



A Practical Guide for using a Tour Coach

Introduction

Access to transport is fundamental to full and independent participation in society as a whole. Yet, disabled people travel one third less than non-disabled people. In the context of an increasingly mobile society and an ageing population where there are likely to be higher levels of disability, it is essential that the transport industry develops to meet these challenges. Many improvements have already been made or are well under way, but there is still a significant way to go.

The DRC is thus producing a series of good practice guides for transport providers. Each guide deals with a different transport sector and offers practical advice on good practice in serving disabled customers. The following sectors are covered:

- Scheduled buses and coaches
- Breakdown recovery services
- Rail services
- Rental vehicles
- Taxis and private hire vehicles (PHVs)
- Tour coaches

Purpose and scope of the Guidance

This Guidance is aimed at providers of non-scheduled bus and coach services operating in England, Scotland and Wales. For ease of reference these operators will mostly be referred to as ‘tour coach operators’ (since these comprise the largest proportion of non-scheduled bus and coach services).

As explained above, the Guidance is intended to be a practical guide, offering good practice advice to tour coach operators in serving disabled customers and potential customers. It shows how the adoption of good practice can promote equal treatment of – and avoid discrimination against – disabled people.

However, the Guidance is not intended to offer an explanation of the workings of the DDA as it applies to disabled people and transport. The DRC has already produced two Codes of Practice which are designed for this purpose, and more

detail on these can be found in the following section ‘What the law says’ and in the Appendix 1 to this Guide.

Rather than replicating these Codes, which are inevitably legalistic documents, this Guide takes a more practical and comprehensive approach. It covers the whole process of using non-scheduled bus and coach services. It deals with all aspects of the journey, including those services provided before, during and after it. This will include the point at which a potential customer starts planning a journey (information-seeking and publicity issues) and makes a booking, to the end of the trip.

The scope of this publication is therefore not restricted to what is covered by the law, and it should not be treated as a legal interpretation, but rather as a guide to effective practice in serving disabled people. Nor is the guide a statement of best practice (a concept which is in any case difficult to define in a rapidly changing world), there may be occasions when tour coach operators may want to go beyond the advice given in this guide to effectively serve disabled customers.

The types of vehicle covered here are coaches and buses (public service vehicles) that carry more than eight passengers and which are offered for hire to the public. Vehicles that provide scheduled services are dealt with in a separate publication, the Guide to Scheduled Buses and Coaches. Non-scheduled services include leisure and tourism, sightseeing tours (if not registered as local services) and vehicles on contract hire. This is an important sector of coach travel and accounts for more than half of all coach travel in Great Britain. Leisure and holiday travel by coach is particularly attractive to older people, among whom there is likely to be a significant proportion who have some degree of disability.

What the law says

Although, as stated above, this Guidance is not intended to provide an interpretation of the DDA, a brief summary of its basic principles is set out below. A more detailed summary is also provided in Appendix 1 to this Guide.

Essentially, the DDA makes it unlawful for organisations which provide services to the public to discriminate against disabled people in the way they provide or do not provide those services. This is much more than simply refusing or neglecting to provide a service, organisations must make ‘reasonable adjustments’ to remove or overcome elements in their services which present barriers to disabled people. The Act has been introduced in stages to allow businesses time to review the way in which they deliver their services and plan the changes they need to make to remove discriminatory aspects.

All transport providers have duties under the DDA. These duties will vary according to the type of vehicles and services they offer to the public.

All transport providers have duties under Part 3 of the DDA in relation to transport infrastructure. For tour coach operators this means things like booking arrangements, accessibility of venues and hotels. Since December 2006 tour coach operators also have duties in relation to the provision and use of the vehicles they provide.

Appendix 1 to this publication sets out further information on the DDA duties mentioned above. However, it is recommended that tour coach operators refer to the relevant Codes of Practice for a full explanation of their legal duties. The DRC has produced a series of statutory Codes of Practice on various aspects of the DDA. These include two that relate to transport:

- the **Code of Practice on Rights of Access to Services and Premises** (known as the Part 3 Code), which covers duties in relation to the provision of transport infrastructure services; and
- the **Code of Practice on Provision and Use of Transport Vehicles** (supplementary to the Part 3 Code), which covers duties in relation to the provision and use of transport vehicles.

Who is a disabled person?

There are officially upwards of 10 million disabled people in Britain. Many may not think of themselves as disabled, but will nevertheless be covered by the DDA definition of disability. Some people are obviously disabled, such as someone who uses a wheelchair or a white cane, others may have disabilities which are not immediately obvious, such as a serious heart condition, mental health issues or diabetes.

