains consistent throughout the store.

- Highlight hazardous areas.
- Avoid highly reflective surfaces.

Moving about within the premises

Think about how customers with mobility impairments in particular would be able to move around and use your store with ease.

Stairs

Avoid internal steps as much as possible: even one or two steps can exclude a shopper who is a wheelchair user from reaching your services.

Larger businesses on multiple levels will consider installing lifts. Ensure that they meet recommended standards, e.g. in England and Wales Approved document M-Access to and Use of

Buildings (2004 Edition Section 3: Horizontal and Vertical Circulation in Buildings Other Than Dwellings), or relevant building standards in Scotland (Building Scotland Act 2002) and Section 3: Access within Building – Building Regulations (Northern Ireland) 2000 Technical Booklet R (currently under review).

However, some businesses may not be able to afford lifts. And, similarly, some locations may not have sufficient trading space to locate a lift to all floors. In these circumstances the alternative offered should be a quality shopping experience such as a personal shopper in a comfortable dedicated area on an accessible floor.

Facilities

If your store provides a café or restaurant then this should be accessible to disabled customers. Within the restaurant area the seating should allow wheelchair users to sit at available tables. This is usually achieved by ensuring sufficient table heights and by having non-fixed chairs. Where possible, a mix of seating types should ideally be available.

There are many other changes that might be possible without major expense or upheaval.

Practical suggestions:

- Make circulation easier such as wide clear pathways.
- Fit handrails .
- Clear markings of internal steps and safety hazards.
- Ensure that surfaces are as level as possible and do not present slipping or tripping hazards.

Getting to goods and services

Shelves, display racks etc

Practical suggestions:

- Reposition existing units and shelving to improve access and circulation.
- Make product information easier to read: Use a large text such as a 14-point font, with good contrast.
- Use alternative methods of providing services: Consider relocating certain services, and offer them at an accessible

level; provide advice counters, changing rooms, and special seating areas where personal shoppers can assist customers.

Queuing systems, waiting areas and seating

If customers have to wait to receive a service, or to walk considerable distances within the premises, you should consider circulation space and whether it is possible to provide suitably designed seats for people with mobility impairments to sit and rest.

Practical suggestions:

Providing additional seating

- Try to ensure that seated customers do not lose their place in the queue.
- Allow enough space or separate access to tills around queuing systems for wheelchair users.
- Reposition furniture in waiting areas to allow wheelchair users to pull up alongside a seated companion.

- Ensuring where practical that announcement systems are both visible and audible.

Counters, service desks and checkouts

Checkout areas should include 'easy-access' positions. An easy access counter should give wheelchair users sufficient space to move easily alongside the goods conveyer and allow for the wheelchair to be moved as goods are paid for. Consider offering additional help with packing to disabled customers.

Chip and PIN

A new feature of all check outs and payment points over the next year will be the use of 'Chip and Pin' systems. Guidance is available in Chip and PIN Guideline G12: Accessibility.

Practical suggestions:

- Create a lowered section of the counter or service desk with sufficient space to key-in numbers, sign card receipts write cheques, or sign

documents etc, to suit both standing and wheelchair-using customers and people of restricted height. Alternatively, a lower writing shelf could be provided. Equipment such as lap trays or clip boards (for people to use key pads, sign receipt, or write cheques if they cannot bend down to reach a counter top) can be useful.

- Make sure that any service call bell is in an accessible and obvious position.
- Keep glazed screens clear of notices, grilles or other distractions that make it difficult for people to lip-read.
- Improve lighting so that it is easier for someone who is lip-reading to see the staff member's face.
- Position service desks so that they are not located in front of windows where bright sunshine will cause the staff member to be in silhouette, making lip-reading difficult.
- Alter staff practices: in situations where it is not reasonable to make counters and service desks fully accessible, it may be possible

to alter practices. For example a member of staff could come out from behind a service desk to meet a wheelchair-using customer who cannot approach the desk and carry out any transactions with them in another part of the premises, maintaining any necessary privacy.

Information about goods and services

Think about how people with visual impairments and with learning disabilities get the information they need about your products and services.

Practical suggestions:

- Make labels, pricing, menus etc clearer: consider use of graphics/symbols, bigger text such as 14 point font size, with good contrast, and larger formats for some in store publications.
- Provide Personal shopping: Are staff trained to assist visually impaired customers by describing and explaining products or services to them?

