

SEMINAR REPORT

SEMINAR ON:

**“Accessibility for disabled people
or people with reduced mobility to
Transport and Tourism services”**

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Programme of the seminar:

Relevance for Europe <i>Presentation on interest in Europe</i>	EC- DG Employment: Inmaculada Placencia
Presentation of European standardization system	CEN : Andreaa Gulasci
Presentation of the study	AFNOR : Fatma Bensalem
Table 1 : Needs and expectations of the people with reduced mobility : <i>“the rights to accessible tourism and transport services”</i>	EDF : Maria Nyman AGE : Peter G. Reiner ANEC : Nina Klemola
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Introduction

The European Commission recognizes that the European standardization system, whereby all interested parties transparently and openly develop standards on a consensus basis with which compliance is voluntary, could contribute to the single market in services. This contribution would take the form of breaking down barriers to trade and thus fostering competitiveness.

Within this policy framework and within the framework of the European directive on the services (directive 2006/123/EC), the European Commission addressed the mandate M/371 in the field of service to CEN to support projects aiming to look in depth at a particular service area and make an analysis with the involvement of the stakeholders, in order to demonstrate the need and the possibilities for the use of standards. CEN proposed to realize projects that can be called "feasibility studies" on various services, each project being leading by a CEN standardization body. The contract between the European Commission and CEN was signed on 29 December 2006.

AFNOR is in charge of the project on "[Feasibility and opportunity to develop a standardization work program concerning the definition of accessibility criteria for tourism places](#)".

This study aims to make an inventory of what exists today in different countries in order to judge the opportunity and the feasibility to harmonize the best practices and to describe services commitments related to the accessibility criteria for tourism places including transport means, in the view of European standardization approach.

Travelling, visiting places in a comfortable and equal way is something that started to be a reality; still a lot needs to be done.

Standards have a successful history of supporting the internal market for products, they can do the same for the services.

1. About CEN and standardization:

CEN, (the European Committee for Standardization), was founded in 1961 by the national standards bodies in the European Economic Community and EFTA countries.

Now CEN is contributing to the objectives of the European Union and European Economic Area with voluntary technical standards which promote free trade, the safety of workers and consumers, interoperability of networks, environmental protection, exploitation of research and development programmes, and public procurement.

CEN is a non-profit making technical organization set up under Belgian law.

CEN is a system of formal processes to produce standards. The responsibilities are shared principally between:

- 30 National Members and the representative expertise they assemble from each country. These members vote for and implement European Standards (ENs);
- 7 Associate Members and two Counsellors;
- The CEN Management Centre, Brussels.

Experts of authorities, industry, consumer organisations, etc (i.e. the stakeholders) participate in the standardisation process, which is open and transparent (over 60.000 experts of all fields are active in CEN work).

1.1 CEN technical activity:

- +/- 1800 committees and groups
- +/- 400 European professional organizations
- > 60 000 national experts

1.2 CEN documents, different needs, different documents:

• EN (European standard)

According to the definition of ISO “standards are documented agreements containing technical specifications or other precise criteria to be used consistently as rules guidelines, or definitions of characteristics, to ensure that materials, products, processes and services are fit for their purpose.

The major aims of standardization are fitness for purpose, compatibility, interchangeability, control, safety, etc. The process of standardization itself follows a set of principles like consensus, openness and transparency.

- A standard is a document Voluntary in application
- Established by all interested parties
- Reached through agreement and reflect consensus
- Approved by a recognised body
- For common and repeated use
- Shaped by those who contribute
- Market driven
- Facilitate contractual arrangements
- The use of standards offers confidence to the customers by transparency
- 1 European standard replaces 30 different national standards in Europe.... And create access to a market of 490 million

Time frame to develop a European standard

- Average of 36 months
- Not more than 54 months
- But also possible in 16 months

A European standard can

- Assist the European economy in its global trading, by making good reliable European standards
- Contribute to Europe's competitiveness globally by promoting European standards
- Ensure coherence between standards at European level
- Enhance the safety of products
- Allow economies of scale
- Help to comply with European legislation
- allow the companies to focus their efforts on the non standardised service process
- Encourage greater competition
- Facilitate trade by removing trade barriers
- Promote common understanding
- Build the single market
- Sharing of best practices
- Enable innovation coming from European research results
- Strengthen regional competitiveness in a global economy (to export European know-how)
- Provide an alternative for better regulation
- EN's must be implemented as National Standard by each national standardization bodies (1 EN = 30 National Standards)
- Conflicting national standards must be withdrawn

Benefits of standards

- Provide common level of accessibility
- Focus on essential requirements (risk oriented, for example)
- promote the wide diffusion of knowledge and good practices
- Standards contribute 1% to the annual growth of the German economy: 20.000.000.000€ (DIN study, 2000)
- Standards have contributed 13% towards the growth in the productivity of British workers since 1945 : 2.500.000 £ (BSI / DTI study)

Besides the positives impacts of standards in the service sectors, standardization still has to face some negative perceptions:

- Standards reduce the variety of services (customer's needs are not so homogeneous)
- Standards prohibit inventive solutions
- Standards prohibit quick adaptation because standardization process is time consuming / dynamic in the service sector,
- although standards make specifications transparent and usable by all interested parties, these specifications / criteria are generally defined by a small set of stakeholders
- small companies are not represented (even if they represent a great majority in the service sector)
- the trade barriers are already higher in most service sectors, standards can't be used to create additional trade barriers, making trade in services more difficult,
- ...

- **CWA (Cen Workshop Agreement) :**

- A CWA represent the consensus of identified stakeholders, the CWA is clear about who these stakeholders are. Participation in a Cen Workshop is open to anyone willing to join and accepting the Business Plan.
- CWA can complete with EN as long as they do not conflict with them.
- CWA offers fast evolving market a quick and flexible solution,
- Allows the market to reach consensus on its own standards, but published on a pan-European basis by CEN members
- Industry often has tended to develop its own solutions (quicker, less “bureaucratic”, etc)

Main characteristics :

- Anyone interested can join (including anyone outside Europe) : direct participation
- A public process: business plan on web for comment prior to the workshop’s launch
- Simple rules
- Result by consensus
- CWA can be technical specifications, guidance material, best practice, information, etc
- Workshop is fast: 5 months is the record, 12-15 months the average

What do we do with a CWA afterwards ?

- A WCA has 3-year lifespan
- It’s then reviewed: it may be renewed (with or without the need for amendments) or is withdrawn
- CWA can go to a TC (or CEN project committee) to future development
- or to ISO: some can became ISO standards

The added value of CEN Workshop:

Better than industry consortia, a CWA is:

- Just as fast
- Far cheaper
- More open and inclusive
- Benefiting from CEN ‘s values
- An experienced infrastructure
- Built consensus communities, it’s CEN speciality

The WCA compare with the EN :

Characteristic	EN	CWA
Standstill	yes	no
Language	3 CEN languages	1 CEN language (other optional)
Public Enquiry	Mandatory	Optional
Approval	Cen NSBs	Participants
Withdrawal	Mandatory	None
Support European Legislation	yes	Not generally

1.3 Standardization in the field of services:

When a provider wants to offer a service across Europe or even to different industries, technical problems can arise. They can be related to aspects like information exchange or interfacing the different parts of the business chain.

Voluntary European standards provide solutions to these problems. They permit the user to compare services and prices by the description of the services provided, the clarification of the terminology, the definition of minimum common criteria of quality of services, etc. This contributes to enforce competition and efficiency, market transparency and confidence.