Tour coach operators should avoid stereotypical assumptions as to whether or not someone is disabled, or as to the extent of someone's disability. For example, some people who use wheelchairs can transfer – say to a seat in a taxi – others cannot. People who can walk may only be able to do so with difficulty and with the help of a walking aid.

Rather than making such assumptions, the operator should be focusing on the individual's service requirements. The nature of someone's disability is only relevant when considering whether and at what point they might require assistance.

One issue which the range of different disabilities serves to emphasise is the importance of staff training in disability awareness and equality issues. Staff

attitudes towards disabled customers are often cited as the single most important aspect determining satisfaction with a service. Staff training is dealt with in section 6 below.

Planning for disabled customers

The DRC recommends that the ultimate aim for all transport providers should be to integrate provision for disabled customers to the point where it is automatically planned into the provision of any service, vehicle or building and, ideally, mainstreamed within that provision. This is in order to prevent, wherever possible, a situation in which disabled people are separated out from other passengers as ‘special cases’.

Building disability equality into all service monitoring, review, planning and implementation should help ensure that the operator is providing an optimum level of service for its disabled customers (and undoubtedly many of its other customers also).

Keeping up to date with improvements in technology and vehicle equipment will help provide future solutions to the problem of inaccessible services. What may be beyond the budget or technologically impossible today may well be possible in the future, especially with a positive approach and effective long-term planning and budgeting.

Positive attitudes, positive outcomes – the importance of staff training

In leisure, tour and contract hire coach services there is usually a close and continuing contact between the operator’s staff and customers. This applies particularly of course to the driver and courier or tour guide if there is one, but it is important to remember that there is also contact between customers and staff who deal with requests for information and booking for tours and group hire. It follows that training all staff to understand how they can best meet the needs of disabled customers is absolutely essential. It is in any case worth considering that effective training of this kind can often reduce the need for general customer service training.

Support and commitment from management are crucial in achieving truly high standards and long term change. Planning for the future should incorporate disability issues from the outset. It is recommended that disability equality training should include everyone in the organisation.

Content of a training programme

A programme for staff training should obviously vary as appropriate according to the level of detail required. The following are some basic pointers for reference.

The programme should:

- Be based upon the principles of the 'Social Model' of disability; these ensure that the starting point for any training is the acceptance that disabled people are full members of society who are disabled by the poor design of the built environment, by a lack of clarity in information provided and by the inappropriate attitudes of others.
- Explain how to assist disabled people. This should cover the needs of people with all kinds of disability, not just those of people who are more obviously disabled, such as wheelchair users. Staff should be trained not to simply assume that a person needs a particular form of help, and to ask if help is required before giving it.
- Involve disabled people, preferably with a wide range of disabilities. They are the experts on their disability and should be able to indicate where potential barriers are likely to be.
- Ensure that if there is any equipment, for example a wheelchair lift on a vehicle, that staff know how to operate it correctly and safely.
- Explain how to communicate effectively, particularly with people with learning disabilities or speech impairments as well as people with hearing loss.
- Instruct the driver what to do in the case of an emergency, for example vehicle breakdown.
- Give an overview of what the DDA legislation means in practice.
- Aid personal development, for example by encouraging staff to learn sign language.

Where operating companies are too small to have the necessary resources to develop their own training programme, there are training specialists who can advise on the content of training for front-line and management staff. There are also some useful guides published on serving disabled customers – see Appendix 2 at the end of this guide.

Refresher training

Training of this kind is not a one-off activity. Refresher training should be given regularly, for example, to take account of relevant technological developments.

Information about services and booking procedures

For tour coach operators whose services can involve the provision of activities and accommodation over a sustained period of time, it is particularly important to identify and plan for the needs of customers before the journey starts.

Journeys usually start with the customer finding out about what services are available. The ways of doing this are varied. The prospective customer may call at the company booking office – or telephone; they may find out about the service from an advertising leaflet, brochure or local newspaper, or there may be a website they can visit.

Whatever is the initial source of information, the ultimate purpose should be to establish a dialogue between the customer and the operator. In doing this, the disabled customer can be encouraged to describe anything in the journey or at the destination that might cause them problems. This gives the operator the opportunity to make any arrangements that are necessary in advance of the journey

Access to information by telephone

For most customers the telephone is likely to be a major point of contact. As with all customers, courtesy and a willingness to help are of paramount importance in creating a positive initial impression.

