



# COVID-19 and disabled customers

## Supplementary Guidance

### Version 1: Published 13 July 2020

#### 1. Introduction and background

This guidance sets out additional issues for cinema operators to consider regarding disabled customers who have access requirements visiting their venues whilst COVID-19 guidelines are in place. It should not be considered legal guidance and is based on a practical and best practice approach; it will be updated in the light of experience and changing safeguarding measures, as mandated by government.

Traditionally cinemas have provided a broad range of adjustments and support to disabled customers who have access requirements, to the point where the UK is generally viewed as a world leader in this field. However, recent developments arising from the COVID-19 outbreak mean some of these adjustments might not be possible or a different approach might be needed.

Cinemas should continue to seek to provide an inclusive service and meet the adjustment needs of disabled customers wherever possible. However, it should be remembered the COVID-19 guidelines issued to the sector by the UK Cinema Association (UKCA) – [\*Cinemas – keeping workers and customers safe during COVID-19\*](#) - have primacy over this supplementary guidance.

Consequently, when considering providing additional support, the health and safety of staff and other customers must take priority. This of course has always been the case, but the current situation means that the balance between adjustments and health and safety has moved.

When considering how or whether to provide support, there are a number of issues to be considered:

- The adjustment needs: what the individual needs in order to overcome any barriers to visit the cinema;
- Any risks to staff and customers: will the provision of those adjustments create a health and safety risk to the staff or other customers; and
- What approaches can be adopted to manage those risks: is there anything that can be done to reduce or manage those risks to an acceptable level.

Where the risks can't be managed to an acceptable level, then the support is unlikely to be appropriate in the current climate. However, the cinemas should continue to strive to provide adjustments where it can and are encouraged to be creative and flexible in their approach.

To help develop a sector-wide approach to these issues, the UKCA has established a working group from amongst its larger members which is also supported by its professional disability advisers.

## 2. Key issues

There are a number of specific issues which cinemas should consider, set out below. It should be remembered that the safeguards required by government are likely to change over time as the risk presented by COVID-19 changes. As a result, the consideration of the issues below may also change.

### Support involving physical contact

Members of staff have traditionally provided assistance to customers with disabilities which has required some physical contact, for example providing a guiding elbow to a visually impaired person to find a seat or offering an arm to someone who is unsteady on their feet moving around the venue. Under the current COVID-19 guidelines, the provision of such physical support is not allowed, and staff should not provide such assistance.

There is a variation on this in place in Scotland, which allows limited contact for guiding a visually-impaired person: <https://www.rnib.org.uk/scotland/scotland-news-and-media/people-sight-loss-can-be-guided-limit-time-spent-less-two-metres>

The general rule might create difficulties not only for customers, who might up until now have had a reasonable expectation of such help, but also to members of staff who have willingly offered it. The limited exception in Scotland is also likely to add to the complexity of managing this issue. For example, staff there can provide support to someone with a sight limitation but not with a walking one. It also means that if someone does provide a guiding arm, then the venue needs to consider what hygiene steps it might need to put in place following any contact.

Staff need to be fully briefed on the limits of their current role and what they may or may not do when providing support. They should also be briefed as to how to deal with situations where they have cause to refuse to provide such assistance.

Venues should seek to be creative in addressing this issue and discuss amongst staff what assistance can be provided (and how this might be possible) in the context of their venue. For example, standing as close as the guidelines allow and giving verbal instructions from the approved distance or nominating a member of staff to wear PPE and offer support. However, with this last option, any venue which issues PPE needs to ensure it is replaced after contact and disposed of properly.

Key in providing any support is for a member of staff to engage with the individual and identify what support they might need. How to meet these support needs should then be discussed to see what can be done in that venue. This means staff members should be fully briefed about what they can and can't do and bear in mind their own health and safety as well as the customers.

If providing assistance in a safe manner is not possible and the customer can't safely undertake the customer journey without physical contact from a member of staff, then the venue could consider refusing access to the individual on the grounds of breaching the COVID-19 guidelines and creating an unmanageable health and safety risk. Where this

does happen, it will be important for the venue to keep a contemporaneous record of the incident.

Scottish venues will need to determine how to manage any limited contact separately.

### **CEA Card**

It is recognised that if someone needs physical assistance, the most effective way of providing this is by allowing a companion to accompany them where the distancing rules do not apply. To this end, venues should continue to accept the CEA Card. They should also consider being flexible about how to handle situations where a customer does not have a Card, but where a complimentary 'carer' ticket would help manage any health and safety risk and also mitigate any PR damage which may arise if access is refused.

Care should be taken about how judgements are made relating to provision of a complimentary ticket for an escort without a CEA Card and in general terms people should be given the benefit of the doubt.

### **Contactless payments**

It is understood that many venues will prefer to move to a contactless payment system for all transactions and avoid the acceptance of cash. However, only accepting contactless payments may prove a significant issue for some disabled customers as they are more likely not to have access to or use contactless payment options.

Venues are encouraged to accept cash and physical purchases in some circumstances, particularly where it is not possible to use a CEA Card whilst booking tickets online or asking for a complimentary ticket for someone who might assist a disabled customer.