The service sector is the largest single employer all over EU members states. At present the availability of voluntary euro standards in the area of services lags behind the economic importance of the sector; this is why the EC has already asked CEN to identify those priority areas where standardization would be most useful. Of course they can only achieve this with the help and the full involvement of the main stakeholders.

Standardization for what benefit

Companies who have taken part in European standardization know that it is an investment, but they recognize that they get a **return on their investment**:

1) Standards lead to efficiency improvements:

- Companies working together need their services to interface with each other.
- Standards can help to flow of information down the supply chain.
- They can also increase the market position of services providers who comply with standards

2) European standards can improve market access; because they can help to create a level playing field for competition they can also be used as marketing tools to demonstrate excellence to consumers.

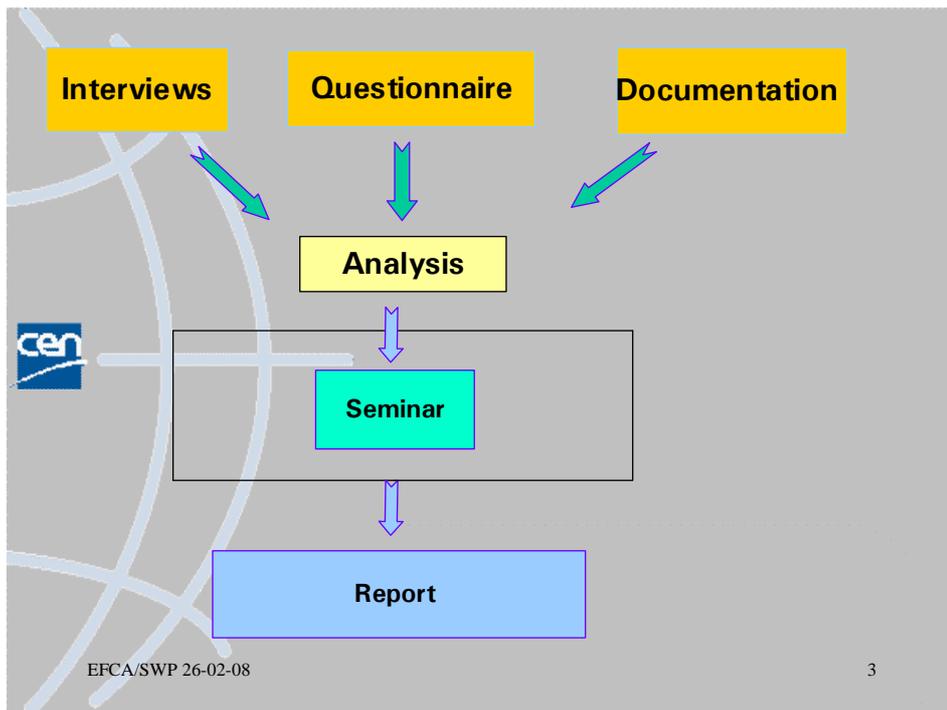
3) Finally standards can be used to promote best practices this knowledge transfer can help the spread of innovation or good practices throughout the market. Good practices will then be disseminated through the voluntary use of the standards by those companies who want to work toward it.

4) And finally standards give also benefits to consumers.

2 First results of the feasibility study

The state of art in the area of transport and tourism services for disabled people and elderly research and their needs to improve accessibility, was apprehended by screening the relevant literature and by questioning the main stakeholders.

2.1 Methodology :



Interviews of:

- **Clients** : EDF, AGE, ANEC, EBU
- **Industry** : HOTREC, BHHPA, ABTA, ECTAA, WKO, EASPD, IRU, ECAC, ENAT, ACCOR
- **Others** : EC : transport, employment, enterprises, NORMA PME, NEN, AENOR, Tourism French Ministry , WTO, Tourism et Handicap

Questionnaires enquiry

- 148 questionnaires were sent out all over Europe (to tourism and transport organizations):
25 answers were received

The first result was to identify the types of services concerned, the main needs and expectations of the main stakeholders concerning standardization in this field.

2.2 Accessibility in transport and tourism activities

What are we talking about

As EDF says *“Being able to travel and to access tourist activities is necessary in order to achieve social inclusion of disabled people. To be denied this right goes against the principles of equal opportunities and non-discrimination. It represents a barrier to the freedom of movement, which is one of the fundamental principles of the European Union.”*

This gives a contrasted reality in and according to professional sectors and countries:

- Breaks in the chain of services
- Lack of visibility for the users (ex: symbols)

- The question of accessibility is rarely handled in a coordinated way with all actors concerned
- Often exclusively centred on physical handicap alone

So the client is often confronted by:

- Different practices and different solutions
- And in certain cases by non adapted or non existent solutions

What are the stakes of accessibility in transport and tourism activities:

- The integration of handicapped and elderly people with equal right of access in tourism, and transport services etc, to benefit from the same rights as everybody else
- The quality of use and access that would benefit every body

There are also :

- Economics stakes to bear in mind: the tourism and leisure industry in Europe is a market with a large potential and an impact on:
 - Innovation
 - Creation of services and employment
 - In security and sustainable development

The current situation

There are some European regulations. At national levels, a number of countries have also adopted respective instruments and standards of both mandatory and voluntary nature in the area of accessibility.

And, voluntary guides or Good practices by organisations (national, European), company network which have produced a lot of professional Guides, Good Practices, and also seminars, meetings, etc, finally resulting very often with recurring problems concerning accessibility:

- A lack of overall vision (client passage throughout the stay)
- A centred approach on specific services,
- A lack of dialogue with the associations representing handicapped or elderly people

2.3 Disabled and elderly people : main expectations

“... Most hotels, restaurants, bars, visitor's attractions and modes of transport are still inaccessible for disabled people in Europe”:

Accessibility is a right issue for equal right to free movement and travel like non-disabled people, but the built environment or services provided don't reflect the diversity of the population (physical, sensory, intellectual capabilities, elderly, etc), it's a form of discrimination. Today customers (disabled and elderly) have a limited confidence in the declarations made by providers.

However disabled people express fundamental needs:

- Need of a General Service Safety Directive + framework legislation + sectoral standards
- Need for a European labelling scheme based on third party independent verification,
- Need to collect information about tourist facilities (which are sustainable and accessible),

- Need of clear definitions
- Transparent and accessible complains and redress procedures
- and safe access to facilities and safe use of equipment, and after sales assistance and advice, ...

They express also some recommendations:

- No standard exist to determine how the disability symbols should be used
- diverse and confusing set of policies and standards across Europe a wish to clear convergence in this field
-
- Accessibility should be viewed as a continuous principle to be followed through out service provision
- Need a clear definition of the scope of the standards
- Important to consult with independent accessibility experts before making costly adaptations

2.4 Industry: expectations and fears

Those who reject any project of standardization in this field, say:

- Disability is unique to each disabled individual and it is impossible to achieve sufficiently flexible, yet effective definitions
- A number of measures/schemes already exist (imposed or voluntary), there is no reason to review them on the basis of common harmonised criteria
- Standardization can't be a goal in itself
- One-size-fits-all-solutions are certainly not the appropriate answer
- the standardization of accessibility criteria would go too far (and could jeopardise small tourism businesses)
- Improvement could be achieved without the costly and "burdensome" intervention of the NSB
- The tourism sector should be able to coordinate good practices guidance at appropriate level for all size of business

Those who *would* accept standardization, say:

- If the EU is determined to pursue a pan European initiative then BP guidance with the lightest possible touch may be the solution
- The process of developing Good Practices Guidance, may be preceded by work to agree terminology (by all stakeholders)
- Any guidance may be appropriate by small tourism businesses (95% in tourism businesses)
- Any guidance may suggest any reasonable steps
- We agree that co ordination of information about accessible tourism is an appropriate aim

Those who support standardization:

- There is a huge market opportunity: the ageing population in Europe is increasing
- The tourism sector should prepare itself in a structural way
- Correct information is only possible with recognized and standardized criteria and well developed symbols
- Need for independent control
- An holistic approach: is the only solution to cover all the accessibility difficulties
- Need of common definitions
- And accessible information

3 European seminar on “Accessibility for disabled people to transport and Tourism services”

70 people attend this meeting, the list of participants shows that we had a good mix of stakeholders.

