

## ACTON PLAN FOR ACCESSIBLE TOURISM

In the communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions titled “Europe, the world's No 1 tourist destination – a new political framework for tourism in Europe”, declared that:

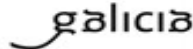
*«Crossborder initiatives have also been set up in recent years, such as (...) pilgrimage routes (...). The Commission considers that a number of these initiatives would benefit from recognition and from a European seal of legitimacy which would guarantee their transnational character.»*

The Lisbon Treaty, as regards as a constitutional draft for the European Union, assumes as fundamental values:

*«respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail»*

(art. 1 bis)





In this area, the Commission itself promoted the programme «Tourism and accessibility for all» (during the period 2014-2015, enhancing the development and implementation of tourist services meeting universal design criteria).

In 2017, within the COSME programme for enterprise competitiveness and small and medium size businesses, the “SABER Project – Santiago, San Benedict, Universal Routes”, communicated with the brand *Open Up Routes*, was developed. This project had as its objectives:

*«To improve awareness, skills and training of both public and private tourism service providers in order to remove physical and environmental barriers and to have people with permanent/temporary impairment enjoy their travelling experience;*

*To develop a diversified transnational tourism offer, based on the “Tourism for All” principle and on a “slow tourism” model, valorizing the tangible and intangible heritage existing along pilgrimage routes of EU relevance;*

*To establish and enhance the cooperation among public/private tourism service providers at local, regional and transnational level, in order to improve the overall quality of the tourism offer, in all segments of the tourism supply chain, and transform each destination in an “accessible environment”;*

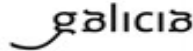
*To increase the competitiveness of local service providers and stimulate the creation of new services for different segments of the tourism market;*

*To develop a transnational communication and brand strategy in order to increase the visibility and attractiveness of the tourism product as a travel experience addressed to all people, not only to people with disabilities.»*

With this aim, work-meetings we held with representatives from the public administration, branch organisations, private initiatives and entities representing disabled persons.

As a result of these meetings a set of minimums were agreed upon and gathered in a memorandum as framework guidelines for the European Pilgrimage Routes, in particular for the routes of St.James and St.Benedict.






Considering the fact that all pilgrimages goes through mountains, rural and urban zonas and including the density of monumental milieu, the increased level of accessibility ought to be coherent with the preservation of nature and the criteria for intervention on historic and artistic heritage.

The above guidelines are supplemented by specific actions identified based on situations commonly found in different areas, in different environments and in establishments of different types. The following table shows the relationship between lack of accessibility, scope of responsibility and solution(s) to the problem.



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<p>Legislation distributed amongst different authorities, leading to vague and weak application and generating interruptions in the chain of accessibility.</p>	<p>→ Legislation → Public administration at state, territorial and local level.</p>	<p>→ Apply regulations consistently in terms of time, overcoming their assignment to a specific level of authority, and translating advances made in general legislation into reality.</p>
<p>Lack of accessibility foresight during initial and midterm phases of projects which result in finalization costs and absence of integral solutions.</p>	<p>→ Planning and design. → Public administration at state, territorial and local level. → Private initiative.</p>	<p>→ Program and impart dissemination, formative and awareness-heightening activities oriented towards the public, commercial and business sectors, according to their activity.</p>
<p>Lack of awareness among business owners.</p>	<p>→ Companies managing private facilities.</p>	<p>→ Schedule and present outreach, training and awareness-raising activities targeting the commercial and business sector.</p>
<p>Accessibility deficiencies and interruptions in the chain of accessibility in equipment and facilities as well as in the rendering of services.</p>	<p>→ Relationship between legislation, planning and design. → Public administration at state, territorial and local level. → Private initiative.</p>	<p>→ Train professionals in the area. → Train design professionals for an adequate implementation of accessibility elements. → Search for qualified competence in inspection and penalties for non-compliance. → Provide administrative and collective supervision of projects. → Demand for full compliance of accessibility norms whenever physically, technically and operatively viable. → Reduce lead times between register of affidavit and competent</p>

