

málaga



Ciudad
de Málaga

Malaga Accessible Tourism Plan

Malaga City Council. Department of Tourism and Promotion of the City.



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1. Introduction

1.1. Presentation of the Malaga Accessible Tourism Plan

At present, there are over 1 billion people with some form of disability in the world. In the European Union, it is estimated that this figure stands at over 100 million, to which a further 100 million people aged 65 and above should be added (European Disability Forum, Eurostat). In Spain alone, in 2018 over 4.5 million people underwent disability assessments (Disability Observatory) and, according to the INE (Spanish National Statistics Institute), there were over 9 million residents aged 65 years and over.

If we add people with temporary disabilities and people with special needs to these figures, the number increases exponentially. People who do not have equal access to tourism and leisure environments, services and products due to the barriers that exist.

Regarding tourism demand, a growing number of people with accessibility needs are travelling for leisure purposes, wishing to engage in a wide range of tourism activities. People who are especially disposed to customer loyalty, as it is not easy to find products and services that meet (or exceed) their expectations.

As regards the tourism offer, the failure to meet and exceed the needs and expectations of a sizeable part of the demand is a direct result of a lack of quality and competitiveness. According to the Human Rights and Disability report (CERMI [Spanish Committee of Representatives of Persons with Disabilities], 2016), the European Union loses around €142 billion a year due to accessibility issues along the tourism value chain. Approximately 89 million people are unable to travel freely around the old continent (CERMI, 2016).

Universal accessibility and **tourism for all** are therefore issues that affect the fundamental rights of all citizens, but they are also important tools to enhance the competitiveness of tourist destinations, businesses and services.

The city of Malaga is a pioneer and has been acclaimed for incorporating universal accessibility into its municipal management, a long process that began over two decades ago and was bolstered strongly with the introduction of the Municipal By-law on

Accessibility in 2004. Subsequent and more recent processes, in particular the implementation of the 2021-2024 Strategic Tourism Plan and the Smart Tourism Destination Project, have brought added impetus which - among other measures - has led to this Accessible Tourism Plan, whose aim is to promote a set of initiatives that will make Malaga a leading inclusive destination.

This Plan is being implemented at a very challenging time for the economy and society, and especially for the tourism industries, due to the COVID-19 global pandemic. But it is also time of numerous dramatic changes, resulting in a period of extreme uncertainty. With this in mind, the Plan proposes a set of useful tools to serve as levers to promote accessibility, designed on the basis of a situational analysis and following a process of reflection, with the aim of safeguarding the future of this highly important industry for the city of Malaga.

The in-depth analysis that forms part of this process aims to provide the necessary tools for the destination to improve the measures it has implemented in recent years, which are set out in the form of a working proposal. These initiatives will have to be aligned with the other key documents identified as having an impact on the destination, with particular focus on the STD (Smart Tourism Destination) Project and its Accessibility Pillar.

1.2. Methodological approach

With the aim of ensuring that this Accessible Tourism Plan is consistent with the Accessibility Pillar Action Plan that arose from the Malaga Smart Tourism Destination Project, and with the relevant reference standards, the standards UNE 178501:2018, *Management System for Smart Tourism Destinations. Requirements* and UNE 178502:2018, *Indicators and Tools for Smart Tourism Destinations*, formed the methodological basis of our approach.

Its scope has therefore been determined according to the various points outlined in section 7.2.4. Universal accessibility pillar of standard UNE 178501. More specifically:

[Accessibility management](#) in the destination:

- The existence of local regulations, plans, projects and strategies, and how these feed down to the different municipal areas and, more specifically, to the tourism sector as a whole.
- The provision of specific and adequate means and resources (human, technical and financial).
- Stakeholder engagement mechanisms.
- The incorporation of training and awareness-raising actions, and promoting the current regulatory framework among tourism managers and professionals.
- Information and communication processes.

[Implementation of accessibility](#) in the destination: focusing on Malaga's key tourism resources, as detailed in Table 1.

Table 1. Tourism resources included in the scope of the Plan

RESOURCES
1. Plaza Mayor Shopping Centre
2. Trade Fair and Congress Centre of Malaga (FYCMA)
3. Malaga Picasso Museum
4. Museum of Malaga La Aduana
5. Municipal Heritage Museum (MUPAM)
6. Pompidou Centre
7. Picasso Birthplace Museum
8. Collection of the Russian Museum, St. Petersburg
9. Contemporary Art Centre (CAC)
10. Cathedral of Malaga
11. Alcazaba
12. Gibralfaro Castle
13. Cervantes Theatre
14. La Concepción Historical Botanical Garden
15. La Misericordia Beach
16. Route No. 6 – Cofrades Tours
17. Malaga María Zambrano train station
18. Local train station
19. Malaga Metro
20. EMT

The following aspects have also been examined:

- Transport and mobility.
- Information and communication processes and promoting accessible tourism.

The analysis phase is composed of four different actions, which together enable the use of primary and secondary sources of information.

1. Documentary analysis.
2. Semi-structured in-depth interviews: public, private and social spheres. The private sphere is limited to the Tourism Sector Forum.
3. Online survey aimed at citizens as a whole, focused on key associations that represent disabled groups.
4. Fieldwork for the on-site analysis of the resources identified above.

This analysis and assessment will identify challenges and opportunities for the destination, forming the basis for the final strategic proposal. For this purpose, two common tools will be used in the analysis of tourist destinations: the SWOT methodology and the CAME methodology. The city of Malaga's Accessible Tourism Plan will be aligned with the destination's tourism strategy, including all the measures necessary to improve accessibility in the areas that require it.

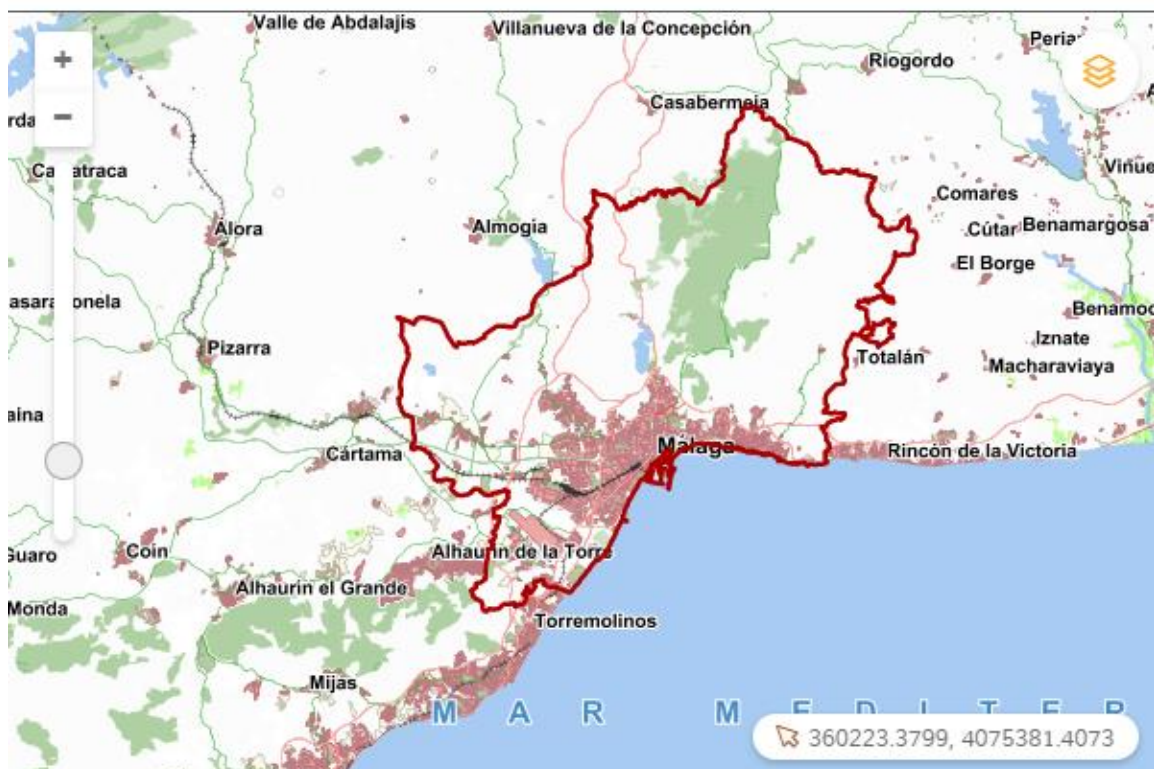
The Plan includes two annexes, which outline the current regulatory framework for universal accessibility and the sources used.

Together with the Plan's main document, the fact sheets prepared for each of the resources include their respective technical analysis, as well as a final document with proposed improvements.

2. Background and context of Malaga

The city of Malaga, the capital of the province of the same name, is currently the second most populated city in Andalusia and the sixth most populated in Spain. On the shores of the Mediterranean, over the centuries many different cultures have fought over *Malaka*, which was founded by the Phoenicians in the 8th century B.C., resulting in a city of immense historical importance and great heritage, with a mild climate all year round.

Figure 1. Geographical boundaries of the municipality of Malaga



Source: [Malaga Institute of Statistics and Cartography](#)

Socio-demographic and economic data

The 578,460 inhabitants of the city of Malaga, with fairly even numbers of men (48%) and women (52%), live in its fourteen population centres, which cover almost four hundred square kilometres. The average age is 42.1 years, with 18% of people over 65

years old, an increase of almost three percent in a decade¹. The ageing rate², which stood at 104.2% in 2018, has increased by seventeen percentage points since 2011 (Department of Social Rights of Malaga City Council).

According to the State Database of People with a Degree of Disability Assessment, in 2018, 180,701 people were assessed in the province of Malaga, the highest figure recorded in Andalusia, second only to the province of Seville. Of these, 118,570 were found to have a degree of disability equal to or greater than 33%, representing more than 7% of the population (Ministry of Social Rights and 2030 Agenda).

In addition to these figures, there is also the number of visitors and tourists who either have a disability or have specific accessibility requirements, with the senior segment from Spain and various European markets being of special importance to the city of Malaga.

Tourism, a key economic activity for the destination, fuelled the exceptionally rapid growth of the city from the 1960s onwards. At present, the total economic impact of the tourism sector is estimated at 2.955 billion euros, of which 1.983 billion is direct (Tourism Observatory of the City of Malaga, 2019).

Malaga's current cultural assets and mild climate throughout the year make it a markedly urban and cultural destination, with a selection of museums that is gaining a growing reputation both at home and abroad.

Tourism data

According to the Tourism Observatory of the City of Malaga, 4,720,543 visitors were received in 2019, of which 2,561,839 were tourists, i.e. they stayed overnight at the destination. Spain is the largest outbound market, particularly the regions of Madrid and Andalusia, followed by European markets (in order): The United Kingdom, Germany and Italy. As a whole, European visitors account for almost two-thirds of the total number received. The average age of visitors to the city of Malaga is 39.78, with people aged 65 and over accounting for almost 8%. Air travel is the main mode of transport chosen, with

¹ Calculated using figures from the Multi-territorial Information System of Andalusia (SIMA) 2011 Census.

² Number of people over 64 years of age per 100 inhabitants under 16 years of age. In this case, for every 100 people under the age of 16 in the city of Malaga, there are 104.2 people over the age of 64.

an average stay of 4-8 days. The average expenditure per tourist for a whole trip is estimated at €711.50, and the average daily expenditure at €88.01.

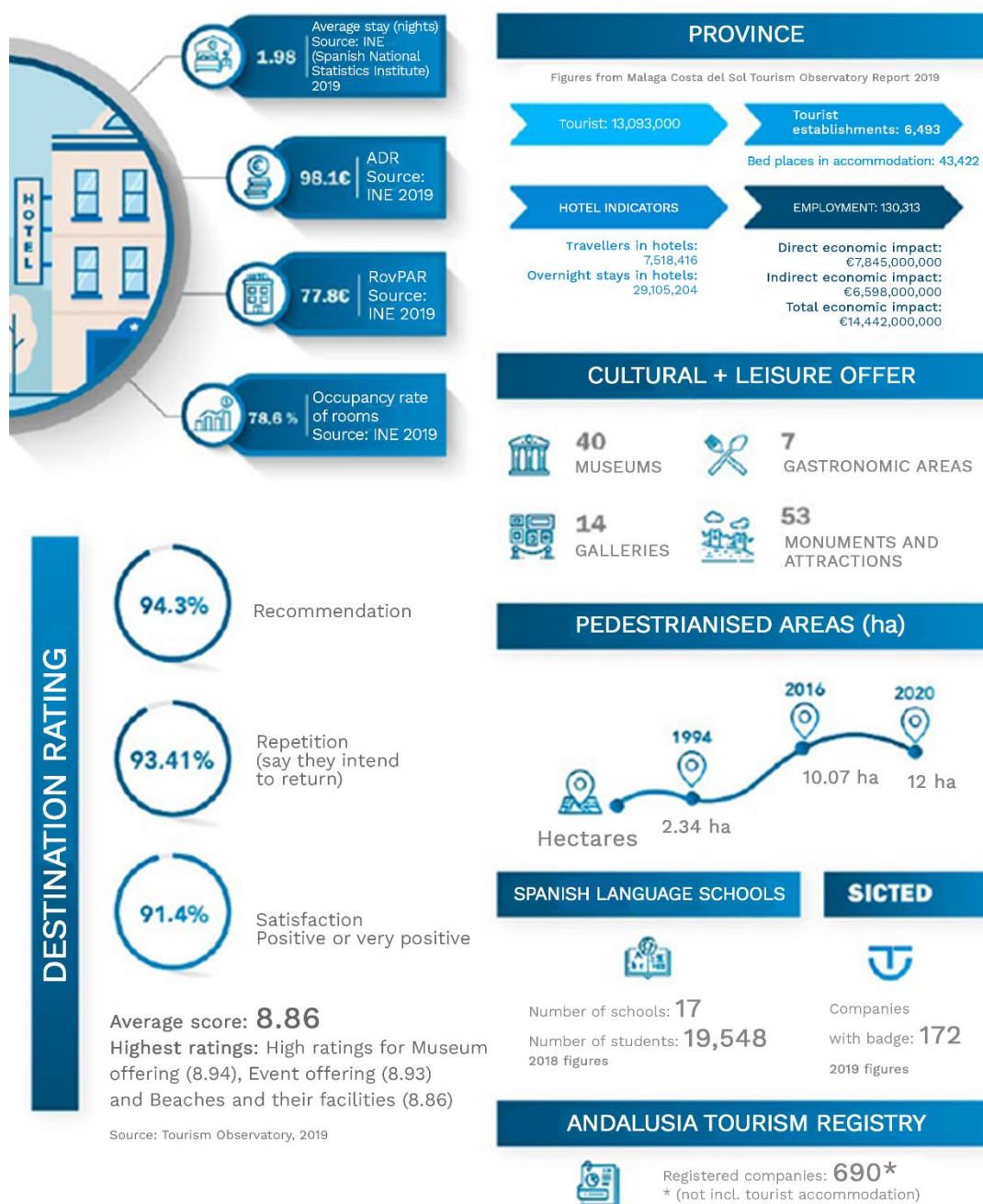
The accommodation available in the destination is wide and varied: in addition to the 18,017 bed places offered by the 410 existing registered accommodation establishments, there are more than 30,000 bed places provided by holiday accommodation (VUT), which has increased by a factor of 2.35 in just two years. Although 3 star hotels are most popular with tourists, it is 4 star hotels that offer the highest number of bed places in the city, totalling 5,095, with the number of overnight stays rising to 2,785,313 in 2019.

In terms of hotel profitability, Malaga has higher average revenue than other Andalusian capital cities. The average revenue per available room (RevPAR) is €77.75, more than six percentage points higher than the previous year.

According to the recently published Malaga Strategic Tourism Plan, if we examine the seasonality of the destination, we can see that it remains fairly stable throughout the year, especially in terms of overnight stays by tourists who live in Spain. This limited degree of seasonality is thanks to the city's position as a cultural urban destination with an exceptional climate.

The following image provides a visual representation of the main tourism indicators:

Figure 2. Main tourism indicators



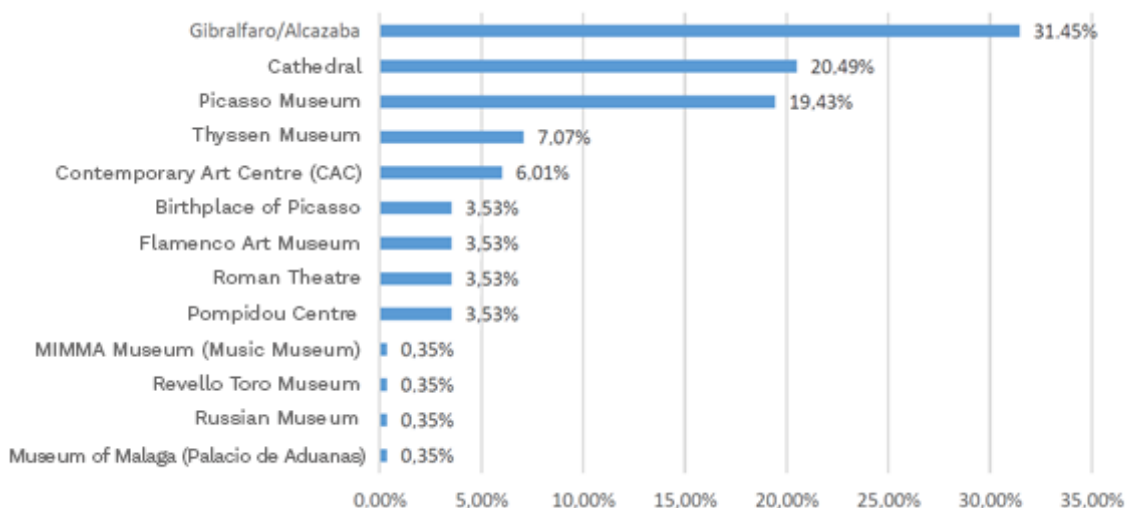
Source: Malaga Strategic Tourism Plan 2021-2024

Cultural offer

Malaga is a byword for history, heritage and culture. In addition to its wide variety of monuments, of considerable value and importance, other artistic attractions are also prevalent, with a growing and notable array of museums on offer. At present, “Malaga, City of Museums”, is home to forty institutions, public and private. Malaga's cultural offer has become its number one attraction for visitors, ahead of the sun and beach and city break products. For their part, cultural tours are the most popular activities in the destination, second only to city walks.

But the range of museums on offer also plays another key role for the destination: it increases visitor satisfaction levels. For overnight visitors, museums are the most highly rated feature (8.94 out of 10), and people who visit Malaga on day trips also rate them highly (8.57 out of 10).

Figure 3. Most visited museums and monuments



Source: Tourism Observatory of the City of Malaga. January 2019-December 2019

Cultural innovation and trends are also synonymous with Malaga, a clear example of which is the Soho district aka Barrio de las Artes (Art District); so is diversification, with iconic venues such as the Cervantes Theatre, Echegaray Theatre and Soho Caixabank Theatre. It is also possible to find cultural events throughout the year, and to take part in city tours with a strong cultural dimension.

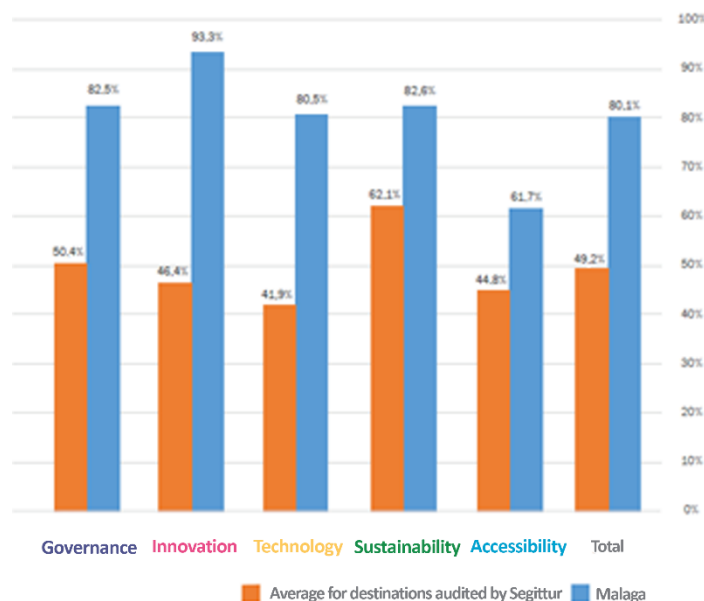
Universal accessibility in the city of Malaga

In terms of accessibility, the city of Malaga has achieved several milestones, a pioneer among Spanish cities in addressing this issue through a cross-cutting and integrated approach, and therefore with an impact on the tourism sector. In 2004, the *Municipal Regulatory By-law on Accessibility in the Municipality of Malaga* came into force, creating a specific administrative department, the Accessibility Section, which is now part of the Office for Social Rights, Equality, Accessibility, Inclusive Policies and Housing.

More recently, Malaga has launched two highly important processes for the tourism sector, namely the Smart Tourism Destination Project and the Strategic Tourism Plan for the next four years (PET 2021-2024). While developing the former, five pillars of action were identified, one of which was Accessibility. The gaps and requirements that were identified will be addressed in the PET, in the form of a strategic challenge.

The following images shows that the destination has performed above average in relation to the Accessibility Pillar:

Figure 4. Malaga's performance in the Pillars of the Smart Tourism Destination Project

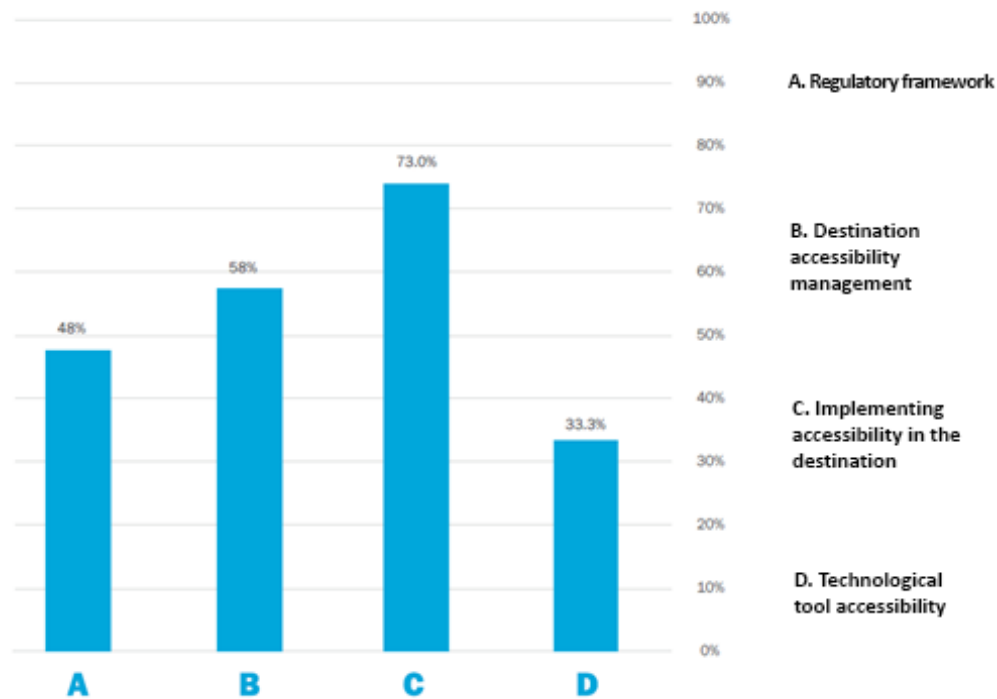


Source: Malaga Strategic Tourism Plan 2021-2024

This Accessibility Pillar requires an analysis of several related issues: regulatory framework, management, implementation and technological tools. In the case of Malaga,

we can see that it scores most highly for the way it implements accessibility. However, this implementation only refers to physical rather than online environments, which are now so important for the performance of a tourist destination. In turn, there is room for improvement for the current regulatory framework and accessibility management.

Figure 5. Performance ratings for specific aspects of the Accessibility Pillar



Source: Malaga Strategic Tourism Plan 2021-2024

We can regard these two documents, the STD Project and PET, as the root of this Malaga Accessible Tourism Plan, as they highlight the need for the destination to have a strategy in this area. According to the PET, one of the destination's current stumbling blocks is its accessibility gaps.

Nevertheless, we must acknowledge the headway and progress made in the pedestrianisation of the city and the prioritisation of pedestrians; in the cultural sphere, through the “Malaga Accessible City” programme - developed by the Accessibility Section - and the initiatives of the museums themselves; or in sun and beach tourism, through the “Enjoy the beach” programme, developed jointly by the Accessibility Section and the Department of Operational Services, Internal Affairs, Beaches and Festivals.

Another notable measure is the accessibility badge, an initiative by the City Council's Accessibility Department, which recognises the progress made towards universal accessibility by commercial establishments, and now also catering establishments, in the city.

The continuous efforts that have been made have earned Malaga a number of awards, some of them international. In 2005, the City Council was awarded the Reina Sofia Prize for Universal Accessibility, for introducing actions to promote accessibility in its management model, with a high level of participation by the different groups present in the city (BCI, 2018). In 2010, the Spanish Committee of Representatives of Persons with Disabilities (CERMI) gave the city its award for the best accessibility promotion initiative, for its “Malaga Accessible City” programme. In 2019, Malaga was the winner in the Accessibility category of the European Capitals of Smart Tourism awards, standing out for its cultural assets, city bus network and “Enjoy the Beach” programme. In the following year, Malaga was selected as European Capital of Smart Tourism 2020, along with the Swedish city Gothenburg.

Therefore, remarkable progress has been made but, as will be seen in our analysis below, improvement is still required to make the city of Malaga a national and global leader in accessible tourism.

3. A look at the demand for tourism among people with accessibility requirements

"Universal accessibility is essential for 10% of the population, necessary for 40% and creates comfort for all."

On this basis, universal accessibility in the design of environments, products and services should be seen as an opportunity to improve quality, competitiveness and differentiation, by dispensing with the idea that its use can only be justified by the needs of people with permanent disabilities and an officially recognised degree of disability. Therefore, the spectrum of demand is as wide and diverse as society itself, albeit with different impacts on the autonomy, safety and comfort of each individual.