Members of staff receiving a telephone booking/information call should be aware that it may be via Typetalk. This is a service that can be used by a profoundly deaf person, in which a telephone operator acts as an intermediary between the caller and the staff member taking the call. The telephone operator relays the receptionist's answers to the caller, which appear on their telephone as a written message.

An increasingly popular way for people who are deaf or hard of hearing to communicate is to use SMS text messaging, so operators should consider making this facility available.

Callers who have a learning disability, for example, may need extra time when making a booking. Staff should use plain and simple language and allow plenty of time for the caller to process information and ask questions.

Similarly, for callers who have a speech impairment, staff should give the customer all the time they need, and should avoid interrupting by suggesting responses.

Use of dedicated services for disabled customers

In larger companies, a dedicated helpdesk for disabled customers could be provided. In this way, all customers come through to the same Helpline number to be asked the same questions, and any customer who wishes to book assistance could be passed through to the appropriate helpdesk. It should be possible to transfer such customers without requiring them to ring another number and explain their query again.

Example: A major coach tour operator provides a dedicated helpdesk for disabled customers. This can provide comprehensive information on the accessibility of the company's vehicles and the hotel accommodation used. Advice is given on the carriage of wheelchairs and mobility scooters on vehicles, as well as arrangements for assistance dogs, other mobility aids and medical aids such as oxygen cylinders.

Websites

Using the internet to find out information and make bookings is increasingly popular. If the company has a website, it should be designed so that it is accessible for disabled people in terms of content and usability; for example, how a customer can progress through it to make a booking. Guidelines on the design of accessible websites are available. In conjunction with the DRC, the British Standards Institute (BSI) has developed guidance for web commissioners and designers.

This guidance can be purchased from the BSI at <http://www.bsi-global.com/ICT/PAS78/index.xalter>. The information on the company website should include brief details of any services and facilities that the operator can provide for disabled people. For example, if the fleet includes one or more wheelchair accessible coaches, how many such coaches there are, how many people can be carried seated in their wheelchairs etc. The Confederation of Passenger Transport UK (CPT) publishes an 'Accessible Coach Directory' which gives this sort of information for some 60 companies.

Example: A major city sightseeing company is replacing its vehicles with wheelchair accessible buses. Its website lists the city tours where these accessible buses are available. The website is updated as wheelchair accessible vehicles are added to the fleet.

There may be other facilities that an operator can make available that will be of help to disabled customers. If there are, these should be mentioned on the website.

Printed information

It is a good idea to produce all printed material for the public, such as brochures about services, in a minimum font size of 14 point print (since many partially sighted people are able to read this size print), with a simple typeface and good

contrast between text/numbers and background (for example, black text on white background). For timetables and other materials featuring numbers, it is best to use 16 point if possible. By adopting this approach, an operator is enabling many more people to read the information provided independently, without having to ask for a special adjustment.

Some people may require information in a larger font size and this should be made available on request. Similarly, companies should make information available on tape for people who cannot read print.

Marketing coach services is an important part of a company's activity. If promotional information is not accessible, a significant part of the market may be missed.

Example: A coach company that offers a holiday programme includes, as part of its marketing, advertisements for its holidays in the local 'Talking Newspaper'. This ensures that potential customers who are blind or partially-sighted hear about what is on offer.

Information on hotels and tourist attractions

Organising coach tours and holidays frequently involves customers visiting a wide range of tourist attractions and staying at hotels. While the accessibility of these places is not the direct responsibility of the coach operator (unless the operator also runs the hotel), the operator should find out whether the hotels or other venues it uses are accessible to disabled people. A number of operators providing coach holidays send questionnaires to hotels, which seek information on the facilities available including, for example, whether there is level access to the public rooms and lifts to bedrooms. If a tour includes a visit to an historic building that is not accessible to wheelchair users, prospective customers who are wheelchair users should be told about it when they make their enquiries so that they can decide whether or not they want to take the tour.

Example: A coach operator that regularly inspects for quality purposes the hotels it uses, arranges for staff members who have been trained in disability access issues to visit these hotels in order to assess their suitability for clients with disabilities such as mobility difficulties. The company is able to promise potential clients that no hotel will be used unless it has been personally inspected and found to meet the required standards.

Example: As part of its general customer service, a coach tour operator issues questionnaires to customers at the completion of their holiday. Where requested, these questionnaires are also made available in alternative formats. Questions relating to the physical accessibility of venues, level of customer service and so on are included. From the information gathered through these questionnaires, the

operator is able to determine which elements of its service are working well and which need attention.

