

DISABILITY WALES



# Streets Ahead Campaign Report

---

August 2009

Contents	
<b>Acknowledgements</b> .....	3
Note on terminology .....	4
1) Executive Summary .....	6
2) Introduction .....	9
3) Research and methodology .....	10
3.1) Mystery Shopping .....	11
3.2) Case Studies.....	11
3.3) Summary of overall findings.....	16
4) Recommendations .....	22
4.1) Strategic Action Group.....	22
4.2) Engagement and involvement .....	23
4.3) Legislation.....	25
4.4) Resources and support.....	28
5) Conclusion .....	32
Appendices .....	34
a.Legislation .....	34
b.Disability Equality Training .....	40
c.Sample Questionnaire.....	421
References.....	42
Bibliography .....	46

## **Acknowledgements**

Disability Wales (DW) thanks all Streets Ahead supporters for their contribution and support throughout the duration of the campaign.

DW would particularly like to thank the following people for their invaluable involvement:

- Alan Hunt, Access Officer Pembrokeshire Council
- Huw Thomas - Reader; Cardiff School of City and Regional Planning, Cardiff University
- Cardiff University Planning Students:
  - Harriet Bowen
  - Rachel Elliot
  - Claire John
- Anne Isaac, Pembrokeshire Association of Voluntary Services (PAVS)
- PAVS Disability Network
- Michelle Fowler – Deaf Association Wales
- Swansea and Narberth Deaf Clubs
- Colin Burrows
- Mystery shopping participants

## Note on terminology

### The Social Model of Disability

There are two main approaches to thinking about and responding to disability: the Medical Model and the Social Model.

The Medical Model of Disability where disabled people are defined by their illness or medical condition as not being a fully functioning human being.

The Social Model of Disability where it is society that disables a person not their impairment via institutional, environmental and attitudinal barriers.

Disability Wales promotes the adoption and implementation of the Social Model of Disability as a means to achieving equality for disabled people through systematic removal of barriers whether by law, change of practice or through positive action.

The Social Model of Disability makes the important distinction between 'impairment' and 'disability':

**Impairment** An injury, illness, or congenital condition that causes or is likely to cause a long-term effect on physical appearance and/or limitation of function within the individual that differs from the common place.

**Disability** The loss or limitation of opportunities to take part in society on an equal level with others due to institutional, environmental and attitudinal barriers.

The impairment may be paralysis in the legs and consequently being unable to walk but the disability is the steps into the building which present an environmental barrier to accessing it and whatever opportunities such as education, work or leisure it affords. Whereas within the Medical Model the emphasis is on the individual being able to walk up the steps, within the Social Model the focus is on removing the steps.

Several key public bodies and institutions in Wales have recognised and adopted the Social Model of Disability including the Welsh Assembly Government and many local authorities.

## **Deaf People**

Through the course of our research individuals from the Deaf community were keen to highlight particular barriers encountered by many Deaf people when accessing goods and services. These participants have asked to be referred to as Deaf BSL users and not disabled people. DW would like to acknowledge the fact that some Deaf British Sign Language (BSL) users do not consider themselves disabled. Instead Deaf BSL users consider themselves as a cultural linguistic minority. In respect of this view we will use the term disabled and Deaf people.

## 1) Executive Summary

From October 2004 all service providers were 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. Five years on and the Streets Ahead Campaign finds that disabled people are still on the pavement struggling to get into and around high street shops, services and businesses.

Disability Wales' campaign Streets Ahead was launched in November 2008 to highlight disabled people's access barriers to high street shops and services throughout Wales. With the focus of the campaign in Haverfordwest and the involvement of local disabled people the report identifies the range of barriers that they encountered during the 'mystery' shopper exercise as well as what can be done to remove them to create an inclusive shopping experience for disabled people.

Mystery shopping and additional case study research findings indicate that the main barriers continue to be with physical access, staff attitudes and communication. These include:

**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.

Despite the negative experiences, good practice was identified and indications that some high street shops and services have embraced their legal requirements and offer a service to disabled customers that affirm their rights as equal citizens.

Using the campaign findings Disability Wales makes several recommendations for change including who we believe should be

responsible for taking these forward and ensuring that the law is implemented.

## **Recommendations**

- The Welsh Assembly Government establishes a strategic action group consisting of representatives from statutory, business and voluntary sector interests regarding access to the high street
- In line with the Disability Equality Duty on involvement local authorities maintain a database of disabled people's and Deaf people's organisations in their area
- Each local authority establishes and facilitates a Forum bringing together the various interest groups concerned with the accessibility of the high street
- Welsh Assembly Government and local authorities identify funding opportunities to support the training and development of Access Groups in Wales.
- Business umbrella bodies include access to the high street as a priority issue and provide information and guidance to their members about their legal requirements under the Disability Discrimination Act (1995) and encourage their members to participate in activities such as training aimed at improving their awareness of disability equality issues.
- 'Reasonable adjustment' as a concept is strengthened and clarified within the Single Equality bill
- In producing codes of practice related to the Single Equality bill the Equality and Human Rights Commission provides clear and comprehensive information on reasonable adjustment targeted at businesses and service providers to include guidance and codes of practice tailored to specific settings.
- In partnership with disability organisations, the EHRC make available training and information to disability organisations, groups and

individuals on their rights under the DDA 1995 Part III Access to Goods and Services and how to pursue a case

- The EHRC undertake a formal inquiry into a high street sector such as banks, cafes or fashion stores regarding their compliance with DDA 1995 Part III Access to Goods and Services
- Local authorities pursue rigorous enforcement of their statutory duties concerning access to the high street where planning permission is sought for new developments and changes to existing buildings
- WAG incorporates accessibility of the high street as a key element in its strategies and policies concerning planning, regeneration, sustainability and transport
- Local authorities identify and publicise the point of contact within the council for further information and sources of support in how to address access issues in high street businesses and services
- Funding schemes that can assist businesses to address access issues are widely publicised, with clear criteria and a straightforward application process
- Welsh Assembly Government and local authorities consider schemes and incentives such as rate relief aimed at enabling small businesses to address access issues
- Disability Equality Training is undertaken by all managers and staff of high street businesses and services
- Local authority planning officers and building control officers receive Disability Equality Training and training in Design and Access Statements, Part M of the Building Regulations and especially BS3800 building standards.

## 2) Introduction

Disability Wales is the national association of disabled people's organisations campaigning for the rights, equality and independence of all disabled people in Wales.

DW's work in the broad area of access spans a quarter of a century and during that time we have worked in partnership with a range of agencies at national and local level to champion disabled people's access to the built environment. *Streets Ahead* is its latest campaign and was launched in November 2008. In a Disability Wales vote, members agreed that "inclusive access to high street shops and services" was an issue of major concern in Wales. We decided to act on these concerns and find out the true picture across Wales, report on our findings and influence those with the power to change things for the better. Examples of good practice, when service providers get it right, would also be highlighted and celebrated.