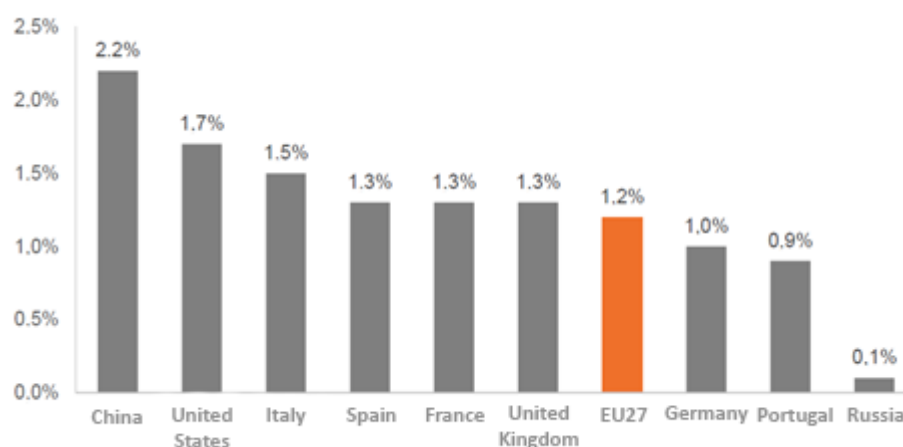
According to the European Commission's study on the *Economic impact and travel patterns of accessible tourism in Europe*, more than half of the EU's population with disabilities reported having travelled at least once in the last twelve months. For senior citizens, the percentage is estimated at 40%. In both cases, most of these trips are domestic, especially when they require an overnight stay. Focusing on the United Kingdom, Germany and Italy, Europe's main outbound markets for the city of Malaga, in all three cases there has been a downward trend in domestic trips, with a rise in international trips to other European destinations. It should also be noted that the United Kingdom, Germany and France (the latter being the fourth largest outbound market to the city of Malaga) have put in place supra-regional accessibility analysis systems and standards, which means that high accessibility requirements have to be met for trips abroad.

Figure 6. Tourist behaviour of people with accessibility needs in the EU (overnight trips). 2012

Propensity to travel							
Profile	EU 27	Germany	Spain	France	Italy	Portugal	UK
Disabled persons	58,10%	71,60%	49,50%	70,70%	26,00%	34,10%	63,70%
People over 65 years old	47,50%	65,00%	40,00%	40,80%	23,60%	27,50%	60,80%
No. trips/year							
Profile	EU 27	Germany	Spain	France	Italy	Portugal	UK
Disabled persons	6,7	6,3	8	6,3	5,8	8,7	6,9
People over 65 years old	5,5	6,5	4,7	6	4,8	6,3	4,7

Source: Accessible Tourism Plan for the Western Costa del Sol

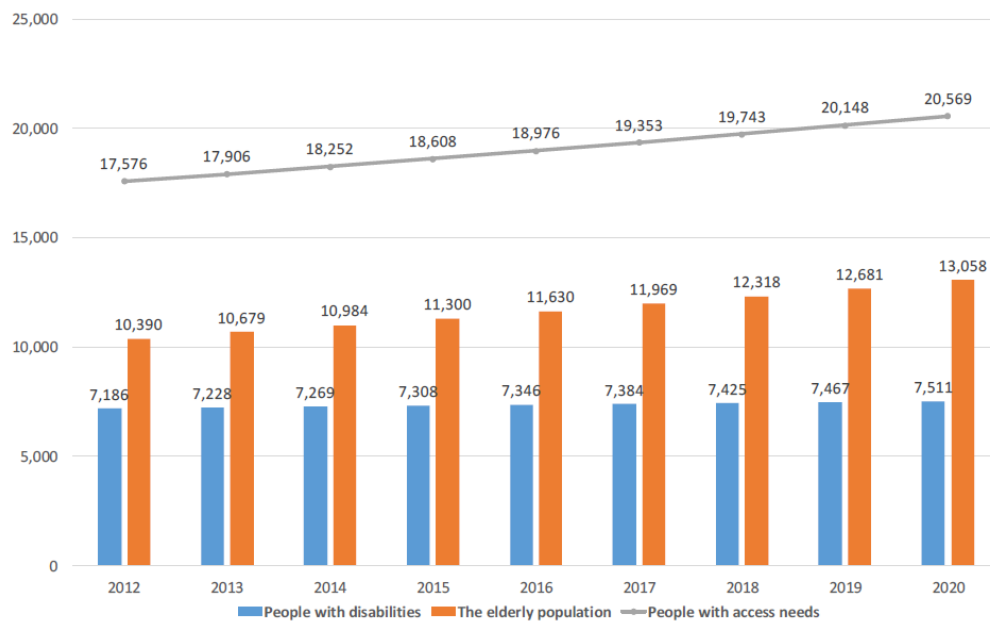
Figure 7. Year-on-year average percentage increase in the number of people with accessibility needs 2012-2020



Source: Accessible Tourism Plan for the Western Costa del Sol

Looking further afield to international outbound markets, the estimated demand for accessible tourism in Europe is on the rise among disabled people and senior citizens, and among people with general accessibility needs.

Figure 8. Estimated growth in demand for accessible tourism in Europe from major international outbound markets (2021-2020)



Source: *Economic impact and travel patterns of accessible tourism in Europe*

Considering the three possible scenarios presented in the study, the forecasts indicate that the number of tourists with accessibility requirements would reach 1.067-1.231 billion people by 2020, a large proportion of whom would be people aged 65 and over.

As far as domestic demand is concerned, the *Observatory of Universal Accessibility of Tourism in Spain* provides valuable insights. Firstly, 60% of the people surveyed with special needs say that they choose Spain as their holiday destination; 36% choose both Spain and international destinations; and only 4% prefer to travel abroad. Figure 9 provides information on seasonality, frequency of travel and the criteria with the greatest bearing on the choice of destination.

When it came to choosing a destination, 41% of the people with special needs surveyed opted for the Autonomous Community of Andalusia. In second place, albeit some way behind, was the Valencian Community, chosen by 24% of respondents. It must be said

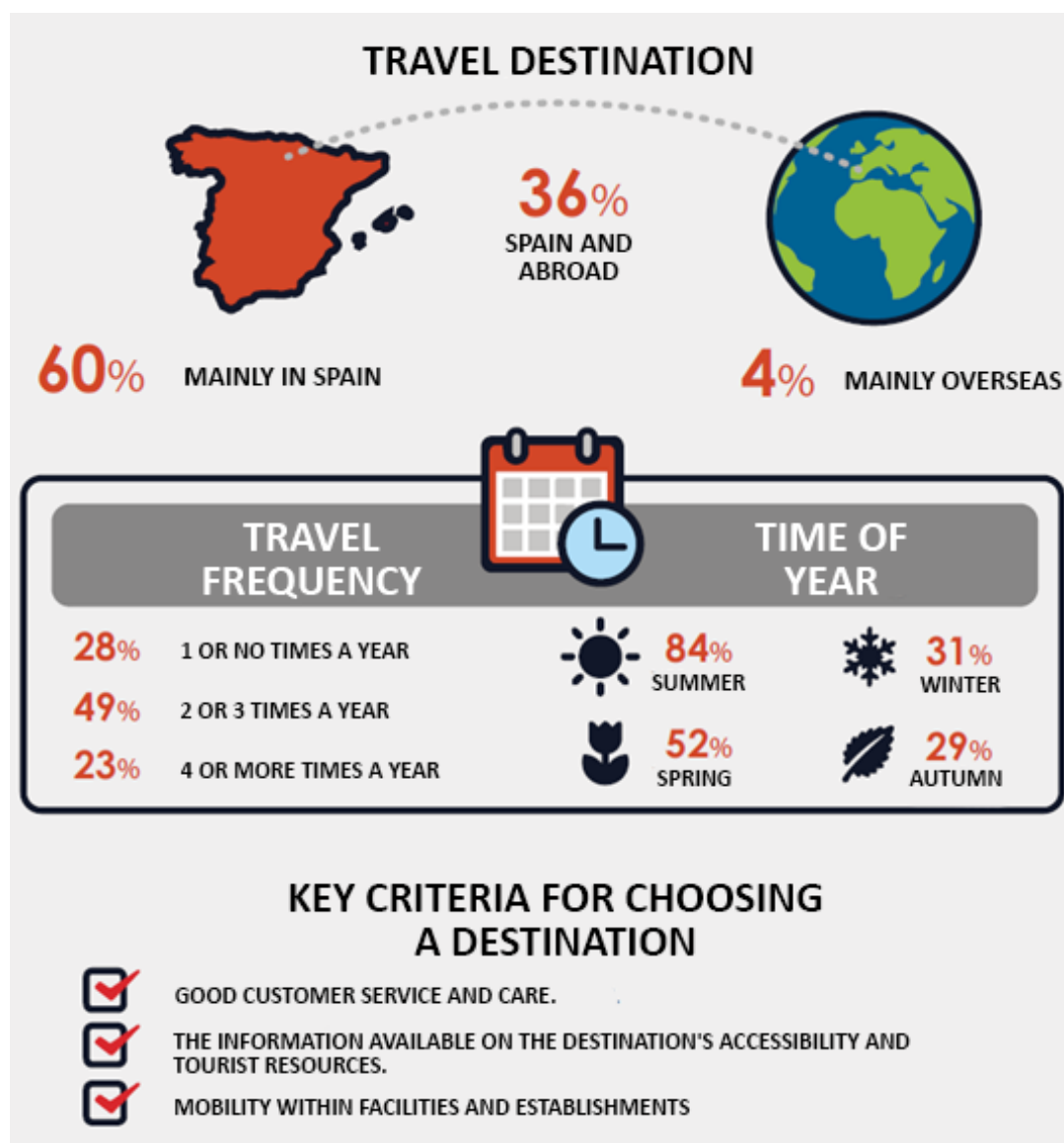
that the figures for both regions are significantly lower among people with no special needs (31% and 16% respectively).

The study also analyses travel motivations, concluding that sun and beach tourism (56%) and artistic-cultural tourism (46%) are most attractive to people with special needs.

When organising trips, 7 out of 10 tourists with special needs choose the Internet and, to a far lesser extent, travel agencies (face-to-face and online) and associations or organised groups. Regardless of the chosen method, there is almost unanimous agreement on the importance of comments, opinions and ratings from other tourists for people with accessibility needs when organising a trip.

Regarding the chosen type of accommodation, 66% opted for hotels. It is interesting to note that the second option does not include other types of hotel accommodation, only private properties and the homes of family and friends. While this causes a notable dispersion of the data on average expenditure, the study is conclusive when it states that *“on average, tourists with disabilities or special needs spent 28% more on their last trip than tourists who did not have any limitations”*.

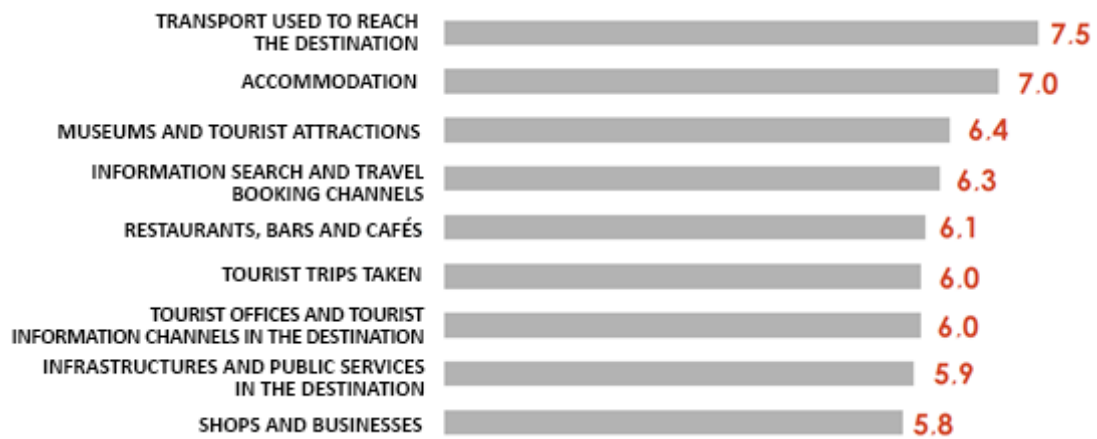
Figure 9. Key facts about the travel habits of people with accessibility needs



Source: Observatory of Universal Accessibility of Tourism in Spain

Finally, it is important to highlight how tourists with accessibility requirements rate the accessibility of different parts of the tourism value chain. At present, although progress has clearly been made, the highest score is for transport (7.5 out of 10). This is followed by accommodation (it is worth remembering that the first option is hotels and the second is private homes). Shops and businesses are the lowest rated link in the chain.

Figure 10. Degree of accessibility of the most recent tourist destination: parts of the tourism value chain



Source: Observatory of Universal Accessibility of Tourism in Spain

4. Universal accessibility management

In any tourist destination, accessibility management is the first of the two key areas on which the focus of analysis should be placed, together with its implementation throughout the value chain. To this end, it is important to recognise that tourism is inherently cross-cutting in nature, which means that there are various areas that have an impact on it, making it necessary to review sources, processes and mechanisms of varying scope and subject matter.

In this sense, the recent analysis carried out as part of the STD Project for the city of Malaga, and more specifically the conclusions drawn on the Accessibility Pillar, will be used as a reference and supplemented with information obtained from the phases and processes detailed above in the methodology.

4.1. Strategic accessibility planning

Strategic planning involves establishing local regulations, plans, projects, handbooks, guides, etc. that serve as a framework for reference and action in all areas, and a documented commitment to universal accessibility in the destination, allowing theory to be put into practice in different municipal areas and, more specifically, in the tourism sector as a whole.

Although Malaga does not have a documented commitment to accessibility as such, based on the current conditions, we can state that there is clearly an official commitment to accessibility due to the various related actions that have been carried out over time.

The introduction of a *Municipal Regulatory By-law on Accessibility* is a clear example of this. This regulatory document reflects Malaga's committed to promoting and regulating accessibility not only in relation to the physical environment, but also in regard to communication, public employment and new technologies. However, since its publication in 2004, the state and regional regulatory frameworks have progressed further and introduced new regulations, and the language and certain terms have evolved and changed, so it would be advisable to review and update its content, especially given that subsequent local regulations and public procurement requirements have made compliance with it mandatory.

An in-depth source review confirms how universal accessibility is addressed in various local regulatory documents, either by express reference or by citing the *By-law on Accessibility*. On reviewing the local regulatory framework, we identified the following, at a minimum:

- *By-law Governing the Use of Public Thoroughfares*. (BOP (Official Provincial Gazette) no. 129. Thursday, 5 July, 2018). Contains the term *handicapped*.
- *By-law Governing Kiosks and other Similar Facilities on Public Thoroughfares*. (BOP no. 39, supplement 1 of 26 February, 2014).
- *By-law on the Use and Enjoyment of the Beaches of the Municipality of Malaga*. (BOP of 16/07/2004). Contains the term *handicapped*.
- *Municipal By-law on Taxi Services*. (BOP no. 109 and 115 dated 9 and 17 June, respectively).
- *Mobility By-law of the City of Malaga*. (BOP no. 11, 19 January, 2021).
- *Malaga Fair By-law*. (BOP (Official Provincial Gazette) no. 136. Monday, 16 July, 2018).
- *Municipal By-law on the Welfare, Protection and Responsible Ownership of Animals*. (V.12). (BOP no. 70, 12 April 2017). Includes the term *mentally handicapped*.
- *By-law Governing the Processing of Town Planning Licences*. (BOP of Malaga no. 109, of 10 June 2019).
- *Municipal By-law on Urban Development*. (BOP no. 71 of 13 April 2007. BOP no. 108, amendment dated 5 June 2007). It states that "*The project shall include the mobility and accessibility infrastructures stipulated in the current Municipal By-Laws*".
- *General By-Law on Public Works and Utilities on Public Thoroughfares*. BOP of 22 July 2002. Includes the term *people with disabilities*.
- *By-law Governing E-Government*. BOP no. 215, 8 November 2012.
- *By-law Regulating the Processing of Planning Permits, Statements of Compliance and Other Means of Intervention in the Use of Land and Buildings*. (BOP of 10 June, 2019). In relation any declaration that it is physically impossible to provide accessibility, it states that "*The technician who drafts the project or technical documentation shall substantiate the impediment, in accordance with the provisions of the Municipal Regulatory By-law on Accessibility in the Municipality of Malaga.*"

However, there is no express mention in the *Municipal By-law on the Conservation and Technical Inspections of Buildings*. (BOP no. 225, 25 November 2013).

Public procurement is a process with a significant impact on the accessibility levels of a region. Firstly, it makes it possible to acquire inclusive products and services and, secondly, it raises awareness among the various suppliers, promoting compliance with the regulations on disability and universal accessibility. Public procurement has the capacity to entrench a culture of accessibility throughout the value chain. An initial review of the tender documents reveals inadequacies in ensuring and enhancing the implementation of accessibility. We reviewed the following:

- *Supply and installation of children's play equipment for the adaptation of sustainable playgrounds*. (21 October, 2021). No express mention.
- *Design and installation of signage in the Alcazaba and Gibralfaro*. Project 80% co-funded by the European Regional Development Fund, Spanish Multi-regional Operational Programme 2014-2020, Edusi "Perchel Lagunillas". (Thematic Objective 6. Specific Objective 6.3.4-Line 1). (14 October, 2021). No express mention.
- *Project work to improve the Accessible Pedestrian Route in Camino San Antón and Calle Antonio Trueba*. (26 June, 2021). Specific to the field.
- *Conservation, maintenance and improvement of the green infrastructure of the city of Malaga*. (24 May, 2021). This requires the successful bidder to comply with legislation in a number of areas, including accessibility.
- *Coordination and development of different cultural activities*. (14 May, 2021). No express mention.
- *Digital marketing service in the area of tourism, quality promotion and investment attraction*. (26 March, 2021). Regarding the post-production of videos, it states that: "(...) these shall be optimised according to the channel through which they are to be published and disseminated, taking into account the variety of formats required by each channel according to the criteria of visual attractiveness, **accessibility** and download speed". In relation to photographs: "The dimensions, sizes and appearance shall be optimised according to the channel through which they are to be published and disseminated, taking into account the variety of formats required by each channel according to the criteria of visual attractiveness, **accessibility** and download speed".

- *Supply for the construction of a promotional stand and leasing of space for the Department of Tourism's participation in the International Tourism Fair of Madrid (FITUR 2021).* (3 September, 2020). No express mention.
- *Social media advice and content management, positioning, analysis and measurement service for Malaga City Council's Department of Culture and Municipal Heritage Museum, and social media content management, positioning and analysis for the Alcazaba and Gibralfaro Castle monuments.* (28 December, 2020). No express mention.
- *Supply of equipment to improve accessibility to the beaches of the municipality of Malaga.* (23 December, 2020). This outlines the specific regulations that must be complied with, including the *Municipal By-law on Accessibility*.
- *Conservation, maintenance and improvement of the green spaces and woodland of La Concepción Historical Botanical Garden.* (18 December, 2020). This requires the successful bidder to comply with legislation in a number of areas, including accessibility.
- *Preparation of the programme of activities to promote, publicise and showcase Malaga's Municipal Heritage Museum.* (28 December, 2020). Among other conditions, the description of the service refers to the "*implementation of universal accessibility in the Museum's activities and in its communication*".
- *Planning, mediation and purchase of advertising space in print, radio, digital, television and other media for the dissemination of promotional advertising, and organising, performing and monitoring communication, promotional, informative and dissemination activities for Malaga City Council's Department of Tourism.* (21 April, 2021). No express mention.

With regard to framework strategies for the city, the *General Urban Development Plan of Malaga* (2011) is the most important one, with express references to the barriers of the physical environment:

- Section III. Urban planning regulations for land and buildings.
 - Minimum safety, health, sanitary, beautification and **accessibility** requirements for urban development and buildings.
 - Regulatory framework
- Section VII. Urban development regulations.

- The necessary measures must be taken to remove architectural barriers in accordance with Decree 72/92 of 5 March and the Municipal Regulatory By-law on Accessibility in the Municipality of Malaga.
- The design of thoroughfares shall comply with the provisions of the Municipal By-Law on Accessibility in the Municipality, and with all other municipal regulations in force at the time of drafting the project.

Prior to the strategy set out in the PGOU (General Urban Development Plan), Malaga published two specific documents on universal accessibility: The Strategic Plan for Universal Accessibility in the City of Malaga 2007-2011 and the Plan for Universal Accessibility in the Municipality of Malaga (May 2010). The former has become a ground-breaking strategy for universal accessibility in the city, establishing cross-cutting approaches and actions with an impact on various areas and the involvement of all municipal departments. Specifically, the Plan covers accessibility to information and employment, social awareness and consciousness, participation, mobility, leisure and free time, training and research, the promotion of rights, accessibility to housing and gender equality for women with disabilities. Implementing some of the measures included in this Plan will lead to an increase in the levels of accessibility of the tourism value chain, as improvements in public transport, cultural, sports and leisure spaces, information and communication materials, and even experiences, will be introduced. This led to the launch of the “Malaga Accessible City” inclusive tours programme and the “Enjoy the Beach” assisted bathing programme, both of which are still running today. In turn, the Plan for Universal Accessibility in the Municipality of Malaga was drawn up in May 2010 with the aim of removing obstacles and architectural barriers on public thoroughfares. To this end, actions are planned in ten municipal districts, involving a variety of measures (e.g. creation of shared spaces, widening of pavements, relocation of elements and furniture, improvements to paving, installation of audible warning devices on traffic lights, etc.). Implementing this Plan has made it possible to significantly improve mobility in the city of Malaga through measures aimed at eliminating architectural, urban and transport barriers. Therefore, both plans are providing a major boost for the transformation of Malaga into a more accessible city.

The *Plan for Sustainable Urban Mobility in Malaga* (PMUS), which was drafted in 2019 and is currently in the implementation phase, proposes actions not only for the physical environment, but also for the population's transport habits, with the aim of providing

Malaga with more sustainable urban mobility. A cross-cutting approach is applied to accessibility throughout the document, with one of its principles being the Principle of Universality, providing an in-depth analysis of the situation and proposing actions with an impact on public thoroughfares and transport. Specifically, the Plan calls for the removal of architectural barriers and improvement of pedestrian accessibility, optimisation of the city bus network's accessibility and improved accessibility at public transport stations and stops. The Plan lays the groundwork for the development of the Strategic Urban Road Safety Plan for the city of Malaga, and both should be included as an integral part of the comprehensive urban mobility and accessibility plans. More detail is provided on mobility and transport accessibility in Malaga in the relevant section (see section 5.1.2).

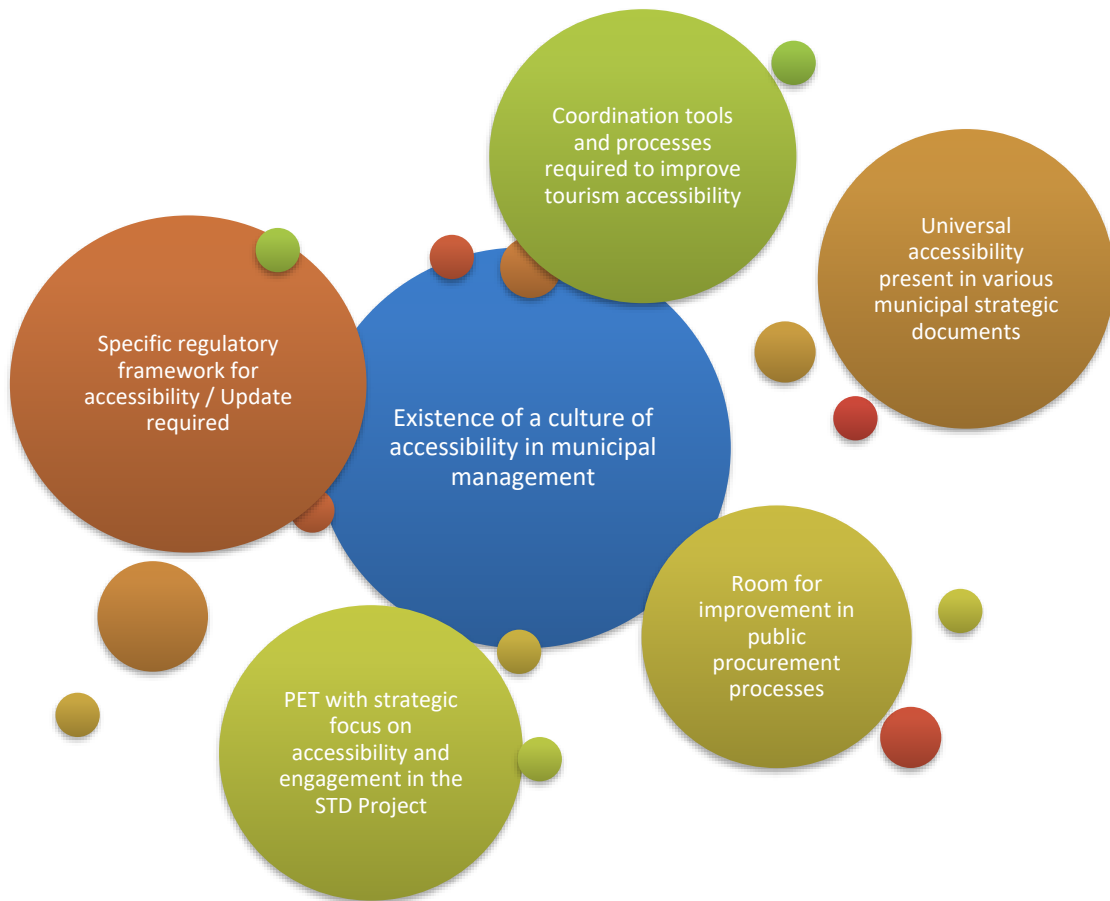
Although the documents analysed above and their areas of impact have varying degrees of influence on tourism activity in the city of Malaga, the Malaga Strategic Tourism Plan 2021-2024 will be the guiding document for the sector over the next four years. Following an analysis carried out as part of the Malaga STD Project, the Plan takes into account the results achieved with regard to different key areas, including universal accessibility as a strategic challenge in its own right, whose fulfilment hinges on three key projects:

1. Roll-out of an Accessible Tourism Plan, to be implemented through this document.
2. Information and training actions on accessibility for visitors and stakeholders in the sector. In this respect, the destination plans to update the signage in the historic centre by 2022 to meet sustainability and accessibility criteria.
3. Improving the accessibility of digital channels, specifically the tourism website and app. This project will soon be undertaken by updating the official tourism website, when it will have to be designed in accordance with the accessibility criteria stipulated by the current regulations.

