

P-05-806 We call for all premises in Wales to be awarded an Access Certificate number – Disability Wales to the Committee

**Disability Wales' response to the Petitions Committees proposal to introduce an
'Access Certificate' in Wales
(Petition P-05-806)**

1.0 Introduction

- 1.1 Disability Wales/Anabledd Cymru (DW) is the national association of disabled people's organisations in Wales striving for the rights and equality of all disabled people, including for independent living. Our core role is to reflect the views of our members to Government with the aim of informing and influencing policy.
- 1.2 Disability Wales subscribes to the Social Model of disability, by which we mean that "disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others" UNCRDP (*UN Convention on the Rights of Disabled People*).

2.0 The Need for an Access Certificate

- 2.1 Disability Wales supports the concept of a national 'Access Certificate' as proposed by Bridgend Coalition of Disabled People. The proposed scheme would complement the Welsh Governments Framework for Action on Independent Living. Accessible and inclusive places are an important enabler for disabled people to lead independent lives. Since October 2004, all service providers have been required to make reasonable adjustments to the physical features of their premises to overcome environmental barriers to access in line with the Disability Discrimination Act (1995) Part III Access to Goods and Services (subsequently replaced by the Equality Act (2010)).

Despite this, high streets across Wales remain largely inaccessible to disabled people.

- 2.2 DW's *Streets Ahead* campaign in 2008/9 involved disabled people in a mystery shopper exercise which sought to highlight the barriers faced in going shopping, using banking and post office facilities or accessing hairdressers, cafes, bars and restaurants. Barriers encountered included:
- **Physical barriers** – access into shop premises and its interior such as lack of level access or ramps into shop premises, narrow width of doorway, wrong type of door entry and interior clutter;
 - **Attitudinal barriers** – staff treatment of disabled customers varied sometimes even within the same store. Attitudes experienced included being unhelpful, insensitive and acting inappropriately.
 - **Communication and information barriers:** including the complexity of verbal language used to conduct transactions and provide services, types of signs used to convey information and their use of inappropriate font size, colour of text and background.
- 2.3 The *Streets Ahead* Campaign Report (2009) made a series of recommendations targeted at Welsh Government, local authorities, business and the EHRC: <http://www.disabilitywales.org/resources/>
- 2.4 Recommendations included giving higher priority to and taking a more strategic approach to achieving access to the high street through strengthened legislation; policy development in planning, regeneration, transport and sustainability; stakeholder engagement; provision of guidance, information and training.
- 2.5 A key outcome of the campaign, was an award of funding to DW under WG's Advancing Equality Grant Scheme (2010–13) for the project *Way to Go: Planning for Inclusive Access*. It provided a comprehensive development and

training programme for disabled people's organisations (DPOs) and planning authorities across Wales; mediation pilots; and publication of a Good Practice Guidance Toolkit which was widely distributed to Planning Authorities: <http://www.disabilitywales.org/resources/>

- 2.6 Project evaluation found that DPOs and Planning Officers alike greatly appreciated and valued *Way to Go* as an intervention in tackling planning issues concerning access to the built environment. However there has been no comparable programme since the project ended in 2013 and the strategic action outlined in the *Streets Ahead* Campaign Report has not materialised.

2.7 Lords Report

3.0 The Development of an Access Certificate

- 3.1 There is a clear lack of consistent information relating to the accessibility of public and commercial premises in Wales. A national rating system would standardise the available information, allowing disabled people to make informed decisions and plan appropriately. The scheme should encompass a range of accessibility issues, decided by a stakeholder group. This scheme should be coproduced with disabled people. It is important that a wide range of stakeholders are involved in the development of this scheme, with representatives from all impairment specific groups represented in Wales, invited to participate.
- 3.2 In their daily lives disabled people require accessibility information for a variety of premises and services. This scheme should reflect the information needs of disabled people.
- 3.3 With regards to the range of accessibility issues the scheme should cover, this should be discussed and decided amongst the stakeholders to ensure

the needs of all disabled people are met through the information provided through the Access Certificate.

- 3.4** It would be a large undertaking if the scheme were applied to all buildings/services in Wales from the start. Initially, it may be beneficial to pilot the scheme across one geographical location or type of premises; cafes/restaurants, bars/pubs/clubs, supermarkets/grocery stores or chemists/opticians/dentists/GPs for example.
- 3.5** As with the Food Hygiene Certificate, an Access Certificate scheme should be appropriately and sufficiently resourced to ensure the scheme is administered effectively. Under the Equality Act 2010, businesses and service providers have a duty to make reasonable adjustments for disabled people. With this legal duty in mind, the scheme should be compulsory for businesses/services in Wales. Ideally, the scheme would be administered and maintained by a national Disabled People's Organisation, involving disabled people as mystery shoppers. This would ensure that the scheme is truly led by disabled people.
- 3.6** It may be useful to conduct engagement work to gather the views of disabled people and their representatives to know what information they would find useful.
- 3.7** Additionally, it will be vital to engage with business owners, service providers and their representative organisations on the proposed Access Certificate. This group may have concerns relating to the cost and administration of the scheme.
- 3.8** Disability Wales conducted an online poll to gather feedback from our subscribers on the proposed access certificate. We asked, "Do you think this idea has a potential benefit to disabled people in Wales?". The poll received 105 responses with 96 per cent of respondents in support of the scheme.

Despite the small sample surveyed the poll shows high public support an Access Certificate in Wales.

4 Conclusion

4.0 In principle Disability Wales supports the idea of an Access Certificate for commercial, public and transport services in Wales. We strongly believe that this scheme should be led by disabled people to ensure that it provides the information we require to lead full and independent lives.