Communicating with disabled customers

Your customers need to communicate with staff about a whole host of issues relating to goods and services on offer, such as pricing, availability, contracts and after-sales service. Clear communication needs further thought for customers with hearing or visual impairments, or those with learning disabilities.

For people with hearing impairments there is a range of technical equipment that can help – most notably induction loops for people with hearing aids. Retailers will need technical advice on choosing and installing different systems. Pads and pens may also be appropriate for interactions around the store.

Once installed, make sure that the systems are advertised and regularly checked. Consideration should also be given to protecting the privacy of customers where appropriate.

Practical suggestions:

- Separate quiet and noisy areas: plan the use of space in store to benefit all customers, particularly

those with hearing impairments, by locating a customer helpdesk away from noisy machinery or equipment.

- **Make communication easier:** staff can be encouraged to look straight at customers and not cover the mouth when they are speaking to them. This will benefit people who use any level of lip reading, including many who would not consider they have a hearing impairment. Allowing extra time and repeating back to the customer to check accuracy and understanding can benefit customers with learning disabilities and with speech impairments.
- **Use alternative means of communication:** in situations where it is not effective to use an induction loop or other type of voice enhancement system, staff could communicate in other ways, such as exchanging written notes with customers.

Customer toilets and baby changing rooms

If a business provides toilets for non-disabled customers then they

will also be expected to make a toilet available for disabled customers where reasonable to do so. The following checklist suggests other improvements that can be made to those toilets that are not fully wheelchair accessible.

Practical suggestions:

- **Fit grab rails:** appropriately positioned grab rails are necessary for customers with limited movement, balance or grip.
- **Use better lighting:** improving lighting in toilets will benefit everyone, particularly those customers with visual impairments.
- **Use some colour contrast:** customers with visual impairments may find 'all-white' areas difficult to orientate themselves in and to identify fittings such as basins and the toilet itself. Making fixtures and fittings stand out more easily through use of contrasting colour makes toilet compartments and washroom areas much easier to use for these and other customers.

- Floor surfaces: for safety reasons, could you change shiny or slippery floor surfaces to non-slip surfaces? This will benefit all customers, particularly those with visual or mobility impairments.
- Outward-opening doors: particularly in small toilet compartments, changing the door so it opens outwards can greatly improve manoeuvring space within the compartment, and make all the difference between a customer being able to use the toilet or not. It is also better from a safety point of view to have an outward-opening door that can be opened in an emergency without being obstructed by anyone or anything inside the toilet compartment. Consider what the door is opening on to and what safety issues there could be.
- Avoid shiny ceramic tiles and floors: these can cause reflection and glare that may be visually confusing – could you replace them with less shiny tiles, perhaps when undertaking a refurbishment or redecoration?
- Clearer signing to toilets: pictorial symbols are beneficial to all customers, particularly those with visual impairments or learning disabilities. Using contrasting embossed, tactile, schematic figures on doors helps all blind and partially sighted customers.
- Management: ensure that wheelchair accessible toilets in particular are not used as storage areas and are kept free of obstructions.
- Maintain alarms: ensure that alarm systems in toilets are regularly checked. Pull-cord alarms should be capable of being activated from floor level. It is important that staff are familiar with any alarm systems.

Getting out of the premises

Customers may sometimes experience additional difficulties when leaving shops, especially if they are carrying heavy or bulky bags. Staff may be able to assist disabled customers out of the building in a variety of ways, such as offering to call a taxi.