Therefore, it is notable how the city of Malaga's involvement in improving universal accessibility has generated a wide-ranging strategic framework for action that has an impact on numerous areas. Since tourism is a sector with a far-reaching impact on a region, this has helped to increase accessibility at different levels of the value chain. Thus, the culture of accessibility engendered by the city of Malaga over the last few decades has become an integral part of the destination's tourism management, as reflected by the inclusion of universal accessibility in the main strategies adopted

(Strategic Tourism Plan and STD Project), and has led to a desire to have a specific tourism accessibility strategy, which is outlined in this document. However, it is this very cross-cutting nature that makes it necessary to coordinate the various strategies and areas involved in order to continue making progress in improving the accessibility of the tourism value chain. There is also room for improvement in public procurement processes and we recommend updating the *Municipal Regulatory By-law on Accessibility* to bring it into line with the regulatory reforms that have taken place since it came into force in 2004.

Figure 11. Key areas: strategic planning

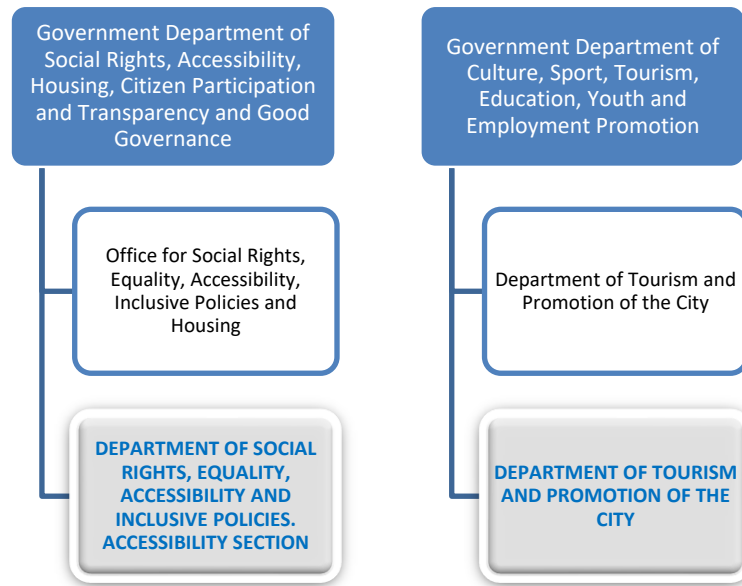


4.2. Means and resources for management

Alongside strategic planning in the destination, it is necessary to allocate sufficient means and resources - human, technical and financial - to enable the strategies and actions planned to be carried out in an effective, coordinated and consistent manner. According to the provisions of UNE 178501, it is recommended that the destination management organisation has an area, department or office, with designated managers, serving as a cross-cutting unit that coordinates actions and ongoing solutions for universal accessibility, in conjunction with the different areas and departments involved in managing the destination (urban planning, culture, health, emergencies, etc.).

There are two departments responsible for Tourism and Accessibility in Malaga. Firstly, tourism is managed by the Department of Tourism and Promotion of the City, which is part of the office of the same name, which reports to the government's Department of Culture, Sport, Tourism, Education, Youth and Employment Promotion. Secondly, universal accessibility management is the responsibility of the Accessibility Section, part of the Office for Social Rights, Equality, Accessibility, Inclusive Policies and Housing, which in turn reports to the government's Department of Social Rights, Accessibility, Housing, Citizen Participation and Transparency and Good Governance.

Figure 12. Tourism and accessibility management units in Malaga City Council

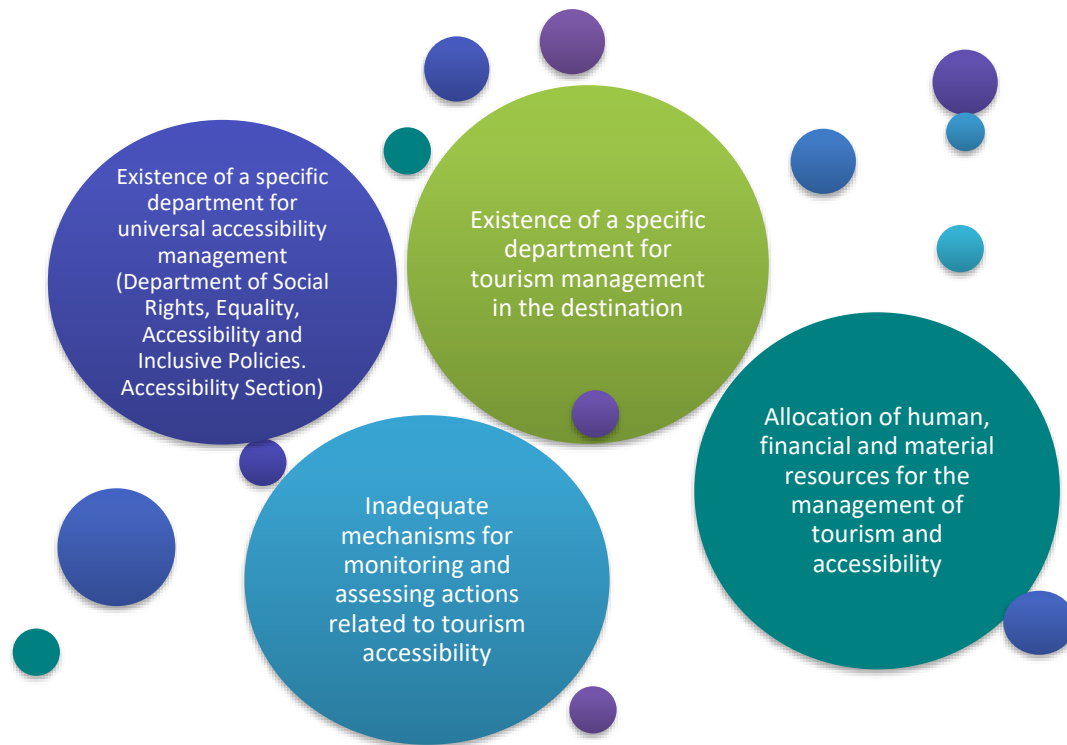


Source: Malaga City Council website

However, the cross-cutting nature of both these issues, accessibility and tourism, means that it is inevitable that decisions and actions taken in areas other than those mentioned above will have an impact on them. Therefore, with regard to tourism accessibility, i.e. strategies and actions targeting both the tourism offer and demand in the destination, the heads of the Department of Tourism will need to be supported by the measures implemented by other municipal departments, with particular emphasis on the role played by the Accessibility Section of the Department of Social Rights, Equality, Accessibility and Inclusive Policies, which will require close cooperation and teamwork to ensure a steady increase in universal accessibility in the city's tourism offer.

As regards putting in place mechanisms to ensure compliance with the universal accessibility measures that have been adopted, it should be noted that the analysis carried out on the Accessibility Pillar of the STD Project did not identify any such mechanisms, nor did it identify any assessment or monitoring mechanisms. The analysis concludes that “the *destination management organisation explains that there is no monitoring of the measures implemented to improve accessibility, and compliance with these measures is not assessed on a regular basis.*”

Figure 13. Key areas: means and resources



4.3. Participatory mechanisms

These mechanisms allow public and private stakeholders to reach agreements on the actions needed to improve universal accessibility in the destination, throughout the value chain and the entire tourism experience. But these mechanisms also that give all stakeholders - including users - a voice, through local organisations, associations, groups, etc.

“These are coordinating, decision-making and advisory bodies formed by representatives of government bodies, social actors, and associations and entities within the municipality, which have the capacity to make proposals that are advisory in nature on economic and social matters, and which serve to ensure the effective participation and engagement of local residents in matters of local public interest”. (Article 53, Organic Regulation on Citizen Participation in the city of Malaga).

In 2008, Malaga City Council approved the Organic Regulation on Citizen Participation, a document that sets out the right of individual and collective participation for citizens, including the participatory bodies created for this purpose and various tools to promote associationalism. Article 61 of the Regulation proposes the creation of participatory sectoral committees in the following municipal areas: social welfare, senior citizens, equal opportunities, **accessibility**, children, cooperation and development aid, citizen security and coexistence, mobility, youth and sports, culture and education, **tourism**, sustainable development, urban planning and the environment, trade, employment and new technologies, volunteering and citizen participation. The Regulation also calls for various types of working committees to be set up in all the city's districts, including one for tourism - the Culture, Education, Youth, Sport and Tourism Working Committee.

The Tourism Sectoral Committee can be tied in with the city of Malaga's existing Tourism Forum, set up in 2007 as a strategic cross-sector partnership that represents all tourism-related sectors in Malaga, thereby promoting the joint management of tourism in the destination. Thus, it brings together the public sector - areas of Tourism, Culture, Sport, Trade Fair and Congress Centre, and Convention Bureau - and the private sector - hotels, hospitality, transport and infrastructure, promotion and marketing, education and

associations. However, universal accessibility is an issue that is not currently being addressed by the Forum, which could undoubtedly raise awareness of this topic across the sector as a whole.

The Organic Regulation on Citizen Participation also provided for the creation of the City of Malaga Social Committee, which was set up in 2011 as an “*advisory and participatory collegiate body, formed by representatives of leading economic, social, professional and resident organisations, a permanent institutional platform for dialogue and deliberation, which issues reports, studies and proposals on local economic development, strategic planning of the city and major urban projects*”. It is composed of representatives from corporations, trade unions, businesses, representatives of employers, employees and associations (neighbourhood associations, consumer and user organisations), and individual social representatives. Four committees are currently being held within it: Committee I on Local Economic Development, Committee II on Special Projects, Committee III on Social Welfare, Education and Improving Citizen Participation, and Committee IV on Health in Malaga ([Malaga City Council](#)). However, the Social Committee's regulations do not include specific responsibilities relating to tourism or the inclusion of disabled groups and/or their representatives.

For its part, the Strategic Plan for Universal Accessibility established local participatory bodies: The Municipal Social Services Committee, the Sectoral Committee for Persons with Disabilities and the Municipal Accessibility Committee. Since then, “*Malaga City Council, (...), has been implementing an inclusive policy, promoting mechanisms for social participation and actions to improve the quality of municipal services for persons with disabilities*”. Finally, Scope III of the 2011-2017 Strategic Plan for Accessibility (Social Participation) includes a measure to create and promote a Universal Accessibility Committee.

However, at present, the Sectoral Committee for Social Rights, Accessibility and Inclusive Policies should be cited as the participatory body that is active in these areas, following the ordinary session held in February 2022 to set up the Committee.

The Accessibility Section coordinates and promotes the participation of the network of social actors through the Accessible Malaga Development Group that was created in 2004. It is composed of around 80 organisations and their various working groups, which work on different issues directly related to inclusive policies.

Another regular collaborator of the Department of Social Rights is the TOCA (Accessible Tourism, Leisure and Culture) working group, created in 2015 and open to associations and organisations from different fields, professionals, institutions, technicians and private citizens who wish to provide their knowledge and work in the field of tourism, leisure and culture accessible to all. The group's mission is *“to promote tourist, cultural and leisure activities that are accessible to all groups in the city of Malaga, and to adapt existing activities in the most suitable way possible for citizens with specific physical or intellectual needs”*. At present, TOCA is made up of sixty leading disability associations (ONCE, Red Cross, Hermanas Hospitalarias, PAMMA, etc.), specialist centres, companies, museums and educational institutions (University of Malaga) and professionals from various fields. It holds monthly meetings to report on, agree on and work on designing inclusive actions and programmes, such as the “Malaga Accessible City” and “Enjoy the Beach” programmes, and cultural events such as the Film Festival and the Sleepless Night, among others.

In conclusion, it is clear that there are various participatory bodies involved in managing, implementing and improving universal accessibility in the city of Malaga, with a strong presence of associations representing groups of disabled people. These mechanisms are implemented within the Department of Accessibility, thus resulting in these associations participating and engaging in tourism-related actions, within the scope of the competencies assigned to this department. This is not the case in the Department of Tourism, where universal accessibility is not currently a specific area of focus within the Tourism Forum.

It has been noted that there is a link between some tourism issues and accessibility, although this is not currently being addressed within the Department of Tourism or in the respective sectoral forum. Instead, accessibility in tourism falls within the remit of the Department of Social Rights, Equality, Accessibility and Inclusive Policies, through its Accessibility Section. This requires greater cooperation between both areas to improve the accessibility of the tourism offer in Malaga.

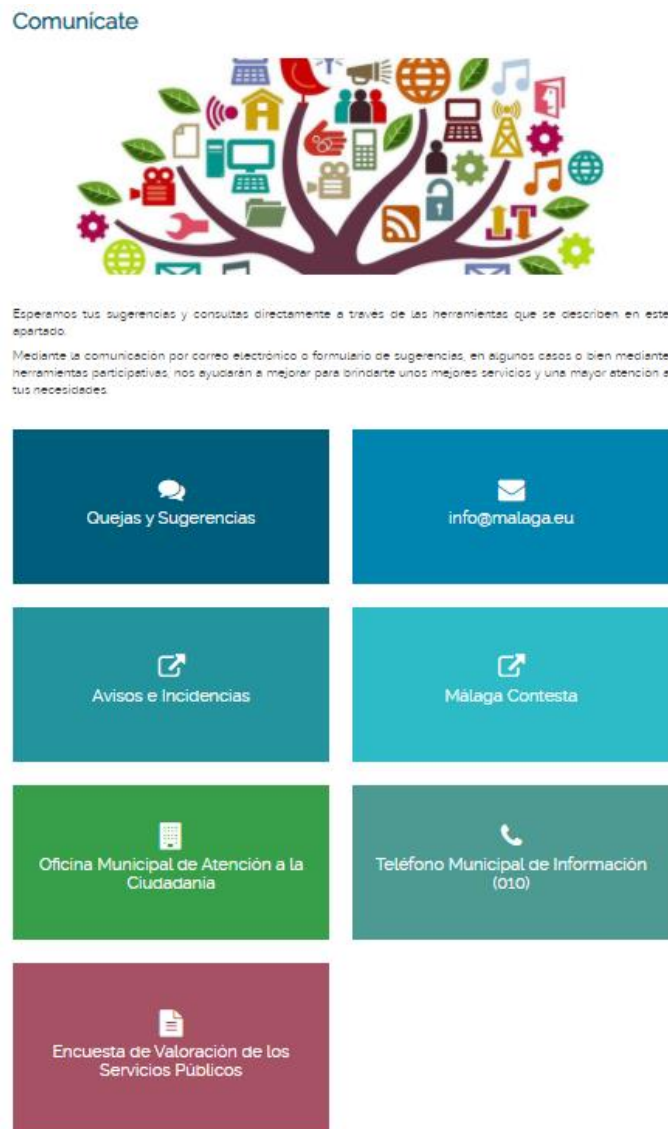
Handling of suggestions, problems and complaints related to tourism accessibility

Managing this service opens up a direct line of communication between tourists and the people who run the activity at the destination, used in conjunction with tourism

intelligence processes. This not only provides more in-depth knowledge of the demand from tourists with accessibility requirements, but also of the destination's own shortcomings.

Malaga City Council provides the Comunicate service, a set of tools to facilitate communication between the public and the government, and it is interconnected with the Comprehensive Citizen Support Service (SAIC). The service is available 24/7 on the internet, and face-to-face support is available at any of the eleven Municipal Citizen Support Offices. In line with the usual protocols for this type of municipal service, all communications are centralised and subsequently referred to the different departments according to their subject matter. Although this service is mainly aimed at local residents, the management organisation confirms that requests (complaints, suggestions) related to tourism are referred to the quality department of the section of the same name. The various procedures that are available through the service cover issues directly related to public thoroughfares, including beaches, but other options are not, for example, procedures related to accessibility in transport, cultural or sporting venues and events, or even issues directly related to accommodation and the rest of the tourism offer.

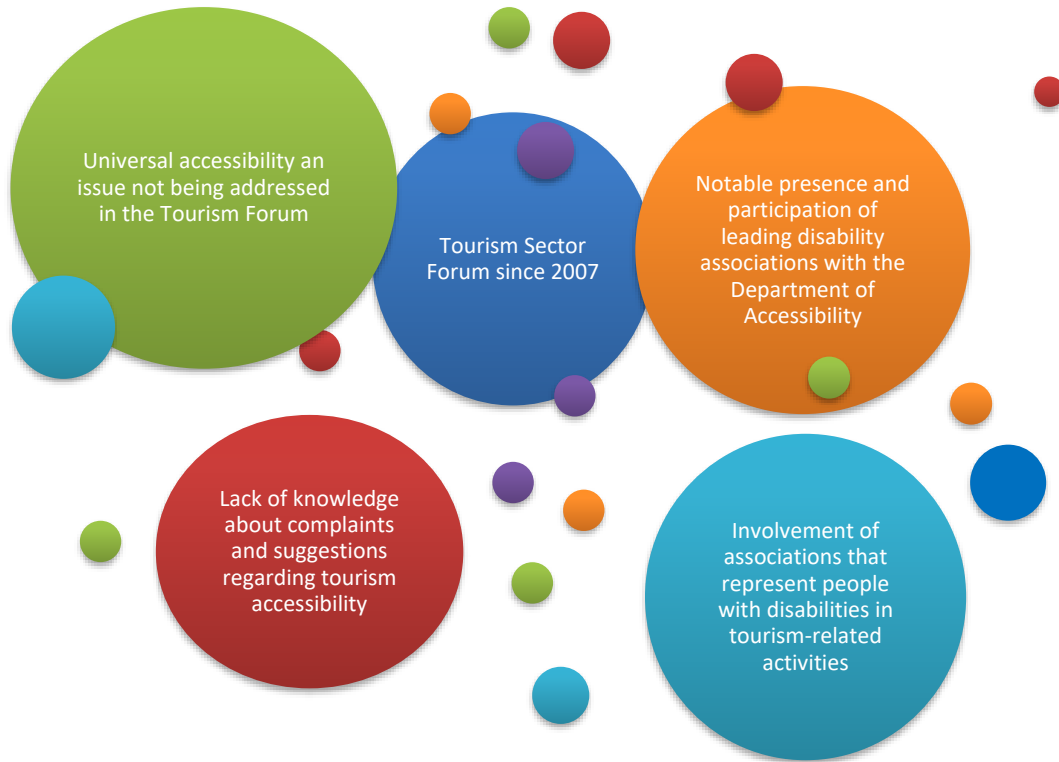
Figure 14. Malaga City Council Comunicate Service



Source: Malaga City Council website

It can therefore be concluded that there is a knowledge gap regarding certain issues (complaints, suggestions) related to accessibility that have a directly impact on tourism activity. This means that there is less awareness of the weaknesses and areas that require improvement with regard to accessibility in the tourism offer.

Figure 15. Key areas: participatory mechanisms



4.4. Training and awareness-raising

Training in universal accessibility and inclusive design, and support for members of the public with special needs and accessibility requirements. This training will have to be extensive in order to cover every level of the tourism value chain, so it must involve as many professionals as possible who are involved in tourism and the tourism experience in the destination.

According to the World Tourism Organisation (UNWTO), “awareness-raising and training on accessible tourism are not an isolated factor in tourism; they are essential and cross-cutting actions in all areas of tourism that help to deliver quality and satisfaction for the end customer”. Training is the tool that will make it possible to eliminate attitudinal barriers in tourism, and to promote accessible tourism as a business opportunity. However, the Organisation itself warns of the obvious need for training in accessible tourism in destinations and tourism industries worldwide.

Article 59 of Royal Legislative Decree 1/2013, Consolidated Text of the Act on the Rights of Persons with Disabilities and their Social Inclusion, states that “the public authorities shall develop and promote information activities, awareness-raising campaigns, training activities and any other measures necessary to promote equal opportunities and non-discrimination, in conjunction with the organisations that represent persons with disabilities and their families”.

The two analyses recently carried out on tourism and accessible tourism in Malaga both agree that awareness-raising and training activities on accessibility are a weakness for the destination. The Malaga Strategic Tourism Plan recognises that “*progress needs to be made regarding training, e.g. on innovation and accessibility for the tourism sector*”. More detailed information is provided in the recent STD Report, which confirms that the Municipal Training Centre (CMF), the organisation that coordinates training at a municipal level, does not work with fixed annual training schedules. Instead, it is flexible, catering to the requirements and needs of the participants. However, the issue of accessibility is not covered by the training provided, nor has it been included in the 2020-2021 training calendar. Specifically, within the management organisation, the staff has not undergone any training or awareness-raising activities on universal accessibility, disability or tourism-related accessibility. As remarked above, these topics are also not

a specific area of work in the Tourism Forum, whose members have not been encouraged to engage in such activities.

Conversely, staff allocated to tourist information offices and points confirm that specific training activities, such as communication in sign language, have been carried out with various organisations, some of which are leaders in the field, for example ONCE (Spanish National Organisation of the Blind). However, training in accessibility and disability is not currently a requirement when subcontracting external staff to manage tourist information offices and points. This issue is left to the individual's discretion and personal motivation.

Additionally, both private and social actors identify the lack of information/training and awareness-raising on accessibility as an area where there is much room for improvement, a situation confirmed during the interview process that was carried out.

However, it is important at this point to highlight the various actions that take place in the TOCA Group, as it involves tourism professionals and companies, some of whom are also members of the Tourism Forum. Some of these activities are related to training and awareness-raising, and are carried out by the organisations themselves within the Group on a regular basis. These include the inclusive tours within the Accessibility Section's Malaga Accessible City Programme, enabling improvements in the accessibility of Malaga's cultural offer.

Figure 16. Key areas: training and awareness-raising



4.5. Information, communication and promotion

This section relates to the processes, tools and information and communication channels associated with the products and services that the destination provides for tourists and visitors and, in particular, the information that exists on the accessibility of the tourism offer and how it is promoted. Given the pivotal role of Information and Communication Technologies (ICT) today, it is worth mentioning *Decree 1112/2018, of 7 September, on the accessibility of public sector websites and applications for mobile devices*, which sets out the requirements and mandatory deadlines and stipulates that websites and mobile applications that belong to and are managed by government bodies and are publicly funded must be accessible.

At a strategic level, as part of its commitment to promote smart development (Thematic Objective 2, Line of Action 2) Malaga's EDUSI (Integrated Sustainable Urban Development Strategy) document links together ICT and universal accessibility, with the aim of *“developing applications (APP) in the areas of tourism, culture, public transport, heritage, etc. that promote universal accessibility and improve real-time information for users”*. Further on, in direct relation to the promotion of historical and cultural heritage and their use for tourism (Thematic Objective 6, Line of Action 1), the aims include *“Improving the universal accessibility of visitor services”*.

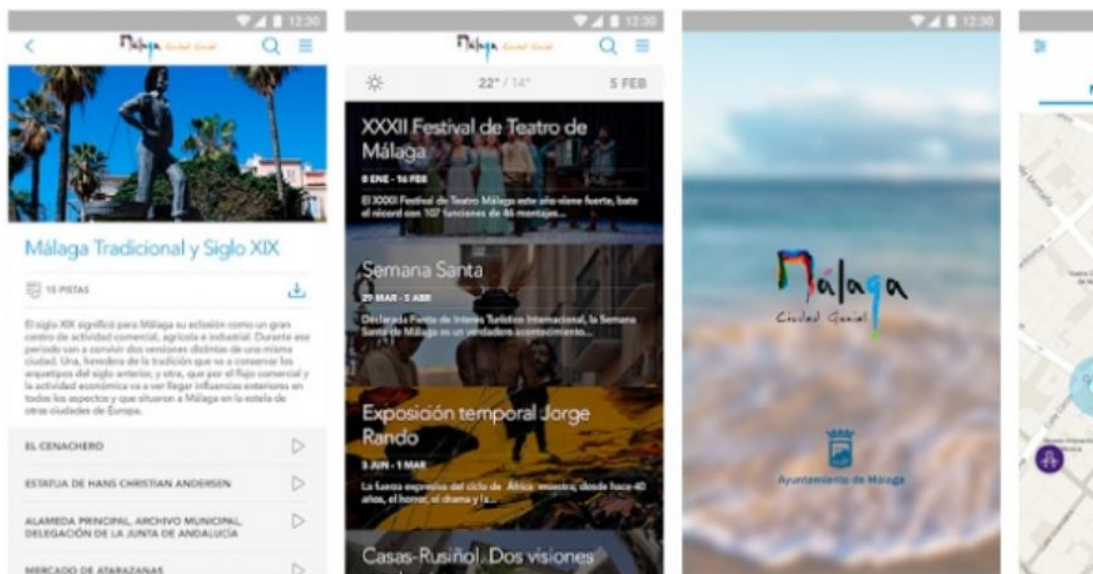
The development and use of ICTs plays a key role in tourist information and communication processes, mainly through two tools: websites and mobile applications. Malaga City Council is currently engaged in a tourism intelligence and big data project that will bring about important changes in the existing information and communication processes. These include updating the tourism website and Malaga Turismo, the associated mobile application, whose designs do not comply with current universal accessibility regulations and whose content is also lacking in significant areas.

Figure 17. Malaga tourism official website



Source: Malaga tourism website

Figure 18. Malaga Turismo mobile app



Source: Malaga tourism website

Along with the Malaga Turismo app, the destination also provides visitors with the official Malaga City Council Audio guide app, the Malaga Beaches app and Malaga Pass, a virtual card that reduces paperwork and waiting times when visiting the city's collection of museums, monuments and attractions, among other related benefits.

Figure 19. Mobile apps related to Malaga's tourism offer



Source: Malaga tourism website

Urban signage and communication

In terms of urban spaces, the STD Report notes that the destination “*has made huge efforts to make environments, especially municipal buildings, easier to understand through the use of pictograms, easy-to-understand directories and Augmentative and Alternative Communication (AAC)*”. These efforts will continue in 2022 with some of the signs in the historic centre being replaced and improved, especially those that provide information on and identify areas and buildings of interest, a measure planned by the management organisation to meet sustainability and accessibility criteria. This measure will give the destination the opportunity to remedy existing shortcomings, such as the directional signage in certain parts of the historic centre (e.g. Route no. 6 of the Cofrades Tours (route followed by religious processions), the formats of wayfinding signs (e.g. tactile maps) and signs to identify attractions and entrances.

QR codes have been placed on practically all elements used for tourist information, and colour contrasts, in general, are adequate.

Figure 20. Totem and information panel with QR code - Cofrade 6 Tour



Source: Ilunion

Figure 21. Information panels with QR codes



Source: Ilunion

With regard to signs for identifying and providing information on resources, there is a mixed picture. Sometimes they are easily detectable, visible and understandable, and sometimes they are inadequate and fail to meet the minimum requirements for accessibility and legibility.