If a coach operator finds that a venue it uses is inaccessible to disabled people, for example a refreshment stopping point where there are no accessible toilets, it should consider switching to another more accessible facility, if one is available. This forward planning would avoid the uncomfortable (and potentially discriminatory) situation of a tour group member being unable to participate in an element of the tour.

Advance booking

As a matter of policy, disabled people should not be required to book further in advance than other customers. However, where suitable accommodation for a disabled person on a coach is limited, operators might advise disabled callers that early booking would be prudent. Similarly, if the customer will need special facilities at the destination, such as delivery of dialysis fluids to a hotel, a period of notice is likely to be necessary.

Sometimes it is merely a question of prompting the person making the booking. A customer may be unaware of exactly what assistance they may require or where the barriers may be, especially if they have not travelled with the tour coach operator before. By asking every customer standard questions at the time of booking, an operator is making it more likely that a customer will remember to request assistance there and then, thereby giving the operator more time to make the arrangements.

This applies equally when someone is making a booking on behalf of a group which includes a disabled person who will require extra assistance from the operator or the use of special facilities. The person making the booking may not be familiar enough with the requirements of the disabled passenger to be able to anticipate where they might need assistance. It is in the operator's interests to encourage them to check with the passenger if they are unsure.

If, however, someone arrives for a sightseeing tour or coach holiday who has not pre-booked the assistance they then find they need, or let the operator know that they have particular requirements, the operator should do its best in the circumstances to ensure that the customer still has as good a trip as possible. Just because someone has not pre-booked is not in itself a reason for barring them from a trip, or treating them badly.

Providing personal information

Many disabled people will of course be happy to provide the necessary information, and may take the initiative themselves to do so. However, some may be reluctant to do this. There may be many reasons why this could be the case:

- If it is the first time they have used the service, they may simply not know enough about how it is organised to realise where they will face difficulties in using the service.
- They may be reluctant to disclose sensitive personal information unless they are persuaded that it is in their interests to do so and they are reassured that it will be kept confidential.
- They may fear that the information will be used to 'screen them out' and deny them the service.

It is also true that many disabled people do not consider themselves to be disabled, and therefore are unlikely to use booking services intended to be used by disabled customers (research by the Department for Work and Pensions found that 52% of people who met the definition of disability within the DDA did not consider themselves to be disabled).

It is obviously important that the issue of disclosure of personal information is approached in a sensitive and positive manner. There should be a clear statement that the information is requested in order to provide the best possible service to the customer. Staff should reassure customers of confidentiality and explain the extent to which information will be passed on to other staff within and outside the organisation.

Relevance of information requested

The information requested should only be relevant to the service provided. If sensitive personal information is needed, it should be explained why this is so and how the information given will help the operator to meet the needs of the customer.

Only in exceptional situations should there be the need to ask for a medical diagnosis. A given medical condition affects nearly everyone in a different way, so the answer obtained is unlikely to give useful information (if someone is unable to walk, this is essential information; the medical reason why they are unable to walk is almost certainly irrelevant). On occasions it may be helpful to describe the way in which the transport service operates so that a disabled customer can identify clearly where barriers may arise.

Use of forms for recording customer information

It is recommended that operators use a standard pro-forma on which customer information can be recorded. As well as recording information which non-disabled customers might provide, such as any special dietary requirements or room preferences, the form could be used to identify the relevant requirements of disabled customers. If all customers are expected to fill out the form, it will allow those who do not consider themselves to be disabled to think about their particular needs before embarking on the tour or holiday.

Example: A coach company providing holidays uses a customer information pro-forma, which includes the following:

- Ability to walk (approximate distance) with/without assistance
- Ability to negotiate stairs, with and without assistance
- Whether the customer will be accompanied by a carer
- Details of any mobility/medical aids, including size and weight
- Whether taking a registered assistance dog
- Any special requirements, for example delivery of dialysis fluids to the hotel
- Any dietary requirements

By providing the company with this type of information, the customer can ensure that appropriate arrangements are made for their comfort and ease of travel. When informed of any equipment the customer needs to take with them, the company can issue appropriate labels to be attached to the equipment. This tells the coach driver (and hotel staff) that the equipment has been accepted by the operator and avoids any potential disagreement over whether an item should be carried on the coach.

It should be noted, however, that if a customer does not provide this information, the operator would still be expected to do its best to meet their requirements. Refusing to allow someone on a tour/holiday, or refusing to assist them simply because they had not completed a form at booking stage is likely to be regarded as discriminatory.