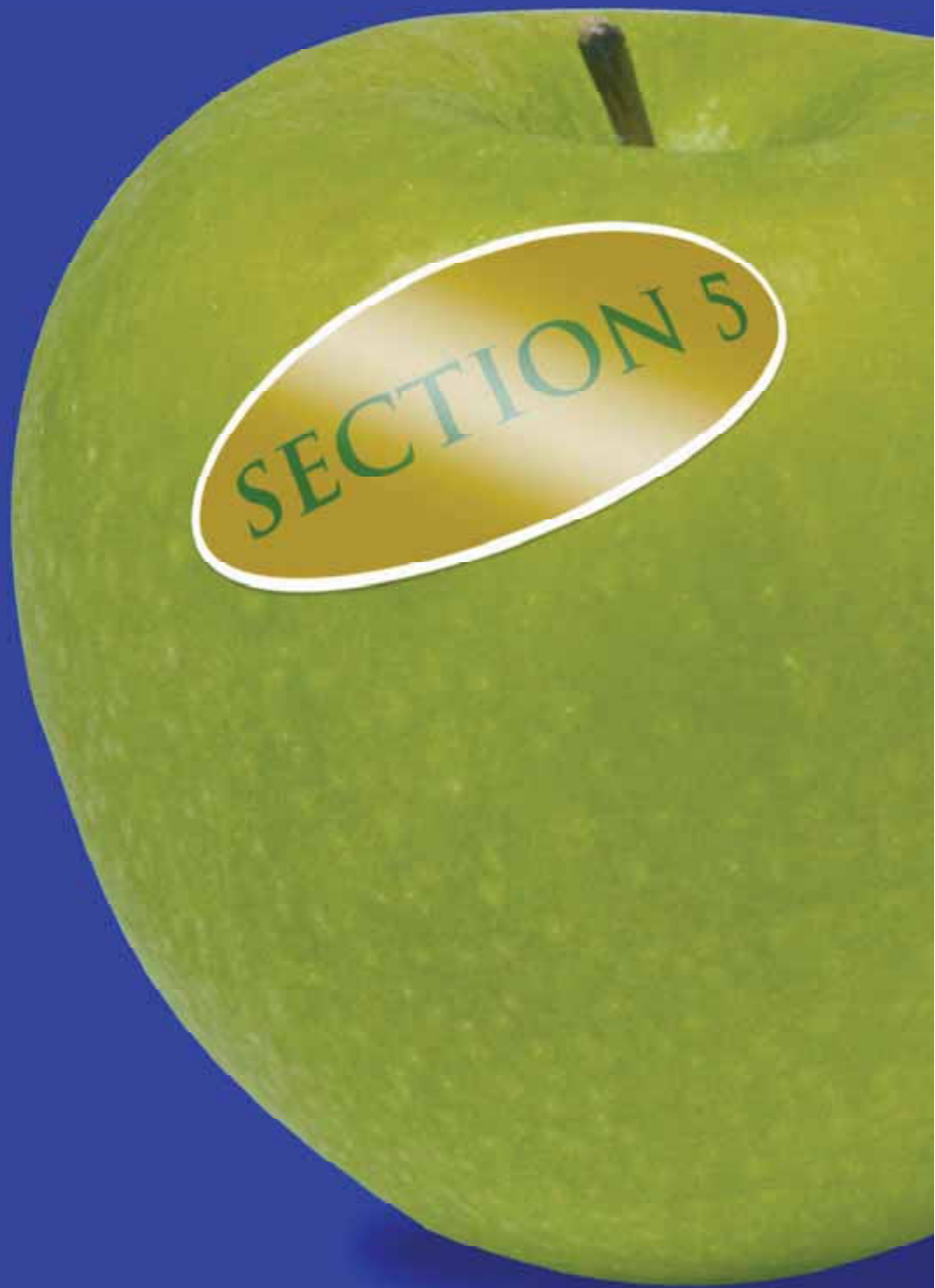
You also need to consider means of escape for any disabled customers in case of an emergency evacuation. Management procedures and staff training and awareness are the key to the operation of emergency evacuation arrangements.

Staff assisting disabled people, both wheelchair users and others with, for example, visual impairment should act calmly. Fire drills should therefore ensure that these different measures are practised regularly. Evacuation procedures need to address, as standard, the possibility that some customers will not hear an audible warning – this could include using flashing alarms. As such fire evacuation drills need to incorporate appropriate practices.

If advice is sought about the impact of most foreseeable types of impairment appropriate procedures can be developed centrally and then applied to individual stores. In addition to the advice of access consultants, this is another area where reference to national disability organisations can be valuable.

Practical suggestions:

- Keep exit routes free of obstruction such as stored boxes, old furniture, rubbish or other clutter. This is good fire precautions management.
- Check systems: ensure that alarm systems are in working order and that procedures for emergency evacuation (such as fire drills) are in place and tested regularly.
- Staff training: ensure that new staff are trained in alarm response procedures. Brief staff to pay particular attention to assisting customers with visual or mobility impairments off the premises and to alerting customers who are not reacting to audible alarms.



Frequently Asked Questions and Further Illustrations

FAQs

Why should I bother about disabled people, there are so few of them and I don't have any disabled customers?

This probably isn't actually true. Think about your customers. How many of the older ones have poor hearing or eyesight, or would struggle to open a heavy door? Many disabilities such as a learning disability and arthritis aren't necessarily apparent. Bear in mind as well that all of these people have families and friends who are unlikely to use a service if one of their family gets poor service.