In October 2004, implementation of Part III of the Disability Discrimination Act 1995 meant that all service providers – for example; shops, libraries, pubs, cafes, post offices, and clubs - have a duty to provide reasonable physical access into and around premises. This was done to make sure that disabled people are treated equally to non-disabled people.

Five years later we are disappointed that there are still high street shops and services inaccessible to many disabled people. There has been progress in some areas but the pace of change needs to speed up.

In 2005 the UK Government set out its vision for disability equality. The Government report entitled – '*Improving the Life Chances of Disabled People*' stated that, 'by 2025 disabled people in Britain should have the same opportunities as non-disabled people, to improve their quality of life and be respected and included as equal members of society'.

The ability to undertake everyday activities such as buying a loaf of bread, having a hair-cut, taking out a library book and meeting friends in a café in the local high street is one example of how society demonstrates that this vision is realised.

### 3) Research and methodology

It was decided within DW that the campaign would centre on Haverfordwest, Pembrokeshire, as an example of a typical Welsh market town.

Haverfordwest is the county town of Pembrokeshire, Wales. It is the most populated urban area in Pembrokeshire, with a population of 13,367. It has access links by road, rail and air. The town has a recently upgraded bus station located on its east side within walking distance of the town centre, next to a multi storey car park. Haverfordwest railway station is located at a short distance to the south east of the town centre and although it is within walking distance, pedestrians would need to cross the major road network leading into the town. The town lies within the Haverfordwest Conservation Area and has many distinctive characteristics, with a Castle, a large number of listed buildings through both the town centre and the periphery, with many shops, banks and facilities occupying them. A river runs through the town centre with three bridges linking the east and west of the town with the more recent riverside development (east) and the Bridge Street area (west) forming the primary frontage of the town centre. The riverside area is generally flat, particularly to the east in the more modern side of the town, with the historic shopping area maintaining the narrow street. The High Street is located on a steep hill leading towards the west of the town, to where the historic shopping area was located. Many of the High street banks and financial/business units still occupy this area. The High Street area of the town has recently undergone some town improvements with work being carried out to widen the paths leading up the High Street, and with the formation of additional disabled parking bays at the lower end of the high street.<sup>1</sup>

Haverfordwest's location and size meant that it was chosen out of a number of areas across Wales. Pembrokeshire has a very active Access Group, disability network and the local county voluntary council (CVC) is also very active, and therefore key to the location.

---

<sup>1</sup> Cardiff school of city and regional planning , Cardiff University

### 3.1) Mystery Shopping

Disability Wales collaborated with Cardiff University School of City and Regional Planning. Students carried out a mini research project on the accessibility of Haverfordwest high street shops and services. Thirty-eight local disabled people conducted mystery-shopping exercises, during May 2009 documenting their experience of accessing shops and services along the High Street. Mystery shopping participants included people from varied age ranges and impairments, in order to represent a wide cross section of disabled people. Mystery shopper participants were from the De Clare Courtiers, an over 55 group, Young Voices for Choices, a young disabled peoples group, and the local Deaf club. Mystery shoppers visited a number of places, ranging from libraries, clothes shops, banks, cafés and post offices. Information was gained from the thirty eight mystery shopper surveys and by attending the '6th Annual 50+ Conference - One Society for All in March 2009 organised by Pembrokeshire County Council. The aims of the day included sharing experiences with other members of the 50+ Network and youth partnerships; <sup>2</sup>

Cardiff University students attended the conference to supplement the mystery shopping research with face to face discussion. In the conference lunchtime discussion, reference was made to poor attitudes of some staff and service providers' lack of awareness of their duties under the DDA. These came across as major issues and general frustration with non-compliance with the DDA duties through lack of enforcement.

### 3.2) Case Studies

Case study findings collected in June 2009 were similar to the mystery shopping findings. Two case study participants were identified through Pembrokeshire Disability Network meetings, and two others volunteered. Case studies were collected via face-to-face interviews. Many of the disabled participants stated that physical access to shops and services is the most important access issue. While some disabled people think that both physical access to shops and staff attitudes are important.

---

<sup>2</sup> [http://www.pembrokeshire.gov.uk/content.asp?Parent\\_Directory\\_id=107&nav=753,759](http://www.pembrokeshire.gov.uk/content.asp?Parent_Directory_id=107&nav=753,759)

## General Case Study comments

*“I’ve had problems getting into the Post Office because there’s no ramp – it’s the same at the other one too, it has a ramp, but it’s too narrow.”*

Access into a local high street shop was poor but the staff willingness to assist was positive.

- Banks

*“There is also the other side of the coin where you get some cash machines you can reach and some you can’t. Some banks are accessible and others aren’t. It varies a lot between banks. [There’s] only one bank in town that’s got two [cash points] in. One is low level and another normal level. I asked them why? They had thought about it, most banks don’t.”*

*“Some banks refuse to book interpreters; they will only write things down on paper.”*

*“Trying to use certain banks is hard; they have highly reflective glass making it hard to lip-read. Eventually they realise you’re Deaf and they switch on the T-loop system – but what use is that to a BSL user?”*

*“The problem with banks now is that they only provide help over the phone; how am I supposed to phone them? There are often serious financial issues – mortgages, loans, etc – I don’t think it’s safe to try and sort these out with pen and paper.”*

*“The loop systems in some banks often don’t work.”*

Communication is of particular importance to Deaf people. Many access barriers centre on the inability to recognise that for many Deaf people English is their second language. Services should be provided using BSL, their first language.

There is a consensus that raising retailers’ awareness of disability issues goes a long way to improve people’s attitudes and gives impetus to improve services they provide.

Disability Equality Training is seen as vitally important in promoting inclusive access high street shops and services. Deaf case study participants also identified the need for Deaf Equality Training.

- Staff training

*“There should be more staff training on disability issues.”*

*“It should be part of induction training.”*

*“Should be part of the interview because then they would have some sort of idea [of disability]”.*

*“Should be taught in schools too so there would be more of an all round awareness. [It] should be on the school curriculum.”*

- Communication

A Deaf person was not able to return an item due to the shops refund rules being misunderstood. The rules were clearly written in English on the counter. The Deaf person was unable to obtain a refund because they couldn't understand the language used in the refunds policy displayed by the till.

*“I find it difficult to deal with the English (language) at the post office. They do try to write things down for me, but I find it difficult.”*

## Personal Case Studies

### Case Study participant 1

“In one bank you can't get to the front desk, there's just a small table with 2 women sat at it. They tell me to use the phone, but I can't use the phone. While I'm trying to explain this, the people in the queue behind me get fed-up of waiting, and my husband gets frustrated that everyone can hear my business.

“There are wheelchair access problems (in banks); and some banks have an intercom system that makes things very difficult for Deaf people too.”

