

CONTENTS

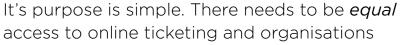
Section 1: Context and Principles Background Legal Context What is Less Favourable Treatment? What are Reasonable Adjustments? What is a proportionate means of achieving a legitimate aim? Guidance from the EHRC The Business Case Section 2: Point of Sale Accessibility Selling Tickets in a Box Office environment Physical Accessibility Staff Training Online Sales Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions What / who are Essential Companions? Policy 25 26	About this Guide	3
Background Legal Context What is Less Favourable Treatment? What are Reasonable Adjustments? What is a proportionate means of achieving a legitimate aim? Guidance from the EHRC The Business Case Section 2: Point of Sale Accessibility Selling Tickets in a Box Office environment Physical Accessibility Staff Training Online Sales Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	Foreword by Penny Mordaunt MP	4
What is Less Favourable Treatment? What is Less Favourable Treatment? What are Reasonable Adjustments? What is a proportionate means of achieving a legitimate aim? Guidance from the EHRC II The Business Case Section 2: Point of Sale Accessibility Selling Tickets in a Box Office environment Physical Accessibility Staff Training Online Sales Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPS) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	Section 1: Context and Principles	5
What is Less Favourable Treatment? What are Reasonable Adjustments? What is a proportionate means of achieving a legitimate aim? Guidance from the EHRC II The Business Case Section 2: Point of Sale Accessibility Selling Tickets in a Box Office environment Physical Accessibility Staff Training II Online Sales Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	Background	6
What are Reasonable Adjustments? What is a proportionate means of achieving a legitimate aim? Guidance from the EHRC The Business Case Section 2: Point of Sale Accessibility Selling Tickets in a Box Office environment Physical Accessibility Staff Training Online Sales Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	Legal Context	9
Section 2: Point of Sale Accessibility Selling Tickets in a Box Office environment Physical Accessibility Staff Training Online Sales Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions and Evidencing Disability The role of Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	What are Reasonable Adjustments? What is a proportionate means of achieving a legitimate aim?	10 10
Selling Tickets in a Box Office environment Physical Accessibility Staff Training Online Sales Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions and Evidencing Disability The role of Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	The Business Case	13
Physical Accessibility Staff Training Online Sales Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions and Evidencing Disability The role of Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	Section 2: Point of Sale Accessibility	14
Staff Training 16 Online Sales 17 Why are online sales not readily available? 17 The danger of mis-selling accessible tickets 17 The necessity of preventing fraud 18 The use of phone lines as a reasonable adjustment 19 What adjustments could be made to make online sales available 19 Introducing a registration process 21 Categorising Ticket Types 21 Telephone Sales 22 Choosing the right number 23 Section 3: Essential Companions and Evidencing Disability 24 The role of Essential Companions 25 What / who are Essential Companions? 25 Policy 25 Evidencing Disability 26 Types of Evidence 26 Disability Living Allowance (DLA) / Attendance Allowance (AA) 26 Personal Independence Payments (PIPs) 27 War Disablement Penision / Armed Forces Independence Payement 27 Blue Badges 27 The Access Card 28	Selling Tickets in a Box Office environment	15
Why are online sales not readily available? The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Z1 Telephone Sales Choosing the right number Section 3: Essential Companions and Evidencing Disability The role of Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card		
The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process Categorising Ticket Types Telephone Sales Choosing the right number Section 3: Essential Companions and Evidencing Disability The role of Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	Online Sales	17
Choosing the right number Section 3: Essential Companions and Evidencing Disability The role of Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	The danger of mis-selling accessible tickets The necessity of preventing fraud The use of phone lines as a reasonable adjustment What adjustments could be made to make online sales available Introducing a registration process	17 18 19 20 21
Section 3: Essential Companions and Evidencing Disability The role of Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card 24 25 26 27 28	Telephone Sales	22
The role of Essential Companions What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card 25 26 27 28	Choosing the right number	23
What / who are Essential Companions? Policy Evidencing Disability Types of Evidence Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card 25 26 27 28	Section 3: Essential Companions and Evidencing Disability	24
Policy 25 Evidencing Disability 26 Types of Evidence 26 Disability Living Allowance (DLA) / Attendance Allowance (AA) 26 Personal Independence Payments (PIPs) 27 War Disablement Penision / Armed Forces Independence Payement 27 Blue Badges 27 The Access Card 28	The role of Essential Companions	25
Types of Evidence 26 Disability Living Allowance (DLA) / Attendance Allowance (AA) 26 Personal Independence Payments (PIPs) 27 War Disablement Penision / Armed Forces Independence Payement 27 Blue Badges 27 The Access Card 28	·	
Disability Living Allowance (DLA) / Attendance Allowance (AA) 26 Personal Independence Payments (PIPs) 27 War Disablement Penision / Armed Forces Independence Payement 27 Blue Badges 27 The Access Card 28	Evidencing Disability	26
1 officies 25	Disability Living Allowance (DLA) / Attendance Allowance (AA) Personal Independence Payments (PIPs) War Disablement Penision / Armed Forces Independence Payement Blue Badges The Access Card	26 27 27 27 28
Section 4: Further Sources of Support 30	Section 4: Further Sources of Support	