Figure 22. Easily detectable identifying signage outside the Botanic Garden



Source: Ilunion

Figure 23. Information signage that fails to meet accessibility criteria for tourism resources.



Source: Ilunion

Tourist information offices and points

Most of the information provided at these points is in a standard visual format, although, alternatively, there are QR codes on a display in the offices themselves as well as on the tourism website. There are also five themed audio guides available: Monumental Malaga, Picasso's Malaga, Sacred Malaga, Traditional and 19th Century Malaga, and Botanical Malaga. Each of these has a track related to a particular resource and the information is delivered through audio only, and the playback speed can be adjusted. However, the website's failure to meet the accessibility criteria poses an initial barrier.

To support the processes put in place for communicating with tourists at the tourist information office, a communication handbook has been prepared by the Department of Accessibility, with elements of Augmentative and Alternative Communication (AAC), such as pictograms. This handbook is designed to improve and foster these processes with tourists who have difficulties with communication, comprehension, language and verbal expression. It is worth noting that intercoms have been installed to facilitate communication, given the current conditions in which masks and protective screens are used. However, no audio induction loops have been installed, but there are magnifying glasses to help deliver information to visually impaired people.

The office has some information on the accessibility of the tourism offer, especially regarding tourist accommodation, primarily relating to hotels, museums and monuments. While it is not exhaustive or based on technical parameters, this information, obtained by staff via the resources' websites and through telephone enquiries, is enabling them to create their own databases so that they can answer any queries that arise on accessibility. This procedure could be further strengthened by increasing staff's knowledge of accessibility and disability issues, and using more specific technical parameters for each area (e.g. physical environment, cultural content, events, etc.).

In terms of tourism intelligence processes, no specific data is collected on demand from visitors with accessibility requirements, which would help the destination to make more informed and objective decisions.

Finally, it is worth highlighting that the central tourist information office in the Plaza de la Marina (UNE ISO 14785:2015) has been awarded the Q for Tourist Quality seal again. It has also passed the first follow-up assessment for the *Safe Tourism Certified*

certificate, for the adaptation of services to COVID-19, in order to offer tourists, residents and employees a safe and trustworthy environment ([Malaga Tourism](#)).

Promotion and dissemination of the tourism offer that meets accessibility criteria

The first step in promoting and disseminating a destination is to gain knowledge about the tourism offer and its characteristics. Such activities are usually the responsibility of the management organisation, in this case, the Department of Tourism and Promotion of the City of Malaga.

The work that the city of Malaga has been carrying out for years to improve accessibility has had a visible impact on the tourism value chain, and it now has essential resources and services that are suitable for people with accessibility requirements. However, there is no systematic or centralised system for obtaining this information, since there are several initiatives and different actors involved.

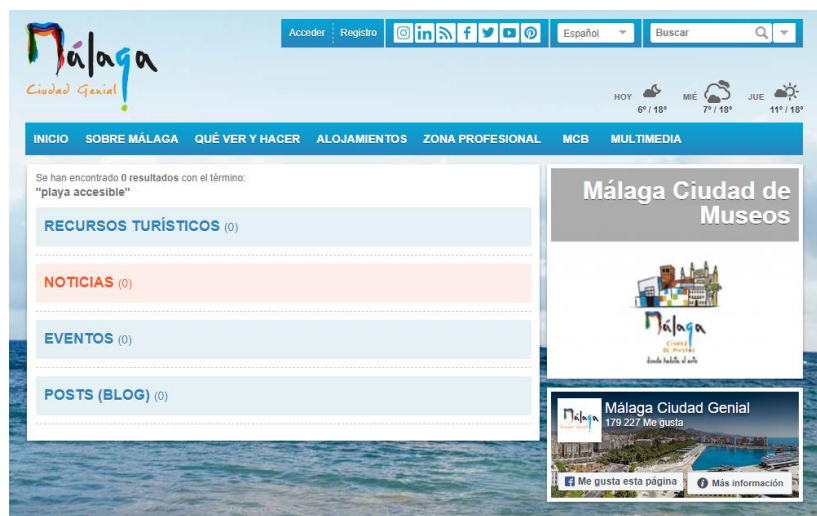
Tourist information offices and points are the most crucial physical sites for promoting and disseminating the destination's tourism offer. Thus, as explained above in this section, a database of tourism resources is being compiled which includes accessibility criteria, obtained from their websites and through telephone enquiries. This information is not contained in specific publications and is provided on demand to people who request it.

In turn, Malaga's official tourism website (<http://www.malagaturismo.com/>) is the reference website that needs to bring together all the information available on the tourism offer, including characteristics related to accessibility, thereby helping to meet the objective set out in the Strategic Tourism Plan: *"Malaga shall have a strong online presence, making its products accessible to everyone and establishing a position as one of the top destinations in online searches"*. In order to achieve this, the Plan acknowledges the need to improve the technologies used for tourism marketing, especially the tourism website. This improvement will have to take into account the current regulations on universal accessibility in order to ensure the effective promotion and dissemination of the accessible tourism offer at the destination, among other things. At present, the website does not have a specific section for this purpose, nor does it include information on specific accessibility features other than the International Symbol

of Access (ISA), to indicate the existence of “*handicapped accessibility*”, which is an inappropriate term.

One prime example of this relates to Malaga's beaches, resources of vital importance for the sun and beach tourism product, where major work has been done to improve universal accessibility, both in terms of the facilities and the assisted bathing service offered through the “Enjoy the Beach” programme, which is managed by the Accessibility Section together with the Department of Operational Services, Internal Affairs, Beaches and Festivals. This information is neither featured nor highlighted on the official tourism website, and searching for it yields no results (using the term “accessible beach”). However, this information is available on the official beach website ([Malaga Beaches](#)), which features videos with clear language and slow speech, signed and subtitled (the YouTube platform allows this to be activated and disabled), and a PDF leaflet containing the rules for using that service.

Figure 24. Search results for “accessible beach” on Malaga’s tourism website



Source: Malaga tourism website

Figure 25. Malaga’s official beach website – information on the Enjoy the Beach programme



Source: Malaga's beach website

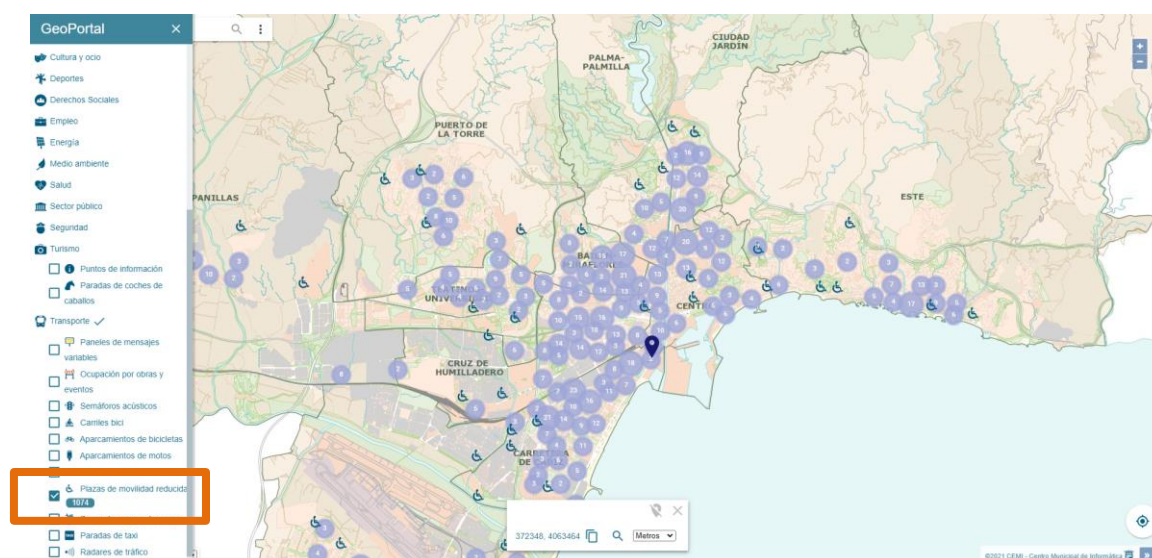
Additionally, in its section on [Facilities and Spaces](#), Malaga City Council's official website provides multiple search criteria, including “Accessible facilities” and “Spaces with accessible sports facilities”. There is certainly a wide range of establishments and spaces. However, many of them are directly linked to tourist activity at the destination, for example, commercial establishments. Once again, the ISA symbol appears next to them to indicate that the establishment “Has access for persons with reduced mobility”.

Figure 26. Accessibility information for accessible facilities on the City Council's website

Source: Malaga City Council website

For its part, Malaga City Council's GeoPortal contains other useful information about universal accessibility, in this case relating to transport. Thus, it shows the geolocation of parking spaces reserved for persons with reduced mobility (a total of 1,074) and 103 taxi ranks, including those with a parking area for accessible taxis.

Figure 27. Location of parking spaces reserved for persons with reduced mobility



Source: Malaga City Council's GeoPortal

Another channel for promoting accessible initiatives in the city, mainly those aimed at the local residents, is the [Facebook page of the Department of Accessibility](#) the main

channel, for example, to find information and book accessible guided tours as part of the “Malaga Accessible City” programme. Moreover, information about these initiatives is specifically disseminated among leading disability associations.

With regard to cultural events, an increasing number of these are taking place in the destination and there is also a larger selection of events that cater for accessibility requirements, such as the Sleepless Night and Malaga Fair.

However, these events are also not covered by the usual channels for disseminating and promoting tourism, and are difficult to find.

In addition, information on the accessibility of Malaga's tourism resources can be found in external sources - ones that do not belong to or are not managed by Malaga City Council or its departments. Examples include:

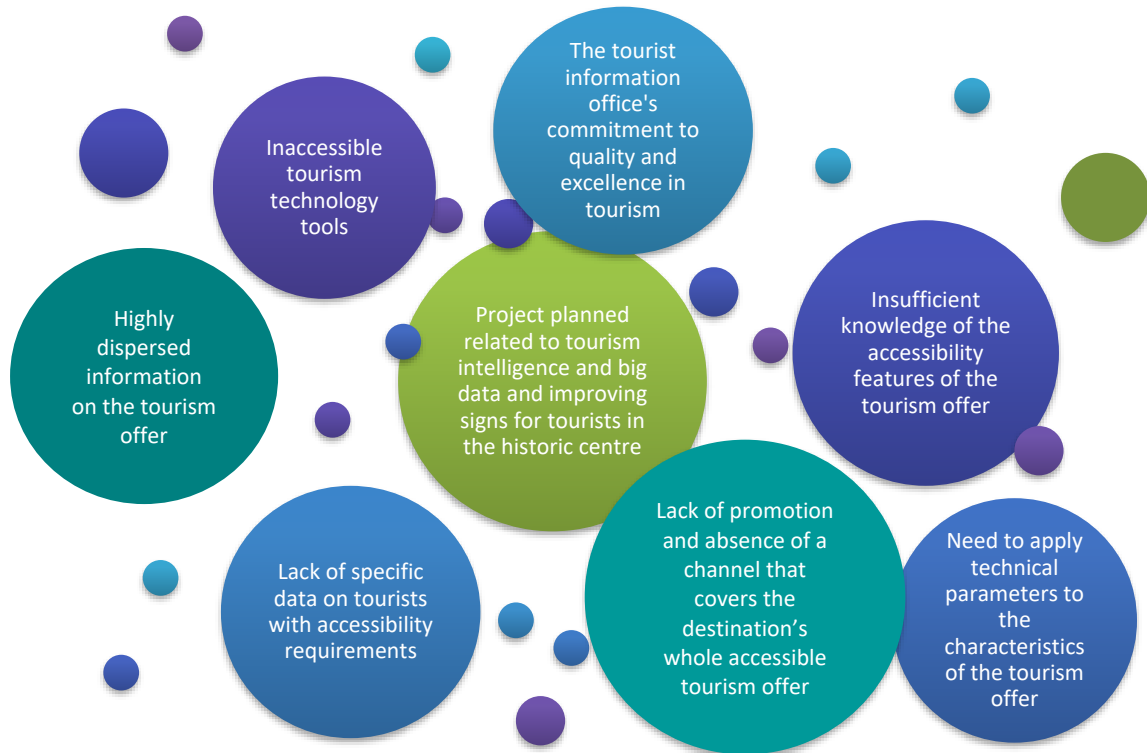
- The [Accessible Tourist Destination Guide](#), developed by ILUNION Accesibilidad for the Andalusian Regional Government, which can be accessed via the project's dedicated website. This included a self-assessment tool to provide managers of tourism resources with a better understanding of the degree of accessibility of their establishments and services.
- The [Accessible Tourism Guide in Malaga 2021](#): an initiative by Movisenior, a shop that sells mobility aids and products in the city of Malaga.

For its part, the University of Malaga (UMA) is currently developing an educational innovation project to raise awareness and educate students on tourism accessibility. For this purpose, a website is being created which will include fact sheets on Malaga's tourism resources, together with descriptive videos in alternative formats, such as sign language interpretation. This project, with a dual focus on analysing tourism and raising student awareness, is led by the UMA, with the participation of Malaga City Council, the TOCA Group and its representative associations, teaching staff and students. The information gathered within this project is considered to be highly valuable for the tourism sector in Malaga, for highlighting and promoting its accessible tourism offer.

Based on the above information, we believe it is a priority to consolidate knowledge about the accessible tourism offer and to bring together the dispersed range of initiatives and information currently available, identifying relevant channels for the destination that are popular with tourists and visitors and that cover every part of the value chain, with

particular emphasis on Malaga's official tourism website and app. Additionally, this accessible tourism offer must be included in the promotional activities and events carried out on a regular basis by the destination, as part of its marketing strategy and annual operating plans.

Figure 28. Key areas: information and communication



4.6. Conclusions on accessibility management

There is a strong commitment to accessibility in the city of Malaga, where work began decades ago and has been ongoing ever since. There are two key milestones: the development of the *Municipal Regulatory By-law on Accessibility* in 2004 and the creation of the Department of Accessibility, part of the Department of Social Rights, which promotes the establishment of strategic lines of action and the implementation of measures aimed at removing architectural and urban barriers, as well as barriers in transport and communication. This ongoing work has been recognised on a number of occasions through awards and commendations and has engendered a strong culture of accessibility in municipal management, permeating various sectors and spheres of action.

This cross-cutting approach to accessibility management has led to significant progress in this area at various levels of the tourism value chain (e.g. urban transport), although there is room for improvement in areas such as public procurement. Moreover, the culture of accessibility has led to tourism strategies that seek to address this issue and which, in turn, gave rise to this accessible tourism strategy.

However, there has not been an even increase in accessibility across all tourism services, and areas for improvement have been identified which will require the organisational and participatory structure and decision-making on proposals to be improved, thus allowing accessibility measures to be planned, prioritised and implemented in the tourism sector.

There are noteworthy mechanisms in place to ensure the participation of disabled groups within the Accessibility Section of the Department of Social Rights, Equality, Accessibility and Inclusive Policies. This is not the case in the Department of Tourism, where universal accessibility is not a core area of work in the sectoral forum (Tourism Forum). Thus, disabled groups participate and engage in activities, some related to tourism, within the scope of work of the Accessibility Section, so it cannot be said that this participation extends to all municipal tourism services or to the whole range of services provided. In this regard, it is worth highlighting the recent creation of the Sectoral Committee for Social Rights, Accessibility and Inclusive Policies.

With regard to training and awareness-raising activities on accessibility and disability, there is ample room for improvement in this area, as initiatives are practically non-existent, both for workers in municipal tourism services and for managers and employees in the private tourism sector. The preparation of technical guides and handbooks, and the dissemination of the regulatory framework, international standards and examples of good practice are also important awareness-raising actions aimed at the different stakeholders in Malaga's tourism sector.

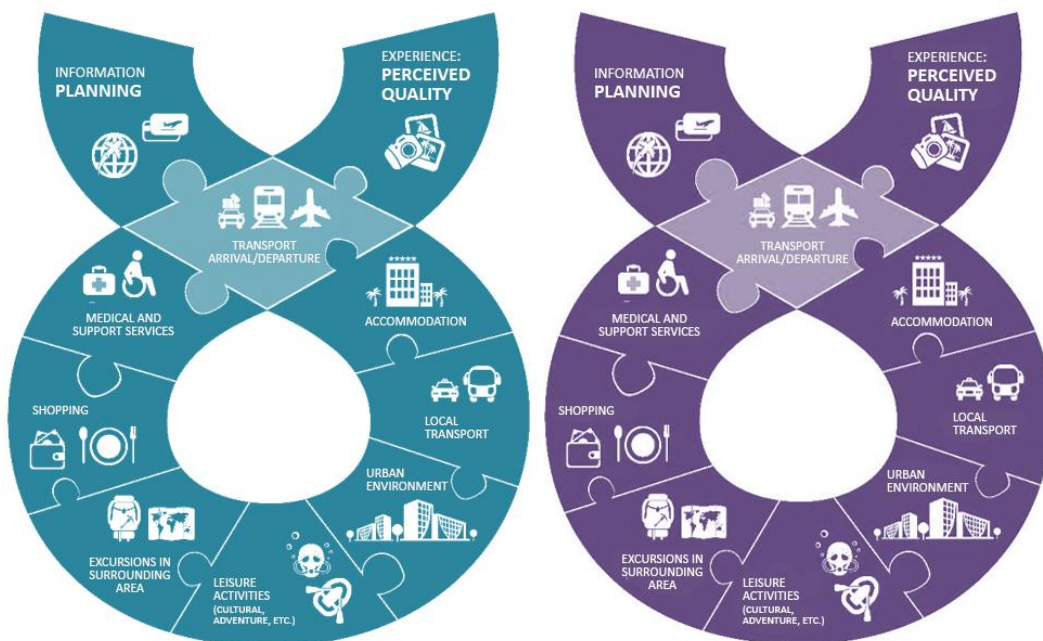
Regarding information and communication processes, significant weaknesses have also been detected in terms of the accessibility of technological tools, more specifically the tourism website and the tourism app, bearing in mind the importance of these tools for destinations when it comes to publicising, promoting and making their offer attractive. It should be noted, however, that they are planning to update them. Similarly, their content will be largely dictated by the knowledge available on this tourism offer and there is a need to provide further details about the features of the tourism offer based on technical parameters, and also to pool existing information and work together on the various initiatives that are being developed. It is also necessary to learn more about these segments and markets, tourists and visitors with accessibility requirements, and to be aware of their suggestions (problems, complaints) in order to identify and remedy the destination's shortcomings. Both steps are essential for designing, planning and launching promotional actions for the accessible tourism offer that will effectively reach the destination's target segments and markets.

5. Implementation of universal accessibility in the destination

The implementation of accessibility is the second of the two pillars that underpin the development and characterisation of any inclusive tourist destination.

To this end, universal accessibility must be addressed throughout the value chain, being present, to varying degrees, at every level of the chain so that it is not hindered by the presence of barriers and ensuring, at the very least, an accessible service that guarantees its continuity. Consequently, all providers of tourism products and services must work in unison to ensure alignment between the accessibility and tourism value chains, enabling a complete travel experience, from the inspiration phase to the end of the trip and the journey back home.

Figure 29. Aligning accessibility and tourism value chains



Source: Ilunion

Identifying the accessibility features of the different links of the tourism value chain requires an analysis of each of them. As noted above, there have been various such initiatives in Malaga, at different times and led by different actors and organisations, and the information on this issue is widely dispersed. In any event, no such actions have been identified that cover every possible part of the value chain.

Therefore, firstly, this section will analyse various components of the value chain, focusing on public management environments, but also, to a large extent, on Malaga's cultural offer, which is key to its current position as a tourist destination. Then, the issue of transport and mobility will be examined, before concluding with an analysis of public perception, based on the key areas identified in the survey that was conducted.

5.1. Analysis and assessment of tourism resources

This analysis and assessment focuses on twenty tourism resources that are currently key features of the tourism offer in the city of Malaga, especially its cultural offer. There is detailed information on each of these in a separate document, in the form of fact sheets, with the exception of the Malaga Metro and city bus transport (EMT), which are covered below. The following table lists the twenty resources selected for analysis.

Table 2. Tourism resources chosen for analysis

RESOURCE	TYPE
1. <i>Plaza Mayor Shopping Centre</i>	Leisure, shopping
2. <i>Trade Fair and Congress Centre of Malaga (FYCMA)</i>	MICE
3. <i>Malaga Picasso Museum</i>	Culture
4. <i>Museum of Malaga La Aduana</i>	Culture
5. <i>Municipal Heritage Museum (MUPAM)</i>	Culture
6. <i>Pompidou Centre</i>	Culture
7. <i>Picasso Birthplace Museum</i>	Culture
8. <i>Collection of the Russian Museum, St. Petersburg</i>	Culture
9. <i>Contemporary Art Centre (CAC)</i>	Leisure / Culture
10. <i>Cathedral of Malaga</i>	Culture / Religious
11. <i>Alcazaba</i>	Culture
12. <i>Gibralfaro Castle</i>	Culture
13. <i>Cervantes Theatre</i>	Leisure / Culture
14. <i>La Concepción Historical Botanical Garden</i>	Leisure / Culture
15. <i>La Misericordia Beach</i>	Leisure / Nature
16. <i>Route No. 6 – Cofrades Tours</i>	City route
17. <i>Malaga María Zambrano train station</i>	Transport (infrastructure)
18. <i>Local train station</i>	Transport (infrastructure)
19. <i>Malaga Metro</i>	Transport (system)
20. <i>EMT</i>	Transport (system)

In addition to this analysis and assessment, additional information is provided below on the tourism offer in the city of Malaga, which merits attention. There is also information

from other sources and initiatives, collected during the interview process, including important information from the STD Report.

TOURIST ACCOMMODATION

With regard to the accessibility of tourist accommodation, the current legislation specifies the number of accessible rooms that must be made available. Firstly, the *Municipal Regulatory By-law on Accessibility in the city of Malaga*, which covers hotels, residential homes and care homes, requires 1 adapted bedroom when the accommodation has between 20 and 50 rooms; 2 adapted bedrooms when there are between 50 and 100 rooms, and up to 3 for establishments with more than 100 rooms. Secondly, the regional legislation, introduced after the local regulation, broadens the types of establishments and increases the accessibility requirements (Figure 30).

Figure 30. Accessibility requirements in tourist accommodation, Regional Government of Andalusia

TABLE 1. USE OF BUILDINGS, ESTABLISHMENTS AND FACILITIES									
FOR ACCOMMODATION	FLOOR AREA / CAPACITY	NUMBER OF ACCESSIBLE ELEMENTS							
		ENTRANCES (Article 64) Up to 3 > 3		Lifts and ramps (Art. 69)	Bedrooms and lodgings (Art.79)	Showers* (Art. 78)	Mobile hoists (Art. 79.2)	Toilets* (Art. 77 DB SUA)	Parking space (Art. 90 - DB SUA)**
Hotels, hotel apartments, hostels, guest houses, motel, other hotel establishments, holiday accommodation (villas, chalets, bungalows, cottages), non-profit holiday accommodation, lodges and spas	1 to 50 lodgings	1	2	1 in 5 or fraction thereof	1***		1	1 per block, 1 in 5 separate toilets	1 per accessible lodging
	51 to 100 lodgings	1	2	1 in 5 or fraction thereof	2		1	1 per block, 1 in 5 separate toilets	1 per accessible lodging
	101 to 150 lodgings	1	2	1 in 5 or fraction thereof	4		2	1 per block, 1 in 5 separate toilets	1 per accessible lodging
	151 to 200 lodgings	1	2	1 in 5 or fraction thereof	6		2	1 per block, 1 in 5 separate toilets	1 per accessible lodging
	>200 lodgings	1	2	1 in 5 or fraction thereof	8 and 1 or more per 50 lodgings or additional fraction thereof from 250 lodgings		2	1 per block, 1 in 5 separate toilets	1 per accessible lodging
Student accommodation	All	1	2	1 in 5 or fraction thereof	Same allocation as hotel establishments depending on the number of lodgings			1 per block, 1 in 5 separate toilets	1 per accessible lodging
Tourist campsites	Up to 1000 m2	1	2		Same as student accommodation	1 in 10 or fraction thereof		1 per block, 1 in 5 separate toilets	1 per accessible lodging
	>1000 m2	1	2		Same as student accommodation	1 per block		1 per block, 1 in 5 separate toilets	1 per accessible lodging

**Toilets: In blocks with 10 or more toilet units: 1 accessible unit (consisting of washbasin and toilet) per 10 toilets or fraction thereof (CTE-DB SUA)

***Parking spaces: This allocation will be applied provided that it is higher than the Regulation's general allocation (1 per 40 spaces or fraction thereof)

****In these cases the requirements only apply to the bedroom and toilet as stipulated in the Regulation, not to any other areas that may exist in the accommodation: kitchen, living room, etc.

Source: Decree 293/2009, of 7 July, approving the regulations that govern the rules for accessibility in infrastructure, urban planning, building and transport in Andalusia.

Although there is no data on compliance with this legal obligation, generally speaking, according to the ONCE Foundation's Accessible Tourism Observatory, this area of legislation is not usually complied with, primarily due to a lack of knowledge or misunderstanding of the measures that must be taken to ensure that the accommodation

is fully accessible. Thus, it is common for there to be a shortage of accessible accommodation, especially in categories below 4 stars.

The initiative being carried out by the Malaga Tourist Information Office to create a database of tourist accommodation that includes accessibility criteria is, therefore, essential in order to obtain in-depth knowledge of the range of accommodation on offer. However, it is necessary to include specific technical parameters and follow a systematic approach in order to ensure that the information can always be found at the click of a button.

Among the accessible tourist accommodation in the city of Malaga, [Hotel Ilunion Malaga](#) is one of the highest rated resources in the aforementioned [Accessible Tourist Destinations in Andalusia](#) project.

CITY ROUTES

One of the cornerstones of accessibility in the urban environment can be found in the measures implemented as part of the Plan for Universal Accessibility in the Municipality of Malaga, including shared spaces, the widening of pavements, tree grilles, the removal or relocation of vertical obstacles and gaps, the installation of railings and handrails, the installation of audible warning devices at traffic lights, zebra crossings and pedestrian crossings that need to be adapted. In this respect, our fieldwork revealed that most of the pedestrian crossings have been lowered, although attention should be paid to the tactile paving in these areas, as it is sometimes inadequate. On the other hand, one notable example of good practice is the smart pedestrian crossing installed on Calle Córdoba in 2017, which was supplied by the company [Interlight](#). A system that activates the horizontal road markings when its sensors detect pedestrians on the road.

