

## **POSITION STATEMENT**

### **TITLE: COMMUNICATION ACCESS – HOTELS, MOTELS AND OTHER SIMILAR ACCOMMODATION**

#### **ISSUE:**

Most hotels, motels, caravan park cabins and on-site vans, guesthouses, holiday apartments, and other similar accommodation facilities provide inadequate communication access facilities for use by guests and staff who are Deaf or hearing impaired. Some provide captioning facilities and some provide volume control telephones. A very small number of facilities designed specifically for people who are deaf do provide TTYs and some other communication access facilities.

All people who are Deaf or have a hearing impairment have the same right to access facilities as do people with hearing. Therefore, if an accommodation facility provides televisions, radios, phones, fire alarms, etc. for the benefit of guests or staff, those facilities must be accessible to all guests and staff, regardless of their hearing. Failure to provide equitable access to such facilities means the person who is Deaf or has a hearing impairment is discriminated against. It is illegal to discriminate against people on the basis of their hearing/deafness disability. If there are legislative provisions to provide particular facilities, such as fire alarms, then again those facilities must be accessible to all.

It is possible to provide communication access through the provision of the right equipment. For example, it is possible to purchase Teletext-enabled TV sets so that captions may be displayed. It is possible to purchase telephones with volume control, and portable telephone amplifiers and couplers. It is possible to purchase smoke alarms and a range of other devices that attract attention via flashing lights or vibrations rather than via sounds. A range of affordable solutions exists.

There is no valid reason why operators of hotels, motels, caravan park cabins and on-site vans, guesthouses, holiday apartments, and other similar accommodation cannot provide adequate communication access for all guests and staff who need it.

#### **POSITION:**

That, regardless of whether or not there are particular legislative requirements:

1. All hotels, motels, caravan park cabins and on-site vans, guesthouses, holiday apartments, and other similar accommodation should provide communication access facilities as follows to all Deaf and hearing impaired guests and staff that need it:
  - Appropriate means in place to ensure that all such guests and staff will be alerted to any danger (e.g. fire, bomb threat), and to any evacuation drill or system test,

within the premises at the same time as all other guests and staff. Appropriate means for fire alerts might be alarms with flashing lights and portable vibration pagers. The system needs to take account of the fact that the Deaf or hearing impaired persons may be in any part of the premises when the alert is required.

- Non-audible alarms in guest rooms to provide equivalent doorbell (or door knocking) functions to those provided to other guests. This is particularly important in emergency situations.
  - Access to captioning (whenever programs are broadcast with captions) on television sets provided in guest rooms, public areas and staff work areas.
  - Voice telephones in guest rooms, public areas and staff work areas with:
    - a) built-in or clip-on amplifiers (minimum of 20dB gain compared to a standard telephone as defined by Telecommunications legislation) and
    - b) telecoil couplers (minimum field strength of 100mA/m) and
    - c) flashing lights and bed vibrators to alert the user to the fact that the voice telephone is ringing
  - Text facility using Baudot 50 (such as TTYs) compatible with TTYs complying with EIA/TIA-825, and compatible with the National Relay Service, in guest rooms, public areas, and staff work areas. In addition, flashing lights and bed vibrators (in guest bedrooms) shall be provided to alert the user to the fact that the text telephone is ringing. (Payphones also need text telephone facilities.)
  - Vibrating alarms in guest rooms to provide equivalent alarm clock functions to those provided to other guests.
  - Vibrating or flashing light signals to alert guests and staff to the fact that there is an incoming call to a voice or text telephone.
  - Assistive listening devices (i.e. neck loops and headphones), with appropriate amplifiers and connections (such as TV listeners) to enable hearing impaired guests and staff (both with and without telecoil facilities on hearing aid/s) to listen to TVs and radios in guest rooms, public areas and staff work areas.
2. All hotels, motels, caravan park cabins and on-site vans, guesthouses, holiday apartments, and other similar accommodation that offer any venues or meeting rooms should provide necessary facilities (as required by participants in functions or meetings – including participants in staff workplace meetings). The necessary facilities are set out in the separate Policy Position on Communication Access at Events or Meetings in Venues or Meeting Rooms.
  3. All hotels, motels, caravan park cabins and on-site vans, guesthouses, holiday apartments, and other similar accommodation should implement:

- Ongoing maintenance and checking of all communication access equipment and procedures.
  - Promote the existence of installed communication access facilities to staff, guests (and potential guests) by in-house signage (in guest rooms and public areas), Website information and accommodation directory listings (and, ideally, other forms of promotion such as advertising, etc.). Signage in guest rooms should encourage guests to make their needs known to reception staff. Website information should encourage potential guests to make their needs known when making reservations. All staff should be encouraged to identify their needs.
  - Use the International Symbol for Deafness where appropriate to identify:
    - the existence of hearing (communication) access
    - the types of system available
    - which areas are covered by the system
    - where to obtain receivers and attachments needed to use a system
4. All staff and guests and other users of any hotels, motels, caravan parks and on site-vans, guesthouses, holiday apartments, and other similar accommodation should make their specific communication access needs known to the accommodation providers if they expect them to be met. This may occur at time of room booking, check in or during stay. (This does not remove the obligation of the service provider to make necessary provisions, particularly as travellers often arrive unannounced for a variety of reasons.)

#### Explanations:

1. People with telecoils in their hearing aids need telecoil couplers for telephone access. They are built in to some telephones. Many phones that are fitted with telecoils are of insufficient strength.
2. People without telecoils in their hearing aids (or without hearing aids at all) need built-in or clip-on amplifiers for telephone access.
3. Adequate volume control for the majority of hearing impaired people is 20 dB gain compared to a standard telephone as defined by Telecommunications legislation.
4. Telephones with the 20dB gain usually have built-in telecoils of sufficient strength, and do not require clip-on amplifiers or clip-on telecoil couplers.
5. Wherever flashing lights are used to alert people, they must be visible from all parts of a guestroom or staff office, etc.
6. For people who do not respond to flashing lights when asleep, vibrating alerts are the minimum requirement. Other people prefer to be woken by flashing lights.

## **COSTS OF POSITION:**



The costs of implementing this position statement will vary depending on the size of the accommodation establishment, the solutions chosen by the accommodation provider and their purchasing power.

## **RESEARCH BASIS:**

The availability of the range of communication access facilities referred to in the position statement is known. A large percentage of respondents to a Hearing Access Standards Project survey conducted by the Deafness Forum in 2003 identified needs for all of the facilities referred to in this Position Statement.

**APPROVED:** Board - October 2003.

**REVIEWED:** Board - 25 October 2004, Board - March 2005.

**DATE OF NEXT SCHEDULED REVIEW:** No further review yet scheduled.