The objective of this seminar was to allow a debate on how to contribute to increase accessibility and how to help the industry especially small businesses to be more involved in accessibility issues, and to identify the need of possible standards in the field of accessible tourism services

There are a lot of good initiatives all over Europe to share and perhaps some consensual documents to elaborate;

Some key points were identified during this for consideration and discussed, so that some agreements and recommendations could be reached.

Keynote speakers and presentations:

3.1 Users representatives:

AGE : Peter Reiner

In most Member States current tourism and public [transport facilities](#) are not easily accessible for older people. Whilst they may offer accessibility features to wheel chair users, they are seldom designed with older people’s needs in mind.

- Transport:

Physical barriers: Local transport facilities often have quite high steps to get in, they start and stop too abruptly causing risk of falls for frail older people, the seats are too scarce and not easily accessible at peak hours. Platforms and pavements to bus or tram stations are often inaccessible or dangerous for people with reduced mobility. Public escalators and lifts [are too often out of order](#) and remain un-repaired for long periods.

Timetables: In rural areas there are strong concerns that public transport is not adequate. Older people with limited resources tend to move to less populated areas for economic reasons but there are less transport services available. In these areas [timetables](#) are set for the working age population or school children. Older people experience difficulties and long waiting times when commuting from one mode of transport to another during off peak times. Older people often get appointments during off peak times but public transport is more problematic. The lack of accessible public transport facilities in rural areas is all the more problematic that services of general interest such as post offices, banks, food shops, are closing down.

Personal safety: Frail older people are often reluctant to use public transport or visit tourism facilities at night due to a fear for their personal [safety](#). This feeling is aggravated in areas that are poorly lit and badly paved. The feeling of security is not limited to crime. Personal safety on board and outside public transport facilities is equally important. Fear of falling in

the bus, or train, floors that are slippery when wet or uneven pavements make it difficult for older frail people to use these facilities.

- Tourism

Here again it is not enough for a site to be wheel chair accessible to become “age friendly”. Older people’s needs [go beyond wheel chair accessibility](#). Older people need safe walking surfaces (old city centre pavements are very lovely but present a real danger to older people. There should be a path in the middle of the pavement with a smooth surface to enable wheel chair users, parents with prams and older people to walk safely).

Whenever possible public sites should be adapted to make them accessible to older people. This creates some challenge for old sites but often solutions can be found which help adapt old buildings to the needs of people with reduced mobility. New tourism facilities are usually designed to be accessible for people with reduced mobility but there is too much noise, too little free rest places , not enough clean toilets. Sometimes there is a long distance to cover between the bus station and the entrance which is alright when you are in a wheel chair but very exhausting when you are using a walking aid.

There is a need for more harmonized and more visible signs for the most common services.

A few suggestions for the removal of physical barriers: lower pavement at road crossings, smooth and even pavement in streets and walking areas, zebra crossings with a disability button which allow for more time to cross the street, enough rest places and clean public toilets facilities (why do women often have to queue for so long in public toilets facilities?), adequate timetables, well lit open space, [standardized sign posting](#), [well trained staff](#), etc.

In some Member States, it is compulsory for public transport and tourism facilities to meet accessibility criteria based on the concept of Design for All. . Public transport in these countries are usually well developed and are the favored transport option in particular in urban areas. In other countries however public transport is outdated and poorly developed and the percentage of users is very low.

Why would EU standards help in our view: Rules and standards vary a lot from country to country. The definition of an accessible facility varies a lot because there is no common standard for a wheel chair, no uniform understanding of the concept of “Design for all”. In the Nordic countries an accessible lift is one that can transport both the wheel chair user and his/her assistant (a six person lift). In southern countries an accessible lift is one that can transport a wheel chair user alone (4 person lift). This example shows that that a facility which is considered accessible in one country might not meet the needs of a person with reduced mobility coming from another Member State. This creates barriers to the freedom of movement that everyone is expected to enjoy in the EU and is a violation of their fundamental rights. It creates also a challenge for the industry and entrepreneurs operating in the framework of the EU internal market.

Products designed to comply with accessibility criteria in one Member State are not automatically in line with accessibility criteria of other Member States. This leads to extra costs for the producer who wishes to extend his market penetration to the whole of EU internal market. It is therefore also a barrier to free movement of goods, another of EU four fundamental freedoms.

The lack of [harmonized sign posting](#) means also that people in need of a service or facility may not find it when traveling to another country or region.

This not only results in unnecessary stress for the travellers with reduced mobility. It can also in some cases result in life threatening situations, for example in the case of the emergency stop button of lifts or escalators which are very diverse and of different shape, form and colour with the sign sometimes on the button, sometimes next to the button, etc.

Conclusions:

The lack of harmonisation in terms of accessibility of tourism and transport facilities has a huge impact on the take up rate of these facilities by older people. With the rapid ageing of the population older people constitute an increasingly important segment of the consumers. The so-called silver economy opens up new market opportunities for the industry and service providers. But the lack of common standards is preventing the EU to turn the challenge of our ageing population to an opportunity. Therefore

- **AGE sees a definite needs for standardisation in this field;**
- This is of utmost importance to protect the fundamental freedom of movement that every EU citizen is entitle to enjoy within the EU;
- It is also indispensable to protect the rights and safety of a particularly vulnerable group of consumers (an area where the EU has competencies);
- Climate change is an issue of such importance today that in itself it justifies an EU action to promote accessible transport facilities. Accessible public transport facilities are the best answer to encourage everyone, not only people with reduced mobility, to switch to public transport and limit the use of private cars;
- It will help achieve a single market for the transport and tourism industry;
- More research is needed to help **develop EU accessibility standards or guidelines for transport and tourism facilities based on the concept of "Design-for-All"**.
- Transitional measures and reasonable transposition delays can be put in place to enable a smooth transition to a harmonised accessible public space.

EDF : Maria Nyman

The aim of EDF is to promote the rights of disabled people in all EU policy areas. I have been asked to make a presentation today about the point of view of EDF on the need for standardization in the area of accessibility of tourism services.

There are some challenges for accessible tourism in Europe that are difficult to overcome, because the competence of the European Union in the area of tourism is limited. The EC Treaty states that the activities of the EU shall include measures in the sphere of tourism (Article 3 EC). However, the treaty gives no particular guidance for a community tourism policy. Any act by the Council of Ministers in the field of tourism needs unanimity among all the Member States. Standards can partly be a solution to this lack of possibilities for obtaining legislative instruments in the area of tourism services.

Being able to travel and to access tourist activities is necessary in order to achieve social inclusion of disabled people. To be denied this right goes against the principles of equal opportunities and non-discrimination. It represents a barrier to the freedom of movement, which is one of the fundamental principles of the European Union.