ABOUT THIS GUIDE

Jonathan Brown Chief Executive, STAR

This guide is intended to highlight both legal and operational considerations around ticketing for Deaf and disabled customers. It is the culmination of a great deal of work that has followed on from the Attitude is Everything State of Access Report in 2014.





need to be considering *how* they do it, not *whether* they do it. There are many details to take into account about how this can be achieved and also some necessary changes of thinking and practice that will be required.

The ticketing industry in the UK is extensive and sometimes complicated and writing a guide to cover such a broad industry is a challenge. However, the principles are straightforward and translate to any size of operation, even if the details of delivery may be necessarily different. We will also look at updating the guidance in the future, particularly with case studies or to enhance information about particular issues or sectors. We are open to hearing any suggestions of content that people would find helpful in a future edition of this guide.

This guide has been commissioned by The Society of Ticket Agents and Retailers and is sponsored by The Ambassador Theatre Group and JM Marketing, operators of Securemybooking.com

The guide has been written by Nimbus Disability Consultancy with contributions from Attitude is Everything.

FOREWORD BY PENNY MORDAUNT MP

Minister of State for Disabled People, Health and Work

There is no doubting the importance of good accessibility for disabled people in every part of our society.



And beyond accessibility, we also need to see equality of experience. We must do all that we can to offer disabled people a real choice in how and where they spend their time and their money.

This of course extends to supporting people with access needs to attend ticketed events. The Equality Act makes clear organisations' responsibilities for the service they provide to disabled people.

With many large venues and sporting events now using more accessible ticketing, there can be no excuse for poor practice.

And as a ticket retailer, it would be foolish to miss out on your share of over £249 billion - the "Purple Pound" spending power of disabled people in the UK.

We are seeing more and more innovation in approaches to accessibility, and the work of Nimbus Disability, Attitude is Everything, and a range of other organisations in offering solutions to retailers, is key to making things better. I

wholeheartedly welcome the publication of this Guide to support ticketing retailers in becoming as accessible as possible, and hope that the whole industry will take the guidance on board. I look forward to hearing about your advances in accessible ticketing soon!





BACKGROUND

Suzanne Bull of Attitude is Everything looks at the experience of customers to date



"Even the initial bit about buying a ticket can be complicated. Is there a PA scheme? Are there special 'disability access' tickets or do I buy one ticket and apply for a PA ticket separately? Can you get access tickets on pre-sale? All these factors need to be understood beforehand."

Facilitating ticket sales to the growing demographic that is the Deaf and disabled cultural audience should be a high priority for any venue, festival or ticket seller. Rather than comprising of a niche group to be accommodated as an afterthought, evidence shows that there is significant spending power to be unlocked when accessibility is addressed, beyond the moral and legal arguments for equality. DWP stats show that UK households with a disabled person have a combined income of £249 billion after housing costs.

According to SCOPE, there are 13.3 million disabled people in the UK comprising of 7 per cent of all children, 18 per cent of all working age adults and 44 per cent of all pension age adults. We know that more Deaf and disabled people are seeking to go to cultural events than ever before, but in order to do so, they must first navigate the ticket buying and access booking process. This is their first encounter with customer service, and is the gateway that governs whether or not they end up making purchases and accessing what is on offer.

In our 2014 State of Access Report, a biennial report on access and the live music industry, we found that **83% of disabled gig-goers surveyed had been put off buying tickets** due to inaccessible booking systems.

The reported barriers included limited booking options, limited availability of both tickets and reliable access information in advance of the event going on sale, as well as having to repeatedly prove eligibility for bookable access facilities. 88% had felt discriminated against during the ticket-buying process, and 47% had considered legal action as a result.

