

Disability Equality Scheme

2006 - 2009

Introduction

This Scheme is made in implementation of the Disability Discrimination (Public Authorities) (Statutory Duties) Scotland Regulations 2005. It sets out the approach which we will meet our General Duty to:

- Promote equality of opportunity between disabled people and other people
- Eliminate discrimination that is unlawful under the Disability Discrimination Act
- Eliminate harassment of disabled people that is related to their disability
- Promote positive attitudes towards disabled people
- Encourage participation by disabled people in public life
- Take steps to meet disabled peoples' needs, even if this requires more favourable treatment.

The plan also sets out the following actions that are required to fulfil our Specific Duty.

- Provide a statement of how disabled people have been involved in developing the scheme
- Prepare an action plan setting out the steps that we will take to comply with the General Duty.
- Our arrangements for gathering information about our performance of on disability equality
- Arrangements for assessing the impact of our activities on disability equality; and
- Details of how we are going to use the information gathered, in particular in reviewing the effectiveness of its action plan and preparing subsequent schemes.

About VisitScotland

Tourism is central to the Scottish economy and the industry's health is vital for the country's future.

The industry is currently worth £4.2 billion per annum in revenue to the Scottish economy.

Although thriving, the industry holds a lot more potential than is currently being realised and the Scottish Executive, VisitScotland, the Enterprise Networks and the

many diverse businesses and other organisations involved aim to achieve at least a 50% real terms growth in tourism revenues within the next ten years.

VisitScotland employs approximately 1,000 staff through a diversified network with less than 15 per cent of jobs based at the main office in Edinburgh. The network of 15 local offices stretch from London to Lerwick and the 120 Tourist Information Centres stretch throughout the whole of Scotland, with an additional two in England. Tourism supports around 9% of all employment within Scotland.

VisitScotland's Core Activities

VisitScotland has responsibility for five things.

1. To give *strategic direction* to the industry.
2. To *market* Scotland and all Scotland's tourism assets to all parts of the world to attract visitors.
3. To provide *information* – and *inspiration* - to visitors and potential visitors to enable them to get the best out of a visit to Scotland.
4. To provide *quality assurance* to visitors and *quality advice* to industry partners to ensure the industry delivers to meet – or exceed - visitors' expectations.
5. To promote *partnerships* with - and across - the wider industry to ensure we all reap the economic benefits of collective effort.

VisitScotland's Support Activities

To support the five core activities, VisitScotland provides services in four other areas.

1. *Routes to market* for the industry - for example sales channels like VisitScotland.com, brochure advertising and exhibition space - to help join marketing with product delivery and generate income.
2. *Retailing* - for example the sale of gifts, souvenirs, tickets and passes through the TIC network to meet visitor requirements and generate income.
3. *Sector development* to help fill gaps in the market offering where there is clear visitor demand and inadequate, or disjointed, supply. (This includes VisitScotland's involvement with *EventScotland* which has been set up to develop and promote events at all levels throughout the country).
4. *Corporate services* and *communications* to give the solid platform to enable us to undertake all the above activities.

Involving disabled people in producing this scheme

This Scheme brings together all of our activities and measures that contribute towards disability equality in a single document for the first time. We have benefited from input from disabled people in developing these activities and measures, and where appropriate, this input is referred to in the Scheme.

Developing an overall equality scheme and establishing channels to provide input to this from disabled people is a new venture for VisitScotland. Although this scheme has been adopted initially with limited input from disabled people, we have made arrangements with Glasgow Access Panel for a workshop in mid January 2007. We are committed to continuous development of the Scheme to reflect input from disabled people. Specifically, we will issue a revised version of the Scheme early in 2007.