The UN Convention in the Rights of Persons with Disabilities, which was adopted in December 2006, is also requiring accessibility measures of all State signatories. Article 9 (2) of the UN Convention states:

States Parties shall take appropriate measures:

- a) To develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities **and services** open or provided to the public;*
- b) To ensure that private entities that offer facilities and services which are open or provided to the public take into account all aspects of accessibility for persons with disabilities;*
- c) To provide training for stakeholders on accessibility issues facing persons with disabilities;*
- d) To provide in buildings and other facilities open to the public signage in Braille and in easy to read and understand forms;*
- e) To provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public;*
- f) To promote other appropriate forms of assistance and support to persons with disabilities to ensure their access to information;*
- g) To promote access for persons with disabilities to new information and communications technologies and systems, including the Internet;*
- h) To promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost.*

All EU Member States have signed this UN Convention and, in addition, the EU has also signed it as the first Human Rights convention ever signed by the Union. This means that accessibility to tourism is not any longer an option, but an obligation. **Standards and guidelines are explicitly mentioned** as tools for ensuring that accessibility will be achieved.

If we are to ensure accessibility to the tourism services, we have to have a **holistic way** of thinking. There are several parts that need to be integrated in the **tourism accessibility chain** if we are to guarantee a positive result. These parts will obviously depend on the tourism service offered or requested, but as examples, there might be a need to consider accessibility to the **information provided** about the tourism service (and at the tourism facility itself), the built environment, the transport system connecting to the tourist site or building etc etc. Only if all these parts will respect universal design principles we will be sure that persons with disabilities will be able to benefit from tourism services as any persons without disabilities.

What is **Universal Design**? The UN Convention defines it as the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.

Universal Design is the solution for ensuring that all persons will be able to use a tourism service without discrimination. Universal design therefore means comfortable, high quality tourism, which all people would benefit from. In addition, constructing an accessible built environment and accessible modes of transport does not represent a higher cost in itself. What IS costly is to adapt a building or a vehicle to become accessible once it is already constructed. Therefore, accessibility must be considered from the very beginning of each project linked to tourism. Universal Design actually makes good business sense as well, as it opens up the service to a huge potential of clients with various needs and abilities.

Currently, the two key barriers faced by disabled people concerning tourism within the EU are:

- **lack of physical accessibility and**
- **lack of reliable information on accessibility.**

The first one is obvious: lack of appropriate infrastructure of the tourist sites themselves is only one part of this. Tourism has to be seen – as already stated - from a holistic perspective. This means that you will not be able to even reach that tourist site – accessible or not – if the whole travel chain is not accessible. This implies that internet booking sites should be accessible. Otherwise, disabled people will have more difficulties than other people to arrange their holiday. It also implies that the transport should be accessible. And so on.

At present, one of the barriers to travelling for disabled people is the diverse and often **confusing set of policies and standards existing across the EU** Member States regarding access for disabled people. EDF would wish to see these policies and standards made more transparent and favour closer convergence in this field. As it is now, each Member State defines its own way of implementing the concept of “tourism for all”, as well as policy initiatives associated with it. This is certainly not satisfactory.

So I mentioned that there are two main barriers. The first one relates to accessibility. The second one relates to lack of reliable **information on accessibility**. Too often, tourism service providers use the accessibility **labels** inappropriately as marketing tools. As long as there is not something as a European accessibility label, disabled people are unable to trust the existing symbols and can therefore not travel with confidence. The symbols lose their value and sometimes they can mean almost anything as it is today.

What **EDF asks for, is therefore a European standard, for accessibility symbols**. Not only the wheelchair symbol, but also other symbols for people with sensory disabilities or cognitive impairments. Accessibility is of course not only about wheelchair access. It is also important that requirements for persons with visual or hearing impairments or intellectual disabilities and so on, are taken into account. Hotels often neglect this even in relation to emergency evacuations and safety requirements. Standards are of course invaluable in proposing solutions to this, but will not make the whole difference. Standards can never be replacing the need for non-discrimination legislation of which accessibility must be a part. But standards would be a way of proposing solutions for the implementation of such legislation in practice.

However, these accessibility symbol standards that EDF are suggesting will only have any real value if there are **clear rules** on how and when to use the accessibility symbols and that the use of the standards are correctly implemented. This means that there must be an **independent expert evaluator** that states whether a certain tourist site has the permission of using those symbols or not in their advertising. With **reliable information** as regard the accessibility of a particular tourist site, more disabled people would feel confident to travel and to enjoy tourism. It is also key that the voice of persons with disabilities is reflected in the standardization committees drafting these standards, why **EDF is strongly supporting effective user representation in these committees**. Disabled people are experts on their own needs and how to meet those, and it is therefore indispensable that they are taking an active part in the writing of the standards.

Another area where there is **a clear need for standards is the disability awareness training of the personnel** working in the tourism sector. There is a need for mandatory disability awareness and disability equality training among all staff dealing directly with the clients and there would be a need for clear standards on what such training should include.

Would any other, “softer”, solutions than standards and legislation be possible in order to achieve access to tourism services, such as voluntary commitments or exchange of best practice? I think that this is not only possible, but also essential. But it is important to keep in mind that there is a need for **independent assessment** regarding what examples that could be flagged as “best practice”. Who decides what is really a good example? Something that is perfect for a wheelchair user might be completely inaccessible for a blind person! We have also received examples from the EDF membership showing that for example some hotels have spent huge amounts of money to adapt their rooms and bathrooms to accommodate for instance wheelchair users. But they might have forgot essential features such as an accessible tab in the shower. Because of this, the person might be unable to use the accessible bathroom independently! This is another reason why standards could be an invaluable support for tourism service providers: there might be a lot of good-will out there, but it can be very difficult to think of all aspects needed for rendering a tourism service fully accessible if there are not sufficiently clear and harmonious standards on how to design universally accessible services.

To sum up, I believe that standards are one of many tools to achieve our dream of an accessible society. **But standards cannot replace legislation, only underpin it.**

Also, if we are to ensure that the standards will really serve their purpose of improving accessibility to tourism services, user involvement must be guaranteed, and reflect the diversity of the disability movement and the diverse needs. Only in this way we will be able to design universally accessible tourism services, and thus, create a European tourism industry that is inclusive, sustainable and attractive for a huge number of potential customers.

ANEC : Nina Klemola

Anec is the European consumer voice in standardisation and certification. It was established in 1995 and is funded by EU and EFTA, consumer organisations contribute in kind Represents consumers from all EU Member States and 3 EFTA countries. Working Groups embrace about 200 consumer experts, working on seven priority areas: Child Safety, Design for All, Domestic Appliances, Environment, ICT, Services and Traffic Safety

Results of the ANEC study on service standards, 2007:

1). **Need a legislative framework for services** in EU, on :

- Safety ('General Service Safety Directive')
- Quality
- Liability of service providers

2). **This framework to be then underpinned by formal standardisation**, as done for products under the New Approach (complementing roles of regulation and standards)

3). Current **standardisation processes to be made more transparent**, inclusive and democratic

- Services Directive gives explicit role to consumer organisations to promote quality of services

4). Service standardisation has strong links with contract law, need to take also into account:

- Relevant laws and regulations
- International Private Law
- International conventions

- Instruments by non-traditional law-makers (academic study groups, regulatory committees, national agencies...)

For ANEC:

Tourism and transport is a consumer priority areas in services:

- Increasing mobility of European consumers
- Ageing of European population
- Increase in direct online marketing and purchases

Importance of safe, high quality and accessible services, and need for horizontal anti-discrimination legislation at EU level, complemented by formal standards.