BACKGROUND

The report found that whilst **75% of disabled people preferred to book their tickets online**, only 2 out of 10 venues were actually offering online ticketing to disabled customers, opting instead to sell accessible tickets through in-house telephone booking lines, often with limited opening hours. We demonstrated that the UK music industry was losing out on 2.5m tickets sales, or £66m in annual revenue, by not offering online booking to Deaf and disabled customers.

We concluded that in order for more tickets to be made available for disabled customers to purchase online, there needed to be more awareness of accessibility issues and a universal proof of disability system to overcome issues with proving eligibility.

With this in mind, Attitude is Everything partnered with the Society of Ticket Agents and Retailers (STAR) to set up a working party involving all of the key ticketing agencies, including Ticketmaster, See Tickets, TicketWeb, The Ticket Factory and Eventim, who made a commitment to consider how booking systems could be made more accessible for disabled people. Since then, the group has worked to support the development of a universal proof of eligibility card – the Access Card - and examine how the whole ticket-buying process can be improved.

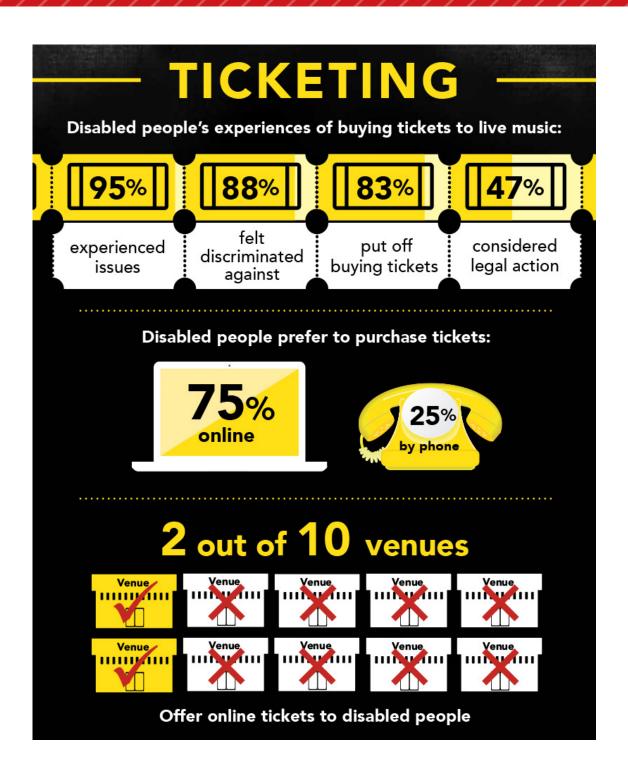
Attitude is Everything's ethos is to positively encourage the music industry and work with partners to improve accessibility for Deaf and disabled customers. The voices of Deaf and disabled music fans are at the heart of everything we do, and they are telling us that they need to see change when it comes to buying tickets and booking access. We believe that it's possible to improve current systems in

order to provide a fair and equal service to both disabled and non-disabled music fans. This guide is a great step towards this goal. Please join us, STAR and Nimbus in working to make live music and the arts accessible for all.

Suzanne Bull MBE CEO of Attitude is Everything



BACKGROUND



Source: Attitude is Everything's 2014 State of Access Report www.attitudeiseverything.org.uk/resources/publications/state-of-access-report-2014/

The Equality Act is a piece of legislation which gives all organisations certain responsibilities when it comes to offering their services to the general public and disabled people.



The main practical focus for businesses needs to be on avoiding treating disabled customers less favourably than others and being able to identify and implement 'Reasonable Adjustments', all the while being conscious of what is practically possible within the limitations of a business's internal structures.

What is Less Favourable Treatment?

Under the Equality Act is a unlawful to treat a person less favourably for a reason relating to disability. This takes into account the customer journey a non-disabled person might be able to expect in comparison to that which you offer a disabled person. This might be directly because of the fact a person is disabled or for a reason relating to or arising from disability.

For example, if all of your customers can book online but a disabled person has to book in person at the box office this could be seen as less favourable treatment. It would cost a disabled person more and take a lot longer for them to make a purchase than others.

TICKETING EXAMPLE

Disabled Customers are required to call a premium rate phone number to book tickets whereas non-disabled customers can book online for a nominal booking fee.

This could be seen as less favourable treatment.

What are Reasonable Adjustments?

Reasonable Adjustments are the changes we need to make to reduce or remove the chance of a disabled person being treated less favourably.

In the example above we would have a legal responsibility to make an adjustment to our policy to have disabled people book in person. In the past this has typically meant offering disabled people a telephone booking service.