Our Business Activities

Our activities are focussed on six corporate objectives:

1. Give Strategic Direction to the tourism industry

Tourism Strategy

The Scottish Executive's Tourism Strategy, *The Next Decade, A Framework for Change*, was launched on 7 March 2006. It sets out what the tourism industry and its supporting agencies need to do to meet the ambition of 50% growth by 2015. Key initiatives outlined in the document include:

- A workforce training plan will be developed to raise standards across the industry.
- The establishment of local product development networks linking with local authorities and cultural heritage networks to expand on what Scotland has to offer tourists.
- The establishment of a Tourism Research Network to research into the industry to help drive up standards.
- By 2015 all businesses wishing to work with VisitScotland must be members of the Green Tourism Business Scheme.
- Pride and Passion movement working locally to increase the effect of its "hearts and minds" campaigning.
- Increase the membership of the Green Tourism Business Scheme.
- A Sustainable Tourism Partnership which will build on the work of the Tourism Environment Forum to promote sustainable tourism throughout Scotland.

The strategy document does not contain any specific reference to addressing the needs of disabled people. The public and private sector

VisitScotland does not itself own the National Strategy. Ownership lies with Scottish Ministers and responsibility for delivering strategic objectives is shared between VisitScotland, other public bodies with remits for tourism, as well as the industry itself.

VisitScotland's 14 area network teams have a role in facilitating Area Tourism Partnerships. These Partnerships involve the industry and public bodies at local level, and aim to bring a local dimension to delivering the National Strategy. This is done primarily through Area Tourism Partnership Plans. As with the National Strategy itself there is little specific mention of the needs of disabled people.

In facilitating Area Tourism Partnerships, we have encouraged disabled people working in tourism to participate. An example of this encouragement is through providing a sign interpreter to enable a disabled business person to participate as a member of one Partnership.

Guidance to the industry

We maintain a corporate website www.visitscotland.org which provides information and guidance to the tourism industry in Scotland. There is a section of this site dedicated to guidance on the requirements of Disability Discrimination Act. We commissioned Margaret Blackwood Technical Consultants to provide expert support in drawing up this guide based on that consultancies established expertise in the field through close working with disabled people..

The section explains what the DDA is, who it applies to and how it affects businesses. It outlines what steps a business can take to comply with the provisions of the Act and includes details of how to conduct an Access Audit, including a downloadable checklist which can be used to assess how accessible the establishment is and where any reasonable adjustments and improvements need to be made. In addition, a number of case studies were developed to demonstrate to businesses how to use the checklist.

This corporate website itself has been designed to take account of the Website Accessibility Initiative (WAI) Guidelines which define three standards of accessibility:

- A – the most basic, where the site must comply with all the priority one checkpoints.
- AA – a higher standard, where the site must comply with all the priority one and two checkpoints.
- AAA – the highest standard, where the site must comply with all the priority one, two As a marketing organisation for Scotland, it is not VisitScotland's role to regulate businesses and to ensure that they are complying with the Disability Discrimination Act.

The visitscotland.org site has been designed to be AA compliant as a minimum. This has been achieved ahead of the general target for public bodies to meet the AA standard for their websites by 2010.

Advice via VisitScotland Staff

We have produced a CD-Rom with guidance from the Disability Rights Commission for use by our own staff in reviewing DDA compliance for our won premises and tourism business premises.

We have distributed 5000 copies of the DRC Mini-Guide for serviced and self-catering tourism SMEs to businesses in Scotland. We regularly update this guidance through electronic bulletins and newsletters to businesses, and through the face to face contact that our staff – primarily our Quality Advisers – have with businesses.

2. Attract visitors by building a successful Scottish Tourism Brand

Promotion of Scotland as a holiday destination to disabled people

In the work that we undertake to promote the Scotland brand, we segment our marketing activity along the lines of what there is to see and do in Scotland. Following extensive consumer research, we have developed a product portfolio which segments our marketing activity as follows:

- freedom (including touring / wildlife)
- active (including golf, cycling, walking, adventure sports)
- cities
- culture & heritage (including festivals, genealogy, food & drink)
- business tourism

Using consumer research, we further segment our activities according to the age, gender, income and lifestyle of potential visitors.

VisitScotland does not segment its marketing messages to differentiate for people with disabilities. However, we do take steps to ensure that marketing messages are accessible by tourists who may have a disability. Examples of the activity we have undertaken are as follows:

Publications: following research with RNIB and Access for All, we have produced a set of guidelines outlining how our publications should be produced to ensure they are accessible to people with disabilities. These guidelines comply with the RNIB "See it Right" guidelines.