Main consumer concerns:

- **Safety** of services
- **Quality** of services
- **Accessibility** of services
- Accessibility and **transparency of complaints** and **redress procedures**
- **Liability** of service provider
- Customer satisfaction
- Data protection / **confidentiality** / privacy
- Need clearly defined scope for any service standard
- **Tourism and transport to be addressed separately**

Core consumer elements

- **Qualified staff**
 - o Relevant professional qualifications
 - o Relevant practical experience
 - o Regular assessments and regular training
 - o Proper supervision
 - o Physical and intellectual capacities
 - o Communication, language skills and disability awareness
- **Information provision**
 - o Transparent, timely, clear, correct and comprehensible information to be provided in accessible formats
 - o Use of CEN/CENELEC Guide 6
 - o Information on the service, on provider, and on the contract
 - o Billing provisions
- **Safety, security and accessibility of premises, equipment, materials or food**
 - o Staff training and qualifications
- **Complaints procedures and after-sales service**
 - o Transparent, easy-to-understand, and easily accessible & available
 - o Timeliness of responses
 - o Possibility to have third person act as “agent” for consumer
- **Redress mechanisms**
 - o In-house dispute resolution mechanisms need to be independent and transparent
 - o Access to alternative dispute resolution schemes
- **Customer satisfaction**
 - o Regular feedback to be sought (variety of channels)
- **Data protection and confidentiality**
 - o Role of European legislation

- **Continuity of accessible service throughout service provision**
- **Interoperability - service/product interface throughout service provision**

3.2 Some examples and good practices:

SCANDIC Hotels: Magnus Berglund

Our vision: *“Scandic will be the first choice for disabled people and their organisations.”*

- Accessibility in Sweden is based on

- Nordic Common Sense – business concept
- Anticipate guests’ needs and be creative
- EU directive
- Awareness within companies and agencies

- A few facts...

- 1 million disabled people in Sweden
- 50 million in Europe

- **30% of all disabilities are visible**

- Various disabilities

- Mobility problems (e.g. wheelchair users, people with a stick/crutch/rollator)
- Blindness
- Deafness
- Allergy (serious allergies)
- Mental disability

How do we treat our disabled guests? : *“We treat all guests equally.”*

➔ **There is also more in our concept manuals**

- Meeting manual
- Breakfast concept manual

Quality Assurance and Safety

- 93 points
- 76 compulsory
- ...how is our hotel doing?

SNS Bank “Accessibility, design for all”: Herke Douw

“Ambition of being the best in consumer friendliness”

Reasons why

- Roots: since 1817 with a mission to encourage independency
- Retail banking: a bank easy approachable for the customer
- DIY service concept: the new business model
- Image of innovator
- Accessibility = creating value for all our customers

Important adjustments to snsbank.nl:

- More contrast; foreground - background
- No drop-down menus any longer
- Improvement of consistency
- Simplify navigation
- Improvement search engine

Steps taken

- 2002 Cooperation with Viziris (federation of visually handicapped and blind).
- 2003 Cooperation with foundation Bartimeus Accessibility and University of Twente (entrepreneurial research university).
- 2004 Online banking token and ATM adjustments
- 2005 Website highly accessible for braille use
- 2006 Introduction of Live@dvice (Advising via webcam)
- 2006 Implementation of fifteen of the sixteen W3C accessibility guidelines
- 2007 Speaking online banking token

→ Conclusion: no reason not to do it!

- **Not complicated**
- **Not difficult**
- **Not costly**
- **Inspiring**
- **Motivating**
- **The result = better accessibility for all customers**
- **The outcome = positive feeling about our brand....**

Tourism for all in Piemonte : Alberto Manzo

Turismabile is a **label** introduced by Piedmont Regional Government.

It marks all projects concerning to accessible tourism and promotion of quality offer reserved to tourists with special needs.

Turismabile is also the label that marks all projects involved in the matter of accessible Tourism and welcome policies in Piedmont.

The concept of "Tourism for All" in Piedmont starts with the project "Piemonte per Tutti" realized in 2004-2005 before the Olympic Winter Games in Turin; trained project staff, organized by the region, controlled more than 10.000 structures in Piedmont with a specific, complete and structured form identifying which structures were accessible.

FROM 2004 TO 2008: 10,000 STRUCTURES CONTROLLED WITH A COMPLETE AND ACCURATE FORM – WHAT WE NEED TODAY IS A DIFFERENT APPROACH

Key concepts

Accessibility

- the ability for people with temporarily or permanent impaired mobility to enter in the structure they want to visit.

Usability

- the ability to fully use and enjoy services available within, or connected with, a structured or facility.

Accessible is comfortable

- Tourism for all means not tourism dedicated to customers with special needs but a wide open concept of welcome policies that wants to make all aspects of a holiday easily enjoying for everyone, apart from their difficulties.

ACCESSIBLE TO IMPAIRED PEOPLE MEANS MORE COMFORTABLE FOR EVERYONE TOURISM FOR ALL IS A GREAT BUSINESS OPPORTUNITY FOR OPERATORS

Turismabile in 2007

- Turismabile wanted to promote Piemonte and his accessible facilities collected in 25 accessible **itineraries prepared** by ATL **and verified** by project staff using traditional instruments of tourism promotion
- An educational, reserved to tourist operators and journalists coming from European Countries, some of them I can see today among you
- An international congress about accessibility, as quality key for tourism, and barriers, not only related to building principles, that we must cross to access the undiscovered market of tourism for all.

TURISMABILE NOW IS:

- **25 ITINERARIES**
- **150 TOURISTIC LOCATIONS**
- **200 HOTELS**
- **A COMMUNICATIONAL AND PROMOTIONAL MODEL**

Turismabile in 2008

- New **accessibility criterium for all structures** of the Region created to deepen interests of operators in accessible tourism market and barriers elimination
- Round table on accessible tourism with Regional Government and representatives of hotel owner, travel agencies and organisations of disabled people
- Creating of a **integrated system of services** in the country – Accessibility chain
- Producing a **technical manual on accessibility** chain implementation in Piemonte
- Producing a promotional movie about accessibility chain in Piemonte
- Cooperation with Tourism department of Regional Government in promotion initiatives: BIT MILAN – 21st-24th february 2008 Turismabile within Piedmont Region Government's stand. 21st february h.11.45 am press conference about Turismabile 2008

What do we need?

International cooperation

Working with international nets on accessible tourism is Turismabile outcoming purpose

International development of good practices

All subjects involved in creating a system for "tourism for all" must **move in the same direction**, managing to widen cultural change in operators and politics

International standards

Every tourist with special needs must be sure that **quality and accessibility standards are equal** both in Italy and Belgium

IS MY DEFINITION OF USABILITY (OR ACCESSIBILITY) OF A STRUCTURE THE SAME AS YOURS?

PREDIF: Alonzo Ortega

PREDIF is a Confederation, created in 1996, union of the ASPAYM National Federation and the COAMIFICOA Federation.

It represents the interests of more than 30,000 people with great physical disability along the country.

PREDIF Aims:

- To represent the people with physical disability seriously affected (wheelchair users in general).
- To advance in the union and cohesion of the integrated Federations and Associations
- To offer programs and services to its partners

Representation:

- National Adviser Board of People with Disability, Consultative organization of the State General Administration.
- Spanish Committee of People with Disability Representatives (CERMI).
- International Federation of People with Physical Disabilities (FIMITIC), European association integrated in the European Disability Forum (EDF).

PREDIF, have made **the guide "100 accessible tourist lodgings"** with the last aim of **offering objective information** of different establishments in the Spanish tourist supply.