Now though we need to ask the question; is a telephone booking line alone less favourable treatment and can we make further adjustments to that?

TICKETING EXAMPLE

Making an adjustment to allow disabled people the same booking options as nondisabled customers.

In this case making accessible tickets available for sale online would be considered as anticipating the needs of disabled people and exploring the possibility of making a reasonable adjustment.

What is a "proportionate means of achieving a legitimate aim"?

In some circumstances it might not be possible to offer a service which is directly comparable with that which we are capable of providing to the general public at large.

In these circumstances, if it is possible to show objective justification that the way we provide our services to disabled people is both proportionate and reasonable then it is possible to have a difference in customer journeys. This can be especially true where asking for pre-registration or evidence of need for free companion tickets.

TICKETING EXAMPLE

Placing accessible tickets available for online sale without any level of protection could mean that these tickets are mis-sold. Having a pre-registration process for customers, whilst not being equal treatment can be seen as being a necessary process to ensure tickets are only available to those with need for them.

Throughout the rest of this guide these 3 guiding legal principles need to be borne in mind.

Guidance from the EHRC

IIn 2016 The Equality and Human Rights Commission¹ offered an opinion on the current availability of ticket sales to disabled Customers:



Ticket agents must take reasonable steps to ensure that disabled customers can access their services. This is set out in the Equality Act 2010 and is called the reasonable adjustment duty.

"Agents should also ensure disabled people can buy tickets online in the same way as everyone else."

The Society of Ticket Agents and Retailers elaborated on this further;



"Whenever tickets are generally available online, disabled people should also be able to book by the same method.

"Venues sometimes hold back accessible positions from being sold online as they want to ensure the customer's needs are met and believe this is best achieved in person or on the phone.

"However, despite those good intentions, there is the potential for this to be considered discriminatory if disabled people are not also able to book online when that facility is offered to other ticket buyers.

"In addition, tickets for events are often allocated to different ticket agents and accessible positions do not usually form part of that allocation. However, as customers with access needs cannot be served, a reasonable adjustment needs to be made.

Ticket agents should therefore provide information about where disabled people can buy tickets for an event."

1. "Equality and Human Rights Commission - GOV.UK" https://www.gov.uk/government/organisations/equality-and-human-rights-commission

Code of practice and guidance

The Equality and Human Rights Commission have published a code of practice and guidance on the reasonable adjustment duty. Please follow the links below for more detailed information about members' legal obligations.

- www.equalityhumanrights.com/en/publication-download/services-public-functions-and-associations-statutory-Code-practice
- www.equalityhumanrights.com/en/advice-and-guidance/equality-law-theatres-and-other-entertainment-venues
- www.equalityhumanrights.com/en/multipage-guide/delivering-services-andlaw

THE BUSINESS CASE

THE IMPORTANCE OF ACCESSIBILITY





SPENDING POWER

OF STUDENTS, OLDER PEOPLE AND DISABLED



£19 BILLION



£80 BILLION





Disabled people that have had to take their custom elsewhere, to a more accessible competitor



The customer base of an average business that is made up of disabled customers

11 MILLION

People with a limiting long term illness, impairment or disability in Great Britain; the most commonly reported impairments are those that affect mobility, lifting or carrying



Disabled children in Great Britain



Working age disabled adults in Great Britain



Adults over State Pension age disabled in Great Britain







I third of the populations shopping habits are informed by the accessibility of businesses and the way in which disabled people are treated.







2 thirds of disabled people seek businesses with a good reputation for dustomer service



Percentage of disabled people that make purchases in-store as opposed to online



Percentage of disabled people who use the internet to find information on goods and services

FIND OUT HOW TO ACCESS THIS MARKET







Mirrhuir Disability Consultancy www.ade-nknbus.com Cred/Holiky Quality Assurance Sources
Department be Business and Imposition & Softle
202 Logacy For Disabled Recytle
Industry And Accessible Business
Morate Board by Caria Marsh Mallow from the
Nous Project





SELLING TICKETS IN A BOX OFFICE ENVIRONMENT

If the option for Box Office sales exists for non-disabled customers then due consideration must be given to this environment for disabled customers.

Physical Accessibility

There is guidance available for the recommended layout and dimensions of reception counters² and in all cases priority must be given to making a Box Office as physically accessible as possible.

Accessibility extends beyond lowered counters and consideration must be given to the installation of auxiliary aids such as loop systems.



For some small venues, however, making a small Box Office accessible would be impossible and therefore further consideration should be given to making adjustments which remove the need for physical access.