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		<p>technical inspection.</p> <p>→Require supportive measures from the public administrations to promote increased accessibility.</p> <p>→Search for financial support in order to implement these measures.</p>
<p>Parking spaces reserved for persons with particular needs: incorrect signage, poor location and/or not enough space for parking and transfer.</p> <p>If parking capacity exceeds 7 spaces, at least one space should be reserved to pregnant women and marked by the relevant clearly visible vertical sign.</p> 	<p>→ Parking areas managed by government bodies.</p> <p>→ Parking areas associated with private facilities.</p> <p>→ Parking areas assigned to social cooperatives</p> <p>→Public administration at state, territorial and local level.</p> <p>→ Private initiative.</p>	<p>→Designate the perimeter of the space with the following dimensions: 5.00 x 2.20.m + 5.00 x 1.50 m for transfer space. The transfer space may be shared by two adjoining spaces.</p> <p>→It is advisable to designate spaces reserved for PRM in perpendicular and angle parking areas, as those reserved in end-to-end parking areas usually involve a risk of accident as the transfer space coincides with the roadway.</p> <p>→Install the vertical signpost to coincide with the front corner of the vehicle. If it is placed to one side, it may block the door from opening. If it is placed behind, it may block the rear door and platform operation.</p> <p>→At night, signs should be self-illuminating or placed in a well-lit area</p> <p>→Competent authorities should increase control to prevent unauthorized use of reserved parking</p>
<p>Inconsistent kerb ramps for pedestrians, with a ramp on one pavement and a kerb on the other side thus creating dangerous situations in the crossings for people with reduced mobility. Sometimes due to error, sometimes due to delimitation of the project, and sometimes due to delimitation of territorial authority between government bodies.</p>	<p>→ Local authorities, provincial councils, autonomous community governments, central government.</p>	<p>→ Provide both sides of the pedestrian crossing with the same type of lowered kerb, ensuring that all ramps have an angle not greater than 5% (in very few instances, law permits 8%, however not in this case)</p>

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<p>Traffic lights with acoustic signals on only one side causing disorientation for blind persons while crossing towards the pavement without sound references.</p>	<p>→ Public administration at state, territorial and local level</p>	<p>→ Equip both sides of the same crossing with the same traffic lights in terms of visual, audio and temporal signalling.</p>
<p>Pedestrian routes with pavement in poor condition due to improper installation or lack of maintenance.</p>	<p>→ Local authorities, provincial councils, autonomous community governments, central government. → Companies managing private facilities.</p>	<p>→ Install firm, smooth pavements that are non-slip when dry and wet, stable, consistent, continuous and without joints.</p>
<p>Public transport stops unmarked and without signs. Complicated or impossible physical access at stops and shelters, especially in rural environments. Asymetrix communication in stations, ports and airports without compensating audio and visual channels and vice versa. Lack of ramp or platform for vehicle access. Lack of or deficient communication of vehicle stops.</p>	<p>→Mobility: Public transport → Public administration at state, territorial and local level. → Private initiative.</p>	<p>→Post stops with a code identifying the transport system – municipal, metropolitan, occasional, intercity... - route number origin and destination. →Choose accessible shelter models and install them in places communicated with and accessible pedestrian itinerary. →Establish communication systems guaranteeing the emission and perception of messages in visual and acoustic channels simultaneously. →Equip all vehicles and stops with an access system to get on/off without limiting the mobility of people. → Equip all vehicles with visual and acoustic systems for stop request.</p>
<p>Establishments designed and built according to accessibility criteria, which cannot be reached because approach routes are not accessible. Activities and services installed in heritage buildings with objective accessibility deficiencies, which cannot be resolved due to the nature of protected cultural heritage.</p>	<p>→ Local authorities, provincial councils, autonomous community governments, central government. → Companies managing private facilities.</p>	<p>→ Establish consistent connections between approach routes and establishments. → Guarantee compliance with accessibility standards in urban planning and public transport. → Buildings and facilities hosting pilgrim services will be located</p>

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<p>When access to common services – swimming pools, lounges, libraries, etc. – is difficult, facilities usually opt for discriminatory solutions, creating a small accessible space separate from the general environment.</p> <p>Difficulty accessing points of interest at tourist establishments due to a lack of orientation and information.</p> <p>Difficult or impossible access to the disposable adapted elements.</p> <p>Absence of information systems duplicated in audio and visual channel.</p> <p>Difficulties in understanding signage due to a lack of consistency between systems of symbols.</p>		<p>in spots connected with the route by accessible pedestrian paths.</p> <p>→ Locate equipment and facilities related to the Way connected with the route by accessible pedestrian paths.</p> <p>or a system of accessible public transport.</p> <p>→ Plan and manage the relation between establishment and operation in a way that guarantees a minimum of accessibility for all persons.</p> <p>→ Remove architectural barriers or supplement appropriate accessories, for ex. green areas supplemented with adapted benches and tables of universal usability.</p> <p>→ Plan according to universal design criteria from the start of the project thus providing inclusive solutions that avoid segregation.</p> <p>→ Install guidance strips and routing resources so that the strip is accessible by hand, both vertically and in depth.,</p> <p>→ Identify the point of interest using colour and texture contrasting pavement.</p> <p>→ Duplicate printed information in audio format.</p> <p>→ Establish communication systems guaranteeing the emission and perception of messages in visual and acoustic channels simultaneously.</p> <p>→ Develop a normalized signage for the Way of validated universal comprehension.</p>