The methodology used for the making of this guide has been divided in four differentiated phases:

- Phase 1. Elaboration of the analysis methodology

In 2004, PREDIF, with the collaboration of different organizations specialized in the accessibility area as CEAPAT (State Center of Personal Autonomy and Technical

Assistance), Vía Libre (company of ONCE Foundation) and FESORCAM (Community of Madrid's Federation of Deaf People), elaborated a serie of Cards of **Accessibility Diagnosis**. This evaluation tool allows to make an exhaustive diagnosis of the level of accessibility of a tourist establishment, on the basis of the special needs of people with physical and sensorial disabilities.

- Phase 2. **Pre-selection of establishments**

The lodgings were selected from the PREDIF database, elaborated on the basis of its knowledge about the tourist supply, thanks to the different projects developed by this organisation, as well as with the information send to us by tourists with disability.

- Phase 3. Field work: **Diagnosis of accessibility**

At this stage is important to indicate that PREDIF has visited more than 600 establishments of the Spanish tourist supply.

- Phase 4. **Selection of the establishments and elaboration of information**

Selection criteria of the 100 establishments:

1. To **fulfil minimum requirements of accessibility**.
2. Geographic representativeness along the national territory.
3. **Typology of tourist destinies** of different nature (beach, mountain, city, etc.).
4. Typology of tourist lodgings of different category (rural hotels, houses, shelters, etc.).
5. **Elimination of exclusive establishments for people with disability**.

The experience of the people with disability says that the frequently used methodology of **symbols trying to represent the level of the establishment accessibility** does not offer adequate information to the user. We considered then that the best formula to record the level of the establishment's accessibility in the guide in an objective and real manner is to describe in detail each of its characteristics and, on the basis of this information, each person decides if it is the one that responds to his/her needs. In this way it allows that each tourist makes his own decision when choosing the best lodging, because a "tourist with disability is, overall, a tourist".

Viajes 2000 : Jon Cortina

- Viajes 2000 :
 - 60 employees
 - % handicapped : 18%
 - 7000 disabled customers per year
 - Viajes 2000 is a shareholder of GEBTA, and belong to ONCE Corp.

Busines areas:

- Company travel agency
- Meetings, Incentives and Conventions
- Holiday market
- Tourism for persons with disabilities

Data and figures:

- 70% of people with disabilities have conditions to travel, following US studies.
- Spain: 8 million of tourists
- UK, France, Germany and the US: 59 million tourists.
- There are disabled potential people, currently not travelling due to lack of accessible products offer.

Disables people satisfaction:

- Low satisfaction in Spanish market, due to limited accessible turistic products offer.

Relevants aspects:

- Demand increasing
- Short offer = business opportunity
- Customer focused

Disabled people needs

- Accesible facilities
- Adapted transportation
- Accesible environment
- Complementary offer
- Need of trustworthy information regarding turistic offer.

What do we do in VIAJES 2000?

- **Information check and verification**
- Solution creation

How doo we di in VIAJES 2000?

- **Accesibility information double check**
- **Tourism focused to accesibility**
- **Technology**
- **Staff training**

3.3 The position on the tourism and transport representatives:

ENAT : Ivor Ambrose

The European Network for Accessible Tourism (ENAT) was set up by 9 European organizations at the beginning of 2006 as a pilot project supported by the European Commission. Its goal was to demonstrate how disability policies could be mainstreamed more effectively in the tourism sector.

In the past two years **ENAT has gathered over 400 members from 47 countries**. We have held two International Workshops and an International Congress, bringing together more than 500 actors and stakeholders in accessible tourism. We have established a **website** at

www.accessibletourism.org which has received more 20,000 unique visitors, and where you can find News, Publications, Good Practices, Links, Videos, and profiles of the members.

This month ENAT has become a non-governmental, non-profit organization with its headquarters in Brussels. The General Secretariat of ENAT is located at the premises of EWORX S.A. in Athens.

The motivation to establish ENAT grew from the sponsoring partners' awareness of a number of contemporary challenges in the tourism sector:

- **The demographics of population ageing brings new challenges and opportunities to all areas of the tourism sector;**
- Older tourists and tourists with disabilities have **the right to travel and enjoy tourism but this right is inadequately recognized and poorly met by the majority of tourism and transport providers**. Exercising the right to travel is not always possible and can be both difficult and even hazardous due to multiple failures in the accessibility of information, transport, attractions, accommodation and services;
- **There are good examples of accessible tourism offers and initiatives in many European countries**, regions and cities but these are generally **not well known**. The travel and tourism industry and the consumer alike need to be made aware of these good practices in order for improvements to spread and thus enable the tourism market to function better;
- **Mainstreaming disability requirements into everyday practice** is a major challenge for all parts of the tourism sector. It requires the transfer of specialist knowledge in planning, design, management, economics, education and training;
- **Accessibility guidelines, minimum requirements and other forms of planning and management support are needed**. Information exchange between specialists and mainstream providers in the tourism sector so that providers can deliver high quality tourist offers in suitably designed and managed facilities.

ENAT's Proposals in the Area of Standardisation

Standardization is recognized as one of the key elements in a range of measures that can lead to the realization of accessible tourism for all in every tourist destination and venue in every region, town and city of Europe – and in other continents of the world.

ENAT recognizes that there **are already standards** issued by national and regional standards authorities which address – either directly or indirectly – a number of issues under the umbrella of “accessible tourism”. **These standards may form the basis of European or International standards**.

The development of unofficial or ‘proprietary’ standards and practices in countries and regions – and even, to some extent, in individual venues - without an international frame of

reference composes a threat to the inclusive and consensual approach to accessible tourism development advocated by ENAT.

→ **ENAT would encourage and support the authorized standards bodies in establishing a work programme** to integrate or harmonize existing standards and to identify areas where new standards might be needed, working towards eventual international standards and guidelines. Such a work programme should allow for the participation of industry and consumer organizations, policymakers and experts.

In its 2008 – 2009 work-programme, ENAT plans to develop its existing network activities and on-line facilities, so as to promote higher quality service provisions in the tourism sector and encourage the application of international standards wherever possible.

To meet this objective, in 2008, ENAT will:

- Introduce the ENAT Members' Code of Good Conduct which will define a set of general service requirements and aspirations which tourism operators and providers joining ENAT must adhere to;
- Develop and introduce Accessible Tourism Guidelines, based on existing standards and good practice, targeting service delivery, facilities design and management practices, to help ENAT members meet the requirements of the Code of Good Conduct;
- Offer an Accessible Tourism Compliance Label exclusive to ENAT members, in order for them to publicize their adherence to the ENAT Code of Good Conduct;
- Supervise the ENAT members' compliance with the Code and give advice on the implementation of the Guidelines.

ENAT aims to help to build consensus and contribute to common solutions and standards (- European and International standards) by means of:

- **Dissemination** of information about the value of international standards and guidelines for inclusive tourism development;
- **Gathering** good practice examples on a wide range of themes, sourced from all regions of the globe, and publishing these in the ENAT Resources Database and in News items and e-Bulletins directed to the tourism sector;
- Gathering and **publishing** documents and/or references to existing standards, guidelines, etc.
- Establishing moderated Discussion **Forum(s)** to enable debate and development of ideas concerning accessible tourism requirements, criteria, etc.
- **Participating** in transnational research and development projects with ENAT members and partner organizations;
- Participating in projects to encourage the spread of education and training for accessible tourism with ENAT members and partner organizations.

13. ENAT will continue to make active representations to European, national and regional policymakers, institutions and authorities whose actions (or lack of actions) may impact upon accessible tourism development.

14. ENAT will continue to inform the tourism sector and its stakeholders about the added value of accessible tourism and transport and the need for continual improvements both in mainstream and specialised service provisions, so as to meet the requirements of all tourists.