Ideally, consideration should be given to having an Access Audit undertaken by a suitable organisation. This would result in the production of a prioritised list of recommendations for alterations to the box office environment and beyond.

2. This can be found in Approved Document M of the Building Regulations and quidance contained in the relevant British Standards.



SELLING TICKETS IN A BOX OFFICE ENVIRONMENT

Staff Training

In order to meet the needs of disabled people, it is is critical that front line and senior staff are appropriately trained and equipped to meet the needs of disabled customers.

A big barrier faced by disabled customers is speaking to staff who are not aware of what an organisation's policies or procedures around booking accessible seating is.

Training should look at internal systems such as policy, but should also be extended to cover more generalised topics such as Disability Equality and Awareness, The Law as it applies to service providers, General Etiquette and Terminology.

This type of training should be delivered by a suitably qualified and experienced trainer with lived experience of disability.

The starting point for looking at whether we are offering the same customer journey for disabled people is to look at the accessibility of the journey most people use.

Most major ticket sellers for entertainment events now see well over 90% of their transactions taking place online and, as such, there needs to be a focus on giving disabled customers the same opportunity of choice.

Why are online ticket sales not readily available?

Historically, online ticket sales to disabled people have been rare and problematic, given the differences between a ticket retailer and a venue operator.

There is a reluctance to place accessible tickets on open sale for a number of risk factors; primarily being the protection of the seats from fraudulent or accidental purchase.

The danger of mis-selling accessible tickets

For extremely busy on-sales, where any available ticket can be sold without any scrutiny on the part of the purchaser, it is important that a line of defence is in place to ensure that accessible tickets are only sold to disabled people.

Without that layer of protection, it would be very easy for someone to purchase tickets accidentally. Or perhaps in a situation where a desperate customer looking for tickets for an an otherwise sold out show might buy them and then worry about the consequences and logistics later.

TICKETING EXAMPLE

Adele announces a new UK Arena tour - when tickets go on sale, panicked fans just click on any available ticket type and worry about the consequences later.

Whilst this type of behaviour isn't deliberately fraudulent, it does mean that fans genuinely in need of the accessible spaces will have less chance of successfully making a purchase.

The necessity of preventing fraud

It is clear that any system which allows for the purchase of 1 ticket plus 1 free ticket will be the target of fraud. As such, not only has it been difficult to put these tickets on open sale, it has also become necessary (for some providers in some situations) to ask for a proportionate level of evidence to support the genuine need for a free ticket.

It is also true that some of the additional facilities put in place to support disabled people can be seen as *more* favourable treatment; better sightlines, easier access, smaller queues for the toilets and so on.

TICKETING EXAMPLE³

"A SUPERFIT football supporter pretended to be wheelchair-bound to get a frontrow spot for Liverpool's sell-out clash with Everton.

Kop fan Jake Danna, 23, who does triathlons, had got hold of a disabled ticket"

^{3.}Taken from a Sun Article.

^{4.} NB - this is the Sun's terminology and we would urge the use of 'wheelchair user' over 'wheelchair-bound'

The use of phone lines as a reasonable adjustment

It has become commonplace to remove all accessible tickets from online sale and make them available to disabled customers via a manual process operated directly by the venue or promoter, often through 'disabled booking lines'.

In the past this would have been what would be seen as a proportionate means of achieving a legitimate aim; protecting tickets to ensure that a disabled customer could get the right access was only achievable by directly contacting the individual member of staff with responsibility.

Any frustration on the part of the customer for not being able to book online was an extremely unfortunate, yet necessary, by-product of the only reasonable policy it was possible to implement.

Now, however, as technological capacity and popularity increases, it is vital that all providers consider what adjustments can be made to facilitate online sales for disabled people.

TICKETING EXAMPLE

Disabled customers must call a specialist booking line to call as the venue has decided to not make online sales available. This option protects tickets for those customers that need them, but is not equal treatment and is not the preferred booking method of many disabled customers.

Consideration must be given to making online sales available.

As mentioned in the beginning of this guide by Attitude is Everything; STAR has taken up the challenge set by Attitude is Everything to ensure that a more equitable, streamlined and consistent customer journey is available for disabled customers wanting to access live music and entertainment events.

What adjustments could be made to make online sales available

When deciding what adjustments can be made to a part of your service provision it is important to identify the barriers that need to be overcome and find solutions for each in turn.

Considering the issues and barriers earlier in this report, it can be useful to create a table which explores such barriers in relation to your own offer.