### **Talking to customers**

While staff should be encouraged proactively to engage with all customers, there might be some additional considerations required in relation to communicating with disabled customers. For example, if a member of staff is wearing a face covering it might well have an impact on someone who uses formal lip reading or the more informal type most people use especially in noisy environments, such as judging facial expressions. If the member of staff is unable to remove the face covering, they should seek to find alternative ways of communicating, such as using a speech to text app on a tablet or phone or offering the customer a pen and paper which can be disposed of afterwards.

In some situations, the use of a transparent visor might be helpful for those who use lip reading and so on. Also, staff should be encouraged to discuss what issues they have encountered and any solutions that have applied. Any such solutions could also be forwarded to the UKCA for possible inclusion in any future guidance update.

Staff should be supported in being confident around trying to resolve any communication issues by simply asking a disabled customer with an access need 'how can we do this?' Clearly, they will need to bear in mind the limitations of the overall guidance. They should also be aware of the limitations the guidance places on their ability to be flexible and be able to explain it to all customers.

## Wheelchair users

The provision of wheelchair spaces should be reviewed in each venue to ensure the social distancing rules can be maintained. Where such distancing is not practical, it may be necessary to remove some spaces. However, cinemas should continue to make wheelchair spaces available where at all practicable.

As for the guidance re physical contact above, staff should not normally provide any assistance or support in manoeuvring a wheelchair unless there is an immediate and real health and safety risk – see section on emergency evacuation. Where staff wear PPE, they may offer assistance with wheelchair manoeuvring. However, this should be limited as much as possible and other measures might need to be considered such as the use of wipes for the handles and replacement of any ppe afterwards.

Some cinemas allow the booking of wheelchair spaces on-line; this will need to be reviewed to ensure that any changes to wheelchair space allocation are reflected.

Some venues are having to set up one-way access and egress systems and change emergency evacuation routes. Venues should take into account how these will work for wheelchair users and bear in mind some wheelchairs are larger and heavier than others. Venues should take into account any use of general or specific wheelchair lifts and how they might be operated safely for a wheelchair user.

## Equipment

The provision of specialist equipment, for example audio description headsets, hearing neck loops etc should continue. However, the system for issuing and maintaining this equipment will need to be reviewed to ensure that staff can maintain social distancing whilst doing so. Additionally, there will be a need for a system which ensures the units, in their entirety including headphones and earpieces, are deep cleaned after each use and that staff are able to maintain the equipment to ensure its usage, for example checking the batteries.

It should be noted that where foam is used in the equipment, for example earpieces, it might be possible and easier to replace these rather than to attempt to deep clean them. If in doubt, venues should speak to the equipment suppliers for advice on effective deep cleaning.

There is a wide range of equipment in use in the sector which uses different technologies for connecting to the cinema's own equipment. It would be preferable, if practicable, for customers to use their own devices which would minimise issues for the venue. However, this should not be insisted upon even if it is possible but offered as an alternative.

## Accessible toilets (including Changing Places)

Venues should ensure the continued availability of accessible toilets. There will be a need to ensure deep cleaning of these facilities on a frequent basis and this deep clean should include not only the sanitary equipment but all of the equipment in these facilities such as grab rails, towel and soap dispensers. Paper towels should already be available but if not, they should be installed rather than continue to use hot air hand-driers. Where hand-driers are used, there will be a need to include these in any deep cleaning.

There may be additional pressure on general toilets which might lead to an increase in the usage of accessible toilets by customers who do not need these specialist facilities. While it might therefore be appropriate to police the use of these facilities, it is recognised this is likely to prove difficult as it is not appropriate to ask for someone to prove their need to use these facilities.

While it might be appropriate to move to a RADAR key system, it should be recognised that not all disabled people have such a key. If such a system is introduced the cinema should ensure such keys are readily available to borrow but any system that does this will need to ensure keys are available without causing embarrassment to the person requesting one.

Each time the key is used it will need to be safely transferred between customers and staff members and be cleaned. There might be other approaches to ensuring the appropriate use of these facilities, for example a member of staff to be available to actually open the door on request so they can retain the key, or for the venue to consider giving these keys away to those who need them and who don't have one.

### **Unaware customers**

Maintaining the social distancing rules might be an issue for those people whose disability impacts on their understanding of the current situation and the introduction of new rules or have a condition which might impact on their ability to comply with them. These factors do not allow the lessening of the rules in these circumstances. However, they should be taken into account if there is a need for staff to take action. It might be appropriate for staff to deal with any 'transgressions' differently than they might otherwise and explain the rules or their need and what will happen if they are continually transgressed.

If, after several interventions by staff, problems persist, it might well be appropriate for the individual to be requested to leave by a senior member of staff. If this does happen it would be appropriate to make a contemporaneous record of the incident.

### **Accessible screenings**

It is recognised that the limits placed on audience numbers and potential changes to screening schedules could increase the 'opportunity costs' of subtitled (ST) screenings. However, venues should seek to continue to offer such screenings wherever feasible. Reductions in such screenings may be an appropriate - if undesirable - outcome of the current situation, but care must be taken to continue to make adjustments for those who benefit from such screenings. Venues should continue to offer audio description (AD) as a matter of course subject to their ability to be able to provide the specialist equipment safely.