“It is an American brand wheelchair this means it's a little larger than usual. There is trouble getting through a lot of doorways. Some shops usually

only open one door, even though they have two, and we've also encountered problems with many pubs because a lot of them have steps."

"I really feel that they (shop assistants) should know BSL. I've asked them about it before, but they tell me that management won't let them."

### Case Study participant 2

"Where I live the Post Office has steps, so I've asked them about having a ramp to allow me access to their shop, but the staff tell me they are unable to do this at the moment because cars keep parking where the ramp needs to be. They are waiting for planning permission to change things at the moment. The area is very narrow anyway; especially when road works are being carried out, they really need to think about disabled access. Access in local shops is also difficult due to very narrow paths and aisles, it's really not suitable at all for wheelchair users, and I find it really awful. As for communication in the shops, I understand the hearing people fairly well because I can lip-read, and the attitude of most people I meet has been fairly good.

### Case Study participant 3

"I found it was quite frustrating because people, staff in particular, would ignore me. They could see I was sitting there looking at clothes, for example, but didn't come and ask me if I wanted help. I got stuck in a rail and couldn't move backwards or forwards. They just went on with their business and didn't help".

"The library is a problem; could get in but after that they have to open doors for you. I questioned this, suggested they have different doors when entering. Their attitude was we will open them for you. I think they meant the present doors. No one had thought about it [the type of door] before. This is a public library."

"The [bus] drivers - [there are] low-level buses but quite a lot say there is a pull-out to provide ramp for wheelchairs, but they say [it's] not working. They say I'll pull up as close as I can and then for me to get on that way. But I say no because of the gap; I might get stuck in it. If they pulled the

ramp out there would be no gap at all. They always say the ramp is broken.”

“There is a pub in the middle of town. The passageway going in was very narrow; the wheelchair was a tight squeeze. It was OK once in, but getting in and out was really bad. No-one offered to help, but they were helpful once inside moving tables etc.”

#### Case Study participant 4

“I went to a book shop and I looked at the CDs and the books and I found no trouble.”

“The shop is divided into two levels; second level is too steep even with a ramp.”

“They do ask though if you want anything and go and get it.”

#### Business Case Studies

These businesses were identified as good practice by disabled people involved in the Campaign.

- An opticians in Swansea:

The opticians in Swansea had three or four staff members that were able to use British Sign Language (BSL). Having this many members of staff that can use BSL is not common. Usually only one member of staff, if any, can use BSL. There is no guarantee that the staff member who can use BSL is working that day. ‘*BSL used here*’ stickers are increasingly appearing in a number of high street shops and services.

- A Supermarket in Haverfordwest:

The store has ample disabled parking bays. The aisles are wide and there are wider wheelchair accessible checkouts. Staff attitude towards and treatment of disabled customers was positive.

- A Surgery in Prestatyn:

Practice staff had attended a number of seminars that were also attended by disabled people. What they learned from those and the legal requirements for new buildings helped influence the building design.

Positive feedback was received from disabled patients on staff attitude and access to the surgery. It was noted that staff disability awareness had increased. There was T-Loop at the surgery and staff knew how to operate the device. Staff had also attended a number of disability equality training sessions. The surgery has a low level reception desk, wide external and internal doors and accessible parking.

- An in-store café in Cardiff:

An in store café in Cardiff, and in most others of their stores in Wales have a pager alert device that alerts customers when their food is ready. Such a device benefits Deaf or hard of hearing customers without singling them out for special treatment, therefore provides a fully inclusive service.

- A café and travel agent in Bangor:

The café is at the front and the travel agent is at the back of the shop.

There is a small concrete slope between their door and the pavement rather than a small step. There is a wide doorway to get in, then a gentle slope (with handrail) from the door to the main café area. The café has a choice of comfy sofa, tub chair or seats around a table. It has been stated that a wheelchair user can position themselves at the table comfortably. Staff are happy to take away a chair to make extra space and the “gang way” is uncluttered.

### 3.3) Summary of overall findings

- Banks

Some banks were easy to enter, signage was generally clear. Staff were polite and helpful when approached but were not proactive in offering assistance. Some mystery-shopping participants stated that

they could get into the premises they were assessing and could move around unobstructed. Other observations included that pavements were easy to negotiate and generally staff attitude was positive.

- Retail

Shop floor clutter, this caused access difficulties. It was found that many retail outlets have a stepped entry into the shop. Changing rooms were too small and aisles too narrow and there were a lack of drop kerbs. Clear signage was also lacking. Entering some business premises proved difficult because some mystery shoppers were not able to open the door unaided. Staff did not appear to be disability aware.

- Public Services

The internal door of one public building was heavy to open and staff did not offer assistance.

### 3.4) Barriers

Over half (55.26%) of mystery shoppers said that they had experienced barriers when undertaking the activity.

The most common barriers are:

1. Physical Access

- External accessibility, for example stepped entry into shops without alternate ramp provision, and shop merchandise on the pavement outside making it difficult for wheelchair users and those with mobility impairments to negotiate.
- Internal layout and design, for example merchandise badly laid out. Cluttered alleys with merchandise on floor obstruct disabled shoppers from browsing. Narrow aisles that are too tightly packed and too narrow for disabled people with mobility impairments to navigate and browse. Non contrasting floor design means that visually impaired

customers are not able to navigate around the shop due to poor colouring floor markers or lack of them.

## 2. Staff attitude

- For example staff reluctance to assist a disabled customer i.e. only giving assistance when directly asked to do so. Less than 40% (39.47) of mystery shoppers said that staff appeared to have any disability awareness or training. Only 31% of mystery shoppers received assistance to enter the facility.
- There is a lack of awareness of the DDA. Access barriers still exist both physical (external and internal) and attitudinal.
- There have been some improvements in larger retail outlets but there is still a long way to go with smaller high street retailers. There is still a lack of awareness of the DDA which could be due to the fact enforcement is not rigorous enough.

### 3.5) Common physical barriers include

- Lack of ramps into shops. Part M of the Building Regulations should be adhered to when placing a ramp inside or outside the retail premises. Gradients have to be properly measured to ensure minimum standards are met which is currently 1:12.
- Exterior clutter outside shops can cause difficulties when disabled people try to pass the shop on the pavement outside. Wheelchair users may not be able to pass on the pavement; visually impaired people, and those with mobility impairments may bump into the laid out merchandise causing them to trip. Owners and their guide dogs may not both be able to fit on the narrow pavement when walking alongside each other past the shop, causing either to trip or fall over the clutter or step off the kerb.
- Inside the shop lack of ramps or lifts to get to different floors prevents disabled customers, especially those with mobility impairments, from accessing merchandise on the top floor. Therefore, disabled shoppers are not being offered the same service as non-disabled

shoppers. Regardless of how helpful staff are in fetching items from the top floor for disabled customers to view they are still receiving a limited service. Disabled shoppers should be able to browse a variety of merchandise before making a decision to buy.