Inability to provide service

Coach operators and anyone representing them must remember that it is unlawful to discriminate against a disabled person in the way in which they provide or do not provide their services, for a disability-related reason (see Appendix 1). Thus, a company cannot refuse to accept a customer simply because they are disabled.

However, the requirement not to discriminate does not mean that a disabled person must be accepted no matter how they behave. If a disabled person who was drunk and behaving in a disorderly manner wanted to go on the sightseeing tour, the driver would be justified in not permitting him to board, because a non-disabled person behaving in the same way would also be refused.

A coach operator might refuse to provide a service to a disabled person if, in order to do so they would be unable to provide the service to other members of the public.

In some circumstances a coach operator may decide that they will only be able to accept a booking from a disabled person on condition that they are accompanied by a carer. Such decisions are not always easy. Generally, people who need help with personal care, for example, if they need help with dressing themselves, are likely to require a carer to accompany them on a tour. Similarly, someone with dementia who was prone to wandering off and becoming lost unless accompanied would need to travel with a companion. However, someone who has difficulty in cutting up their food should be able to expect an establishment such as the hotel in which they are staying to serve them pre-cut up food if requested, and therefore they should be able to travel alone if they wish. These types of issue serve to emphasise the importance of training staff in disability awareness so that they can make an informed and appropriate decision. If the operator does decide that a carer is necessary, they may wish to offer a discount for the carer.

If it is not possible to provide a service to a disabled person, the reason for this should be carefully explained. It is the operator knows of another company that could accommodate the customer's needs, the customer should be told about them. However, it should be borne in mind that referring a disabled person to another business without considering properly whether they could be served could be considered discriminatory.

Example: A woman with a mobility impairment which means she can only walk short distances wishes to book a coach holiday touring historical sites in Scotland. She completes the standard booking form and sends it in.

When a member of the booking team for the coach operator receives the form and realises that the woman has a mobility impairment, he initially considers recommending another coach company which he knows caters specifically for people with mobility impairments. However, rather than make assumptions about her impairment, he contacts her in accordance with the operator's standard booking procedure. Through the course of their discussion, the staff member and customer work out that if the customer misses out just two of the visits to historical sites she will be able to participate in all other aspects of the holiday. She is willing to accept this and on this basis both parties proceed with the booking.

Charges for services

It should be remembered that it is not lawful to charge a disabled customer more than other customers for a coach journey or tour, for example by levying an extra charge for the carriage of a wheelchair or an assistance dog.

Access to the booking office

Where the company has a booking office or travel centre to which members of the public have access, this should be accessible for disabled customers. If there are steps up to the office entrance, for example, the coach operator should consider installing a ramp for wheelchair users. The provision of an induction loop at the booking office counter would help people who use a hearing aid and the provision of an accessible toilet (if the operator already provides toilets for customers) would help wheelchair users and others with mobility difficulties. For further guidance material see Appendix 2.

Boarding and alighting

General assistance

Getting on or off a high floor coach can be challenging for some people. Drivers and/or couriers should be ready to offer assistance with boarding and alighting – though they should always ask the customer first whether they need assistance and if so, how best to do this (rather than making assumptions based on past experiences). This could mean helping (but not physically lifting) someone up or down the steps or guiding a blind passenger to a seat.

If the coach does have a wheelchair passenger lift, it is the driver's responsibility to operate it, to assist the passenger into the body of the coach and to ensure that the wheelchair is correctly secured. It is possible that a person with a walking difficulty might wish to use the lift. Provided it is safe to do so, the driver should be prepared to accommodate such a request.

Carriage of wheelchairs in non-wheelchair accessible coaches

Quite a large proportion of wheelchair users are able to walk short distances and, with assistance, manage a few steps. Operators of coaches without devices to lift a wheelchair into the body of the coach should be prepared to accept such customers, provided that the wheelchair can be safely stowed in the coach's luggage compartment. However, if the wheelchair is a particularly heavy and cumbersome electric model that cannot be dismantled, or if any dismantled part

of a wheelchair is so heavy that attempting to load it into the luggage compartment would be likely to endanger the health and safety of the driver, then they should not be expected to lift it.

Some coach operators have set a limit on the weight that a member of staff can be expected to lift. The Health and Safety Executive guidelines, for example, suggest that the maximum weight that should be lifted is 20 kg. This limit would apply to each part of a wheelchair, if it can be broken down into pieces. In such cases it would be reasonable for the operator to place a limit on the number of pieces: it is recommended that this should be a maximum of five. The person using the wheelchair, or the carer/companion would be expected to dismantle and re-assemble the wheelchair, but the driver or courier should be responsible for loading it onto the coach.