Audio Material: VisitScotland's main guide to Scotland is accessible in CD-Audio format for the visually impaired.

Accessible Scotland Guide: VisitScotland has published an Accessible Scotland Guide. This is a free brochure which lists almost 1,000 accessible accommodation establishments and visitor attractions which are members of the Disability Access Scheme.

E-marketing: VisitScotland's e-marketing activity complies with level one standards as a minimum and in many cases complies with level two standards. This means that consumers can access the majority of our online activity. Where the online element requires the use of Flash software, this will often mean the visually impaired cannot interact properly with digital activity, e.g. some of the online games. However, they can still interact with the registration form and read the terms and conditions. We are to develop more accessible versions of our digital activity.

Consumer website: The Scottish tourism consumer website, www.visitscotland.com, is an important marketing tool as well as a major source of visitor information. VisitScotland does not directly own or operate this site, which is managed by a Public Private Partnership, eTourism Ltd, in which VisitScotland holds a minority interest. We are in a position through our management of the concession to influence site content and design.

Visitscotland.com has been audited by an external agency (Iconzest) which provided

generally positive feedback and while we acknowledge that the site is not yet fully compliant with Level A, steady progress is being made towards achieving this standard. . The site is already meets requirements for some of the criteria at Levels AA and AAA.

Visitscotland.com has for some time been incorporating the same good design into the site which disability access also requires and generally has moved towards a more disabled-friendly format. Specific examples include:

- pages built with a XHTML layout linking to CSS. The layout of these pages is controlled as much as possible by the CSS style sheets which leaves a simple and easier-to-read page for screen readers.
- an increased and consistent use of ALT attributes to provide a text equivalent for non-text elements (eg images) enabling them to be read by screen readers.
- the use of a text-replacement technique when images are used as titles, as on the home page. This means that the title is actually written in the XHTML as real text for the screen readers etc, but when rendered on screen, the text is hidden and replaced by an image representation.
- improvements to site navigation. By removing lots of individual page links, we now use a navigation 'list'. Once again, when the page is viewed by a screen reader or someone with a browser that does not support the styles, the navigation is displayed as a simple grouped list of links which is simple to understand and it's obvious that each link is a page link.
- avoiding the use of tables for screen layout and positioning.

Work will continue to improve accessibility to this important tourism marketing and information resource.

3. Engage and work in partnership with the tourism industry and other stakeholders

We do not have information on the numbers of disabled people who are engaged in the tourism industry, but we acknowledge the need to ensure that our industry services are accessible to all. As an initial step towards this, elements of the Marketing Opportunities Campaign will be posted on the revised VisitScotland corporate website – www.visitscotland.org – which is, AA compliant.

4. Enhance the visitor experience through the provision of information

VisitScotland Premises

Prior to the merger with the 14 Area Tourist Boards, VisitScotland undertook an audit of all its premises, including main VisitScotland offices, network offices and Tourist Information Centres.

Provision required to improve access for people included:

- Ramps
- Assistance bells
- Hearing loops

- Designated toilets

Considerable progress has been made in addressing the action points identified in this initial audit. We will carry out a full review of all of our premises before the end of 2007 to assess progress in securing full DDA compliance.

5. Enhance the visitor experience through the provision of quality assurance to visitors and quality advice to the industry

3.2. Quality Assurance

We have developed a comprehensive quality assurance scheme for those with mobility impairment. This has been in place in Scotland for the past two decades. Under the scheme, properties are assessed by trained VisitScotland Quality Advisors using strict criteria, and are awarded one or more of the gradings depending on their suitability for different levels of mobility impairment.

There are three categories of accessibility for accommodation:

Category 3: access for residents with mobility difficulties

Category 2: assisted wheelchair access for residents

Category 1: unassisted wheelchair access for residents

There are additional categories and associated criteria for caravan and camping parks and for visitor attractions.

Participation in this scheme available for no additional charge to businesses who participate in our general Quality Assurance Scheme. There are currently some 1,000 businesses which have been assessed for mobility access. Awards are clearly indicated on plaques that we provide to participating businesses. They are used in marketing materials, including both those that we provide and those provided by businesses themselves.