- A shop's interior clutter can cause difficulties for disabled customers to enter and browse for items. A poorly laid out shop floor with too narrow aisles and merchandise on the floor obstructs wheelchair users from navigating their way around.
- Entry into shop premises highlighted a number of access barriers. Some shops door widths have been found to be too narrow for a standard sized wheelchair to fit through. A number of disabled people are now using larger wheelchairs and mobility scooters. Most of these wheelchairs and mobility scooters are wider than the minimum standard door width. Most premises widen their doors only to the minimum standard size required in the Building Regulations Part M, for external doors to buildings used by the general public i.e. retail premises.
- The door is the wrong type; e.g. a manual operated door instead of push button or automatic doors in some shops and in a local library. Disabled people find it hard to open manual doors independently. Disabled people in wheelchairs and those with mobility and dexterity impairments have difficulties with these doors. They are not able to push or pull the door as well as manoeuvre themselves through at the same time.
- For blind and visually impaired people the lack of colour contrasting stairs and bubble flooring to indicate the location of stairs and doorways is a hazard as well as an access barrier. Blind and visually impaired people require non-colour contrasting surfaces and bubble flooring to negotiate their way around shop premises.
- The majority of High streets have drop kerbs; however, there are not enough of them. Some drop kerbs are badly placed, and disabled people find them difficult to use. Due to their inappropriate location disabled people find themselves having to cross the road diagonally not in a straight line, which makes crossing the road hazardous. Some drop kerbs are even blocked by parked cars. Warning signs

could stop drivers parking over drop kerbs and if they were penalised with a fine.

### 3.6) Common attitudinal barriers include

- Lack of Disability and Deaf Equality Training, i.e. lack of understanding of the Social Model of Disability and Cultural-linguistic model of Deafness.
- Poor staff attitude such as adopting a blasé attitude towards their disabled customers. A staff member's individual perception of disability could affect the level of service provided. A wheelchair user may be given a better service than a person with a mental health condition because more is understood about the former condition than the latter. Staff misunderstandings can occur as a direct result of disabled customers' impairment.

### 3.7) Common communication barriers include

- Poor signage in banks, post offices and shops proved to be confusing, especially to visually impaired mystery shoppers. Floor markings indicating the location of the tills and other directions could have been clearer. Floor markings are needed to enable blind and visually impaired people to negotiate their way around the shop. Signs tend to be written in formal English: Deaf people whose first language is BSL, people with learning disabilities and others with limited literacy could have difficulty understanding their meaning.

### 3.8) Transport

- Accessibility to public transport is a barrier that cannot be ignored. Transport inaccessibility was mentioned throughout the course of the research, and buses in particular. Without accessible public transport disabled and Deaf people who rely on it (not all disabled and Deaf people have access to private vehicles) could find it impossible to travel into town. At the time of the campaign the Welsh Assembly

Government is running a National Transport Plan consultation. The National Transport Plan is part of the *One Wales* National Transport Strategy establishing the framework of an integrated transport system which aims to improve the transport system throughout Wales.<sup>3</sup>

### 3.9) The value of disabled and Deaf customers to the business sector

Access to high street shops and services should be in place because disabled people have the same right as any other citizen to enjoy local amenities and facilities. It is also a legal requirement.

Nevertheless, businesses and service providers may wish to note the consequences of not ensuring access, which in light of the current economic downturn has particular pertinence:

- 67% of disabled people choose businesses that are good at serving disabled customers.<sup>4</sup>
- 66% of disabled people choose businesses where they have received good customer service related to their impairment. For 37% good disability service is the primary reason for choosing a particular business. For a further 29% it is a secondary factor when deciding where to shop.<sup>5</sup>
- 58% of disabled people say that the way in which businesses treat them affects the shopping habits of their friends and families. 26% say that poor service means others are less likely to shop with the business; a further 16% said that friends and family never shop with companies, which have provided a poor service.<sup>6</sup>

---

<sup>3</sup> <http://wales.gov.uk/deet/publications/transport/wts/wtstrategy/wtspdfloen.pdf?lang=en>

<sup>4</sup> 'The Walk Away £: Employers' Forum on Disability customer survey, 2006

<sup>5</sup> 'The Walk Away £: Employers' Forum on Disability customer survey, 2006

<sup>6</sup> 'The Walk Away £: Employers' Forum on Disability customer survey, 2006

- 55% of customers also considered companies general reputation on disability, for example whether they were positive about employing disabled people, when making purchasing decisions.<sup>7</sup>

#### 4) Recommendations

In order to address the three main barriers identified by participants in accessing high street shops and facilities: physical access, attitudes and communication, Disability Wales makes several recommendations about how this may be tackled both at national and strategic level as well as more locally and practically.

##### 4.1) Strategic Action Group

The limited progress since the full implementation of Part III of the Disability Discrimination Act (1995) in October 2004 indicates that a high level, strategic approach is required to address this and bring all relevant parties together to take forward agreed actions on a systematic basis.

Several agencies have a direct interest or responsibility in this area and bringing these together formally would provide a useful and valuable means of sharing knowledge, skills, ideas and good practice as part of a co-ordinated approach to ensure that disabled and Deaf people's legal rights with respect to high street access are honoured and fulfilled.

We believe that the Welsh Assembly Government is best placed to lead such a group that should operate on a task and finish basis for an agreed time period.

In addition to Disability Wales, several other national organisations are running campaigns on related themes including Age Concern Cymru and

---

<sup>7</sup> 'The Walk Away £: Employers' Forum on Disability customer survey, 2006

Help the Aged in Wales (Towards Common Ground), Guide Dogs (Say No to Shared Space) and LC Disability (Action for Access). Organisations have their own particular slant on an issue given the needs of the particular group they represent or serve. However there is ground for partnership working and sharing intelligence in order to achieve the best outcomes across the range of interests.

**We recommend that:**

- The Welsh Assembly Government establishes a strategic action group consisting of representatives from statutory, business and voluntary sector interests regarding access to the high street including local government, business umbrella bodies, unions, disability organisations and consumer bodies.
  - The Strategic Action Group should consider the findings and recommendations of the Streets Ahead report and agree the action necessary to take the recommendations forward to create a fully inclusive local high street. The strategic action group should operate on a task and finish basis over a period of eighteen months and monitor progress concerning the identified and agreed actions.

4.2) Engagement and involvement

4.2i) Engagement and involvement of disabled people

The Streets Ahead campaign sought the participation of a wide range of disabled people many of whom have not previously been formally involved in access issues. Participants collected information via mystery shopping exercises and case studies. This diverse and inter-active approach enhanced the campaign and ensured that the findings captured the broader experience of disabled people and Deaf people.

It is vital and for public bodies a legal requirement that disabled people individually and collectively should be involved at each stage of the

process when decisions are being made about accessibility to high street shops and services.

All involvement activity should be fully funded so that the access requirements of disabled and Deaf people are met and they are not out of pocket as a consequence of their participation.