The changes that you will need to make will benefit all of your customers. To give you one example when supermarkets introduced shallow trolleys for disabled people they realised that other customers found them better than the standard trolleys as well! So now we all have the choice of either shallow or larger trolleys and it's the shallow ones that go first.

Costs and benefits: Are the DRC and ECNI concerned that some service providers will simply

cease activities because of the costs of making these changes?

That would be foolish. What the changes are about is opening up your service to more people. The costs can only be reasonable. No one will hold you to more than that. This is not something to panic about. Most businesses are creative and put customer service at the heart of what they do. People shouldn't be frightened but see improving access as an opportunity to improve their service to all of their customers.

Local Authorities: Isn't there a danger that I can invest time and money in making changes to my premises only for the local authority highways or planning departments or the Department of Regional Development in Northern Ireland to scupper them?

If you think that the changes will need planning permission or will encroach on the pavement then you'll need to talk to your local council or relevant department in Northern Ireland about their role in helping you fulfil your legal duties.

Ultimately if they refuse, then that doesn't mean you do nothing. You still have to consider other creative options or offering the service in an alternative way. Check the DRC or ECNI websites for advice if this sort of situation occurs and we can help you get it right.

Reasonable adjustments: So if I serve a disabled person in the street, that counts as providing a 'reasonable alternative' way of offering my service and I won't have to make any changes to my premises?

Legally you do have the option of providing the service by a reasonable alternative means but this must not infringe the dignity of the disabled person or be unduly inconvenient. 'Reasonable alternatives' can include offering a service over the telephone rather than in person or allowing the disabled person to use a different entrance which is more accessible.

After 1st October 2004 you have to also consider removing, altering or avoiding the barrier. The DRC and ECNI recommend that as a matter of good practice that you remove or alter the barrier first and look at

'reasonable alternative' ways of offering the service as a last resort.

Historic Buildings: I run my services from a listed building. Am I exempt?

No. For service providers in listed buildings there is no block exemption. Many adjustments can be incorporated sympathetically. The DRC and ECNI can provide sources of guidance on these matters via the DRC or ECNI websites or you could get an access auditor to come in and give you an idea of the changes you could make. There is also guidance from English Heritage. However we must remember that disabled people want to use services delivered from listed buildings just like everyone else and this is achievable with effort, advice and imagination.

Further Illustrations

Large/Multiple Retailers: some examples of good practice

These examples are purely for illustrative purposes and are based upon good practice and issues faced by retailers. They simply reflect situations that can arise, not any legal outcome that would be subject to the circumstances of any case.

Example 1:

A chain of high street fashion stores has many branches with good on-street access but where it has limited trading space on each floor, it adopts its corporate access statement accordingly. Where it cannot acquire premises with lift space, it uses areas on ground floors as its 'ShopatEase' points. These include seating, access to a Personal Adviser, catalogues and a phone for staff to call upstairs for sizes and availability. The stores find that these points attract new customers including mothers with young children who otherwise find shopping upstairs a burden. The concept is then found to work where lifts are available, and it is

easily adapted to its 'on-line' shopping service.

Example 2:

An estates team face difficulties with the DDA. The customer care policies of their firm are very centrally prescribed, and they have little support at head office to undertake additional specific expenditure relating to access. The resulting approach is non-specific and if anything defensive, trusting only to current measures which are quite reasonable in parts of the estate. After 2004 some embarrassing DDA service related cases result additionally in 'binding agreements' as part of the legal settlements. These require policies to be modified regardless of 'corporate policy', and expensive measures to be undertaken right across the estate.

Example 3:

A family owned chain of clothes shops 'for the discerning buyer' has a range of outlets in several different cities. They have had an access audit undertaken of all the

shops and this has identified a number of physical features which are making it difficult for disabled people to use them. They decide to firstly make the improvements to physical features that can be done easily in all their shops, for example improving the signage and ensuring all glass doors can be easily identified. They then look at what refurbishment programmes are planned in the near future and where improvements to access can be built in to these. The next step they take is to look at making significant improvements in the most popular shops that might include ensuring the main entrance is accessible and providing access to any upper floor. At the same time they develop a longer-term plan for bringing all of the remaining shops up to the same high standard.