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<p>Establishments built in protected buildings and located on upper floors without a lift, or inaccessible lift car.</p>	<p>→ Local authorities, provincial councils, autonomous community governments, central government.</p> <p>→ Companies managing private facilities.</p>	<p>→ Plan and manage the connection between establishment and operation in a way that guarantees minimum accessibility for all persons.</p> <p>→ Compulsory implementation of PEBA (Elimination Policy of Architectural Barriers). According to law 41/1986, art. 32 (par. 21), competent authorities shall implement relevant policies to eliminate architectural barriers in all existing facilities intended for public use, not yet complying with the provisions of the Presidential Decree of April 27th, 1978, no. 384, within one year from its coming into force.</p>
<p>When access to common services – swimming pools, lounges, libraries, etc. – is difficult, facilities usually opt for discriminatory solutions, creating a small accessible space separate from the general environment.</p>	<p>→ Establishments managed by government bodies.</p> <p>→ Establishments managed by private facilities.</p>	<p>→ Plan the design from the start according to universal design criteria.</p> <p>→ Propose inclusive solutions that prevent segregation.</p>
<p>New routes marked without observing the principle of universal usability</p>	<p>→ Local authorities, provincial councils, autonomous community governments, central government.</p> <p>→ Private bodies assigned to mark routes on behalf of public authorities (Ministry, Regions, Provinces, Municipalities) or private bodies (Local action groups, Associations, etc.).</p> <p>→ Private stakeholders (ex: authors of guide books) assigned by other private stakeholders to mark routes.</p>	<p>→ Require to mark routes in compliance with the principle of universal usability thus observing territorial, historic, cultural and safety criteria.</p> <p>→ Raise awareness on universal availability requiring the commission in charge of tracing routes to provide a precise and updated snapshot of existing services and facilities in compliance with the specific needs of potential users.</p>



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<p>Acknowledged and certified routes that are not accessible</p>	<p>→ Local authorities, provincial councils, autonomous community governments, central government.</p>	<p>→ Accomplish accessibility plans in order to adapt those sections of the route according to their orography and preservation requirements of historic heritage, if possible.</p> <p>→ Establish alternative routes whenever the original route is not accessible.</p> <p>→ Assign route marking to public or private bodies that work for “Tourism for All” and are experienced in universal usability.</p>
<p>Lack of accessibility along the routes of the pilgrimage.</p>	<p>→ Local authorities, provincial councils, autonomous community governments, central government.</p>	<p>→ Accessibility plans to adapt legs of the routes where action is viable given the terrain and heritage protection status.</p> <p>→ Establish alternative routes when it is not possible to create an accessible route.</p>
<p>Lack of accessibility in tourist establishments and provision of services.</p>	<p>→ Establishments managed by government bodies.</p> <p>→ Establishments managed by private companies.</p>	<p>→ Training and awareness-raising for professionals operating in the industry.</p> <p>→ Training and awareness-raising for design professionals on proper implementation of accessibility elements.</p> <p>→ Qualified inspection authority and penalty for non-compliance.</p> <p>→ Project oversight by government and professional associations.</p> <p>→ Require full compliance with accessibility standards when physically viable.</p> <p>→ Assign works to make facilities universally usable to experts such as Universal Designers (qualified by an ad-hoc course of study).</p>

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		<ul style="list-style-type: none"> <li>→ Reduce the time between recording the declaration of responsibility and the qualified technical inspection.</li> <li>→ Support from government agencies to promote increased accessibility.</li> <li>→ Provision of financial support to make it possible to implement these measures.</li> </ul>
Lack of cycling lanes in accordance with the law	→ Local authorities, provincial councils, autonomous community governments, central government.	Build cycling lanes with a minimum width of 1,50 m along the road yet separated by a concrete curb or green belt to ensure users safety and a guiding tool for visually-impaired people.
Lack of audio description in interior spaces, audio guides in museums not written and programmed according to audio description standards for the blind.	<ul style="list-style-type: none"> <li>→ Establishments managed by government bodies.</li> <li>→ Establishments managed by private companies.</li> </ul>	→ Programme and produce audio description equipment in accordance with UNE standard 153020:2005, audio description for persons with visual disabilities. Requirements for audio description and creation of audio guides.
Difficulty accessing points of interest at tourist establishments due to a lack of orientation and information.	<ul style="list-style-type: none"> <li>→ Establishments managed by government bodies.</li> <li>→ Establishments managed by private companies.</li> </ul>	<ul style="list-style-type: none"> <li>→ Install guidance strips and routing resources.</li> <li>→ Identify the point of interest using colour and texture contrasting pavement.</li> <li>→ Duplicate printed information in audio format.</li> <li>→ Remove architectural barriers or supplement appropriate accessories, for ex. green areas supplemented with adapted benches and tables of universal usability.</li> </ul>