Malaga City Council has made significant efforts to connect the main tourist attractions via accessible routes, by providing pavements that are sufficiently wide and level paving. It is worth highlighting the tactile guidance paving laid on Alameda Principal and the overall satisfactory use of this paving in newly paved central areas (STD report). These efforts will be accompanied by the forthcoming project to replace some of the existing signage in the historic centre.

Although the terrain is generally good for accessibility in the city, there are areas with steep slopes that reduce accessibility and make it difficult for many users to move around

safely and independently, an issue that must be factored in when designing and disseminating information on accessible city routes. It is worth highlighting the UMA's initiative to add a layer on Google Maps with information on gradients, so that each user can make the most suitable decision for his or her personal circumstances. Project not completed due to lack of funds.

With regard to street furniture, the STD Report finds that some elements are fully compliant with the regulations. There are various types of bollards, some of whose design and height are unsuitable. The same applies to benches, i.e. there are different types and some have elements that do not meet accessibility requirements and are not ergonomically designed.

Finally, it is worth mentioning the tourist route that runs through the centre of Malaga and which is one of the most highly rated resources in the [Accessible Tourist Destinations in Andalusia](#) project. The route starts at Calle Marqués de Larios street and ends at the Municipal Heritage Museum. The central streets along which it runs have shared spaces, paving that is in a good condition and has no raised areas, there are no undetectable obstacles, there is seating and the pedestrian crossings and dropped kerbs have been properly executed.

Figure 31. Accessible tourist route through the centre of Malaga



Source: [Accessible Tourist Destinations in Andalusia](#)

TOURIST INFORMATION OFFICE

Located in Plaza de la Marina, the Tourist Information Office has a level entrance, adequate doorways and well maintained, non-slip flooring. Inside, there are two adapted single-sex toilet cubicles with an ISA sign. The counter is lowered, but no audio induction loop has been installed. As noted earlier in this report, the office has set up a display with QR codes to provide access to tourist information and it has databases for resources showing whether or not they have been adapted. For people with communication and comprehension problems, a communication handbook is available, and magnifying glasses are also available for users on request.

Figure 32. Counter in the Malaga Tourist Information Office, Plaza de la Marina



Source: [*Accessible Tourist Destinations in Andalusia*](#)

COMMERCIAL AND CATERING ESTABLISHMENTS

With regard to these establishments, it is worth highlighting the initiative launched by the Accessibility Section of the Department of Social Rights, Equality, Accessibility and Inclusive Policies, whose development was supported by the Malaga Chamber of Commerce. It consists of an accessibility badge designed to recognise establishments in Malaga that are accessibility friendly, which cater for accessibility in some way. The initiative was originally launched for commercial establishments and subsequently for catering establishments. This is a major awareness-raising project in the city that currently includes almost 900 establishments, all of which are geolocated, but there is no online tool or platform where they can all be seen. The Facilities and Spaces of the City section of the City Council's website only shows a fraction of these establishments, approximately 244 of the 876 that have signed up, showing only the ISA symbol and the legend "Has access for persons with reduced mobility (PRM)". The last time fieldwork was carried out for Malaga's accessibility badge was in 2016.

Figure 33. Malaga City Council's list of accessible facilities

The screenshot shows the Malaga City Council website's 'Instalaciones y Espacios' (Installations and Spaces) section. The page has a dark blue header with navigation links: 'El Ayuntamiento', 'La Ciudad', 'Sede Electrónica', 'Transparencia', and 'Málaga 24h'. A search icon is also present. On the left, there is a sidebar menu with options like 'La Ciudad', 'En Portada', 'Historia de la Ciudad', 'Agenda', 'Callejero', 'Días Festivos', 'Instalaciones y Espacios' (selected), 'Juntas Municipales de Distrito', and 'Movilidad'. The main content area features a title 'Instalaciones y Espacios' and a decorative graphic with location pins. Below this, a text box states: 'En esta sección se encuentran todos las instalaciones y espacios de la ciudad de Málaga.' There are two dropdown menus: 'Equipamiento accesible' and 'Distritos'. A 'Buscar' (Search) button is located to the right of these menus. Below the search area, there are two tabs: 'Listado' (selected) and 'Mapa'. The first result under 'Listado' is 'ACCESORIOS ANDYCRAFT' with the address 'PASEO DE LA FAROLA, 1' and icons for accessibility and contact.

Source: Malaga City Council website

CITY PARKS AND GARDENS

According to the information provided by the STD Report, provided in turn by the destination, most of these spaces are equipped to meet minimum accessibility requirements, including: level entrances, stable paving, drainage to avoid puddles and excessive accumulations of water, accessible furniture and regular maintenance of plants to avoid overhanging obstacles.

In specific reference to children's playgrounds, the same report also states that there are adapted spaces, such as Huelin Park, Calle Walt Whitman and Malaga Park.

BEACHES

The city of Malaga has 15 beaches, covering an area of 13.5 kilometres. La Misericordia Beach was analysed within this Plan, although all of Malaga's beaches merit special mention, especially those that are equipped with accessibility features, both because they are priority resources for the destination and because of the levels of accessibility they have achieved.

Malaga currently features 6 beaches with independent bathing areas. Areas where people with reduced mobility can use amphibious chairs to access the water and facilitate bathing. These beaches are San Andrés, La Malagueta, Caleta, Pedregalejo, Guadalmar and Palo. Facilities include nearby reserved parking spaces for people with reduced mobility, adapted access (level or ramped), walkways to the shoreline, accessible toilets/changing rooms and adapted showers. They are all equipped with a lifeguard and rescue post.

In addition to these services, the “Enjoy the Beach” programme was launched, developed jointly by the Accessibility Section and the Department of Operational Services, Internal Affairs, Beaches and Festivals, and it consists of specialised monitors providing support and accompaniment to the sea for people with reduced mobility. In 2021, the service was provided from 15 June to 15 September on a daily basis, and on weekends during the other two fortnights of both months, at La Misericordia Beach and El Dedo Beach. The former provides 6 amphibious chairs for adults, 2 chairs for children, 2 electric hoists, 1 manual hoist, 1 walker and 1 set of amphibious crutches. El Dedo Beach has 4 amphibious chairs for adults, 2 chairs for children, 2 electric hoists, 1 manual hoist, 1 walker and 1 set of amphibious crutches.

Specifically, La Misericordia Beach has been recognised as one of the most highly rated accessible resources by the [Accessible Tourist Destinations in Andalusia](#) project.

Figure 34. Concrete walkway to La Misericordia Beach shoreline



Source: Ilunion

INCLUSIVE GUIDED TOURS AND EVENTS

The Malaga Accessible City programme arose from the city of Malaga's 2007-2011 Accessibility Plan. This programme has been very well received, especially among local residents, who are its main target group. Every year, various types of guided tours are organised as part of this programme, all of which include accessibility features, such as sign language interpretation or informative material in Braille. Providing tours, workshops and even excursions, information and registration is via the Facebook page created for this purpose and managed by the Accessibility Section, <https://www.facebook.com/malagaaccessible/>. It is run by this Section, with the active participation of the TOCA Group and various organisations, thereby ensuring that third sector associations and representatives of people with disabilities are involved in implementing the project.

Recent examples are the Urban Art Tour, Murals - Graffiti, with Street Art Malaga, held on 2 December and Paseos dibujados por Malaga (Sketching walks through Malaga), the final events in the 2021 programme.

Malaga Accessible City is a hugely important initiative for the destination's accessible tourism offer, especially its cultural offering, yet it is not being promoted through the usual tourism promotion channels, hindering its dissemination and wider uptake among visitors and tourists as an inclusive experience.

Malaga's cultural agenda is becoming increasingly packed, with a greater number of activities and events, some of which cater to accessibility requirements, either through the Accessibility Section, in conjunction with the Department of Culture and Citizen Participation, through different organisations such as the TOCA Group, e.g. "Sleepless Night", or through private cultural organisations, like museums, e.g. the Screen TV festival held in the auditorium of Malaga's Picasso Museum.

5.2. Transport and mobility

This section contains information on accessibility features related to transport and mobility in Malaga, covering a number of areas. The first two areas discussed are two of the city's most important transport systems, the Malaga Metro and the city bus network. These are followed by an analysis of the adapted taxi service and parking spaces reserved for people with reduced mobility.

Urban mobility

The city of Malaga currently has an extensive network of transport infrastructures, with the airport and María Zambrano station at the forefront, making it the main gateway to the Costa del Sol, and other parts of the Andalusian region. According to the Strategic Tourism Plan, 20 million passengers pass through the airport each year, 2.5 million through the long-distance train station and up to 500,000 through the port. Extensive air links with other countries and cruise ships increase international passenger arrivals by up to 85%. Additionally, the metropolitan area of Malaga covers a territory with almost one million people, with a high number of daily commuters, in which the suburban and metropolitan bus network plays a key role.

Internally, the city of Malaga is combating the excessive use of private vehicles with an increasingly comprehensive public transport offer, which includes two suburban lines, the city and intercity bus network, the metro network and the taxi service. In addition to this, there are over 45 kilometres of cycle lanes (Special Plan for Sustainable Urban Mobility in Malaga (PEMUS), p. 28). Malaga also implements access controls to its historic centre, with the aim of prioritising pedestrian use and promoting economic activities such as retail and hospitality, although the large number of pavement cafés can lead to overcrowding that creates barriers to the comfortable and safe mobility of tourists and residents (EDUSI, p. 42).

In general terms, in accordance with the Plan for Sustainable Urban Mobility in Malaga, there have been continuous improvements in the accessibility of urban transport over time, with a vital role being played by the development and implementation of the Strategic Plan for Universal Accessibility and the creation of the Sectoral Committee for Mobility in 2016, a participatory body dealing specifically with this issue and composed of three thematic committees focused on taxi services, bicycles and heavy transport ([Malaga City Council](#)). With the same objective, the city is gradually implementing

measures for the general improvement of public spaces, such as the conservation and improvement of paving, or the adaptation of pavements to improve accessibility (EDUSI, p. 105), which has helped to link together key public spaces via accessible routes, with approximately 10% still awaiting adaptation to meet the minimum required criteria (STD, p. 264). At present, around 42.86% of the public thoroughfares analysed within the PMUS have a passing width of at least 2 metres and around 25% of them do not have the 1.80 metre clearance required by the regulations (PMUS 203). However, the city's terrain favours greater accessibility, with a predominance of gentle slopes of less than 6%, with certain exceptions in the northern part of the Eastern District and parts of Ciudad Jardín (PEMUS, p. 81). However, the 2019 PEMUS survey identified increasing the number of cycle lanes and improving the accessibility of pavements as the most popular proposals among users, highlighting the need to step up these measures.

As outlined in the PMUS (285, 288), with the aim of promoting mobility on foot and increasing the accessibility of pedestrian routes, especially those with the highest number of pedestrians, various actions are planned regarding pedestrian routes and perimeter or transversal networks. In addition, the Plan sets out improvements to accessibility on the city's main pedestrian routes in three separate phases: in the short term (2020-2025), it proposes improvements to more than 15 km of routes (Figure 35); between 2026-2030, the improvements will be made to more than 14 km of thoroughfares (Figure 36); in the long term (2031-2035), more than 7 km of the pedestrian network will be improved (Figure 37).

Figure 35. Proposed pedestrian routes to meet accessibility criteria in the short term (2020-2025)

⇒ Paseo de Sancha - Avda. Pintor Joaquín Sorolla
⇒ Avda. Moliere (Cmno. de la Térmica – C/Pacífico section)
⇒ Avda. de Velázquez
⇒ Avda. de Europa
⇒ Eguíluz - Pso. de los Tilos
⇒ Cmno. San Rafael
⇒ Paseo de los Tilos – Eguiluz
⇒ Manuel José García Caparrós - Pasillo de Santa Isabel - Avda. la Rosaleda - Huerto de los Claveles
⇒ Carretería – Álamos – Plaza de la Merced
⇒ Alcazaba Tunnel
⇒ Victoria
⇒ Armiñán Bridge
⇒ Pso. de Martiricos - Avda. Fátima
⇒ Martínez Maldonado
⇒ Velarde
⇒ Eugenio Gross - Blas de Lezo - Avda. Simón Bolívar

Source: Plan for Sustainable Urban Mobility in Malaga

Figure 36. Proposed pedestrian routes to meet accessibility criteria in the medium term (2026-2030)

⇒ Pso. de Reding - Avda. Pries
⇒ Heroe de Sostoa
⇒ Ingeniero Jose Maria Garnica
⇒ Callejones del Perchel
⇒ Avda. de las Americas
⇒ Avda. Andalucía
⇒ Competa - Avda. Obispo Angel Herrera Oria - Avda. Ingeniero de la Torre Acosta
⇒ Virgen de la Cabeza
⇒ Armengual de la Mota
⇒ Mármoles
⇒ Martinez de la Rosa - Calzada de la Trinidad
⇒ Camino de Suarez
⇒ Avda. Doctor Gálvez Ginachero
⇒ San Juan Bosco
⇒ Avda. Carlos Haya
⇒ Paseo de los Curas
⇒ Avda. Manuel Agustin Heredia

Source: Plan for Sustainable Urban Mobility in Malaga

Figure 37. Proposed pedestrian routes to meet accessibility criteria in the long term (2031-2035)

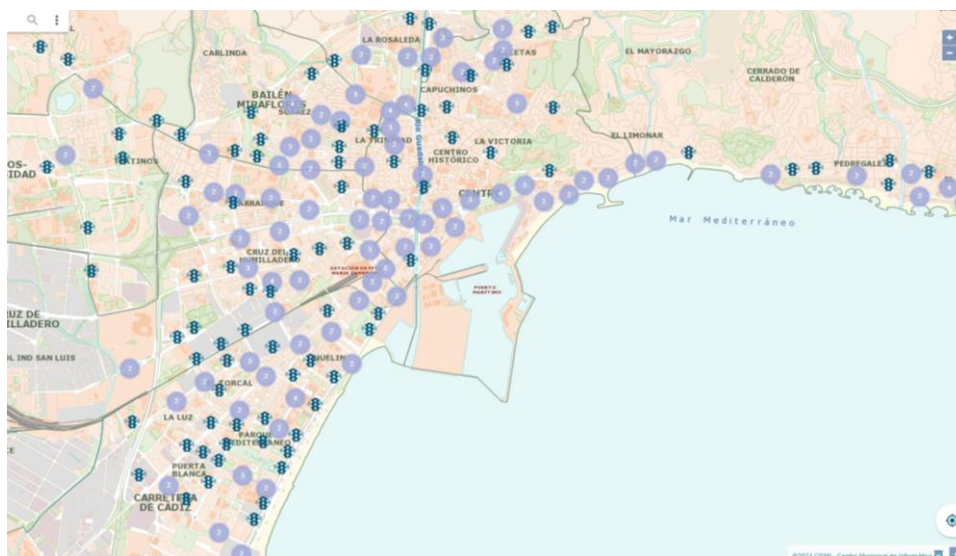
⇒ Eduardo Dominguez Avila
⇒ Jaboneros - D. Juan de Austria
⇒ Explanada de la Estación
⇒ Av. Juan XXII - Abogado Federico Orellana Toledano - Princesa
⇒ Juan Sebastian El Cano - Almería
⇒ Avda. de Barcelona

Source: Plan for Sustainable Urban Mobility in Malaga

Directly related to this issue, it is worth highlighting two initiatives involving the analysis, mapping and geolocation of accessible routes in the city. The first was launched by the University of Malaga and involved adding a layer to Google to provide specific information on the gradients of the city's streets, thus offering alternatives to the suggested routes. The second was created by the TOCA Group and consisted of adding accessible routes to the Google Maps platform as well.

Finally, it should be added that accessibility for residents and tourists who are travelling on foot is enhanced by the presence of audible traffic signals at 329 of the 477 existing junctions, 104 of which also have counters that display the remaining crossing time (PMUS 165).

Figure 38. Location of audible traffic signals in the city of Malaga



Source: Malaga City Council Geoportal

The city bus network

Empresa Malagueña de Transportes (EMT) currently operates 51 city routes ([EMT](#), 2021), several special connections (Parque Tecnológico de Andalucía (Andalusia Technology Park), port and airport), 2 tourist routes, 5 night routes and special routes for events and festivals, services used by more than 2.5 passengers per month. In 2005 the company launched a programme to increase the accessibility of bus stops and to install real-time information panels. It ensured that all vehicles had access ramps and cognitive disabilities were catered for in information processes by establishing a specific model, developed in conjunction with the Accessibility Section of the Department of Social

Rights, Equality, Accessibility and Inclusive Policies, together with the Technical Committee on Cognitive Accessibility to Information, part of the Malaga Accessible City Development Group. This model received an award from Territorio & Marketing. After a pilot project that lasted for several years, the model was overhauled in 2014 to correct the weaknesses that had been identified, incorporating pictograms, replacing vinyl signs, modifying the circles that mark bus stops on the route, identifying stops with letters and developing QR codes with audio descriptions of information. The network also has audible information on waiting times, both at stops and inside the vehicles (EMT has a national patent for the voice system at stops). Equally notable is the use of ICT in information signs at bus stops, including receivers for activation buttons for the visually impaired ([Malaga City Council](#)), the same ones used to activate traffic lights.

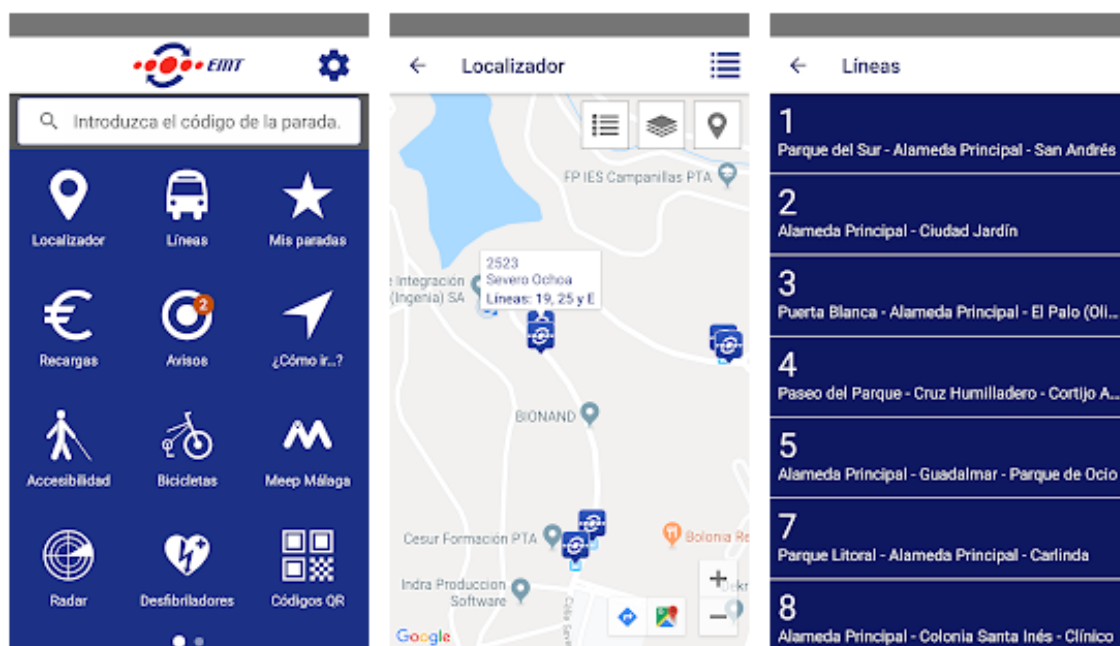
In addition, the level of accessibility of city bus transport has increased dramatically since the following solutions were implemented ([EMT](#)):

- On-demand stop system. Using the mobile app, users who require it can request this service by voice command and manually.
- Dynamic “high luminescence” information panels at stops.
- Stops with audio systems for information on waiting times.
- Buses equipped with interior and exterior “next stop” audible announcement systems.
- Audible signals and light indicators inside new vehicles.
- Braille stop numbers.
- Pictograms identifying stops.
- Information system in sign language.
- 100% of the fleet is equipped with access ramps for people with reduced mobility.
- Procurement of mega buses ([EMT](#)): equipped with defibrillators, more reserved seats and more space for people with reduced mobility. They feature large, coloured front panels to make it easier to identify the route number by number and colour.

Special mention should be made of the mobile application linked to this service, which allows you to find all the information on routes, buses and stops, thanks to the installation of a geolocation system. The app also features an on-demand stop function, online payment and the possibility of requesting a bus stop, replacing hand gestures (a function designed especially for the visually impaired). More recently, a virtual assistant has been

added as a new feature of the app. It is called “Trayecto” and it assists passengers before, during and at the end of their bus journeys, explaining all the steps necessary to reach the specified destination from the passenger's point of origin. This feature was made possible by the use of GPS signals and iBeacons ([Smartcity.es](https://www.smartcity.es/), 2020).

Figure 39. Features of the EMT Málaga mobile app



Source: EMT Málaga

The accessibility of bus stops is improved through regular upgrades. Approximately 65% have voice diode panels, 80% to 85% feature augmented reality and geographic information systems and 10% have information in Braille (STD). More recently, 13 stops in the Eastern District were revamped with various upgrades.

Malaga Metro

This transport system was added to the city's urban transport system in 2014, the year in which it was opened. There are currently two lines in operation, but both the General Urban Development Plan of Malaga (PGOU) and the Spatial Development Plan for the

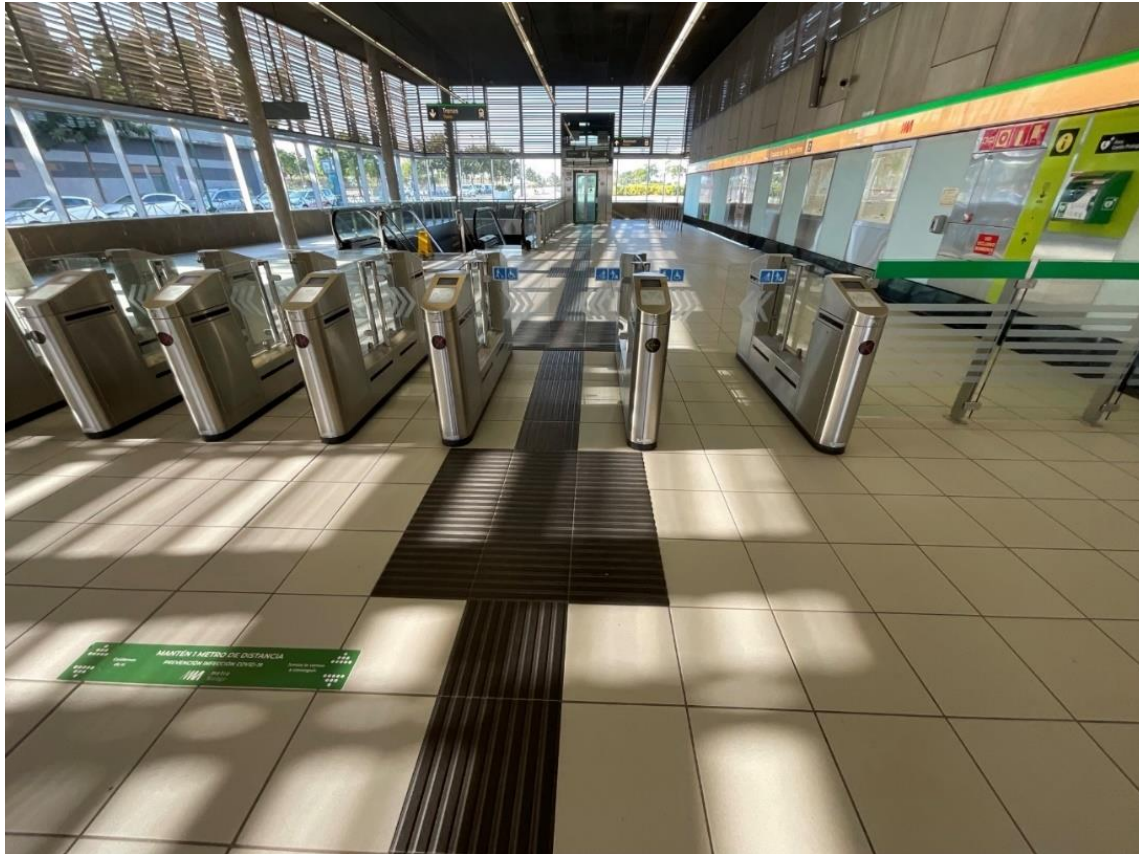
Urban Agglomeration of Malaga (POTAUM) contain provisions for its expansion (PMUS 116).

Accessibility is provided by Malaga Metro through a specific management system, for which it was certified in accordance with Standard UNE 170001-2: 2007 *universal accessibility management* in 2018, by the certifying body AENOR. For this purpose, the entity has created an Accessibility, Environment and R&D&I Department to which it allocates human and financial resources, and a Global Accessibility Plan to implement actions in this area. The measures it has adopted include removing architectural barriers in stations and carriages, and introducing solutions to ensure sensory accessibility, such as information leaflets in Braille, embossed station and line maps, and the installation of colour-contrasting strips in underground stations. All stations have entrances that are of above-standard width and tactile paving markings. The vending machines are adapted to enable visually impaired and physically disabled people to use them independently, with sound activation and Braille signage. The option of personalised communication via intercoms is also available.

More recently, Malaga Metro has been working on improving the accessibility of its website, on audio improvements to the public address and intercom systems and on staff training ([Malaga Metro](#)).

Training in universal accessibility and customer care for the disabled, a requirement for obtaining certification, is being provided on an ongoing basis for newly recruited staff by the company Ilunion Accesibilidad. Similarly, Malaga Metro has held open days with users and leading disability organisations, such as ONCE, during which users have had an opportunity to see the various accessibility measures in place ([ONCE](#), 2020). The last one was held in November last year, in which testing was carried out by users with disabilities, including representatives and technicians from ONCE and the Accessible Malaga Development Group.

Figure 40. Entrance to Malaga Metro station and accessible features



Source: Ilunion Accesibilidad

Malaga taxi service

In the city of Malaga, use of the public taxi service decreased from 2.2% in 2008 to 1% in 2018, with a rise in the use of other public and, especially, private means of transport, notably cars and motorbikes (PMUS 44). However, this service is regarded as essential for mobility in the city of Malaga, for its residents and for the large number of tourists who visit it every year.