A coach operator might set a reasonable limit on the number of wheelchairs or scooters that can be carried on a non-wheelchair accessible coach as both luggage space and maximum vehicle weight are limited.

Carriage of scooters

In recent years there has been a substantial increase in the numbers of people who use scooters rather than wheelchairs. Loading and safely securing a scooter in a coach luggage bay will not always be possible, but there are small lightweight and/or demountable scooters that can be handled and stowed. It is sometimes possible for a person who wishes to use a scooter at their holiday destination to hire one there. Operators who provide coach holidays regularly to the same destinations should be able to find out whether this is possible and to advise customers accordingly.

Other mobility and medical aids

There are many different kinds of mobility and medical aids that some disabled customers will need. As a general rule, provided they do not exceed a given weight, they should be accepted by the coach operator. Examples include:

- Oxygen cylinders: these should be portable cylinders, which typically weigh about 13kg (28lbs).
- Nebulisers: these are normally quite compact and weigh about 11kg (25lbs).
- Oxygen exchangers: these should be portable and not weigh more than the accepted maximum referred to earlier (20kg).
- Walking frames and zimmers (which are usually capable of being taken apart).
- Other aids such as prostheses, incontinence pads etc.

If a customer will need equipment at the destination that cannot be carried on the coach, then, provided the customer has informed the operator in advance, it should be possible for the operator to find out whether arrangements could be made for the equipment to be available at the destination. Examples could include large oxygen cylinders and oxygen exchangers, which can be large and weigh up to 36kg.

It should be noted that although it could be considered discriminatory for an operator to refuse to carry the types of aids listed above, the driver should not be expected to adjust or change medical aids.

General issues

Some disabled people have their own mobility aid – anything from a walking stick to an assistance dog. As a general rule a disabled person should never be separated from their aid unless it is done with their agreement. Someone who uses a walking frame might be happy for this to be carried in the luggage compartment provided they are helped on and off the coach. However, an assistance dog should never be separated from its owner.

Travelling in the vehicle

Coach operators should consider ways in which they can make travelling in the vehicle comfortable and enjoyable for their disabled customers. Many coach operators do not have coaches that can carry wheelchair users in their wheelchairs but, as already stated, there are many passengers with a variety of other disabilities who will still be able to use these types of coaches. Some passengers, though by no means all, will require assistance from time to time with aspects of the journey. Some instances of the kinds of assistance or policy alteration that may be required are set out below.

Assistance with commentary

On some tours, for example sightseeing around a city, a commentary is provided. Where this is the case, it would be a good idea for the operator to provide written versions of the text if requested by passengers who have difficulty hearing or understanding the commentary. This could be in the form of a leaflet which customers could keep after the tour or it could be in the form of a laminated booklet, which customers would be expected to return at the end of the tour.

The facilities that a coach operator makes available for disabled people may vary depending on the resources of the company. For example, a large bus tour operator providing tours in a major city might offer a radio microphone system for hearing aid users and, from time to time, a British Sign Language (BSL) interpreter for certain pre-designated tours. However, it is unlikely that a small bus tour operator would be able to offer this sort of service. An appropriate

alternative might be to provide a written commentary, as mentioned above, or to make audio taped guides available (with an option of plug-in neck loops) which can be used by people with hearing aids.

Where aids of this kind are available, it is important that disabled people are made aware of them. Promotional literature and material advertising the operator's services should include information about any aids that are, or can be, made available.

Employment of tour guides

Some coach operators employ tour guides who travel with the tour around a particular town or other tourist location. These guides are usually self-employed and are contracted by coach companies on an ad-hoc basis. They are frequently registered and qualified as 'Blue Badge' guides (not to be confused with Blue Badge parking permits for disabled people). The company that employs one of these guides should check to find out whether the guide has undertaken disability equality training and should establish whether the guide will be responsible for providing any written commentary or leaflets for a tourist who was unable to hear the spoken commentary.

Seat belts

Before setting off on a journey with passengers, the driver or tour guide should ask whether anyone requires assistance with doing up their seat belt. If so, they should provide that assistance. The driver should also ensure that if a passenger is travelling in their wheelchair, both the wheelchair and the passenger are correctly secured.

Seating arrangements

On a holiday tour that extends over several days, a coach operator may have a policy of asking passengers to change their seats from day to day so that everyone has the chance to sit at the front of the vehicle. There may be occasions, however, when this policy would need to be altered.