Disability Wales commends the particular role that Access Groups play in championing access issues in their area. Most Access Groups involve a majority of disabled people and operate mainly through volunteer effort. They work closely with their local authority scrutinising planning applications, sitting on advisory groups, undertaking access surveys and providing information locally on access. Access groups play a vital part in achieving accessible and inclusive environments for disabled people across Wales. Desk based research undertaken by the Disability Rights Commission in Wales and Disability Wales in 2006 confirmed that some access groups had folded and others reported dwindling membership. Since then there has been no reversal of this position. Despite the valuable role they play and the importance placed upon them by their local authority this is not usually matched by the level of funding and support required to enable them to grow and thrive. Investment in access groups is a vital component in achieving accessible and inclusive high streets.

**We recommend that:**

- In line with the Disability Equality Duty local authorities maintain a database of disabled people's and Deaf people's organisations in their area including those that represent specific communities of interest such as young disabled people and seek to involve them in forums, processes and activities aimed at improving access to the high street
- Each local authority establishes and facilitates a Forum bringing together the various interest groups concerned with the accessibility of the high street including the business sector and disabled and Deaf peoples organisations to draft an action plan to tackle main areas of concern in the local high street;

Welsh Assembly Government and local authorities identify funding opportunities to support the training and development of Access Groups in Wales.

#### 4.2ii) Engagement and involvement of the business sector

Business umbrella bodies have a leadership role to play in advocating the vital importance of their members addressing access issues not only to comply with disability discrimination law but in the interests of maintaining the future of the high street itself. Engagement of the business sector in access issues will develop their knowledge and skills, improve service to customers and help them avoid costly mistakes and litigation.

In partnership with the local authority and disability groups, business umbrella organisations could arrange 'open days' on access for their members which provide practical demonstrations of what shops and services can do to make their premises accessible, coupled with information about the law and sources of support, as well as taster sessions in Disability Equality Training, Deaf Equality Training and introduction to British Sign Language.

We recommend that:

- Business umbrella bodies identify access to the high street as a priority issue and provide information and guidance to their members about the legal requirements under the Disability Discrimination Act (1995) and encourage their members to participate in activities such as training aimed at improving their awareness of disability equality issues.

#### 4.3) Legislation

##### 4.3i) Clarification of 'reasonable adjustment'

Reasonable adjustment is a term specific to the Disability Discrimination Act 1995/2005 however it requires clarification and further guidance

because of the wide variation and misunderstanding regarding interpretation. Retailers can do one of four things when they have a barrier to access: alter it, remove it, find a way of avoiding it such as reorganising the space, or provide the service by different means. A reasonable adjustment can be anything from providing a chair for a customer to rest on to a full scale refurbishment. It can involve significant cost or very little at all. What would be expected of a national chain store is different from the corner shop. However the law requires both the shop keeper and the managing director to ensure that disabled people can access their services appropriately.

The Single Equality bill is currently progressing through parliament which if passed will bring together all equality and discrimination laws including disability discrimination into a single Act. This provides an excellent opportunity for a review of the concept 'reasonable adjustment' including redrafting codes of practice on how it should be interpreted.

**We recommend that:**

- 'Reasonable adjustment' as a concept is strengthened and clarified in the Single Equality bill
- In producing codes of practice related to the Single Equality bill the Equality and Human Rights Commission provides clear and comprehensive information on reasonable adjustment targeted at businesses and service providers to include guidance and codes of practice tailored to specific settings.

4.3ii) Enforcement of Legislation

In the UK there is a plethora of legislation designed to promote inclusive access to high street shops and services. Existing legislation includes;

- The Disability Equality Duty 2005

- The Disability Discrimination Act 1995/2005 Part 3 covering Provision of Goods and Services,
- Design and Access statements
- The Building Regulations Part M
- BS8300 Building Standards

The problem does not seem to be a lack of legislation but the enforcement of it. Enforcement of the DDA and the DED depends on an individual disabled person who believes that they have been discriminated against bringing a case themselves. Design and Access Statements, the Building Regulations Part M and BS8300 Building Standards rely on enforcement action by local authority officers from planning and building control departments respectively. The Disability Equality Duty also applies to all aspects of a public body's planning role and function.

Currently two thirds of enquiries to the Helpline service run by the Equality and Human Rights Commission are from disabled people and a high percentage are about access issues. The EHRC can and does support individuals who pursue their rights under Part III of the DDA such as the recent Allen vs. Royal Bank of Scotland case. This resulted in the highest award being made to a plaintiff under this legislation with the Judge instructing the Bank to make the necessary adaptations. However the EHRC does not support every case and many disabled people lack the knowledge, resources and support to take action themselves. The scale of the problem means that relying on individuals who have experienced discrimination to tackle it shop by shop, café by café, and hairdressers by hairdressers is untenable.

It is vital that individuals are able to assert their rights and there should be easier ways for disabled people to give feedback on access to a shop without having to make a formal complaint. One idea may be a 'postcard' scheme where disabled customers hand in a pre-printed postcard with tick boxes completed as appropriate. This could help avoid potential confrontation which many people fear or can prove unproductive.

The weight of responsibility for ensuring compliance should rest with the service provider themselves and on statutory and enforcement bodies. This requires public bodies to ensure that all involved in the decision making, planning, design and delivery of a service understand and are able to execute their statutory responsibilities. It also requires a tough line to be taken with those who are in breach through enforcement action.

As part of its enforcement role the Equality and Human Rights Commission has powers of investigation and can undertake formal inquiries into particular sectors such as the banking or retail industry to find out how it is executing its legal responsibilities under equality and human rights law whether as employers or service providers.

**We recommend that:**

- In partnership with disability organisations, the EHRC make available training and information to disability organisations, groups and individuals on their rights under the DDA 1995 Part III Access to Goods and Services and how to pursue a complaint or legal case
- The EHRC undertake a formal inquiry into a high street sector such as banks, cafes or fashion stores regarding their compliance with DDA 1995 Part III Access to Goods and Services
- Local authorities pursue rigorous enforcement of their statutory duties concerning access to the high street where planning permission is sought for new developments and changes to existing buildings
- WAG incorporates accessibility of the high street as a key element in its strategies and policies concerning planning, regeneration, sustainability and transport

4.4) Resources and support

4.4i) Information

There is currently little coordination of information and advice regarding how to address access issues and many businesses do not know where to go to find it.

Local Authority Access Officers played a vital role in forging links with a variety of agencies both within the Council and externally and were often a source of expertise on a range of access matters. There are now only two or three dedicated access officers employed by local authorities in Wales. Some of their functions are carried out by Equality Officers or undertaken by officers in planning and building control departments often as an add on to their main role. There are dangers in one individual being regarded as the access 'expert' for the authority because the necessary knowledge, skills and values should be shared widely across the Council. However there should be a point of contact within a local authority which is clearly identified on the website and in relevant literature which businesses and service providers can contact for further information about access and related issues.