Toegankelijkheidsbureau: Mieke Broeders

There is need for a double approach to make it possible that people with special needs (and their family/ assistants) can spend their free time and enjoy their holidays.

At the one hand there is the inclusive approach (mainstreaming) in making the tourism sector accessible and designed for all. In order to fulfil an inclusive tourism demand it is necessary to develop:

- **Mainstreaming instruments to assure that new tourism facilities are designed for all**, such as: legislation, subsidies, public procurement accessibility requirements, ...
- Support for making the existing tourism facilities designed for all, such as incentives for approving accessibility, expert consultancy on accessibility (action plans, screenings, technical advice, audits), staff training, information services on accessible tourism, ...

On the other hand, even if the 'general' tourism sector will be accessible for all, there will always be a need for services and more advanced accessibility for people with special needs. For these kind of holidays there is often a combination of tourism and (medical) care.

Existing facilities for people with special needs have to be adjusted to follow the evolutions of the leisure sector and the quality standards tourists expect nowadays.

In a recent study on care tourism we have concluded that the tourism suppliers who deal with people with high needs are mostly designed to serve big groups of people with special needs. Also they lean highly on volunteers and helpers of the families of the people with a disability.

Survey results show that people with disabilities nowadays want to travel less in groups, but more with their friends and families. An important issue is the assistance and care these people need. The survey shows that it's an important added value if a hotel owner can provide these kind of facilities.

In other words the tourism sector should supply also assistance and care in a flexible and modular way. Traditionally in Flanders these kinds of services are mostly based in welfare organisations. New initiatives could also be based in the tourism sector, in close cooperation with the care sector.

Key principles

- A person with a disability has the right to have a holiday or travel on business like everyone else
- Like other travellers, the wishes and the way they want to spend their holiday differs widely
- Disabled people should not be hindered in their choice because of a lack of accessibility
- There is not a 'specific type of disabled traveller'
- Therefore the whole scale of tourism facilities needs to be made accessible for a larger group of users
- For certain groups more is needed than an accessible infrastructure

Double approach

- **Inclusive approach**: making the tourism sector accessible and designed for all
 - An **action plan** for and by the tourism sector on macro and micro level
 - For every subsidised investment accessibility is a condition and is guaranteed by an **accessibility audit**
 - **Financial support** for the industry: subsidies for investments on accessibility (up to 52.000 €)
- **Initiatives to respond to the specific needs** of certain groups – care holidays
 - **Technical support** – consultancy by specialised architects, **guidelines**, fact sheets,...
 - **Screenings** of the infrastructure on the degree of accessibility (database accessible Flanders)
 - **Staff training** for tourism sector (hotels, guides, museums, ..)
 - Promotion and **information** for those who take initiatives:
 - **Database** ‘accessible Flanders’
 - **Label** accessible accommodation / accessible with help
 - Information service : Info point accessible travelling
 - **Annual award for the best initiative** on ‘accessibility’
 - **Legislation** for new buildings is coming up (building permit)

Special initiatives

- Next to the ‘general tourism’ sector , that needs to be accessible for all, more advanced accessibility is necessary for people with special needs (availability of technical aids, asthma and allergy etc.)
- More service and availability of (medical) care is necessary
- Existing facilities for people with special needs, have to be updated at the quality standards a tourist expects nowadays
- For groups and individuals and their family
- mainstream tourism and niche market

Some findings

- Care tourism for individuals and groups (institutions, organisations) require different approach
- 40 % (individuals and groups) don't go on holidays because of the lack of assistance or care. To be able to rely on a ‘safe environment’ (care and assistance nearby) is important
- Individuals and groups don't expect assistance from hoteliers, but **staff training** in how to deal with people with a disability and availability of technical aids (e.g. shower wheelchair, hoists, adjustable bed,..).
- Individuals are willing to pay extra for technical aids in the hotel.
- **Need on assistance** with handling luggage / assistance with excursions. **Availability of diet and adjusted meals** are important for groups

- Beside the **accessibility of the accommodation** a variety of **accessible environments** (recreation, shops, transport, pubs, restaurants...) to make excursions are vital
- For individuals and groups the average stay is 7 days, they travel mostly in the low season and midweek
- Accessibility of the accommodation is crucial, for groups also the availability of more accessible rooms and bathrooms is important
- individuals travel with their own family or friends ,who assist them. Providing assistance and care is wished, this would enlighten the burden for family carers
- Groups who travel now, bring their own staff and volunteers. For the further development, volunteers will be necessary so holidays can be provided for a reasonable price (for groups and care tourism facilities). The cost of these volunteers is a problem.
- **Financing a holiday is for some a problem** (individuals and groups), therefore financial support for the aspect care and assistance will be necessary
- For individuals and groups, the feeling of being on holiday is important (not a medical atmosphere).
- The **care holiday centres in Flanders now are situated in social tourism** and mostly dealing with elderly, and (big) groups
- A more tourist approach is needed and also a wider variety (also from the private sector)
- The 'holiday care tourist' of today has, like other tourists, higher expectations of comfort, tourism facilities. A good balance between care and tourism approach is needed
- More initiatives in care tourism have to be taken for families with children, adults and individuals who travel and also need care and assistance
- Special attention is needed for the 'carers' (family and friends) they also need a holiday. So the availability of care and support for the tourist with a disability has to be combined with special programmes for the carers
- Opportunities for the mainstream tourism facilities to work together with the care sector in order to serve a niche market for people with special needs. E.g. 'Care hotels ' can be an alternative for rehabilitation instead of a stay in a medical setting,

Tourism and services association (ATH): Emmanuelle Thulliez

Association Tourisme et Handicaps (ATH) was founded on 15th March 2001 : 76 members

www.tourisme-handicaps.org (only in French)

its aims :

- To motivate tourism professionals to welcome disabled people
 - To implement and manage policies of accessibility to holidays and leisure
- Publications for French tourism professionals
 - Various partnerships
 - Tourism Trade Fairs

The « Label Tourisme et Handicap » was Created in 2001



The Label ATH :

- National Label
- Concerning 4 types of disabilities
- Determined by associations and professionals
- Concerning any tourist place
- Voluntary demand
- Partnership between regions and national association
- For 5 years

Letters was distributed by 3 organizations but not presented by their representatives during the seminar: HOTREC, BHHPA and ECTAA

HOTREC:

HOTREC wrote : " we have the greatest doubts about the work currently undertaken by AFNOR for CEN. These doubts concern the following aspects:

- desirability;
- contents;
- responsible bodies.

Desirability :

AFNOR has started its work, without first checking whether the exercise is desirable. In a letter addressed to HOTREC (not dated), AFNOR clearly indicates that its analysis is done "*in order to demonstrate the need and possibilities for the use of standards*". Thus the desirability phase has clearly been by-passed and, to say the least, the "objectivity" of the work of AFNOR is questionable.

The focus on "tourism" services is also causing us problems. Unfortunately, disabled people live with their disability throughout the year and not only when they go on holidays. Better access to all aspects of every-day life (streets, shops, administration buildings, financial institutions, cinemas, petrol stations, etc.), including holidays, should be ensured: there is no

justification to tackle disabled people's problems when they are on holidays as an isolated and independent issue.

Contents :

HOTREC is opposed to the development of European standards for accessibility criteria for tourist places. Unfortunately, "disability" is unique to each disabled individual and it is impossible to achieve sufficiently flexible, yet effective definitions.