Example: A tour operator has a policy of asking passengers to change seats from time to time during the tour so that everyone has the opportunity to sit at the front of the coach if they so wish. When booking the tour, a disabled person with mental health issues asks if a seat can be reserved for him near the front of the coach as, due to his disability, he feels anxious if not placed near the front exit. The operator agrees to change the policy to allow the passenger to occupy a seat near the front of the coach.

Sometimes a tour operator arranges a seating plan for the coach before the tour starts. Even if this is the case, however, and if customers have been encouraged to

let the operator know if they have any seating issues when they book the tour, this should not be taken as reason enough not to alter the seating policy.

Toilet and refreshment breaks

Some coaches are fitted with an on-board toilet. On some the toilet is at the same level as the seating, in others it is down a few steps. If a disabled passenger wishes to use the toilet while the coach is stationary, the driver or courier should be prepared to assist the passenger to and from the toilet if necessary. The driver or courier is not expected to provide assistance in the toilet. On tours and long journeys drivers should remember that some passengers may need to use a toilet more frequently than others. This is an issue which some people would be reluctant to disclose, so that planning routes on which the coach can make frequent stops where there are accessible toilets makes good sense. The driver should also state where and when the next stop is likely to be.

Similarly, refreshment stops should be made at places that have accessible facilities. If the only possible refreshment stop is at a place where the café or restaurant is not accessible, the driver or courier should be prepared to ask a member of the café staff to bring refreshments to the coach – though obviously this is not an ideal solution for any party and should not be viewed as a permanent or long-term solution. The coach operator should plan routes which incorporate accessibility as well as other considerations such as the driver's required rest periods.

Stopping points

Finding places to stop in towns and elsewhere can be difficult for non-scheduled coach drivers. Some tourist locations advertise that they are 'coach friendly', but they appear to be in the minority. Coach drivers have to use their own judgement about where to stop to let passengers alight, but they should draw up as close to the pavement or boarding platform (if there is one) as possible. This will help passengers with mobility impairments to board and alight more easily. If the vehicle has a kneeling suspension (all modern coaches do) this should be deployed. If the coach is fitted with a lift or ramp, the stopping place should have sufficient width to allow for the boarding aid to be deployed and for the wheelchair user to be able to manoeuvre on and off it.

Coach operators sometimes encounter local authority restrictions as to where they can set down/pick up customers at tourist sites. Where this is the case, it might be a good idea to remind the local authority of their obligations under the new Disability Equality Duty (introduced in December 2006), which requires them to have due regard to disability equality issues in all their activities. Such activities would include the provision of suitable set-down and pickup points for visitors who come to their area by coach. Such places should be located within a

reasonable distance of tourist areas, even though the coaches may then be required to park at a more remote place.

Local authorities should recognise that some disabled people require longer to board or alight, and should develop their parking enforcement strategies accordingly.

Out of course events – vehicle breakdown

In the event of a vehicle breakdown, the operator should if possible ensure that the replacement vehicle has a comparable level of accessibility. Thus, if the broken-down vehicle is wheelchair accessible and a wheelchair user is on board, the replacement vehicle should also be wheelchair accessible. If such a vehicle is not available within a reasonable time, the operator should make alternative arrangements, perhaps by finding an accessible taxi or minibus, which could take the wheelchair user on to their destination.

It is important that, wherever possible, operators should make advance contingency plans for such out of course events, for example by compiling up to date lists of local taxi firms offering accessible taxis.

Equipment checks

Operators should carry out regular and frequent checks of equipment such as boarding aids and any on-board information systems to make sure that they are in full working order. For example, the driver's standard onceover of the coach before any journey should include the checking of such equipment. This way, if the ramp is not working, the driver can report the fault immediately, so that the repair can be scheduled as quickly as possible, and also so that, if available, a replacement accessible coach could be substituted.

Contract Hire

When coaches are hired by a group it is the primary responsibility of the group organiser to identify the access needs of members of the party. However, the coach company should make available to the organiser information about the accessibility of the coach. If the organiser specifically books a coach with wheelchair access, and then gives as the destination a site which the coach company knows from experience to be highly inaccessible, it would be sensible for the company to inform the organiser of the potential problem.

It would also be sensible for the coach company to prompt organisers to notify them of any assistance the driver may be required to provide for disabled passengers, such as operating a wheelchair lift if one is fitted.

Customer feedback

In order to achieve and maintain good levels of service, a coach operator would be well advised to set up an effective system for obtaining, monitoring and acting on customer feedback. A complaints procedure, for example, which encourages customers to explain what the problem was and how things could have been handled better, and which ensures a prompt response to every complaint, is likely to provide a useful basis for future planning. In addition, it should reassure customers that the operator is genuinely seeking their input on ways to improve its services.