Barrier	Adjustment
Need to pre authorise certain ticket types to be sold to a particular customer	Instigate a pre-registration scheme
Ticketing system is not set up to pre authorise ticket sales type	Amend / replace current ticketing system
Staff base does not have knowledge / capacity to run a registration scheme	Train staff and increase resources
Running a registration scheme could be seen as an extra layer for disabled customers and therefore less favourable treatment	Argue that this is objective justification or link with another pre-registration scheme which meets both your and your customers needs such as the Access Card or Hynt schemes.
The current ticketing provider is unable to handle online sales	Allocate accessible ticketing allocation to a provider that can process these sales and make it clear at all points of sale that disabled customers need to make their purchase through this provider

Introducing a registration process

Capturing information about a disabled customer's needs for access is the key element of a registration system.

It is an opportunity to pre-authorise particular access benefits which then correspond to online booking features or ticket types..

It is also an opportunity to seek additional information which supports the legitimate need of such facilities. (see later the section on Evidencing Disability)

Categorising Ticket Types

In making ticket sales available to disabled customers it is important that you are able to categorise and protect certain types of seating to be unlocked and purchasable only by customers who have been whitelisted through the use of either; an internal pre-registration process or, the integration of a third party process such as the CredAbility Access Card.

The choice of seating can then be made by the customer. The distinction between the type of seating should be made clear to ensure the right type of seating is chosen by the customer.

Wheelchair Accessible Bays

 Wheelchair Accessible bays should typically account for 1% of overall capacity. These should be made available to wheelchair users who remain seated in their chair for the duration of the event

Ambulant Seating

 Ambulant, or easy access seating, is typically standard seating which is accessed by short distances and avoids stairs. This again should account for 1% of overall capacity and should have a proportion protected for people who would not be able to attend unless seated in this kind of area

Seats within Loop Range

• Customers with a hearing impairment may require the use of loop systems which will only have an effective working range in specific parts of your venue. The seats that are able to access this should be clearly categorised and protected for the use of those that require them

Shortened line of sight

Nearby Toilet Access

• For some customers urgent access to a toilet may be the difference between booking a ticket and not. Where possible seating with the easiest access to WC's should be highlighted to customers acknowledging this need

Essential Companions

• Free ticket allocations should be made available for Essential Companions with a paid ticket. These should not be restricted to being sold in any specific areas of the venue as, with the support of a companion, disabled customers may be willing and able - perhaps even prefer to - sit in other areas of the venue, for example with a group of friends.

TELEPHONE SALES

"Disabled people trying to buy gig tickets sometimes have to "wait hours" on "premium rate telephone lines" and are often seated separately from family and friends, a study has suggested.

"Some have even missed out on concert or festival tickets because venues have delayed accepting proof of disability⁵."

Whilst the previous section looked at the requirement to make Reasonable Adjustments to ensure Online Sales can be a possibility for disabled customers, it is important to remember that for some disabled customers, online sales may be completely inaccessible and others may simply prefer to ensure they can discuss their needs with the venue directly.

In these circumstances it is vital to ensure that a proportionate level of customer service is available via telephone.