With the aim of ensuring an adequate supply of taxis to meet the needs of all people, Article 8 of *Royal Decree 1544/2007, of 23 November, governing the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities*, stipulates that municipalities are obliged to ensure that 5% of licences are issued for adapted vehicles. Annex VII covers the basic accessibility requirements that the service must meet, including the use of Braille for fares.

The city of Malaga has a Municipal Taxi Service By-law, published in 2017, of which Chapter VI relates to the accessibility of this municipal service, with express reference

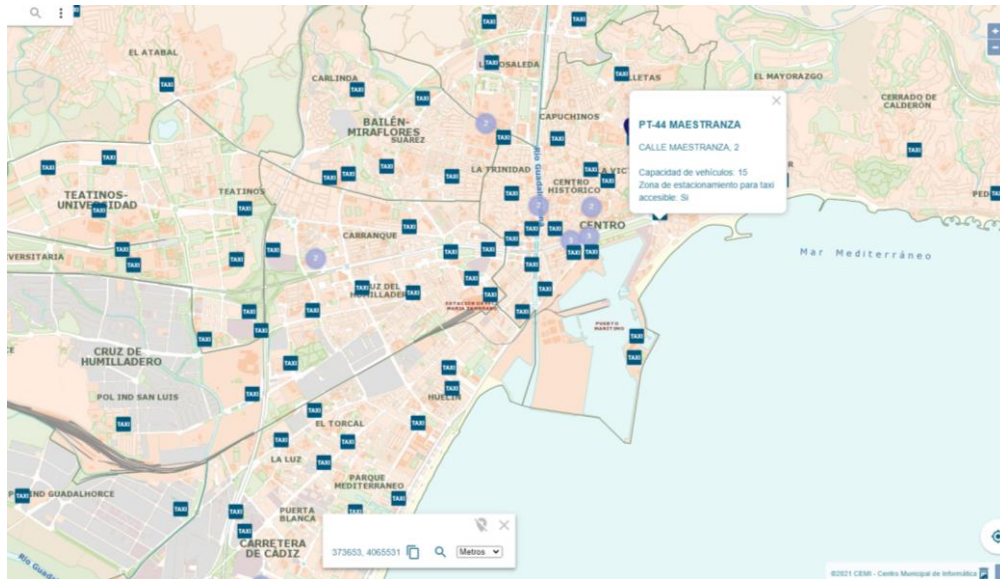
to state regulations. According to the Plan for Sustainable Mobility, *“Malaga has 1,432 taxi licences, of which 88 are for accessible vehicles and 83 are for vehicles with more than 9 seats”*, which means that more than 6% of vehicles are adapted and, therefore, in compliance with the regulations. To ensure compliance, the By-law introduced an enforcement mechanism whereby the latest licences to be granted must be for accessible vehicles if the 5% minimum is not being met. Similarly, the local regulation includes other accessibility measures that fall under the responsibility of the Municipal Government, such as ensuring the accessibility of taxi ranks and the urban environment, the use of accessible technological resources for taxi ranks, extending the use of the Braille reading system - and other accessible media - and ensuring that wheelchair users are able to see the fare meter.

With regard to priority use of this service by persons with disabilities, Chapter IV, Article 81 of the By-law stipulates that *“adapted vehicles shall provide priority services to persons with disabilities, but when such services are not required, they may provide services to any non-disabled person, as with other taxis”*. Despite this stipulation, and although the percentage of adapted taxis is higher than the legal minimum, sources who were consulted when this Plan was being prepared reported lengthy waits and, at times, the non-availability of taxis for people with accessibility requirements, who needed them for their journeys. According to the information received, this may be due to the fact that, although the 5% legal threshold has been met, there are too few units available for the number of passengers in the city, and also because adapting vehicles is not cost-effective. Although the taxi service was generally well rated in the citizen survey, some comments received in the survey confirm this information.

According to the Plan for Sustainable Mobility in Malaga *“This service needs to be optimised with measures such as: the upgrading of taxi ranks, accessibility for vehicles, the adaptation of taxis for other disabilities (Braille system in some taxis, audible fare meters), promoting electric vehicles and useful information for users, etc. The aim is also to introduce technological systems in taxi ranks and services”*.

Malaga City Council's GeoPortal provides the location of the 103 taxi ranks that currently exist in the municipality, and in each case you can check whether there is a parking area for accessible taxis.

Figure 41. Geolocation of taxi ranks in the city of Malaga



Source: Malaga City Council Geoportal

Through the Department of Social Rights, Equality, Accessibility and Inclusive Policies' Accessibility Section, the city has also introduced a subsidy scheme as a tool to promote the use of adapted taxis among local residents ([Malaga City Council](#)).

The management of the taxi service in Malaga has its own participatory body, the Taxi Committee, which is part of the Sectoral Committee for Mobility.

Figure 42. Eurotaxi signposted taxi rank in the city of Malaga

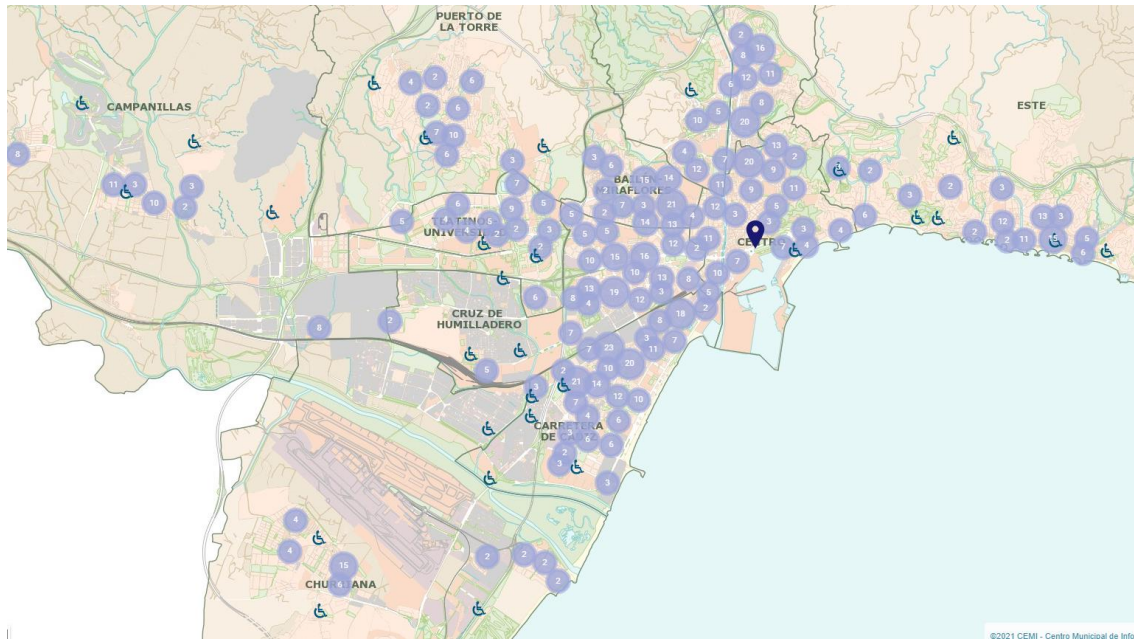


Source: Ilunion

Parking spaces reserved for people with reduced mobility

According to figures from the Plan for Sustainable Mobility in Malaga (231), “As of 2019, Malaga has a total of 1,057 reserved parking areas with a total of 1,577 parking spaces”, so it has been increasing steadily since 2013. In turn, Malaga City Council's GeoPortal offers a total of 1,072 geo-referenced parking spaces reserved for people with reduced mobility (PRM). According to *Decree 293/2009 of 7 July, approving the regulations that govern the rules for accessibility in infrastructure, urban planning, building and transport in Andalusia*, there must be 1 PMR parking space for every 40 spaces, or fraction thereof, on underground and above-ground public roads and spaces, irrespective of who owns them. Although the proportion of such spaces is not known at present, the citizen survey conducted as part of this Plan contains several opinions from users calling for additional parking spaces that are reserved for people with reduced mobility in the city.

Figure 43. Available parking spaces reserved for people with reduced mobility in the city of Malaga



Source: Malaga City Council Geoportal

In turn, Malaga City Council's Mobility By-law simply provides information on how to apply for a parking space and the respective identification card.

As regards the condition of these parking spaces, the PMUS provides no detailed information in this respect, although the STD Report confirms that the spaces are of a suitable size, with some non-conformities in access zones beside parking bays and the colour of signage, which does not comply with the regulations.

At present, in the city of Malaga, you can use two different mobile applications to manage your parking online. Firstly, Telpark, which operates in Spain and Portugal, allows you to reserve spaces, charge electric vehicles and pay for parking meters, although we found no reference to users with disabilities or information about PRM parking spaces. A second mobile app has been launched by SMASSA itself, providing a list of parking spaces sorted by proximity to the user and a geolocation map. The application allows you to pay for different services and manage fines, with personalised alerts for users, although we have been unable to confirm whether it has been developed according to accessibility criteria.

Port of Malaga – Málagaport

The Port of Malaga is currently a leading port on the Iberian Peninsula for cruise tourism, a key product for the destination. According to the Malaga Strategic Tourism Plan, it is also aiming to become a leading European destination by promoting sustainability, through greater control of the number of cruise passengers and smaller excursions.

According to the information provided by the port terminals, parking is available for passengers on the ferry to Melilla, including two parking spaces reserved for people with reduced mobility. Two totem stands have been placed in the port operations area. These signs show people with reduced mobility the spaces that are reserved for them in the terminal and the priority service they are offered. In this regard, priority boarding and disembarkation lanes were added. The terminals have adapted toilets and reserved seating, marked with the SIA symbol and close to the boarding area, and the lifts have been equipped with Braille and embossed button panels. We have also been informed that terminal staff have received training in this area and are knowledgeable in dealing with passengers with reduced mobility.

Figure 44. Signage for priority service and reserved seats in the terminals of the Port of Malaga.



Source: Eurogate Group Terminals S.L.

The port also has three cruise terminals, one in El Palmeral and two in the Levante area. According to the information received about these spaces, they are all adapted for people with sensory and physical disabilities. There are access ramps that are within the maximum permitted gradient, both at the entrances and on the overhead walkways and lifts. There is also a service providing assistance to people with reduced mobility, at the request of the ship, for the boarding / disembarkation / transit of its passengers. The terminal itself provides wheelchairs and trained staff for the transfer of people with reduced mobility to the ship or to the shuttles serving far-off docks. All internal shuttles have ramps and lap belts for wheelchair users. Finally, it is reported that the staff are trained to cater for different types of customers.

In order to improve the experience of all cruise passengers, the PET includes measures whose implementation would enhance the accessibility of the facilities and services offered in this area, including the setting up of Wi-Fi access points, the installation of charging points for electric wheelchairs, providing information about the city before disembarkation (including accessibility features and through accessible ICT tools), extending the range of mobility services in the port to the city (especially cycle and PMV lanes). Moreover, in view of the number of elderly and disabled passengers arriving on cruise ships, the Port of Malaga is considered an important tourism site for promoting the city's accessible offer.

5.3. Social perception: citizen participation survey

As part of the roll-out of the Plan, an online survey was developed on the perception of the city of Malaga as an accessible tourism destination, with the general aim of giving a voice to and gathering the opinions of users, and more specifically of users with disabilities, their families, the people around them and leading associations. The survey was therefore made available to all citizens, tourists and visitors.

Ilunion Accessibility disseminated the survey as follows:

- Informing key disability organisations:
 - ONCE Málaga
 - ONCE MADRID
 - CERMI Andalusia
 - CERMI Madrid
- Promoting the survey on Discapnet, <https://www.discardnet.es/>, a leading website for people with disabilities. Through:
 - Special features
 - News
 - Social media posts:
 - Discapnet's Twitter account: <https://twitter.com/Discardnet>
 - Discapnet's Facebook page: <https://www.facebook.com/webdiscardnet/>

The survey had a total of 100 respondents with valuable information on all or some of the questions. It was designed with 25 questions, divided into 6 thematic blocks and with a final rating.

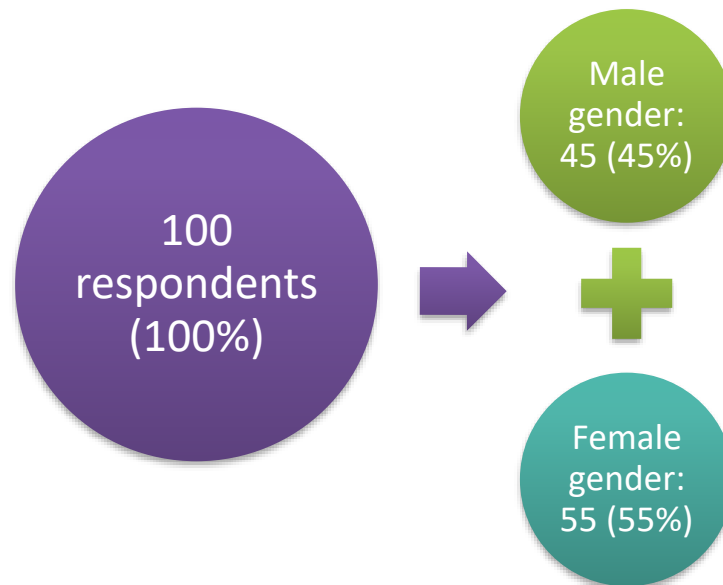
Table 3. Citizen participation survey thematic blocks

<i>Block 1. User profile</i>
<i>Block 2. Mobility and transport</i>
<i>Block 3. Beaches and leisure facilities</i>
<i>Block 4. Cultural Malaga</i>
<i>Block 5. Information and communication</i>
<i>Block 6. Perceived quality</i>
<i>Final rating</i>

The key points are outlined below:

BLOCK 1. User profile

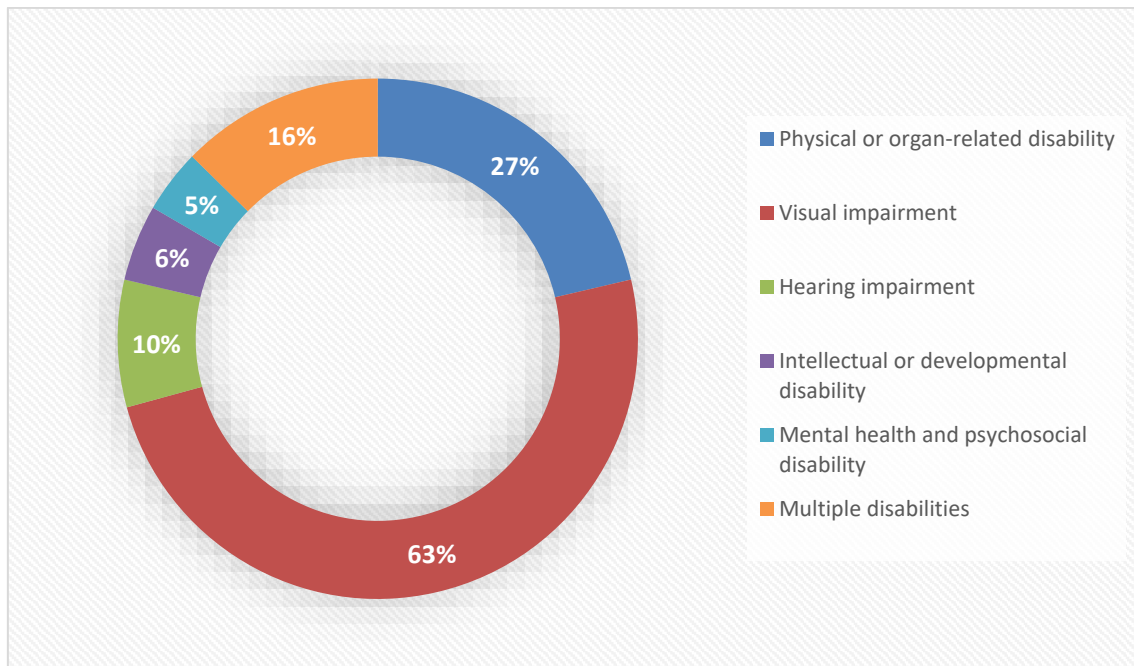
Figure 45. Participation by gender



Of the 100 people who responded to the survey, 71% stated that they had a disability and 25% had some sort of connection with disability, either through a personal or professional relationship. Only four of the respondents stated that they had no connection with disability.

Of the 96 respondents who had some connection with disability, over 62% were related to visual impairment, and there were responses for all types of disabilities.

Figure 46. Types of disability (%)



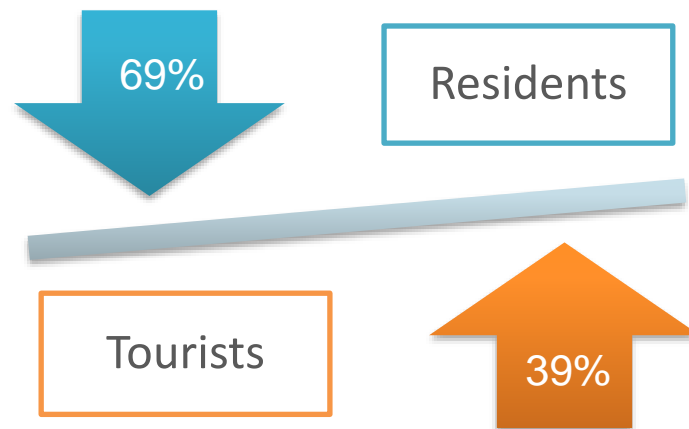
39% of people with disabilities say they need personalised assistance during travel, while 61% do not.

Figure 47. Personalised assistance required during travel (%)



Finally, 69% of respondents said they lived in Malaga, while 31% had visited the city as tourists.

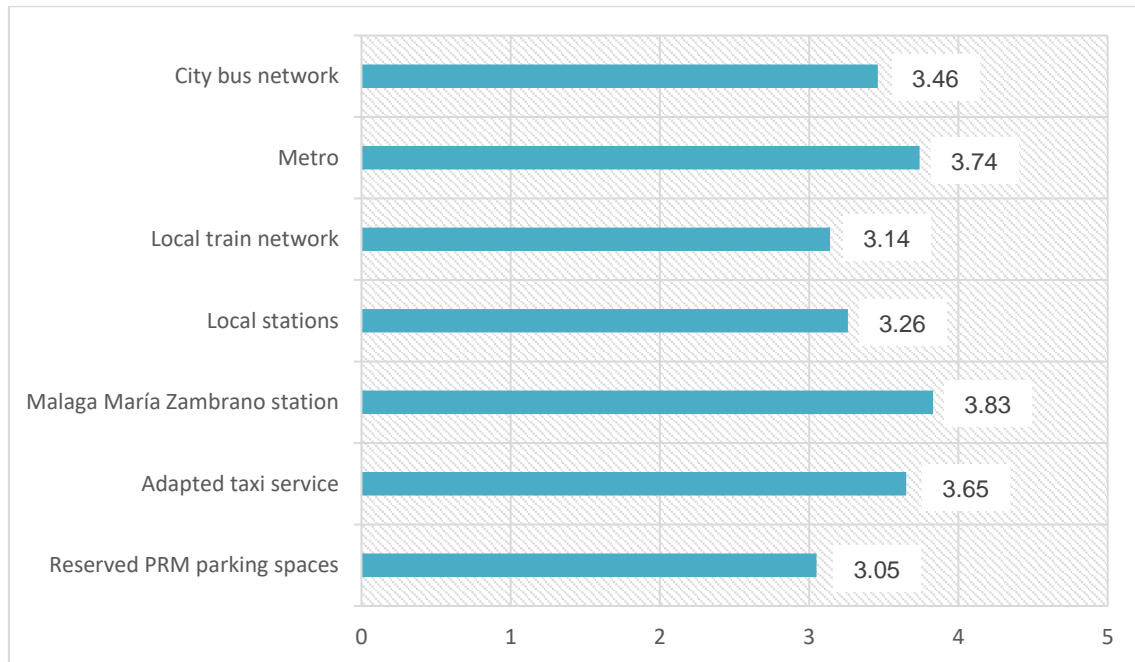
Figure 48. Place of origin of respondents (%)



BLOCK 2. Mobility and transport

To the question “*How easy and comfortable is it for you to get around the city of Malaga?*”, with reference to different modes of travel and transport infrastructures, the following graph shows an average score of around 3 in each case, which could be interpreted as meaning “easy and comfortable” for each question.

Table 4. Average scores for mobility and transport



Overall, we can conclude that the results for both Accessibility/Mobility and Transport are positive, especially with respect to the Malaga María Zambrano train station, the Malaga Metro and the adapted taxi service. The greatest room for improvement is in reserved parking spaces for people with reduced mobility and in the local train network, the latter of which falls outside the scope of the local authority.

Below are some of the comments provided:

“More parking spaces for the disabled”

“Greater cognitive accessibility”

“Remove physical obstacles in the city, especially from the walls of buildings”

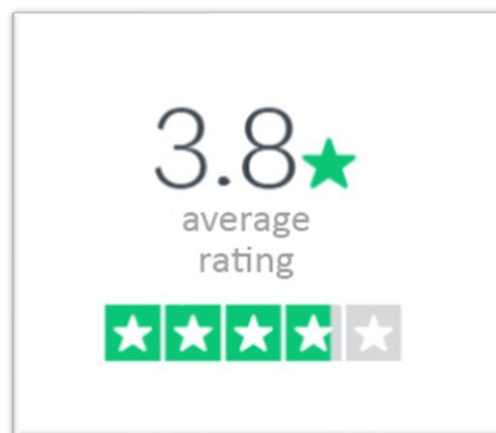
“They should fix the entrance and exit of Torremolinos station, it is impossible for me to get there by train”

“Adapted taxis should always be available for people with reduced mobility”

BLOCK 3. Beaches and leisure facilities

Of the 97 respondents who responded to this block, 27 said that they had used the facilities of one of the adapted areas of Malaga's beaches at some point, while 70 people said that they were not familiar with this service. On a scale of 1 to 5, where 1 is dissatisfied and 5 is fully satisfied with the facilities at the adapted area they visited, the average score was 3.8.

Figure 49. Average rating of the facilities of the adapted areas on beaches



When asked specifically about the assisted bathing service at La Misericordia and El Dedo beaches, the average satisfaction score was 3.7 (from a total of 19 respondents), with most of the scores being between 4 and 5.

Figure 50. Average rating of the assisted bathing service provided on La Misericordia and El Dedo beaches

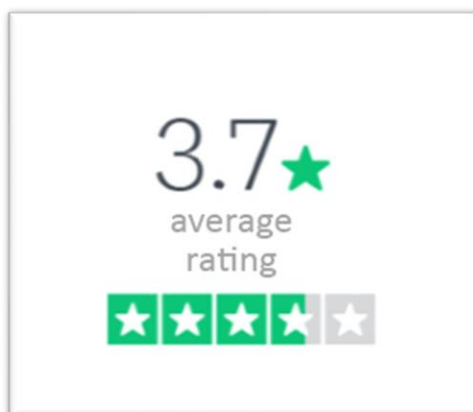


Table 5. Detailed results for the assisted bathing service provided on La Misericordia and El Dedo beaches

1	2	3	4	5
0%	15.79%	26.32%	31.58%	26.92%

*A score of 1 means “dissatisfied” and a score of 5 means “fully satisfied”

In reference to key leisure facilities at the destination, they were asked how easy and comfortable it was to use the Plaza Mayor shopping centre, the Trade Fair and Congress Centre, and La Concepción Botanical Gardens. The first two are rated highly by the respondents, with 25% giving them a score of 5 (the highest possible rating). The Botanical Garden is also positively rated, although it has more room for improvement. The detailed results are shown in the following table:

Table 6. Detailed results for leisure facilities

Question	1	2	3	4	5
Plaza Mayor Shopping Centre	7.61%	13.04%	18.48%	19.57%	25%
Trade Fair and Congress Centre - FYCMA	8.70%	14.13%	10.87%	18.48%	25%
La Concepción Botanical Garden	9.78%	11.96%	20.65%	14.13%	16.30%

*A score of 1 means “not at all easy or comfortable” and a score of 5 means “extremely easy and comfortable”

Below are some of the comments provided:

“La Concepción Botanical Garden became less accessible despite the fact that its facilities were improved in 2010. In 2013 EMT stopped providing bus services there and it became a lot more difficult for blind and visually impaired people to get to the Botanic Gardens”

“It is impossible to go by public transport, the bus services do not stop there and neither does the metro, the adapted taxis do not want to take people with reduced mobility, they prefer to pick up users who are going to the airport”

“More adapted car parks, audio guides...”

“More parking spaces for (people with) reduced mobility, especially by tourist attractions and in Malaga city centre”

“In the shopping centres the floors are slippery and the steps are not marked”

BLOCK 4. Cultural Malaga

Given the importance of museums for Malaga's reputation as a cultural destination, a specific thematic block was included. Of all the questions, the highest score was awarded to the service received by staff in these venues, with almost 50% of ratings being between 4 and 5. Accessibility to the physical environment also scored well, while there was room for improvement in the alternative formats provided to aid the comprehension of content and promote the offer.

Table 7. Key points on accessibility in museums and cultural venues

Question	1	2	3	4	5
<i>It is easy to find information on the accessibility features of cultural venues and events</i>	10.59%	16.47%	29.41%	16.47%	17.65%
<i>In general, it is easy and straightforward to enter and move around cultural venues</i>	7.14%	16.67%	26.19%	23.81%	19.05%
<i>Once inside, the design and format of the content makes it easy to understand and enjoy (e.g. plays, musicals, exhibitions, audio-visual content, etc.)</i>	14.63%	17.07%	28.05%	15.85%	17.07%
<i>Overall, I believe that the service I received from the staff of the cultural venues catered to my specific needs</i>	8.24%	14.12%	20%	21.18%	28.24%

**A score of 1 means "strongly disagree" and a score of 5 means "strongly agree"*

The channels most frequently used to search for information are Malaga City Council's website and social media, in equal parts. However, it is worth noting that almost 45% of people believe that not enough information is provided.

Below are some of the comments provided:

“Need to adapt cinemas and theatres for the hearing impaired”

“Audio description”

“Having advance knowledge of the accessibility of the cultural offer, before visiting the city”

“Provide events for the visually impaired, films and exhibitions for everyone”

“Ensure physical and cognitive accessibility for cultural activities in the districts, not just for the big events in the centre of Malaga”

“Audio induction loop, subtitling or sign language interpreter”

BLOCK 5. Information and communication

This block is used to rate the information and communication processes at the destination, i.e. how key information is communicated and disseminated in different spheres with an impact on tourism. Thus, the information provided on means of transport was rated positively, with 65% of respondents giving it a score between 3 and 5. Along the same lines, 60% of respondents said that they had found tourist activities and experiences that catered to their specific needs. The information provided in the tourist information offices and points is rated as satisfactory by almost 60% and Malaga's official Audio guide mobile app requires the most improvement.