A number of measures/schemes – whether imposed by law or/and developed on a voluntary basis, at industry or enterprise level – already exist in all EU countries. There is no reason why these schemes already in place would need to be reviewed on the basis of common, harmonised criteria. After all, the objective is to facilitate access for the disabled people and harmonisation cannot be a goal in itself. One-size-fits-all-solutions are certainly not the appropriate answer in this matter.

What is crucial is that information be easily available about those key elements that will enable the disabled customer to make a sensible judgement about whether, bearing in mind his/her specific needs, the tourist place (accommodation, means of transport, attraction...) is accessible. But this aim does not call for harmonised accessibility criteria throughout the EU.

Responsible bodies :

Standardisation work by the standardisation bodies is in no way a prerequisite for the improvement of availability of information on access to tourist places.

HOTREC is of the strong opinion that such an improvement could be achieved without the costly and burdensome intervention of the standardisation bodies. Together with the various platforms representing the disabled, the tourism sector should be able to coordinate, at the most appropriate level – local, destination, regional, national or European -, good practice guidance appropriate for all size businesses and meeting the expectations of the great variety of customers with special needs, while keeping the economic implications for businesses at a reasonable level.

* * *

HOTREC will attend the meeting on 13 February 2008, but its participation should in no manner be interpreted as a support for the development of harmonized accessibility criteria by CEN. HOTREC would appreciate if this letter would be included in the file for the meeting.

ECTAA :

"We would remind you that the added value of a travel agency is based on the advice which it brings to the customer to facilitate its decision-taking in the characteristics of a defined journey. Agencies making daily bookings for the people with reduced mobility adapt

themselves to the specific demands of the clientele for reduced mobility. Also tour operators develop products specifically adapted to the people with reduced mobility. From now on we do not see the necessity of elaborating criteria of accessibility to places of interest and to transport of people with reduced mobility. In the specific case of transport an EU adopted legislation (air and railway transport) or in the course of preparation (transport by sea route or by coach) takes into account the specific needs of the travelers with reduced mobility.”

BHHPA:

In summary, BH&HPA is fundamentally opposed to a European standard for accessibility criteria.

At the outset, it may be impossible to achieve sufficiently flexible yet effective definitions for appropriate terminology. Experience to date, at the UK national level, leads us to believe that this task is unachievable without compromising tourism businesses and in particular small tourism businesses and micro-enterprises. If the EU is determined to pursue a pan-European initiative, then best practice guidance with the lightest possible touch may offer some benefits. The process of developing best practice guidance must be preceded by work to agree terminology; until terminology can be agreed by all stakeholders the project should not be progressed. Since 95% tourism businesses in the EU are small or micro-enterprises, any guidance must be appropriate for application to such businesses. Any proposed guidance should require the business to consider accessibility and, where appropriate, suggest any reasonable steps that may be taken; balanced against the economic implications as to what is, or is not, reasonable for the business.

U Parliament Report on a renewed EU Tourism Policy 17.10.07 (from the Committee on Transport and Tourism) ‘Welcomes initiatives to coordinate at European level the information on accessible tourism that would allow tourists with reduced mobility and their families to find information about the accessibility of tourist destinations:...’ We would agree that co-ordination of information about accessible tourism is an appropriate aim; the creation of a standard for accessibility criteria would be to go far beyond the Committee on Transport and Tourism’s recommendation and could jeopardise small tourism businesses.

4. Summary of results

Proposals from the seminar

Possible issues	Clients representatives	Business representatives
Other than standardisation :		
- Legislative framework	X	
- Privates standards		X
- Other :		
Standards:		
a) Terminology	X	X
b) Information provision on accessible services and facilities	X	X
c) Accessibility criteria for transport and tourism services	X	
d) Accessibility : signs and symbols and rules	X	X
e) Labellisation scheme for accessibility	X	X
f) Safety of services for disabled people	X	X
g) Training and competence requirements for accessible and care services	X	X
h) Care and assistance to disabled and elderly people: Service requirements	X	
i) Guideline : good practices for transport services	X	X
j) Guideline : good practices for tourist services	X	X
k) Complaints and redress procedures	X	

Recommendations:

- Clients representatives:
 - o Need to clearly define the scope of any service standard (ANEC)
 - o Tourism and transport to address separately

- Business representatives:
 - o An inclusive approach making the tourism sector accessible and designed for all
 - o An holistic approach for tourism and transport services
 - o Accessibility should be guaranteed by an accessible audit
 - o Financial support for the industry for investment on accessibility
 - o Annual award for the best initiative on accessibility
 - o Promotion and information for those who take initiatives
 - o Central coordination to put in common initiatives and find common ground as consensus

- Guidelines on how to monitor standardisation
- In order to avoid misuse of standards in competition, essential requirements should be specified in terms of performance rather than design
- Support scheme for small and medium sized companies must be installed which allow them to join standardization processes and to integrate their preferences into the specifications of service standards.

5 Conclusion

The number of attendees at this seminar confirms the interest for this subject, 70 participants representing all categories of stakeholders (see attendance list).

However in certain cases a poor perception of standardisation in general remains. Some representatives of the business activity still consider it as a constraint rather than a complementary tool to their business. They find the financial implication is disproportionate to the benefit and that standardisation process is time-consuming in relation to the dynamism of the services sector. It is felt that standardization rather tends to streamline the business into a single model and such a streamlining makes different establishments lose their originality. Furthermore standardisation is not adapted to small businesses which can't always adapt to these standards.

On one hand some stakeholders acknowledge the rights for disabled people to travel and enjoy leisure and tourism, whereas on the other hand they consider the cost without taking into account the enormous potential for their market. This market is constantly growing and will develop more rapidly with the influx of the elderly (silver economy) and the number of disabled people prone to travel, their families and friends, assuming that tourist services are adapted. There are a lot of care services to develop; innovation in this field is still in the gestation period.

Even if they consider the difficulty of adaptation to the needs for disabled people due to the complexity of the situations, the needs of the handicap (multiple forms of handicap), and the economic consequences of the adaptation of the built environment, the tourist sector is such a promising sector. One objection that came from representatives of hotels, travel agencies and parks, maintains that such standards are counter-productive, or time consuming. However experience in standardisation indicates that such an initiative as proposed would only serve to enhance the business on a long-term basis especially for the survival of small establishments.

The companies from tourist industry, the best prepared to innovate have already taken stock of this market and are drawing a particular advantage.

The very interesting presentations during the seminar showed some initiatives and the advantages, which were gained. They also show the limits encountered notably concerning the continuity of the tourist service chain, and the level of cooperation between the different actors.

They questioned the other actors of this sector on the necessity to define common principles and to identify good practices to share.

This sharing is all the more necessary as the tourist sector has an international outreach and that the nature of organisations of which it is composed are small and medium sized in the majority.

These organisations more than any others need to be supported, to share the know-how and to communicate it.

If they find themselves unable to contribute to standardisation, these small companies (and above all, their professional organizations) would choose to reject any standardisation project.

A study and an agreement on their participation in standardisation, adapted to small establishment should be carried out. This question has been particularly raised by NORMAPME.

In any case users of these services wish to have their needs in the proposed services offer taken into account. A request quite clearly formulated by the clients of these services and their representatives (EDF, AGE), shouldn't be ignored.

Different solutions could be put forward:

- Leave the creation of reference standards for each sector, in the hands of the professional organisations though, with the risk of not seeing them shared with more than their own members (which isn't compatible with an overall approach)
- Request the EU to come into play and appoint professionals
- Or further, allow the interested parties of these sectors under an overall initiative based on consensus to develop shared rules in respecting all the views, for the benefit of all.