**We recommend that:**

- Local authorities identify and publicise the point of contact within the council for further information and sources of support in how to address access issues in high street businesses and services

**4.4ii) Funding and Financial Incentives**

A recurring question particularly from small businesses is whether any funding is available to make their service more accessible. Generally speaking businesses are required to meet this expenditure themselves as they would any other cost associated with their business. Access improvements can be achieved with very little cost such as providing a handrail, brighter lighting, re-organisation of layout or larger print on signs and price tickets. Installing accessible WCs, lifts or replacing steps with ramps and widening doorways may be more of an investment.

Any changes made should be done following expert advice and on the basis of an access survey or audit. This can enable a business or service to take a planned and fully costed approach to addressing access.

Some grant schemes are available for specific purposes for example the WAG Post Office Diversification Fund which is available to sub post offices and can be used to make their premises accessible. Some local authorities such as Gwynedd County Council offer small grants to businesses such as pubs, post offices and shops as part of an initiative to provide safer, cleaner and more accessible toilets to the public.<sup>8</sup>

At the Streets Ahead campaign launch in November 2008, the keynote speaker Steven Alambritis from the Federation of Small Businesses highlighted that improving access can be a disincentive for some businesses as it increases the rateable value of the premises. He called for discounts on rateable value where improvements to the property were to improve accessibility. He also referred to the small business rate relief that businesses can apply for from the local authority where rateable value is below a certain level. He suggested that local authorities might be proactive in recommending to businesses that they utilise the relief awarded to undertake an audit or make access improvements.

**We recommend that:**

- Funding schemes that can assist businesses to address access issues are widely publicised, with clear criteria and a straightforward application process
- Welsh Assembly Government and local authorities consider schemes and incentives such as rate relief aimed at enabling small businesses to address access issues

#### 4.4iii) Training

---

<sup>8</sup> [http://www.gwynedd.gov.uk/gwy\\_doc.asp?doc=23783&Language=1](http://www.gwynedd.gov.uk/gwy_doc.asp?doc=23783&Language=1)

A clear finding from the Streets Ahead research was the importance of staff attitudes towards disabled and Deaf customers and that many participants believed that this was just as vital as addressing any environmental barriers. A courteous and helpful approach that acknowledges the needs of the customer without being patronising or offensive enables all customers including disabled people and Deaf people to feel that their business is valued.

Disability Equality Training (DET)<sup>9</sup> for all levels of staff working in high street stores, business and services is a key component in ensuring that attitudes towards disabled and Deaf customers are appropriate and that staff understand why reasonable adjustments should be made.

It is vital that both management and shop floor staff receive training because while the latter deal directly with the customer, it is the role of the manager to ensure that any company policy regarding access such as store lay-out is carried out. Furthermore the manager is responsible for staff rotas and should ensure that for example staff with BSL skills are available throughout opening hours.

DET is based on the Social Model of Disability and delivered by disabled people who are appropriately trained and experienced.

DET courses typically include sessions in the following areas:

- Who are disabled people?: definitions, attitudes, myths and misconceptions
- Language, terminology and imagery of disability
- Understanding and identifying various environmental, attitudinal and communication barriers and how to rectify them.
- An introduction to Disability related legislation and regulations
- Case studies and practical exercises to reinforce learning

---

<sup>9</sup> see appendix for definition of DET - definition section

Larger companies and national chain stores in particular provide a range of training for their staff and have the capacity to arrange in-house and block training. For small businesses this is not always the case however training could be more cost effectively arranged through business umbrella bodies such as Chambers of Trade at times of day or week to suit requirements.

Disability Equality Training should also be undertaken by officials in local authority Planning and Building Control departments. This should be coupled with training in the technical aspects of Part M of the Building Regulations and especially the new BS3800 building standards and understanding of good practice such as outlined in *Planning and access for disabled people: a good practice guide* (Department for Communities and Local Government). The perception amongst Access Groups and Access consultants is that local authority officers lack detailed knowledge or understanding of the importance of these standards. In some cases inadequate Access Statements are not being rejected and approval is being given following inspection to works that do not meet the required standards regarding accessibility. The joint initiative between WAG, Planning Aid Wales and Access Groups to produce a plain language guide to Access Statements is a welcome step.

**We recommend that:**

- Disability Equality Training is undertaken by all managers and staff of high street businesses and services.
- Local authority planning officers and building control officers receive Disability Equality Training and training in Design and Access Statements, Part M of the Building Regulations and especially BS3800 building standards

5) Conclusion

Disability Wales and its members will continue to play a leading role in campaigning for and securing access to the High Street through working in partnership with all stakeholders to follow up the findings and recommendations made in the Streets Ahead report.

Disabled people make up more than twenty percent of the population in Wales but our evidence reveals they are not being well served by the local high street. Consequently they are increasingly leaving it behind in favour of more accessible out of town retail outlets. These have more Blue Badge parking and shops are better laid out and tend to be more accessible than high street shops. If smaller retailers want to bring trade back to the high street and local authorities and WAG wish to pursue their strategic agendas for sustainable communities and regeneration then addressing access is not only a legal requirement but vital to the economic and social wellbeing of the nation.

## Appendix A

### Legislation

In the UK there is legislation designed to promote inclusive access to high street shops and services. Existing legislation includes;

- The Disability Equality Duty 2005
- The Disability Discrimination Act 1995/2005 Part 3 covering Provision of Goods and Services,
- Design and Access statements
- The Building Regulations Part M
- BS8300 Building Standards

### Disability Equality Duty

“Disability Equality Duty for the public sector. Public authorities such as schools, the NHS, local authorities and inspection bodies need to proactively look at ways of ensuring that Disabled people are treated equally, rather than as a special add-on afterwards. The Duty is not necessarily about changes to buildings or adjustments for individuals, it’s all about embedding equality for disabled people into the culture of public authorities in practical and demonstrated ways. This means that public authorities need to be actively thinking about the principles of disability equality from the outset, rather than responding to our individual disability-related discrimination complaints”.<sup>10</sup>

In 2006 the Disability Equality Duty became a statutory requirement for all public bodies. On their website the Equality and Human Rights Commission explains Disability Equality Duty. The Disability Equality Duty was implemented by the DDA 1995/2005. It means that public bodies must have ‘due regard’\* to the need to:

---

<sup>10</sup> Source: ‘Making the Duty work’ - A guide to the Disability Equality Duty for disabled people and their organisations Disability Rights Commission Guidance for Disabled people

- promote equality of opportunity between disabled persons and other persons
- eliminate discrimination that is unlawful under the Act
- eliminate harassment of disabled persons that is related to their disabilities
- promote positive attitudes towards disabled persons
- encourage participation by disabled persons in public life; and
- take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons (e.g. the provision of an accessible parking bay near a building, where parking is not available for other visitors or employees.)