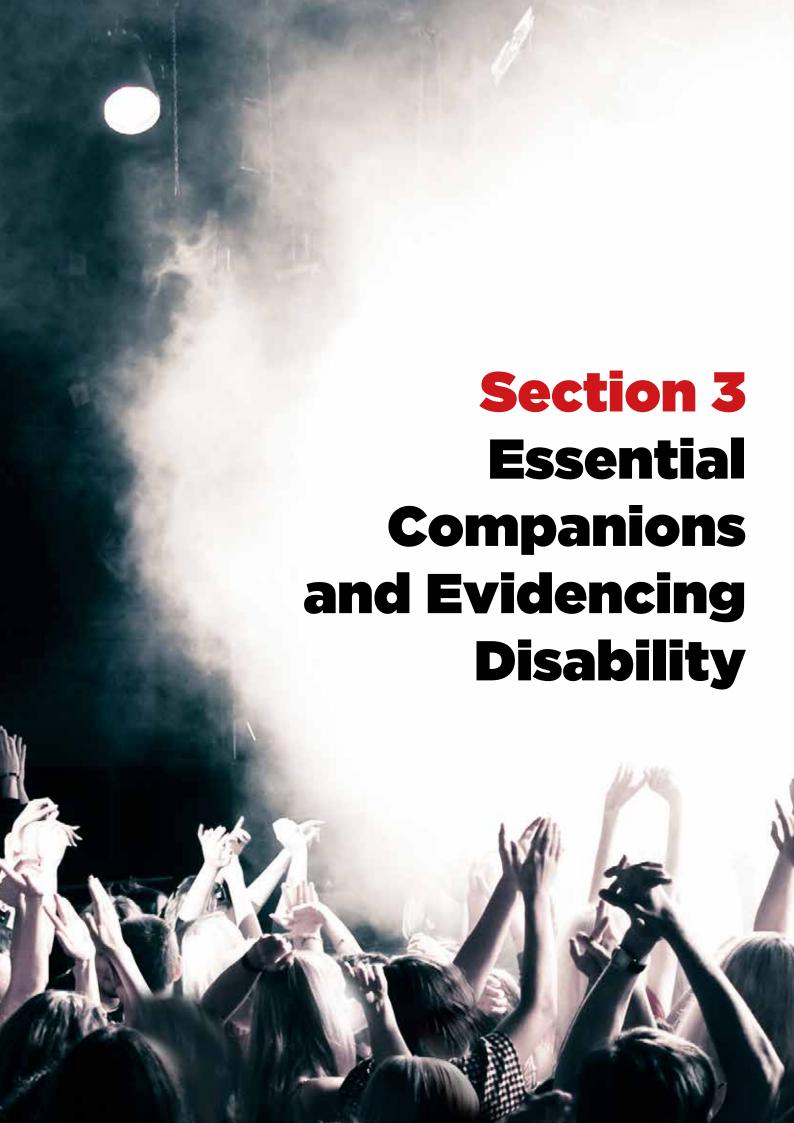
Choosing the right number

One thing that needs to made explicitly clear is that at no point should a disabled person be forced to bear the cost of any type of adjustment.

As such, choosing an access line which does not incur charges in excess of the cheapest alternative booking method is a must. If you are offering this service on a premium rate phone line there is a very good chance to you are directly contravening the Equality Act.

5. Taken from a 2013 BBC News Article





THE ROLE OF ESSENTIAL COMPANIONS

It is now seen as common practice to offer disabled people a free ticket for a carer / Personal Assistant / Essential Companion, however, this causes additional complications in the booking process and there is generally an air of confusion around: what they are, who they're for and how to make sure they only go to the right people.

What / who are Essential Companions?

The terminology differs between different events and sectors and in this guide we will be using the phrase Essential Companions. It is felt that this is the term which most accurately describes both the role and to some extent the eligibility.

An Essential Companion is seen as someone who provides a customer with a level of support that, without which, they would be unable to safely enjoy your services on the same level as non-disabled customers.

It is generally seen as a Reasonable Adjustment to pass some of the responsibility of providing support to a disabled customer to a person that knows them in exchange for a free ticket of entry to a show / event.

It is not a buy-one-get-one-free scheme and it is important that Essential Companions are made aware of the level of responsibility they are accepting in exchange for a free ticket.

Policy

It is important that any venue operating an Essential Companion scheme has a clearly defined and proportionate policy which may or may not include the need to ask for evidence of need. It is accepted that some venues and shows are more likely to be subject to customers misrepresenting their needs than others.

EVIDENCING DISABILITY⁶

As accessibility at live music events improves, policies and facilities specifically for Deaf and disabled music fans are becoming more commonplace.

In some cases music venues and festivals may feel that there is a necessity to ask for evidence of disability, where it is felt that not doing so encourages or enables fraudulent or unnecessary access to reasonable adjustments, such as free Personal Assistant tickets.

Anecdotal evidence from providers suggests that having a system of evidencing in place reduces fraudulent access and increases the actual capacity for disabled customers.

It is a potentially sensitive subject which should be handled delicately, allowing your customers to retain as much privacy and dignity as possible, and should be done proportionally to the service being offered. For example, asking for detailed medical reports from a wheelchair user booking in person at a box office would be seen as disproportionate.

There are a number of things you are able to ask for from disabled people which most (but not necessarily all) will have readily available. Each has its own pros and cons:

Types of Evidence

Disability Living Allowance (DLA) / Attendance Allowance (AA)

Asking for a copy of DLA entitlement is the most common form of evidence requested and produced. It is a good guide that a person meets the definition of disabled as laid out in the Equality Act but it doesn't readily translate into the types of support a person might need.

It is split into two components - care and mobility, of which a customer can be entitled to either or both at different levels. It would not be unreasonable to expect that an individual in receipt of any level of the care or the mobility component would require support from another person.