Example 4:

A major bookshop chain has traditionally used high shelves that wheelchair-users cannot reach. The best way to address this barrier would be to reduce the height of these shelves. However, this is not practical in the short-

term. In this case the barrier is overcome by staff training, so that assistance is given to disabled customers. This management solution works but in the long term shelving is replaced by easier reach systems. This reduces staffing costs that are high partly because many other customers constantly need help reaching or finding books on such high shelves. The marketing team have also observed a long-standing link between the physical height of books and their sales levels.

Example 5:

A large national chain has an ambitious corporate access statement which follows extensive expert advice, consultation and planning. As trading conditions worsen the business needs to face cut backs. It seeks further advice from its access consultants and they provide guidance on how it should prioritise its planning measures. Much of its estate is already accessible. The measures originally planned can in fact then be brought forward again because trading conditions improve.

Example 6:

A large chain of pubs uses similar guidance to retailers to plan its corporate access statement. Having gradually reached its level of aspired service to disabled people the business reviews how it can maintain this. It is advised to use the access statement as part of its annual estate review process. The firm uses its 'spreadsheet' system to include its environmental, management and training requirements in an annual inspection. With the help of Estates officers, each local manager is able to inspect and review levels of performance in these policies. The annual review is integrated into general Estates Management procedures. HR and new national access improvements are phased into these reviews.

Example 7:

A chain of retailers is mostly a franchise estate of neighbourhood shops. The firm produce national guidance based upon central expert advice, consultation and a resulting corporate access statement. Local store owners are

able to apply most measures but where they face local issues such as planning difficulties the guidance gives them access to Estates staff and local professional access audits at a nationally agreed discount. This proves useful in helping local owners get the best advise for the measures they can adopt.

Example 8:

A national chain has a powerful 'Disability Champion' on the Board. She supports the measures that lead to a high profile reputation for being the best. The director regularly meets senior managers to review measures. On one of these occasions she decides that it is beneficial to integrate the previously separate Equality and Diversity Training programmes into the mainstream Customer Care and Sales Training. The new focus is valuable in promoting both a caring image combined with a vigorous sales culture.

Example 9:

A large chain is already successful at attracting disabled

shoppers through its on-line service. As well as being convenient, the on-line service is even more successful when it is made more accessible to use. It then adds a facility for these shoppers to pre-book their requirements for assistance to shop at the stores. It is notable that these customers make more purchases when they choose to visit the stores with such a service.

Example 10:

A large UK chain uses a national forum of disabled people as part of its consultation as it plans and undertakes access measures. It encourages local stores to make similar contact with local groups of disabled people. As a further move it links its customer complaints and feedback to the national forum and its customer care planning. This proves valuable as it then finds many low-cost improvements that refine its customer care measures. Such moves also help store managers to demonstrate to local groups that the chain is committed to continuous improvement in their service.

Example 11:

A chain has a corporate access statement that identifies nearly 75 % of the estate as needing no major action or including desirable levels of access by 1st October 2004. They offer alternative measures after October for customers in the less accessible stores, including on-line and home delivery, and resolve to address the outstanding issues in a rolling programme. They are advised by their consultants on the alternative measures, and how they phase in their measures for the remainder of their estate. They consult on this programme and illustrate it on their website.



SECTION 6



Further sources

- 1:** Disability Discrimination Act
Available on-line from: www.disability.gov.uk/dda

- 2:** Code of Practice – Rights of Access, Goods and Facilities
Available on-line from: www.drc-gb.org or www.ecni.org
Also available from The Stationery Office/TSO Ireland :
www.tso.co.uk

- 3:** Design of Buildings and their Approaches to meet the Needs of Disabled People Code of Practice (BS 8300: 2001 **ISBN:** 0580384381)
Available from the Stationery Office/TSO in Northern Ireland:
www.tso.co.uk

- 4:** Approved document M – Access to Facilities and Buildings
Available from: www.odpm.gov.uk

- 5:** Centre for Accessible Environments
There are many useful documents available for order from this organisation: www.cae.org.uk

- 6:** National register of Access Auditors
This site gives insight into the NRAC and guides businesses in how to best use the site when trying to find an access consultant or auditor. www.nrac.org.uk

- 7:** Making Access to Goods and Services Easier for Disabled Customers: A Practical Guide for Small Businesses and Other Service Providers (Code SP5)
Available from: www.drc-gb.org
There are some very useful contact details for organisations at the end of this document, as well as many suggestions of sources for further information.