\*due regard means that authorities should give due weight to the need to promote disability equality in proportion to its relevance. When considering proportionality public bodies need to give greater consideration to disability equality in relation to areas which have the most effect on disabled people.

Public Services had to become proactive not reactive in ensuring disabled people are treated equally. There is little evidence to suggest this has actually happened.

### DDA Part 3 the provision of goods and services for disabled people:

DDA Part 3 covers provision of goods, facilities and services to the public, whether paid for or free of charge. The main provisions of this part of the DDA were introduced in three stages, as follows:

- Since December 1996, it has been unlawful to treat a disabled person less favourably because of their disability.
- Since October 1999, providers are required to make reasonable adjustments to the way they deliver their goods or services, so that disabled people can access them.
- Since October 2004, all providers are required to make reasonable adjustments to the physical features of their premises to overcome physical barriers to access. Goods and service providers are

expected to make adjustments regardless of whether or not they have had, or currently have, any disabled customers or clients.<sup>11</sup>

From 2010 onwards the Single Equality bill could replace the DDA Part 3 provision of goods and services and the Disability Equality Duty 2005.

### Design and Access Statements

Design and Access statements have been a mandatory requirement in Wales since 30<sup>th</sup> June 2007. A Design and Access statement is separate from a planning application. Legislation requires Design and Access statements to accompany all planning applications (outline and full).

Planning Policy Wales Technical Advice Note 12: Design Welsh Assembly Government describes Design and Access Statements.

Although Design and Access statements are not part of the planning application there is, however, a statutory requirement for access statements to accompany all applications for planning permission (outline and full) and listed buildings consent applications (with some exclusions). The exclusions are as follows.

- A material change in use of land or buildings unless operational development is also proposed
- Engineering or mining operations
- Development of an existing house or within the curtilage (area attached to dwelling house, garden, yard or paths) of an existing house for any purpose incidental to the enjoyment of the dwelling house, unless the property is located within a designated area. (N.B. all new dwellings will require an access statement.)

A Design and Access statement accompanying an outline or full planning application must explain the concepts and principles in relation to (as a minimum):

- Accessibility

---

<sup>11</sup> DWP DDA Report 2007

- Character (including amount, layout, scale, appearance and landscaping)
- Community Safety
- Environmental Sustainability
- Movement to, from and within the development.

A Design and Access Statement accompanying a listed building consent application must explain the concepts and principles in relation to (again as a minimum):

- Appearance
- Environmental Sustainability
- Layout
- Scale

On 1<sup>st</sup> July 2009 the Welsh Assembly Government replaced Access Statements with Design and Access Statements. Design and Access statements are mandatory, under statutory Instruments 2009 No.1024 (W.87) (Wales) (Planning Applications) Town and Country Planning, Wales Town and Country Planning (General Development Procedure) (Amendment) (Wales) Order 2009. From the 1st July 2009 the Order referred to above came into force and requires a Design and Access statement to be submitted with most planning applications. The guidance states that an application that does not have a required statement should not be registered. However, what is not covered in the guidance is the quality of the statement<sup>12</sup>.

Architects, surveyors, and all those involved in the design and construction of buildings must consider disability access to buildings. The two main sources of Guidance on specific accessibility requirements are 'The Building Regulations Part M' and 'BS8300 Building Standards. For retail premises 'reasonable adjustment' adaptations to meet building regulations and business standards must be adhered to if their adaptations are to meet legal requirements.

---

<sup>12</sup> <http://wales.gov.uk/topics/planning/policy/guidance/designandaccessstatements/?lang=e>

## The Building Regulations Part M - Access to and use of Buildings

Building regulations are statutory instruments that seek to ensure that the policies set out in the relevant legislation are carried out. Building regulations approval is required for most building work in the UK.

Part M requires the inclusive provision of ease of access to and movement within all buildings, together with requirements for facilities for disabled people.<sup>13</sup>

The DDA impose legally binding duties on service providers, schools and public bodies, and these are separate from, and additional to, the Building Regulations 2000 minimum access and facilities requirements.

The Part M Approved Document is NOT written as a means of ensuring compliance with these legal duties. It is written to ensure that the design of a building does not create physical barriers to a building's inclusive use, over its lifetime.<sup>14</sup>

BS8300 sets out minimum standards of accessible design. UK law requires all public buildings to be accessible. Access to those with disabilities must be considered when designing new buildings, and when planning improvements to existing buildings. BS8300 explains how the built environment can be designed to remove restrictions to disabled users

### British Standard BS8300

BS8300 British Standard applies to the following types of building: in relation to accessing high street shops and services.

a) Transport and industrial buildings, e.g. rail, road, sea and air travel buildings and associated concourses, car-parking buildings and factories

---

<sup>13</sup> Taken from <http://www.sitelines.co.uk/partm/>

<sup>14</sup> The old DRC (Disability Rights Commission) website

b) Administrative and commercial buildings, e.g. courts, offices, banks, post offices, shops, department stores and shopping centres, and public service buildings, including police stations

c) Health and welfare buildings, e.g. hospitals, health centres, surgeries and residential homes

d) Refreshment, entertainment and recreation buildings, e.g. cafes, restaurants, public houses, concert halls, theatres, cinemas, conference buildings, community buildings, swimming pools and sports buildings

f) Educational, cultural and scientific buildings, e.g. schools, universities, colleges, zoos, museums, art galleries, libraries and exhibition buildings

This British Standard does not apply to dwellings or residential buildings designed exclusively for use by disabled people nor does it make specific recommendations relating to the use of buildings by children.<sup>15</sup>

---

<sup>15</sup> [www.bsigroup.com/en/Shop/Publication-Detail/?pid=000000000030139436](http://www.bsigroup.com/en/Shop/Publication-Detail/?pid=000000000030139436)

## Appendix B

### **Disability Equality Training (DET)**

#### **DET is designed to...**

- **promote disability as an Equality Issue**  
Disability is too often regarded as a health or "care" issue. This medical perspective focuses on what is "wrong" with a disabled person rather than the barriers society erects, preventing real equality and promoting a passive/helpless image of disability.
- **examine the root causes of exclusion and discrimination**  
The problems facing disabled people are far more likely to be caused by the way places and services are designed than by a person's impairment.
- **question stereotypes, myths and misconceptions about disability**  
There are so many commonly held 'truths' about disability that are simply unfounded. DET addresses the attitudes based on these misconceptions
- **promote communication between disabled and non-disabled people**  
When was the last time you talked - and listened! - to a disabled person? All DET tutors are disabled people.
- **promote change both in policy and practice**  
Positive attitudes towards disability should mean positive policies. Traditional ways of designing and providing a service may no longer be appropriate. More effective, accessible practices are constantly being refined. DET offers the best of current good practice.

#### **DET is not about ...**

- **making non-disabled people feel guilty**  
DET is intended to make you feel positive about getting things right, not guilty about the way things have been done wrong in the past.
- **disabled people recounting their life story**  
Entertaining though some stories are, we don't think anecdotal

histories help you understand the causes of oppression and exclusion to disabled people as a group.