Table 8. Key points on accessibility to information and communication

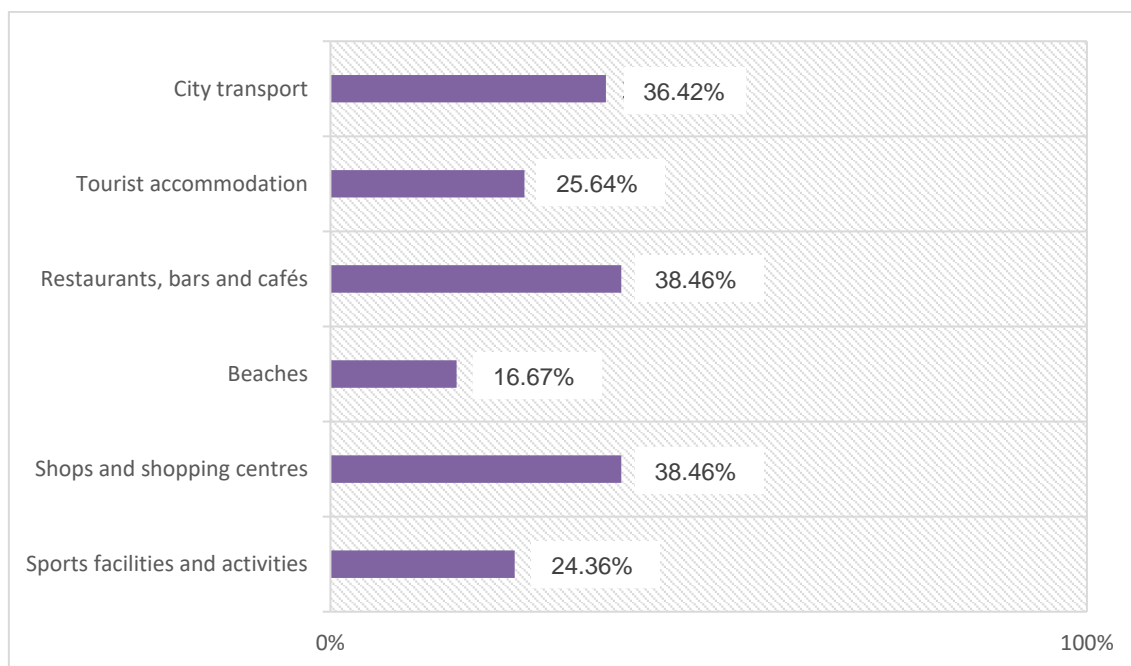
Question	1	2	3	4	5
<i>I find it easy to find my way around the city, thanks to the maps, posters, signs, etc. that are present and their design**</i>	13.75%	15%	26.25%	23.75%	15%
<i>The information provided on the city's transport is useful and meets my specific needs***</i>	7.50%	21.25%	25%	20%	20%
<i>I have found it easy to find tourist activities and experiences that cater to my specific interests and needs (e.g. guided tours, cultural activities, sporting activities etc.)****</i>	16.25%	18.75%	25%	17.50%	17.50%
<i>At the tourist offices I have been provided with useful, practical information that meets my personal needs*****</i>	8.75%	13.75%	18.75%	16.25%	21.25%
<i>I am familiar with Malaga's official Audio guide mobile app and I have found using it easy and helpful for getting to know the city better*****</i>	17.50%	10%	11.25%	3.75%	15%

*A score of 1 means "strongly disagree" and a score of 5 means "strongly agree"

Of 75 responses *Of 75 responses ****Of 76 responses *****Of 63 responses *****Of 46 responses

In response to the question about the tourism resources and services for which it is most difficult to find information on accessibility, the most common responses for almost 40% of the respondents were events, cultural venues and activities, commercial establishments and restaurants. At the other end of the spectrum are beaches, for which information on accessibility is easier to find.

Figure 51. Difficulty in finding information on tourism resources and services



Below are some of the comments provided:

“Greater cognitive accessibility”

“For example, on social networks, they could add a description to the pictures”

“The City Council's website is not accessible, so it is impossible to find the information you want”

“More audio-based information for the visually impaired”

“It would be good if there were more written content and articles on the website. In terms of customer service, when talking to a person with a disability, the needs of the tourist should be taken into account, according to their specific needs and circumstances”

“The technology also needs to be adapted”

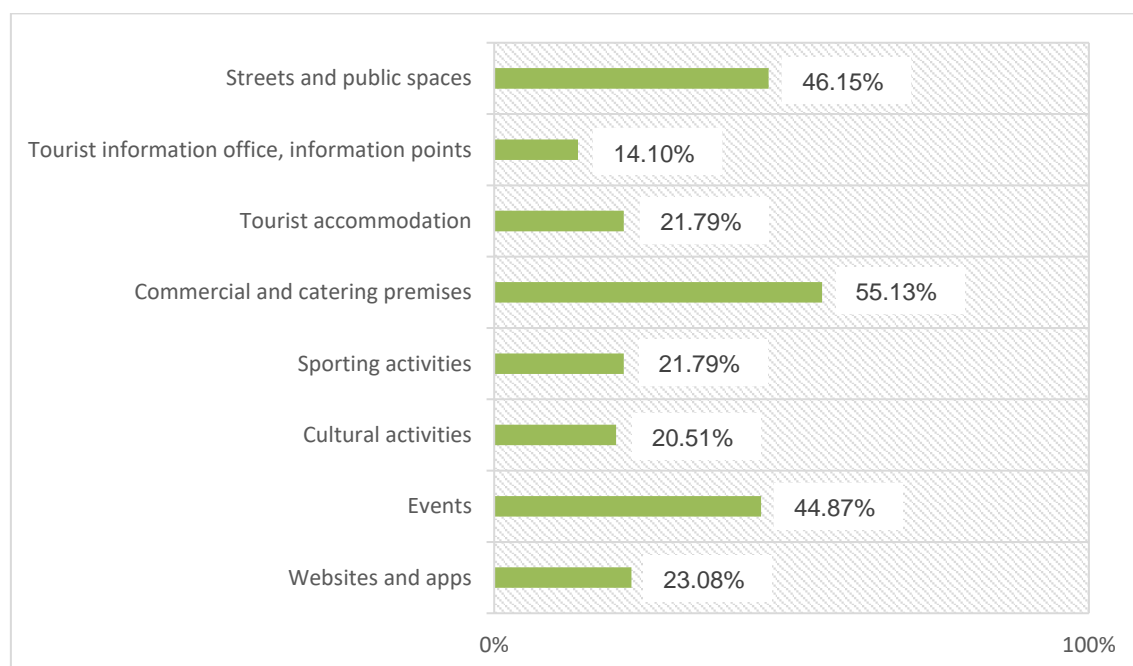
“Hardly anyone knows about Malaga's Audio guide and its usability needs to be greatly improved”

BLOCK 6. Perceived quality

The final block of the survey firstly examines the perceived quality of different tourism services: tourist accommodation, catering establishments, shops and commercial premises, museums and cultural venues; and, finally, the service received from Malaga's tourism professionals is also assessed. It is notable that, in all cases, most of the scores are in the 3, 4 and 5 range (with 5 meaning *fully adequate*), and it is worth highlighting the perceived quality of services received and of museums and cultural venues, where most scores are in the 4 and 5 range.

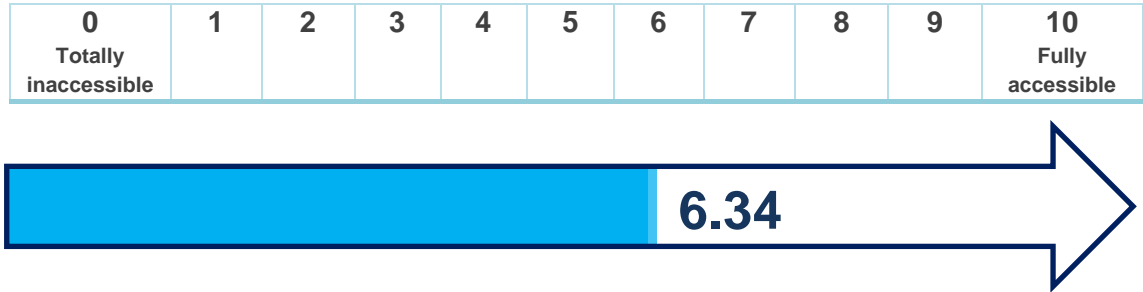
As we saw in the previous section, the areas where it is most difficult to find information on universal accessibility are events, cultural venues and activities, and commercial and catering establishments. In terms of barriers in different settings which hinder enjoyment during the stay at the destination, these were mostly reported in three main areas: commercial and catering establishments (55.13% of respondents), streets and public spaces (46.15%) and events (44.87%).

Figure 52. Tourism environments where the biggest barriers were detected



Finally, the survey asked respondents to give Malaga's accessibility an overall rating, and it was awarded a score of 6.34 (77 responses).

Figure 53. Overall rating of the accessibility of the city of Malaga



6. SWOT analysis and CAME methodology

The results of the analysis and assessment were used to produce a SWOT MATRIX, aimed at identifying the factors that have an impact on the levels of universal accessibility of the city of Malaga as a tourist destination. The matrix has four parts: Strengths, Weaknesses, Opportunities and Threats. For this purpose, all available sources of information, both primary and secondary, were considered, including the documentary analysis, fieldwork and participatory tools - interviews and citizen surveys.

In turn, the CAME METHODOLOGY aims to guide strategic planning by properly addressing the four areas of the SWOT analysis, i.e: Correct weaknesses, Address threats, Maintain strengths, and Exploit opportunities.

Figure 54. SWOT matrix and CAME methodology



The SWOT Matrix and respective elements of the CAME Methodology appear below.

Weaknesses



- ☐ Scope for accessibility requirements to be included in public procurement
- ☐ No requirement for training in universal accessibility and disability in tender specifications and service outsourcing contracts for tourist information offices and points
- ☐ Inadequate monitoring and assessment mechanisms for universal accessibility measures in tourism
- ☐ Lack of knowledge in tourism services about universal accessibility requirements, suggestions and complaints relating to tourism products and services
- ☐ Universal accessibility not being addressed as a subject matter or cross-cutting issue in the Tourism Forum
- ☐ Lack of training and awareness-raising activities on universal accessibility and disability for staff in the city's tourism services
- ☐ Lack of training and awareness-raising activities aimed at the private tourism sector
- ☐ Lack of specific data on demand from people with accessibility requirements
- ☐ Lack of technical parameters/technical tools in the tourist information office for the purpose of characterising the tourism offer and completing the databases
- ☐ Lack of coordination of the various initiatives aimed at characterising the accessible tourism offer
- ☐ Highly dispersed information on accessibility in the tourism value chain
- ☐ No reference channel for highlighting and promoting Malaga's accessible tourism offer
- ☐ Tourism website and tourism app not accessible
- ☐ Lack of promotional activities to highlight the accessibility features of the tourism offer and promote them among target segments and markets
- ☐ Tourist signs (information, directional, wayfinding and identifying places) failing to meet accessible criteria

Correct



- ☐ More accessibility requirements in public tender specifications and contracts
- ☐ Staff trained in universal accessibility and disability in all tourist information offices and points
- ☐ Processes and milestones established for assessing and monitoring tourism accessibility actions
- ☐ Awareness-raising among staff of tourism services about accessibility gaps in the offer, with corrective processes being put in place with the sector
- ☐ Universal accessibility is a common, cross-cutting issue discussed in the city's Tourism Forum, with the participation of the Accessibility Section of the Department of Social Rights, Equality, Inclusive Policies and Housing
- ☐ The staff of Malaga's tourism services receive annual training/awareness-raising on universal accessibility and disability
- ☐ Training and awareness-raising activities are offered to suppliers of tourism products and services, on an annual basis
- ☐ Malaga has information and data on demand for the destination among people with accessibility requirements
- ☐ A technical tool has been developed for proper characterisation of the accessible offer
- ☐ Coordination of the various local initiatives aimed at characterising the accessible offer in the destination, creating synergies and ensuring appropriate use of resources
- ☐ All information on the accessible tourism offer has been brought together and is available in one reference channel/tool for the destination
- ☐ There is a reference channel for visitors and tourists to find out about the destination's accessible tourism offer
- ☐ All municipal websites and tourism applications comply with the regulations on universal accessibility
- ☐ There are promotional strategies, channels, tools and schedules for Malaga's accessible tourism offer
- ☐ The tourist signs in the city of Malaga use alternative formats and meet accessibility requirements

Threats



- ☐ Lack of coordination and knowledge about the different tourism accessibility initiatives in the city of Malaga
- ☐ Large number of Spanish destinations in the process of becoming Smart Tourism Destinations. Risk of loss of competitiveness
- ☐ Growing number of Spanish destinations with tourism accessibility strategies and plans. Risk of loss of competitiveness
- ☐ Infrastructures, products and services that fail to meet accessibility criteria are hindering compliance with current regulations on universal accessibility
- ☐ Providers of tourism services and products are unfamiliar with the regulations on universal accessibility and lack knowledge on how to improve in this area
- ☐ Malaga is strongly positioned as a "city of museums" without ensuring that cultural experiences in museums are inclusive

Address



- ☐ Coordination of the various local initiatives aimed at characterising the accessible offer in the destination, creating synergies and ensuring appropriate use of resources
- ☐ Continuous improvement in the management and implementation of universal accessibility, building on the momentum provided by the Malaga STD project and this Accessible Tourism Plan
- ☐ Continuous improvement in the management and implementation of universal accessibility, building on the momentum provided by the Malaga STD project and this Accessible Tourism Plan
- ☐ Providers, operators and managers of infrastructures, services and products are familiar with and apply the current regulations on universal accessibility. This is driven by an increase in municipal technical inspections
- ☐ Malaga proposes activities to increase knowledge and raise awareness, providing spaces for dialogue and promoting accessibility
- ☐ There are cultural experiences that are suitable for all people in Malaga's museums

Strengths



- ☐ Strong culture of accessibility in municipal management
- ☐ Specific regulatory framework for accessibility
- ☐ Regulation on participation with governing of sectoral committees
- ☐ Specific strategies in place to improve accessibility in various areas
- ☐ Development of programmes that are widely recognised and have an impact on the tourism sector (Enjoy the Beach and Malaga Accessible City)
- ☐ Accessibility a key element of the Plan for Sustainable Urban Mobility in Malaga
- ☐ Existence of a specific department for universal accessibility management at the destination, which is allocated human, financial and material resources
- ☐ Mainstreaming of accessibility in a Department that develops inclusive policies, i.e. the Department of Social Rights, Equality, Accessibility and Inclusive Policies
- ☐ Existence of the Tourism Forum of the city of Malaga, set up in 2007
- ☐ Notable presence and participation of leading disability associations (TOCA, Accessible Malaga Development Group)
- ☐ Tourist information office strongly committed to tourism quality and excellence (renewal of Q for Tourism Quality seal and *Safe Tourism Certified* certification process)

Maintain



- ☐ Malaga is continuing to embed a cross-cutting approach to accessibility management
- ☐ Specific local regulatory framework for accessibility, which complements and supplements the regional and state regulations
- ☐ Institutional framework for sectoral participation defined and implemented
- ☐ Universal accessibility is factored into all areas of municipal activity
- ☐ Malaga recognises and promotes pioneering inclusive programmes for residents and tourists with accessibility needs
- ☐ Malaga prioritises accessibility in local spaces, infrastructures and transport and mobility on foot, by bicycle and by PMV
- ☐ Malaga allocates sufficient resources of its own to the management of tourism in the city
- ☐ The city of Malaga has sufficient resources of its own for the cross-cutting management of universal accessibility
- ☐ The Tourism Forum as a tool for dialogue and cross-sector consensus on tourism
- ☐ People with accessibility requirements are widely represented and participate extensively in Malaga as a destination
- ☐ Tourism services renew their certifications and commitment to tourism quality and excellence, and to universal accessibility

Opportunities



- ☐ Malaga Tourism Strategic Plan has a specific line of action related to accessibility
- ☐ Malaga engaged in Smart Tourism Destination Project
- ☐ Involvement of associations that represent people with disabilities in tourism-related activities
- ☐ Carrying out open and inclusive training and awareness-raising actions within groups that represent people with disabilities (e.g. with disabilities (e.g. TOCA)
- ☐ Tourism intelligence and big data project underway at the City Council
- ☐ Signage improvement project in the historic centre of Malaga
- ☐ Development of databases for resources in tourist information offices and tourist information points, including information on whether or not they have been adapted
- ☐ Identification of various initiatives relating to the tourism offer and its level of accessibility (e.g. analysis, awareness-raising, geolocation)
- ☐ Malaga has established a position as a city with a long history of managing and implementing universal accessibility
- ☐ Presence of segments that reduce tourism seasonality
- ☐ High numbers of international tourists, mainly from the United Kingdom, where universal accessibility is highly developed

Exploit



- ☐ Strategic course on action on accessibility implemented in the PET
- ☐ Malaga has implemented the Accessibility Pillar Action Plan, taking full advantage of the STD Network
- ☐ Increasing the degree of accessibility in the tourism offer and tourism-related activities
- ☐ Malaga's tourism sector is utilising the existing tools to improve universal accessibility
- ☐ Malaga has processes in place to obtain information on demand for the destination among people with accessibility needs
- ☐ Malaga has tourist signs that meet accessibility criteria in its historic centre
- ☐ Malaga has databases with sufficient information on the accessibility features of its offer
- ☐ Malaga coordinates the various current initiatives, creating synergies and making efficient use of resources
- ☐ Malaga is at the forefront of accessible destinations, especially in relation to culture
- ☐ Promotion, positioning and suitable tourism offer to attract segments that could potentially reduce seasonality, including people with accessibility needs
- ☐ Malaga meets and exceeds expectations with a strong and competitive accessible offer

7. Strategic proposal

7.1. Malaga's vision as a destination

The Malaga Strategic Tourism Plan (PET) sets out a vision for 2024: *“To be a destination that is appreciated by its visitors, citizens and stakeholders in the sector, for its ability to deliver lasting memories, citizen coexistence and sustainable development”*.

It is therefore based on the following values:

Figure 55. Core values of Malaga's strategy



Source: Malaga Strategic Tourism Plan 2021-2024

However, the destination's accessibility gap is seen as an obstacle to achieving this vision. Therefore, Malaga needs to improve in this area in order to become a more inclusive destination that exceeds, and not only meets, the expectations of the highest possible number of tourists and visitors.

In terms of the tourism offer, these improvements will take the form of quality and excellence in tourism, but also innovation and customer loyalty, with universal accessibility being perceived as an important competitive factor by the tourism sector in Malaga as a whole.

Based on the information presented above, the following vision has been set out:

“To make the city of Malaga a leading national and international inclusive destination, creating synergies and coordinating public, private and social initiatives, and adopting marketing and communication strategies that ensure that the accessible offer is publicised and promoted among the destination's target segments and markets”

To achieve this, strategic actions have been established which, in turn, will address the needs detected in each of the areas covered by the Plan and which are aligned with UNE 178501:2018, *Management System for Smart Tourism Destinations. Requirements*, focusing on two key pillars: management and implementation of universal accessibility at the destination.

Figure 56. Areas of action for universal accessibility in the destination



7.2. Strategic lines of action

To address the needs identified in the SWOT analysis, the following strategic lines of action have been established to help Malaga to improve as an inclusive tourist destination.

1. Optimising accessible tourism management and planning processes in the destination

- In reference to the local regulatory framework, the tourism management processes and mechanisms and the existence of several tourism and accessibility initiatives

2. Promoting governance and creating synergies between the public, private and social sectors

- Establishing tools that promote the cross-cutting, rather than narrow, participation of the public, private and social sectors in matters related to tourism and accessibility

3. Awareness-raising and training in tourism accessibility

- Actions aimed at broadening knowledge and providing tools to improve levels of tourism accessibility and compliance with the regulations

4. To increase levels of accessibility in the tourism value chain

- Actions aimed at introducing and promoting the inclusion of accessible criteria in environments, products and services, both for tourism and those with a direct impact on the sector

5. Promoting and positioning the city of Malaga as a leading inclusive destination

- Initiatives that raise the profile of the city of Malaga and make it attractive to target markets and segments

7.3. Working proposal

Each strategic plan will be completed by implementing the pertinent actions.

These actions, and the strategic plans, stem from the SWOT - CAME matrix, but also from the Operational Plan based on the analysis of the Accessibility Pillar, which was conducted as part of the Malaga STD Project, which states that *“One of its objectives (in reference to the accessible tourism plan) will be to harmonise the actions proposed in other accessibility-related plans, in order to identify the key tourism-related measures that need to be implemented. This accessible tourism plan will include the STD's strategy, as well as the actions aimed at achieving it (...).”*

STRATEGIC PLAN		ACTION	
A	Optimising accessible tourism management and planning processes in the destination	A.1	Increasing awareness of the accessible tourism offer
		A.2	Greater knowledge of demand for tourism among people with accessibility needs
		A.3	Creation of a tool to monitor compliance with accessibility regulations in the tourism sector
		A.4	Further embedding accessibility requirements in public procurement
B	Promoting governance and creating synergies between the public, private and social sectors	B.1	Participation of the Department of Tourism in the Sectoral Committee for Social Rights, Accessibility and Inclusive Policies
		B.2	Accessible Tourism Committee in the Tourism Forum
		B.3	Accessible Tourism Cluster for the city of Malaga
C	Awareness-raising and training in tourism accessibility and demand from people with accessibility needs	C.1	Training in tourism accessibility for municipal technicians
		C.2	Training and awareness-raising actions for the private sector
		C.3	Development of thematic handbooks on good accessibility practices
		C.4	Dissemination of the regulatory framework on universal accessibility and disability
		D.1	Ensuring the accessibility of technological and online tools used to promote tourism

D	To increase levels of accessibility in the tourism value chain	D.2	Support for the private tourism sector
		D.3	Ensuring that tourist signs meet accessibility criteria
		D.4	Facilitating the assessment and improvement of the Eurotaxi service in the city of Malaga
		D.5	Encouraging the inclusion of accessibility officers in the tourism sector
		D.6	Improving the accessibility of public thoroughfares and spaces
		D.7	Improving the accessibility of popular festivals and events
		D.8	Promoting sensory and cognitive accessibility in the tourist areas of the city
E	Promoting and positioning the city of Malaga as a leading inclusive destination	E.1	SEO benchmarking
		E.2	Bringing together and disseminating information on accessibility in the tourism value chain
		E.3	Supporting the creation and marketing of accessible products and experiences
		E.4	Designing actions to disseminate and promote Malaga's accessible tourism offer
		E.5	Initiatives to raise the international profile of Malaga as a destination

ACTION	
A.1 - INCREASING AWARENESS OF THE ACCESSIBLE TOURISM OFFER	
STRATEGIC PLAN	Optimising accessible tourism management and planning processes in the destination
DESCRIPTION	<p>Although no analysis or assessment of Malaga's tourism offer has been carried out to date, we do have information on the universal accessibility of certain links in the chain, such as urban transport systems. Moreover, a number of initiatives have been identified which, over time, have gathered valuable information.</p> <p>This measure proposes two main areas of action:</p> <ol style="list-style-type: none"> 1. Firstly, tourism services combining and coordinating (or at least knowing about and participating in) the more far-reaching initiatives aimed at improving the accessibility of Malaga's offer, such as those developed by the UMA, or by other municipal departments (e.g. Accessibility, Culture, Sport). 2. Secondly, support is required for the process that was launched at the Tourist Information Office to set up databases of tourism resources which include information on their degree of accessibility - organised systematically - and developing a tool that includes technical parameters that cover a range of accessibility requirements. As a result, more objective, technical and accurate information will be obtained. <p>The aim is to bring together most of the information to increase awareness of the offer and subsequently promote it, via online tools, promotional activities and, above all, in tourist information offices and points.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of meetings held for the coordination (participation/knowledge) of the different initiatives (e.g. annually). • Creation of 1 tool with technical parameters for each type of resource, to be used by the Tourist Information Office. • 1 document describing the systematisation of the information gathering process on the accessibility features of the offer at the Tourist Information Office. • Number of new resources in databases (e.g. annually) with information obtained using the tool.

ACTION	
A.2 – GREATER KNOWLEDGE OF DEMAND FOR TOURISM AMONG PEOPLE WITH ACCESSIBILITY NEEDS	
STRATEGIC PLAN	Optimising accessible tourism management and planning processes in the destination
DESCRIPTION	<p>This action can be integrated into the new big data project proposed by the City Council and is aimed at obtaining valuable information on the needs and behaviour of tourists and visitors with accessibility needs.</p> <p>Various types of information, which could include place of origin, main motivation, form and type of travel - single or accompanied, organised or independent travel -, chosen transport, primary information channel, accommodation booked, activities and experiences enjoyed at the destination (which may not even be promoted at the destination). Also, identifying patterns and trends, and assessing the measures adopted to date.</p> <p>Through the systematisation and subsequent processing of statistical data, it is possible to generate reports that provide knowledge and greater certainty to the tourism sector as a whole.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • The number of indicators to be measured. • Incorporation of indicators in the processes stemming from the big data project that is being implemented. • The number of data extraction processes (e.g. annually). • Number of reports prepared with data on demand among people with accessibility requirements.

ACTION	
A.3 – CREATION OF A TOOL TO MONITOR COMPLIANCE WITH ACCESSIBILITY REGULATIONS IN THE TOURISM SECTOR	
STRATEGIC PLAN	Optimising accessible tourism management and planning processes in the destination
DESCRIPTION	<p>This action is covered by the Operational Plan for the Malaga STD Project's Accessibility Pillar.</p> <p><i>It is advisable to draw up a protocol to monitor compliance, covering all existing buildings, infrastructures and services, and especially private ones for public use (and public places). The protocol will require inspections to be carried out in order to check accessibility conditions, and the necessary actions to be taken to ensure compliance with the regulations.</i></p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • 1 document outlining the monitoring protocol. • Number of meetings, seminars and workshops to disseminate the protocol. • Number and types of stakeholders involved in the monitoring process.