All businesses, whether they participate in our accessibility scheme or not, have a duty to comply with DDA. Being a member of the VisitScotland scheme is only one way of demonstrating this. The scheme only addresses mobility issues, and does not demonstrate compliance with other disability needs.

We have carried out an internal review of our scheme in consultation with the Disability Rights Commission. This review has considered the practices adopted by other national UK tourism agencies. The initial conclusions on this review is that our existing scheme is a firm basis for development. Priorities which will be taken forward in our action plan include:

- Extension of the assessment scheme to be available to non- accommodation businesses;
- Work with the industry to support businesses in preparing self-assessed access statements covering the full range of measures that they have put in place to enable access to disabled customers. This information would be published on www.visitscotland.com and would be fully searchable, to make it easier for

disabled customers to find accommodation and other tourism facilities that meet their needs;

- Continue and extend our work in advising businesses on their responsibilities in relation to DDA – and the business benefits that accessibility offers to them through widening their customer base.

6. Manage our business efficiently and effectively

Human Resources Policy

VisitScotland has a published Equality Policy which commits the organisation to eliminating discrimination and encouraging diversity amongst its workforce. Our aim is to ensure that each employee feels respected and able to give their best. The policy is published on the VisitScotland staff intranet and is reviewed annually.

As part of this policy, each potential new employee is asked to complete an equal opportunities monitoring form. This includes information on disabilities. Applicants are also offered the opportunity to contact the Human Resources Department in confidence at any stage of the recruitment process to discuss steps which might be necessary to overcome any operational difficulties.

Following the merger with the former Area Tourist Boards, we do not have fully comprehensive information for all VisitScotland employees as some of the former ATBs did not record this information. For VisitScotland prior to the merger, there is only one member of staff who is registered as having a disability. A full audit of staff will be conducted during 2007.

The purpose of our equality policy is to provide equality and fairness in our employment. We oppose all forms of unlawful and unfair discrimination.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Our Commitment

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- Equality in the workplace is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.

Staff awareness training

Prior to the merger, both VisitScotland and the Area Tourist Boards provided a programme of disability awareness training to staff throughout their organisations. We will reintroduce a planned approach to awareness training to ensure that staff are aware of this scheme, and have the skills and knowledge required to respond to the needs of disabled people, both in terms of services that we provide directly and in terms of the advisory services that we provide to the industry.

Assessing the impact of this scheme

We have a duty to prepare an annual report on the implementation of this scheme. Our approach to monitoring the delivery of the scheme and assessing its impact will be as follows:

- A member of our Senior Management Team – our Director of Network Operations – has overall responsibility for ensuring that VisitScotland meets its legal obligations under disability equality legislation and its commitments under this scheme and the related action plan.
- This corporate scheme provides an overarching framework. We have introduced a requirement in our business planning process that all Departmental and Network Office Operational Plans will set out the actions that these business units will take to implement Disability Equality, and how performance against these actions will be measured.
- We are developing a range of performance indicators to measure the impact of our disability equality actions.

Action Plan

Involving Disabled People

- We will establish a standing focus group as a channel for input from disabled people to this Scheme, the Action Plan and future reviews of these. The focus group will also provide input and guidance to assessing the impact of this Scheme.

Target: Initial workshop involving disabled people taking place on 19 January 2007, with standing involvement arrangements set up and operating by 31 March 2007.

How will this be measured? Demonstrating output from involvement activity with clear input to the Scheme.

Strategic Direction to the Industry

- We will work with our partners in the Scottish Executive, the industry and other public bodies to ensure that Disability Equality issues are addressed in future reviews of the National Tourism Strategy and in Area Tourism Partnership Plans.

Target: VisitScotland representatives on strategy group highlight the need for this strategy to address disability equality in the next revision of the document. This will be raised by VisitScotland prior to 31 March 2007. Further action is subject to agreement of other stakeholders.

How will this be measured? Strategy updated to set out aspirations and actions to address issues of disability equality in tourism.

- We will provide facilities to enable disabled people with involvement in tourism to participate in tourism consultation and planning.