- **simulating physical or sensory impairments**

We believe this is patronising. Sitting in a wheelchair or wearing greasy glasses for half an hour may be an "experience" but its temporary nature teaches you nothing of the reality of physical impairment and "playing at disability" is insulting to disabled people.

- **describing different impairments**

Everybody is different. People experience their impairments in different ways. The physical or sensory nature of impairments is not the problem. The environmental and attitudinal barriers imposed through ignorance or design by the rest of society cause the problem.

A DET tutor is a disabled person trained and experienced in the knowledge, skills and values necessary to deliver DET courses to a wide range of participants.<sup>16</sup>

---

<sup>16</sup> <http://www.disabilitywales.org/training-consultancy/1305?done=true&returncontentid=1305>

## **Appendix C**

### **Sample Questionnaire**

Mystery customer shopping: sample checklist

Name of premises:

Location:

Address:

Day:

Time:

Shopper:

Task (e.g. trying on clothes)

I. Facility: (Retail small shop)

1. Number of customers (including yourself): 1

2. Number of employees:

3. Was the shop easy to find? Yes /No

4. Was the shop easy to get in to? Yes/ No

5. Was all signage clear and easy to understand? Yes /No

6. Once inside, was the shop easy to get around? Yes/No

**Comments:**

## **II. First Impressions & Approach:**

7. Were staff visible on entering the shop and acknowledged your presence? Yes/No
8. Were the staff friendly and helpful when you approached them? Yes/No
9. If you needed assistance to enter the shop, did staff help with this? Yes/No

**Comments:**

## **III. Assistance:**

9. Did staff offer you assistance?
10. If you were given assistance, was it polite and courteous?
11. Did staff appear to be disability-aware or trained in disability awareness?

**Comments:**

## **IV Outcome**

12. Did you experience any barriers (physical barriers and/or negative attitudes) when undertaking this task? Y/N
13. If yes, what were they?

**Comments:**

## **References**

Federation of Small Businesses

<http://www.fsb.org.uk/default.aspx?loc=general&id=0>

South Wales chamber of commerce [www.southwaleschamber.co.uk](http://www.southwaleschamber.co.uk)

Equality and Human Rights Commission

<http://www.equalityhumanrights.com/advice-and-guidance/service-providers>

Welsh Assembly Government

Flexible business support [http://www.business-support-](http://www.business-support-wales.gov.uk/assembly_government_support/business_funding/local_investment_fund.aspx)

[wales.gov.uk/assembly\\_government\\_support/business\\_funding/local\\_investment\\_fund.aspx](http://www.business-support-wales.gov.uk/assembly_government_support/business_funding/local_investment_fund.aspx)

Post Office Diversification fund

<http://wales.gov.uk/topics/housingandcommunity/grants/podfw/?lang=en>

Single investment Fund [http://www.business-support-](http://www.business-support-wales.gov.uk/pdf/17673_SIF_LEAFLET_FINALweb.pdf)

[wales.gov.uk/pdf/17673\\_SIF\\_LEAFLET\\_FINALweb.pdf](http://www.business-support-wales.gov.uk/pdf/17673_SIF_LEAFLET_FINALweb.pdf)

Design and Access Statements

<http://wales.gov.uk/topics/planning/policy/guidance/designandaccessstatements/?lang=e>

Employers Forum on disability <http://www.realising-potential.org/news/the-walk-away-pound/findings.html>

Yahoo News Article 12,000 independent stores closed Friday, 31<sup>st</sup> July 2009

<http://uk.news.yahoo.com/21/20090731/tuk-12-000-independent-stores-closed-6323e80.html>

Planning Portal

<http://www.planningportal.gov.uk/wales/government/en/1115315398160.html>

Building Regulations - Site Lines <http://www.sitelines.co.uk/partm/>

Disability Equality Duty

Disability Rights Commission [www.dotheduty.org](http://www.dotheduty.org)

Office for Disability Issues <http://www.odi.gov.uk/working/ded/index.php>

<http://wales.gov.uk/topics/cultureandsport/museumsarchiveslibraries/cymal/resources/dedandyou/?lang=en>

Government website [www.direct.gov.uk](http://www.direct.gov.uk)

Equality 2025 [www.equality2025.co.uk](http://www.equality2025.co.uk)

Forum of Private Business

[http://www.fpb.org/news/1628/Retailers\\_required\\_to\\_make\\_premises\\_more\\_user\\_friendly.htm](http://www.fpb.org/news/1628/Retailers_required_to_make_premises_more_user_friendly.htm)

Gwynedd County Council (Grants)

[http://www.gwynedd.gov.uk/gwy\\_doc.asp?doc=23783&Language=1](http://www.gwynedd.gov.uk/gwy_doc.asp?doc=23783&Language=1)

Business link

[http://www.fpb.org/news/1628/Retailers\\_required\\_to\\_make\\_premises\\_more\\_user\\_friendly.htm](http://www.fpb.org/news/1628/Retailers_required_to_make_premises_more_user_friendly.htm)

Department of transport

<http://www.dft.gov.uk/transportforyou/access/dda2005/frequentlyaskedquestions?page=3>

Statistics Wales <http://www.statswales.wales.gov.uk>

Office of Public Sector Information Statutory instruments Town and County Planning Wales

[http://www.opsi.gov.uk/legislation/wales/wsi2009/wsi\\_20091024\\_en\\_1](http://www.opsi.gov.uk/legislation/wales/wsi2009/wsi_20091024_en_1)

[http://www.opsi.gov.uk/acts/acts1995/ukpga\\_19950050\\_en\\_4#pt3](http://www.opsi.gov.uk/acts/acts1995/ukpga_19950050_en_4#pt3)

Access Group Resources

[www.accessgroupresources.co.uk/index.php/learning-resources/legislation/services](http://www.accessgroupresources.co.uk/index.php/learning-resources/legislation/services)

Wales online 20<sup>th</sup> April 2009

<http://www.walesonline.co.uk/news/wales-news/2009/04/20/retailers-with-poor-disabled-access-losing-out-91466-23422213>

## **Bibliography**

The Building Regulations access to and use of buildings approved document Part M 2004.

BS8300 Building Standards.

Disability Wales Policy Statement: *equal access within the built environment* (2007).

Disability Wales Policy Statement: *The Social Model of Disability* (2007)

Welsh Assembly Government (2002) Planning Policy Wales.

Office of National Statistics Census 2001.

Department of Works and Pensions, December 2004.

Cardiff University Planning Streets Ahead Project Student Report 2009.

Annual Population survey 2007, Average weekly earnings for full time employees by Government office region.

The Walk Away Pound Survey of disabled customers' opinions 2006.  
Employers Forum on disability – 'Realising Potential Disability Confidence builds better businesses'