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Lack of toilet facilities accessible to people with particular needs.	Establishments managed by government bodies. Establishments managed by private companies.	→ Oblige to adapt existing facilities or build new accessible facilities. → Build accessible public toilets in towns and villages. → Include adapted signs of public toilets whenever possible (guidebooks, brochures supplied by Tourist Offices, town maps, websites of municipalities or local Tourist Office, vertical signs)
Inability to read restaurant menus or other printed information.	→ Establishments managed by government bodies. → Establishments managed by private companies.	→ Print menu in Braille format. → Programme and record menus according to audio description standards. → Train personnel to interface with any typology of user
Adapted elements which are not accessible.	→ Establishments managed by government bodies. → Establishments managed by private companies.	→ Install guidance strips and routing resources. → Place the adapted resource within reach.
<p>Difficulty accessing information due to a lack of easy-to-read documents.</p> <p>Impossibility of reading all printed information not communicated in audio-visual channel or digitally accessible with reader.</p> <p>Lack of audio description according to functionality criteria for the blind and visually impaired.</p> <p>Absence of facilities to support people with hearing aids and cochlear implants.</p> <p>Lack of textual intercommunication systems.</p>	<p>→ Public administration at state, territorial and local level.</p> <p>→ Private initiative.</p>	<p>→ Adapt general information, accommodation terms and conditions, menus, bills and other information of interest for easy reading.</p> <p>→ Print information in Braille.</p> <p>→ Record information in compatible audio format and make it available of download via Bluetooth or Wi-Fi for mobile devices.</p> <p>→ Write and record according to the norm for audio description for the blind and visually impaired. Offer them in format for download in mobile devices or recorded in available devices.</p> <p>→ Install adequate magnetic induction loops for communicating according to environment and type of activity.</p>

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Linking the set of accessible rooms to the most expensive range in the available offer.		<p>→ Install bi-directional means of communication by text, permitting reading and writing.</p> <p>→ Since accessibility is a right – not a luxury – the proportion of accessible rooms should be applied in every range of the available offer. Otherwise, the rooms should be linked to the lowest or mid-cost price, and not compulsory to the highest price, as if it were an exclusive option.</p>
Difficulties in understanding signage due to a lack of consistency between systems of symbols.	<p>→ Establishments managed by government bodies.</p> <p>→ Establishments managed by private companies.</p>	<p>→ Standardized, universally comprehensible symbols. Example: airport signage is a uniform system throughout the planet.</p> <p>→ Prepare rules for design criteria.</p>
Difficulties in following routes due to a lack of continuity as regards signage.	<p>→ Local authorities, provincial councils, autonomous community governments, central government.</p>	<p>→ Design and sign routes.</p> <p>→ Install signage along the entire route, including forks, turns, platform changes, etc.</p> <p>→ Install signage for service establishments associated with the route.</p>
Absence of facilities to support people with hearing aids and cochlear implants.	<p>→ Establishments managed by government bodies.</p> <p>→ Establishments managed by private companies.</p>	<p>→ Install magnetic induction systems.</p>

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Lack of information systems duplicated in audio and visual formats.	→ Establishments managed by government bodies. → Establishments managed by private companies.	→ Replicate information provided in audio format using information screens and blinking lights.
Lack of textual intercommunication systems.	→ Establishments managed by government bodies. → Establishments managed by private companies.	→ Acquire means of textual communication and make them available.
Lack of staff with adequate sign language skills.  Evidence of people who confound «client attention» with «taking care of the helpless », creating situations of unfair treatment.	→ Establishments managed by government bodies. → Establishments managed by private companies.	→ Hire and incorporate people with formal training in sign language and international signing systems.  → Training on attention to people with disabilities from a client perspective.

Lastly, implementation of these improvements should translate into achieving the following results:

- Effective application of accessibility legislation subsequent to 2000.
- Updated design, evaluation and inspection criteria in accordance with the 2010 law.
- Updated violation and penalty criteria in accordance with the 2013 law.
- Achievement of a continuous route in accordance with the five standardized accessibility parameters: Mobility, Perception, Location, Communication and Orientation, and their implementation in facilities and services located on the Way.
- Communication and valorisation of the memorandum of good practices applied to the Way.
- Application of the principle of equal opportunities.
- A catalogue of accessible facilities and services organized by activity and location.
- Viewing the Way of St. James and the Way of St. Benedict being as inclusive tourism and pilgrimage routes.
- Perception of people on the demand side of a tourism for all as a non-seasonal group and driving force behind business opportunities.