- 8:** Self-Appraisal Toolkit For Small Businesses www.drc.org.uk

- 9:** Bringing the DDA to Life for Small Shops
Available on-line from: www.drc-gb.org
Available free of charge from the DRC Helpline, tel 08457 622 633,
text phone 08457 622 644 or ECNI – 028 90500600
- 10:** Open for Business: a Best Practice Guide on Access
www.drc-gb.org or www.ecni.org
- 11:** Bobby: guidance about accessibility of on-line information:
bobby.watchfire.com
- 12:** Horizontal and Vertical Circulation through Buildings other than
Dwellings (section 3.17) www.odpm.gov.uk
- 13:** For information about technology that is useful for customers with
hearing impairments: www.rnid.org.uk
- 14:** www.open4all.org
- 15:** The Royal National Institute for the Blind (RNIB) has produced a
pack entitled 'See it Right' which provides information on how to
plan accessible information. www.rnib.org.uk

Organisations of use to service providers in Northern Ireland

ADAPT Northern Ireland (NI)

73-75 Great Victoria Street
Belfast
BT2 7AF
Tel: 028 9023 1211
Textphone: 028 90 234391
Fax: 028 9024 0878
Email: cshiels.adaptni@dnet.co.uk

ADAPT NI aims to promote universal accessibility by providing advice, guidance and support.

Centre for Universal Accessibility

Albany House
School of the Built Environment
University of Ulster at Jordanstown
Newtownabbey
BT37 OQB
Tel: 028 90 368505
Fax: 028 90 366875
Email: g.kane@ulst.ac.uk

Offers education and training on the principles of accessibility, undertakes access audits and provides advice on a wide range of accessibility issues.

Disability Action (Headquarters)

189 Airport Road West
Belfast
BT3 9ED
Tel: 02890 297880
Textphone: 02890 297882
Fax: 02890 297881
Email: hq@disabilityaction.org
Website: www.disabilityaction.org

Provides a range of services in Northern Ireland including information and advice on all aspects of the DDA. A team of Access Officers provide access audits, technical advice, information and training on how proposed or existing premises can better accommodate disabled staff, visitors and customers.

Employers Forum On Disability Northern Ireland (NI)

Banbridge Enterprise Centre
Scarva Road Industrial Estate
Banbridge
Co. Down
BT32 3QD

Tel/Textphone: 028 4062 4526

Fax: 028 40669665

Email: info@efdni.org.uk

Employer network, drawn from the public, private and voluntary sectors working to promote training and employment opportunities and accessibility for people with disabilities as employees and customers.

Equality Commission for Northern Ireland

Equality House

7-9 Shaftesbury Square

Belfast

BT2 7DP

Tel: 028 90 500600

Textphone: 028 90 500589

Fax: 028 90 331544

Email: information@equalityni.org

Website: www.equalityni.org

For information, advice and training on all aspects of the implementation of the DDA.

Mencap in Northern Ireland

Segal House

4 Annadale Avenue

Belfast

BT7 3JH

Tel: 028 9069 1351

Fax: 028 9064 0121

Email: mencapni@mencap.org.uk

Provides information on the needs of children and adults with a learning disability.

RNIB Northern Ireland (NI)

40 Linenhall Street
Belfast
BT2 8BA
Tel: 028 9032 9373
Fax: 028 9043 9118

Provides a range of services in Northern Ireland including information, visual awareness training and undertakes access audits on the needs of people with a serious sight loss.

RNID Northern Ireland (NI)

Wilton House
College Square North
Belfast
BT1 6AR
TellTextphone: 028 9023 9619
Fax: 028 9031 2032
Email: brendan.heaney@rnid.org.uk
Web site: www.rnid.org.uk

Provides a range of services in Northern Ireland including information, advice and deaf awareness training.

The William Keown Trust

3 Church View
Dundrum
Co. Down
BT33 0NA
Tel: 028 4375 1243
Fax: 028 4375 1444
Email: wkeowntrust@btconnect.com
Website: www.wkeowntrust.co.uk


Actively pursues a policy of improving access in the environment and carries out access audits.


If you require this publication in an alternative format and/or language please contact the Helpline to discuss your needs. It is also available on the DRC website:
www.drc-gb.org

The DRC Language Line service offers an interpretation facility providing information in community languages and is available on the DRC Helpline telephone number.

SP12

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 **Textphone** 08457 622 644
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Website www.drc-gb.org

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Stratford upon Avon
CV37 9BR



INVESTOR IN PEOPLE



BRITISH RETAIL CONSORTIUM

Equality Commission

FOR NORTHERN IRELAND