Target: Through our involvement arrangements, and building on existing good practice, we will seek to increase the number of disabled people who participate in Area Tourism Partnerships, both directly and indirectly

How will this be measured ? Tracking involvement of disabled people and publishing this information on the annual report on our scheme.

- We will continue to provide guidance to businesses on making proper provision for their disabled customers through our corporate website, through publications and through face to face contact with our Quality Advisers.

Target: Ongoing review of site content to take a account of feedback .

How will this be measured ? Feedback through our involvement arrangements.

Attracting visitors

- We will continue to explore ways in which our marketing activity can be accessible and relevant to disabled people. There are currently statistics available indicating the extent to which disabled people take holidays in Scotland.

Target: Work through our involvement arrangements to improve our information on holiday activity in Scotland by disabled people, and review ways in which our marketing activity could be used to encourage greater enjoyment of Scotland by disabled visitors.

How will this be measured ? Position reviewed in annual report on the scheme.

- Specifically, we will continue to work with our partners in the public private partnership operating the consumer website www.visitscotland.com to raise the site's standards of usability for people with a visual impairment.

Target: Ensure that site development plans are included in the VisitScotland.com business plan for 2007 (due to be adopted by 31 January 2007).

How will this be measured? Measure implementation of plan targets.

- We will work with www.visitscotland.com to extend the range and quality of information on accessibility to accommodation and tourism facilities that is published on the national tourism web portal. This will be developed to reflect input from disabled people.

Target: Requirements brief agreed by 31 March 2007 and information gathering in hand.

How will this be measured? :Number of businesses listed on the website providing accessibility information.

Engage and work in partnership with the industry and others

- We recognise that disabled people are engaged in many capacities in the tourism industry. We will review the need to tailor our services to the industry to meet the needs of disabled people.

Target: Internal review of industry engagement services carried out with input from disabled people by 30 June 2007.

How will this be measured? Progress against internal review action plan.

Enhance the visitor experience through the provision of information

- We will continue to develop the content and delivery of our information services, whether through premises, publications or electronic media, to meet requirements of disabled people, as informed by our planned disability focus group.

Target: Action plan developed with input from disabled people by 30 June 2007.

How will this be measured? Progress against action plan.

- We will carry out regular reviews to ensure that our Tourist Information Centres are DDA compliant.

Target: All Tourist Information Centres will have had a formal DDA assessment by 31 December 2007.

How will this be measured? Progress against target.

Enhance the visitor experience through the provision of quality assurance to visitors and quality advice to the industry

- We will build on our existing accessibility Quality Assurance scheme, following on our internal review of this scheme, by extending the scheme to facilities other than accommodation, and by updating the advice that we provide to businesses on provision for disabled customers, and on extending the range and quality of information that is made available to disabled customers on tourism provision.

Target: Review of Scheme completed by 30 April 2007

How will this be measured? New scheme adopted. Number of tourism businesses participating.

Managing our business effectively and efficiently

- We will review our Equality Scheme annually.

Target: (a) Revised version of scheme to take account of input from disabled people completed not later the 31 March 2007; (b) annual review for 2006-7 carried out.

How will this be measured? Publication of revised scheme and annual review on www.visitscotland.org.

- We will develop Performance Indicators to track the impact of our business activities on disability equality.

Target: Performance indicators developed by 30 June 2007.

How will this be measured? Performance indicator results published as part of the annual report on the scheme.

- We will improve our approach to recording the number of disabled people that we employ and the effectiveness of our measures to ensure that they are afforded equal opportunities.

Target: Introduce disability monitoring and reporting in our Human Resources records system.

How will this be measured? (a) monitoring in place by 30 September 07; (b) details of any actions taken to support new or existing employees with disabilities included in the annual report on this scheme.

- We will introduce a planned programme of disability awareness training for our staff throughout the organisation.

Target: Awareness Training will be included in our Training and Development plans for 2007-8.

How will this be measured? Number of staff completing training

Comments, complaints or enquiries about our Disability Equality Scheme

This is the first version of our Disability Equality Scheme. We accept that it will require development and improvement, and we therefore welcome complaints, comments enquiries or suggestions about the Scheme. We particularly welcome input from disabled people. The point of contact for this Scheme is:

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