The arrangements for specialist screenings such as autism friendly screenings (AFS) or dementia friendly screenings (DFS) might need to be changed to take into account the guidelines' requirements to maintain social distancing. This being the case, if venues are to continue to offer such specialist screenings there will be a need to make sure that those attending understand this new limitation and adhere to it. It is recognised this might prove difficult to police, as allowing flexible movement during the screenings is one of their key features.

Venues should seek to adopt creative approaches to dealing with this limitation such as limiting movement within a pre-determined seating area for each customer party.

## Communications

Of key importance will be to ensure comprehensive and accurate information about the arrangements and why they are in place is given full coverage on a venue-by-venue basis using websites, social media and if possible local radio and so on.

This should include an explanation of why these changes are being made and what can and cannot be done under the new arrangements. Consideration should be given at all times to any accessibility issues around the chosen method of communication. Consideration should also be given to providing a dedicated e-mail and phone line to answer any queries disabled customers might have.

Traditionally some venues have provided alternative format information such as large print and braille menus. These should not be used as they can't readily be deep cleaned. If large print information is to be provided in the future, then it should be within an acetate sheet which must be deep cleaned after use.

In other customer service situations, the transfer of information directly between staff and customers' tablets or phones could be another method of communication. This might only be of limited use but is an example of a flexible approach that could be adopted.

## Emergency evacuation

Venues should review their emergency evacuation arrangements specifically as they apply to disabled customers who might need assistance. While the venue's responsibility for ensuring the safe evacuation of all customers has not changed, the procedures and the provision of support might need to change in relation to disabled customers.

COVID-19 guidelines state that the distancing rules do not apply during an emergency, but every effort should be made to minimise the time that close contact might happen. This would include the provision of help and support to a disabled customer.

Procedures should be designed to maximise the number of customers who can evacuate the premises without assistance from a member of staff. However, this might not be possible for all customers.

Every effort should be made to find ways of providing support which complies with the COVID-19 guidelines on physical distancing. However, in the event of an emergency and where physical contact is unavoidable and essential then the venue should ensure staff are using the appropriate PPE. It might be appropriate, for such PPE to be stored in a refuge area so it is readily available.

Following any physical contact, including when using PPE, the venue should ensure staff follow hygiene procedures and can safely dispose or clean any such equipment. It should also ensure the deep cleaning of any refuge and specialist evacuation equipment such as evacuation chairs.

Every venue will vary in its ability to provide a safe system of egress in the current circumstances. Where it is not possible to provide PPE or to ensure its safe use, disposal and/or cleaning, then the venue might consider not allowing a disabled person into the venue. This should not be an automatic approach and venues should undertake a risk assessment on the individual and assess the amount of help they might require along with the possibility of establishing a safe system of support.

Any refusal to admit in these circumstances should be the last resort and a creative approach to addressing this problem is recommended, for example flexibility in allowing a free ticket to an escort, finding ways of minimising contact with a member of staff and providing PPE.

If a disabled customer is refused access due to the outcome of any risk assessment, then it will be important to keep a contemporaneous record should that decision be challenged.

## Signage

Where new or additional signage is used to highlight routes and 'rules' they should be well positioned and visible to all customers, made highly visible in terms of colour contrast, font size and type and use both words and pictorial information.

## Training

Cinemas should ensure all customer-facing staff are aware of the changes to the help and support they may need to provide to disabled customers and the range and type of adjustments now available. Staff should also be encouraged to identify alternatives and creative approaches to continue to provide adjustments and support under the broader COVID-19 guidelines.

The UKCA is facilitating the provision of on-line workshops to help managers identify and address these issues. To find out more, contact James Connor at the UKCA - [james.connor@cinemauk.org.uk](mailto:james.connor@cinemauk.org.uk)

## 3. Enquiries

Please contact James Connor at the UKCA - [james.connor@cinemauk.org.uk](mailto:james.connor@cinemauk.org.uk) - with any questions or to provide examples of adjustments which have proved successful for inclusion in further revisions of these guidelines.

The Appendix lists organisations who are able to provide information regarding specific disabilities and how to manage the issues.

## 4. Useful websites

Action on Hearing Loss - <https://actiononhearingloss.org.uk/>

Alzheimer's Society - <https://www.alzheimers.org.uk/>

CEA card - <https://www.ceacard.co.uk/>

Dimensions (autism charity) - <https://dimensions-uk.org/>

Inclusive Cinema - <https://inclusivecinema.org/>

Muscular Dystrophy UK - <https://www.muscular dystrophyuk.org/>

National Autistic Society- [www.autism.org.uk](http://www.autism.org.uk)

National Deaf Children's Society - <https://www.ndcs.org.uk/>

Royal National Institute of Blind People (RNIB) - <https://www.rnib.org.uk/>

UK Cinema Association - <https://www.cinemauk.org.uk/key-issues/disability-and-access/>