6. Taken from 'Evidencing Disability' A Practical guide co-written by Nimbus Disability and Attitude is Everything

EVIDENCING DISABILITY

Personal Independence Payments (PIPs)

A major drawback to DLA and AA is their eventual replacement by PIPs in the coming years. Awards at the enhanced rate of either component would most likely indicate the need for an Essential Companion, but could equally be required for recipients of the standard rates in a live music setting.

War Disablement Pension / Armed Forces Independence Payment

This is a payment made to those who were injured or got an illness while serving in the armed forces (including the reserve forces). Again there may be no direct translation of need but each can be a good indication of an underlying medical diagnosis which impacts a person's independence

Blue Badges

Blue Badges are simply an entitlement to park in designated parking bays and are awarded to people for a wide variety of impairments and needs and the entitlement can be interpreted differently between local authorities.

Other potential indicators of need

There are all kinds of other pieces of information people might be able and willing to produce in support of their access requirements. Deaf People may have prescriptions for hearing aid battery replacements; People with visual impairments may have registration cards from their local authorities or assistance dog ID.

There are two industry specific card schemes in operation for theatres in Wales and Cinemas throughout the UK: The Hynt Card and The CEA Card

There are a whole range of discount travel cards, loyalty cards and so on which are based on the presentation of a DLA award letter, but, each reports less about the users need beyond the actual purpose of the individual card.

We would not suggest that you explicitly ask for a doctor's letter for eligibility, as this can involve an additional cost to the disabled person.

The Access Card scheme, run by Nimbus Disability, is seen as the preferred option by STAR, venues and ticketing companies.

EVIDENCING DISABILITY

The Access Card

The Access Card has been developed by Nimbus as a consistent and reliable way of both evidencing disability and reporting the specific needs of disabled people. It's an optional choice which disabled people sign up for and is accepted at venues and festivals across the UK, including Download, Glastonbury and all of AMG's Academy venues.



There is also the option for the provider to gain access to online verification in order to complete bookings over the phone and API integration into native ticketing software is now readily available.

The Access Card allows both the customer and the provider to place the emphasis on improved customer service over the need for evidencing.

EVIDENCING DISABILITY

Policies

The real key to approaching this subject is how you word your policies; this should be contained within the main body of your access statement and information. We'd recommend that you detail what proof (if any) you will accept for automatic eligibility, as well as adding a statement suggesting that you will review an application without the recommended evidence on a case-by-case basis.

The focus should be given to explaining why you are asking for information and that you stress that it is for the benefit of disabled customers in the long run.

Clear concise information should be given about the types of evidence you will consider for each element of access you are looking to provide. For example a Blue Badge would entitle a disabled customer to use accessible parking spaces but not be adequate for a free Personal Assistant / Essential Companion ticket.

Aside from the Access Card, most proof documents don't translate directly to the reasonable adjustments that are required, so in the absence of an Access Card it is worth considering that a narrative of the individual's needs is collected at the same time in the form of a short registration form.

Once this information has been provided, we would recommend that this be securely summarised and added to an Access Address book which would remove the requirement for customers to repeat themselves at each booking.





STAR

The Society of Ticket Agents and Retailers - was formed in 1997 and is the leading self-regulatory body for the entertainment ticketing industry across the United Kingdom, with many of the biggest names in ticketing as members.

www.star.org.uk 01904 234737 info@star.org.uk



Nimbus Disability / The Access Card

Nimbus Disability is a specialist consultancy supporting businesses with identifying and implementing reasonable adjustments and also promoting them. Nimbus Disability are the authors of this report and the creator and operator of the Access Card Scheme. Nimbus offers a range of training, auditing and additional services.

www.nimbusdisability.com www.accesscard.org.uk 01332 404023 info@nimbusdisability.com



Attitude is Everything

Attitude is Everything improves Deaf and disabled people's access to live music by working in partnership with audiences, artists and the music industry. Over 120 venues and festivals have signed up to the charity's Charter of Best Practice. Attitude is Everything also provides access consultancy for music venues and outdoor events, and bespoke Disability Equality Training for the live events industry.

www.attitudeiseverything.org.uk 020 7383 7979 info@attitudeiseverything.org.uk

The National Register of Access Consultants

The National Register of Access Consultants (NRAC) is an independent UK wide accreditation service for individuals who provide access consultancy and access auditor services. It was set up with government backing to provide a single source for organisations seeking competent advice in relation to inclusive environments and accessibility.