The process will only really succeed however, if customers find the procedure accessible and easy to use. Operators should be aware that some customers may require different formats, for example, if the complaint is usually made via a print form, it may be necessary to make it available on request electronically or on tape also.

Appendix 1

Legislative background

There are two Parts of the Disability Discrimination Act (DDA) which have a particular relevance to transport: Part 3, which deals with access to services and premises, and Part 5, which allows access standards to be set for certain types of vehicle.

As far as tour coaches are concerned, the provisions of Part 5 are not relevant. This is because, at the time of publication of this Guide, there are no access standards or provisions within the Act itself which relate to tour coaches under Part 5; these apply only to providers of scheduled buses and coaches, rail vehicles and taxis/private hire vehicles. Brief details on these provisions can be found in the DRC Guidance for each of these modes of transport, or by contacting the Department for Transport.

Part 3: access to services and premises

This section sets out the bare bones of the law. For further information on these duties, their scope and how they apply, transport providers should refer to the **Code of Practice on Rights of Access to Services and Premises** (known as the Part 3 Code) for issues relating to transport infrastructure services, and to the **Code of Practice on Provision and Use of Transport Vehicles** (supplementary to the Part 3 Code) in respect of duties relating specifically to the provision and use of transport vehicles.

Current situation

All transport providers have duties under Part 3 in respect of any transport infrastructure they provide to the public. In the case of tour coach operators this means things like information services and booking procedures, and the selection of locations and venues of the tours or holidays they offer to the public.

As of 4 December 2006, providers of certain types of vehicle (including tour coaches) have similar duties in respect of the provision and use of those vehicles.

These duties are briefly set out below. For the most part, the duties relating to the provision and use of vehicles will be the same as those relating to the provision of infrastructure services. In some cases, however, the duties relating to provision and use of vehicles are more limited, and where this is the case, it is also explained below.

What the law says

Less favourable treatment

It is unlawful for a transport provider to discriminate against a disabled person:

- In **refusing** to provide a service offered to members of the public;
- In the **standard** or **manner** of service; or
- In the **terms** on which the service is offered to the disabled person.

Reasonable adjustments

It is also unlawful for a transport provider to fail to make reasonable adjustments to a service they provide, if that failure makes it impossible or unreasonably difficult for a disabled person to access that service.

This duty to make reasonable adjustments is considered to be the cornerstone of the DDA. It requires the transport provider to plan ahead, anticipating where the barriers to disabled people are in accessing a particular service, and what adjustments could reasonably be made to prevent or remove such barriers.

Reasonable adjustments are divided into three broad categories. The first two set out below apply both to providers of transport infrastructure and to providers of transport vehicles (including tour coaches):

- **Policies, practices and procedures** – tour coach operators have a duty to take reasonable steps to amend any policies, practices or procedures which make it impossible or unreasonably difficult for disabled people to use their services.

- **Auxiliary aids or services** – tour coach operators have a duty to take reasonable steps to provide auxiliary aids or services where these would enable or facilitate disabled people’s access to a service.

The third category of reasonable adjustment applies in its entirety to providers of infrastructure services **only**:

- **Physical features** – providers of transport infrastructure services have a duty to overcome a physical barrier which makes it impossible or unreasonably difficult for disabled people to access a service by: removing it, altering it, providing a reasonable means of avoiding it or providing a reasonable alternative method of making the service available.

As far as tour coach operators are concerned, they are under no obligation to alter the vehicles they provide in order to comply with this part of the DDA. However, they will have duties to consider the full range of adjustments to any buildings or venues which they provide as part of their services (for example, a booking office).

Appendix 2

Further reading

‘Improving Access to Public Transport. Guidelines for Transport Personnel’. Prepared by the European Conference of Ministers of Transport (ECMT) the report is available from OECD Publication Services, 2 rue Andre Pascal, 75775 Paris CEDEX 16, France.

‘Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure’. Available from Department for Transport, PO Box236, Wetherby, West Yorkshire, LS23 7NB. (Tel: 0870 1226 236, e-mail: dft@twoten.press.net)

‘We Can Do That’. A Disability awareness training resource for the bus industry. Available in CD-ROM/DVD/VHS formats. Available from GoSkills Concorde House, Trinity Park, Solihull, West Midlands B37 7UQ (Tel: 0121 635 5520 Fax: 0121 635 5521 www.goskills.org)