ACTION	
A.4 – FURTHER EMBEDDING ACCESSIBILITY REQUIREMENTS IN PUBLIC PROCUREMENT	
STRATEGIC PLAN	Optimising accessible tourism management and planning processes in the destination
DESCRIPTION	<p>During the analysis phase, accessibility criteria were identified in some public procurement specifications, but not in all of them, and sometimes there was no further detail on the expected service.</p> <p>Public procurement processes serve two functions: the procurement of products and services based on accessible criteria and raising awareness and educating suppliers.</p> <p>It is therefore necessary that all public procurement specifications contain:</p> <ul style="list-style-type: none"> - References to the current regulations on universal accessibility. - References to internationally recognised standards, especially when the scope of the bidding document is not covered by a specific regulatory framework. - Details of the objectives pursued by including accessibility criteria for the product or service. - Guidelines to avoid any inadequate application of accessible criteria for products and services. <p>More specifically, this refers to the requirements governing the hiring of external staff for tourist information offices and points, in terms of the training they require for dealing with people with disabilities. (This point will also be covered by training actions).</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Percentage of public procurement specifications without express references to universal accessibility for the requested products or services (e.g. annually).

ACTION	
B.1 – PARTICIPATION OF THE DEPARTMENT OF TOURISM IN THE SECTORAL COMMITTEE FOR SOCIAL RIGHTS, ACCESSIBILITY AND INCLUSIVE POLICIES	
STRATEGIC PLAN	Promoting governance and creating synergies between the public, private and social sectors
DESCRIPTION	<p>The Sectoral Committee for Social Rights, Accessibility and Inclusive Policies is composed of associations, groups and individuals with disabilities, as well as representatives of the city of Malaga's institutions. It has discussed matters such as updating the Municipal Regulatory By-law on Accessibility and future strategies on universal accessibility are also expected to be covered, as occurred in the previous Plan for Universal Accessibility (2007-2011).</p> <p>A cross-cutting tool perfectly suited to accessible tourism initiatives, which also have a marked cross-cutting nature, and in which various stakeholders from across the region are now participating.</p> <p>The Committee is therefore emerging as an essential forum for the participation of the Department of Tourism.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of minutes of meetings with the participation of the Department of Tourism (annually).

ACTION	
B.2 – ACCESSIBLE TOURISM COMMITTEE IN THE TOURISM FORUM	
STRATEGIC PLAN	Promoting governance and creating synergies between the public, private and social sectors
DESCRIPTION	<p>The city of Malaga's Tourism Sector Forum is the most important tourism body for ensuring the integration and participation of the sector as a whole. The public and private sectors are represented in it.</p> <p>However, tourism accessibility is not regularly addressed at present, which makes it difficult to plan and develop medium- and long-term agreed upon actions.</p> <p>For this reason, we believe it is extremely important to set up an Accessible Tourism Committee that involves the public and private sectors, as well as the social sector and representatives of disabled groups. This Committee can be viewed as a participatory tool or advisory body in which joint actions can be developed in order to steadily improve the accessibility of the destination for tourists.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • 1 meeting of the Tourism Forum whose minutes show that the topic has been discussed. • 1 meeting of the Tourism Forum whose minutes establish the official creation of the Accessible Tourism Committee. • Number of stakeholders sitting on the Committee and the sectors/areas they represent.

ACTION	
B.3 – ACCESSIBLE TOURISM CLUSTER FOR THE CITY OF MALAGA	
STRATEGIC PLAN	Promoting governance and creating synergies between the public, private and social sectors
DESCRIPTION	<p>The city of Malaga currently has numerous tourism initiatives with accessibility criteria. Some have emerged during the development of this project, but there are sure to be more. Initiatives across the tourism value chain, which is a great strength for positioning itself as an inclusive destination. There are also numerous associations and representatives of disabled groups actively involved in this development.</p> <p>However, as remarked above, tourism accessibility initiatives are widely dispersed and lack coordination, which makes it very difficult to achieve systematic progress and generate the necessary knowledge, especially in municipal tourism services.</p> <p>There are also major shortcomings in the promotion of the current accessible offer, which could increase the competitiveness of the destination by raising the profile of major attractions such as the Trade Fair and Congress Centre, to host accessible and sustainable events.</p> <p>This is why creating an Accessible Tourism Cluster in the city of Malaga would facilitate:</p> <ul style="list-style-type: none"> - The grouping together of tourism venues, products and services where accessibility criteria are clearly implemented, with a strong commitment to improvement (plan, strategy). - Raising the profile of these venues, products and services. - The coordination of existing initiatives. - A space for co-creation and innovation. - A body that can be funded with public resources to carry out planned actions. - A lever to foster the emergence of further initiatives. <p>Having the UMA in this new space would be highly beneficial.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Official document for the formation of the Cluster. • Number and types of members (e.g. annually).

ACTION	
C.1 – TRAINING IN TOURISM ACCESSIBILITY FOR MUNICIPAL TECHNICIANS	
STRATEGIC PLAN	Awareness-raising and training in tourism accessibility and demand from people with accessibility needs
DESCRIPTION	<p>This action is covered by the Operational Plan for the Malaga STD Project's Accessibility Pillar.</p> <p><i>Measure born out of the need to provide the City Council's technical staff with greater and more in-depth knowledge of universal accessibility, in all municipal departments, especially those most closely involved in the city's tourism sector. These actions should be organised in a training plan that is made available to all departments, at least for basic training on the subject. Two specific measures have been identified:</i></p> <ul style="list-style-type: none"> - <i>Updating the training on universal accessibility for the City Council's technicians, with the aim of improving cross-cutting actions. This training should include a module on dealing with people with disabilities and, at the discretion of the training providers, specific modules should be included, e.g. on facilities and communication.</i> - <i>Creation of round tables or workshops to discuss the different activities being carried out locally and the best practices being implemented (in architecture, facilities and services) in other destinations, so that they can serve as an example and provide a transfer of knowledge between experts.</i>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Annual training schedule/planning including activities on disability and universal accessibility. • Number of proposed training activities on disability and universal accessibility. • Percentage of municipal workers linked to the tourism sector who take part in any such actions (e.g. annually).

ACTION	
C.2 – TRAINING AND AWARENESS-RAISING ACTIONS FOR THE PRIVATE SECTOR	
STRATEGIC PLAN	Awareness-raising and training in tourism accessibility and demand from people with accessibility needs
DESCRIPTION	<p>This action is covered by the Operational Plan for the Malaga STD Project's Accessibility Pillar.</p> <p><i>We recommend implementing training and awareness-raising activities for professionals in the private tourism sector in Malaga, and for staff who work in publicly operated facilities, e.g. certain museums. With the following objectives:</i></p> <ul style="list-style-type: none"> - <i>To incorporate other aspects of accessibility in the measures to be implemented.</i> - <i>To create a favourable environment for the implementation of solutions.</i> - <i>To optimise the measures adopted and showcase them in the tourist destination.</i> <p><i>Additionally, we would emphasise the need to raise awareness of the incorrect terms used to refer to people with disabilities, which have been found both in municipal regulations and in various tourist information channels, websites, leaflets, etc., with the exception of parking spaces reserved for persons with reduced mobility (PRM).</i></p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of activities held (e.g. annually). • Number of participants in the activities (e.g. annually). • Types of resources associated with the participants (e.g. accommodation, catering, cultural offer, sporting offer, infrastructure).

ACTION	
C.3 – DEVELOPMENT OF THEMATIC HANDBOOKS ON GOOD ACCESSIBILITY PRACTICES	
STRATEGIC PLAN	Awareness-raising and training in tourism accessibility and demand from people with accessibility needs
DESCRIPTION	<p>Experience shows that the lack of knowledge about the specific needs of customers with accessibility requirements and about the existence of accessibility criteria and solutions, and how to implement them properly, is the main barrier to moving towards more accessible tourism environments, products and services.</p> <p>In addition to the measures described above, the production and distribution of thematic handbooks on tourism resources, products and services is a tool aimed at raising awareness and providing valuable knowledge for their planning and management.</p> <p>This material, in the form of leaflets, pamphlets, booklets, or in larger formats such as handbooks or guides, should contain objective, clear and easy-to-understand information on how to implement accessible criteria for different aspects (e.g. entrances, toilets, rooms, assistance during activities, etc.) of tourism environments (accommodation, travel agencies, restaurants, shops, etc.). Clear guidelines should also be included on how to properly communicate and deal with people with different types of disabilities, according to the different needs of each individual.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of units developed, by type and subject matter. • Number of units distributed/downloaded.

ACTION	
C.4 – DISSEMINATION OF THE REGULATORY FRAMEWORK ON UNIVERSAL ACCESSIBILITY AND DISABILITY	
STRATEGIC PLAN	Awareness-raising and training in tourism accessibility and demand from people with accessibility needs
DESCRIPTION	<p>The regulatory framework for universal accessibility is broad and covers numerous spheres of action, both nationally and regionally (health, transport, leisure, urban and built environments, information and communication technologies, etc.).</p> <p>Compiling the regulations within this framework and circulating and disseminating them among all stakeholders (public, private and social), especially in the tourism sector, would not only improve knowledge about them, it would also ensure greater compliance in the future and raise awareness about them.</p> <p>These standards can and should be supplemented by internationally recognised standards and further information on each topic (e.g. examples of best practices).</p> <p>Once all the regulations have been compiled, we propose developing activities for their dissemination, which could, for example, take advantage of the training activities proposed in Action C.2, albeit not exclusively so. We also recommend disseminating this information in the city of Malaga's Tourism Sector Forum, as well as placing it in a specific section of the official tourism website.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of regulations compiled and disseminated. • Number of dissemination activities carried out. • Number of people participating in these dissemination activities and the types of areas with which they are associated. • Section of Malaga City Council's website where the documents are hosted and can be viewed.

ACTION	
D.1 – ENSURING THE ACCESSIBILITY OF TECHNOLOGICAL AND ONLINE TOOLS USED TO PROMOTE TOURISM	
STRATEGIC PLAN	To increase levels of accessibility in the tourism value chain
DESCRIPTION	<p>In accordance with the provisions of <i>Decree 1112/2018, of 7 September, on the accessibility of public sector websites and applications for mobile devices</i>, and especially with reference to the city of Malaga's official tourism website http://www.malagaturismo.com/ and the Malaga Turismo mobile application. Also applicable to all mobile apps available through the tourism website. To this end, we recommend that these tools undergo an audit process to detect any shortcomings and needs, or that new tools be developed to comply with the regulatory framework. The Department of Tourism has informed us that it plans to carry out these measures in the short-medium term.</p> <p>According to the recommendations of the Operational Plan (Malaga STD Project's Accessibility Pillar), the <u>website</u> has the following requirements:</p> <ul style="list-style-type: none"> - <i>Provide all images with alt text describing the information to be conveyed and in the appropriate language. If it is a decorative image, the alt text should be empty. If there is text embedded inside an image, the description should be able to convey the visual information in text form.</i> - <i>Check and arrange all page headings in order, so that there is no skipping between levels, and no levels are created without content, for ease of navigation by a screen reader.</i> - <i>Change the context of any links that require it, to avoid links on the same page with the same text leading to different destinations.</i> - <i>Provide all links with understandable text; none should be left empty. When the link is an image, this must have alt text.</i> - <i>Include an alert for links that open new windows.</i> - <i>Use different formats to distinguish between texts that are links and those that are not.</i> - <i>The colour contrast of some texts, which are light blue on a white background, should be improved.</i> - <i>Eliminate any presentational markup elements; use equivalent CSS techniques instead of these elements. In other words, as a general rule, use style sheets to manage the visual appearance of the site.</i> - <i>Label form elements correctly with descriptive titles.</i>

	<ul style="list-style-type: none"> - Provide a title for any layout tables used and link the headers to the corresponding table cells. - It should be possible to navigate through submenus and all elements on different pages using a keyboard. - Avoid continually changing the structure and layout of pages, with new menus, blocks, etc. - Use “breadcrumbs” to make navigation easier for users. - Check for broken links and replace them with the correct destination or delete them. <p>With specific reference to the <u>mobile app</u>, we recommend:</p> <ul style="list-style-type: none"> - Providing a proper description of the images that appear in the application. A description that fails to provide the information that is usually provided, such as the file name, is useless. - There should always be a proper description of the actions performed by icons. - Ensure that the correct language is used so that text is read out in the language selected in the settings and with the correct intonation in that language. - Display the correct titles for each screen, in the appropriate language. - Display links correctly, with legible text and alerting the user if a link opens in a new screen. - Avoid opaque backgrounds behind images when this makes it difficult to read the textual information that appears on them. - The application's text size should be increased when the operating system's text size is increased. - Check the forms to make sure that they have an accessible submit button and provide clear information on the results of searches carried out via the forms. - All items should be accessible via the screen reader. - It should be possible to exit an application screen using a link provided for that purpose. - Remove any links that lead to screens with no content.
<p>MONITORING INDICATOR(S)</p>	<ul style="list-style-type: none"> • Tourism website updated to meet accessibility criteria and audit to check it. • Mobile applications updated to meet accessibility criteria and audit to check them.

ACTION	
D.2 – SUPPORT FOR THE PRIVATE TOURISM SECTOR	
STRATEGIC PLAN	To increase levels of accessibility in the tourism value chain
DESCRIPTION	<p>Action aimed at promoting and highlighting universal accessibility as a necessary feature for tourism environments, products and services, supporting and facilitating its implementation among tourism providers, especially SMEs and micro SMEs, due to their size.</p> <p>The various support initiatives include sharing best practices and networking, for which using the STD Network is highly recommended. Other examples include the creation of user experiences (UX), with the participation of some of the associations that are involved (e.g. TOCA Group) and grants-in-aid to improve facilities, processes, technological tools, etc. For example, the grants awarded under Promálaga's "Impulso Empresarial" (Business Boost) programme, with a budget of €400,000 in 2021, aimed at business owners (self-employed and start-ups) who are going to make productive investments in the city. A second source of funding worth highlighting is outlined in the Andalusia Meta Plan. Strategy LE4 of this Plan, "Accessible and Inclusive Destination", seeks to support universal accessibility projects by promoting and providing financial backing for projects aimed at improving universal accessibility in destinations, businesses and local organisations, and by establishing and applying universal accessibility criteria in calls for proposals for grants.</p> <p>Whether these be local or supralocal grants, it will be vital for Malaga to identify and promote them to raise awareness of them across the sector.</p> <p>This action is complemented by the training and awareness-raising actions proposed for the private sector, with the dissemination of information on current regulations and standards and thematic handbooks.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of grants identified and adopted by Malaga. • Total amount allocated for the implementation of projects specifically aimed at improving accessibility. • Number of actions to promote grants (local and supralocal).

ACTION	
D.3 – ENSURING THAT TOURIST SIGNS MEET ACCESSIBILITY CRITERIA	
STRATEGIC PLAN	To increase levels of accessibility in the tourism value chain
DESCRIPTION	<p>This action is expected to be carried out in the short and medium term, as part of the project planned for 2022. It consists of replacing some of the signs in the historic centre with new ones that are designed to meet sustainability and accessibility criteria. It has been decided that this is the best time to adapt them so that they meet the requirements of <i>Standard UNE 170002 - Accessibility requirements for signage</i>, an international standard that should be included in the documentation compiled and circulated throughout the tourism sector (Action C.4).</p> <p>It is also recommended that this type of signage be extended to other areas in the destination, mainly to facilitate orientation around accessible tourist routes.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of accessibility criteria catered for in the design of the new signs. • Number of old signs (that do not meet accessibility requirements) replaced by new (sustainable and accessible) ones.

ACTION	
D.4 – FACILITATING THE ASSESSMENT AND IMPROVEMENT OF THE EUROTAXI SERVICE IN THE CITY OF MALAGA	
STRATEGIC PLAN	To increase levels of accessibility in the tourism value chain
DESCRIPTION	<p>The city of Malaga has introduced a specific local regulation in this area, promoting the presence of Eurotaxis in order to meet the 5% threshold stipulated in the state regulations. At present, this threshold is being met (and surpassed).</p> <p>However, during the interview process that was carried out under this Plan, according to some of the comments received through the citizen participation survey, the adapted taxi service may not be meeting the needs of people with disabilities, a priority group that is discouraged from using the service by long waiting times, among other issues.</p> <p>Therefore, whether within the framework of this Plan or as part of another strategy, it would be advisable to consider conducting a study to assess the service's degree of compliance with local regulations, regional and state legislation, and whether the percentage of adapted vehicles currently meets the existing demand. Although this study would be carried out by other municipal departments, according to their respective competencies, it will have to be supported and facilitated by the Department of Tourism.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Conducting a study on the current situation regarding the adapted taxi service in the city of Malaga. • Number and types of participatory tools included in the study.

ACTION	
D.5 – ENCOURAGING THE INCLUSION OF ACCESSIBILITY OFFICERS IN THE TOURISM SECTOR	
STRATEGIC PLAN	To increase levels of accessibility in the tourism value chain
DESCRIPTION	<p>Action recommended by the TOCA Group, one of the destination's leading universal accessibility and disability organisations, and a regular partner in various initiatives in this area, such as the "Malaga Accessible City" inclusive tours programme.</p> <p>According to TOCA, the accessibility officer would be an employee, or the owner him/herself, of a tourism, cultural, leisure, commercial establishment, etc., with basic training in the various aspects of accessibility, i.e. not akin to an expert or a technician in the field. This officer would be tasked with identifying needs, accessing spaces and documentation, receiving information on the issue from the company, users and organisations, and encouraging the implementation of actions.</p> <p>Although introducing this role may be difficult in micro SMEs, we believe that it should be encouraged and information about it disseminated among medium-sized and large companies, as they have more human capital. This dissemination could be carried out in the Tourism Forum's Accessible Tourism Committee, among other places.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of places (e.g. Tourism Forum) in which knowledge and the dissemination of information about accessibility officers is promoted.

ACTION	
D.6 – IMPROVING THE ACCESSIBILITY OF PUBLIC THOROUGHFARES AND SPACES	
STRATEGIC PLAN	To increase levels of accessibility in the tourism value chain
DESCRIPTION	<p>This proposal is included because it appears in the Operational Plan for the Malaga STD Project's Accessibility Pillar and has a major impact on Malaga as a tourist destination: <i>“Although much progress is being made in improving accessibility conditions in the built environment, we believe it is necessary to implement the measures set out in the regulations and recommended throughout the report to improve the accessibility of public thoroughfares, spaces and buildings, as well as street furniture and signage, in order to improve the orientation and location of accessible pedestrian routes. When purchasing street furniture, we recommend taking into account the requirements that they must meet in order to fulfil the Universal Accessibility and Inclusive Design criteria established by the regulations.”</i></p> <p>As in Action D.4 above, this proposal falls outside the remit of the Department of Tourism, and its implementation is the responsibility of other municipal departments, as part of a broader strategic framework. However, it is included as a recommendation in this Plan because of its impact on tourism activity in Malaga.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of accessibility improvement projects carried out in public thoroughfares and spaces (e.g. annually). • Percentage of publicly procured street furniture not meeting specific accessibility criteria (out of the total, e.g. in one year).

ACTION

D.7 – IMPROVING THE ACCESSIBILITY OF POPULAR FESTIVALS AND EVENTS	
STRATEGIC PLAN	To increase levels of accessibility in the tourism value chain
DESCRIPTION	<p>This action is covered by the Operational Plan for the Malaga STD Project's Accessibility Pillar.</p> <p>The measures proposed to increase the levels of accessibility of popular festivals and events include:</p> <ul style="list-style-type: none"> - For <u>people with reduced mobility</u>: facilitating vehicle access by means of a special pass for mobility vehicles, ensuring that there are sufficient parking spaces reserved for persons with reduced mobility (PRM) in the immediate vicinity, examining the access conditions to the facilities and giving advance warning of the need to arrive early if a large influx of people is expected. Accessible and adapted information points and lockers. A sufficient number of adapted bathrooms. Spaces, places or seats reserved wherever there is a stage. Where large numbers of people are expected to attend, ensure that the main routes (entrance, toilets, reserved spaces) are accessible so that there is no danger of falls. Provide an adapted transport service for transfers to the site where the event is to be held, informing attendants of its existence, timetables, etc., in advance. - For <u>visually impaired people</u>: in addition to all the recommendations on access for persons with reduced mobility, enable access with guide dogs, provide audio description if the event so allows, and for all audio-visual materials, provide a programme in Braille or the option of listening to it in audio format (e.g. through the use of QR codes). - For <u>people with hearing impairment</u>: audio induction loops, subtitling, Spanish Sign Language (LSE) interpreters, subtitles for all audio-visual material. An LSE interpreter service can be set up for emergencies while the festival or event is taking place. - For <u>people with intellectual disabilities</u>: use pictograms that meet accessibility requirements, easy-to-read event information. <p>All communications related to the event must be accessible to all people, both on paper and in digital format.</p> <p>It is important that these measures be considered for events organised in the destination, with suitably accessible conditions so that everyone, including people with sensory disabilities, can enjoy the shows. One example of good practice is the Almagro Theatre Festival, which is committed to being an inclusive festival that is accessible to all.</p> <p>Finally, in all security plans, it is essential to include evacuation protocols and operational guidelines that take into account the needs of people with disabilities in emergency situations, as well as</p>

	<i>providing adequate training on this subject for the Police, Fire Service and Civil Protection.</i>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of events and festivals that are organised in an accessible way to cater for different accessibility needs. • Number of activities to disseminate and promote the accessibility of such events and festivals and the channels used. • Number of accessible solutions implemented (types and nature).

ACTION	
D.8 – PROMOTING SENSORY AND COGNITIVE ACCESSIBILITY IN THE TOURIST AREAS OF THE CITY	
STRATEGIC PLAN	To increase levels of accessibility in the tourism value chain
DESCRIPTION	<p>Related to the previous action and can be extended to the tourism value chain. Although various related initiatives have been identified in the public and private spheres, and bearing in mind the progress made over the city's long history of improving accessibility, accessible solutions for people with visual impairment, hearing impairment and cognitive impairment continue to be implemented less frequently.</p> <p>Recommended actions include the installation of audio induction loops in tourist information offices and points (mobile or fixed), the provision of video interpretation services in LSE (Spanish Sign Language) and the application of cognitive accessibility criteria in the destination's website and apps.</p> <p>In reference to the cultural sector, and specifically museums, we recommend developing guided tours adapted to different types of disabled users, making the content more accessible and easier to understand. (E.g. touch tours for the visually impaired, interpreted tours in Spanish sign language for the hearing impaired, interactive tours with actors for the cognitively impaired, supported by easy-to-read material and augmentative and alternative communication systems).</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Types of solutions with sensory and cognitive accessibility criteria implemented in tourist information offices and points. • Types of solutions with sensory and cognitive accessibility criteria implemented in municipal museums.

ACTION	
E.1 – SEO BENCHMARKING	
STRATEGIC PLAN	Promoting and positioning the city of Malaga as a leading inclusive destination
DESCRIPTION	<p>Online marketing is now an essential strategy for any tourist destination. This measure, which is directly linked to Action D.1, i.e. the application of accessible criteria in the tourism website and apps, is designed to boost the online competitiveness of Malaga as a destination.</p> <p>For this purpose, we propose conducting a comparative study, benchmarking the information on tourism accessibility that is available on the official tourism websites of the city's main competitor destinations. According to the Malaga Strategic Tourism Plan for 2021-2024, these destinations include Seville, Formentera, Valencia, Madrid and Cartagena in Spain, and Karlsruhe, Amsterdam, Copenhagen, Gothenburg and Breda overseas. However, Spanish destinations that are also part of the STD Project should also be considered, especially those focused on cultural and urban tourism.</p> <p>Understanding how these destinations handle tourism accessibility and how they promote and disseminate it can provide valuable insights into how Malaga can improve its online competitiveness.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • 1 benchmarking study on tourism accessibility.

ACTION	
E.2 – BRINGING TOGETHER AND DISSEMINATING INFORMATION ON ACCESSIBILITY IN THE TOURISM VALUE CHAIN	
STRATEGIC PLAN	Promoting and positioning the city of Malaga as a leading inclusive destination
DESCRIPTION	<p>Various initiatives that raise awareness of the accessible offer have been identified (Action A.1) and, in view of this and the fact that there are various channels that disseminate this information (managed by different actors), the aim of this action is to bring together all the information in order, firstly, to inform the city's tourism services about it, especially the staff in the tourist offices and tourist information points and, secondly, to ensure that the dissemination channels provide all the available information, so that it does not become fragmented, which undoubtedly makes it more difficult to access for tourists and visitors.</p> <p>In any event, this information, which can be divided into different parts of the value chain (information, transport, accommodation, activities and experiences at the destination, etc.), must be available on the destination's online tourism reference channels, i.e. the official website, the Malaga Turismo mobile app and the related social media sites.</p> <p>To implement this, the measures recommended above in this working proposal, such as the Accessible Tourism Committee (Action B.2) and Accessible Tourism Cluster (Action B.3), will be useful.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Information available on the accessible offer in all parts of the tourism value chain. • Channel(s) chosen to publicise the destination's entire accessible offer.

ACTION	
E.3 – SUPPORTING THE CREATION AND MARKETING OF ACCESSIBLE PRODUCTS AND EXPERIENCES	
STRATEGIC PLAN	Promoting and positioning the city of Malaga as a leading inclusive destination
DESCRIPTION	<p>The aim of this action is to complement the efforts made by the destination to increase awareness of the accessible tourism offer (Action A.1), to bring together the information available about it (Action E.2) and the promotional activities to raise its profile and attract customers (Action E.4).</p> <p>Therefore, the first step will be to identify and gain in-depth knowledge of different types of accessible products and services (e.g. accommodation, catering, experiences in the destination), with the support provided to the private tourism sector helping it to grow (Action D.2). Subsequently, themed experiences, packaged or otherwise, can be created and marketed, keeping in mind the importance gained by online channels.</p> <p>The experiences that have been identified as highly recommendable include the “Malaga Accessible City” inclusive tours programme, which could be improved and allocated the necessary resources to make it available to international as well as domestic visitors and tourists. This programme is also connected with Malaga's cultural and museum heritage.</p> <p>In order to implement this action, we believe that the involvement of tourism marketing agencies, such as AEDAV Andalucía (a member of the Tourism Forum) and their affiliates, is essential. We also consider the tools proposed above, e.g. the Accessible Tourism Committee (Action B.2) and the Accessible Tourism Cluster (Action B.3), to be invaluable.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of accessible experiences identified. • Tourism marketing agencies identified with accessible experiences in their travel/experience brochure.

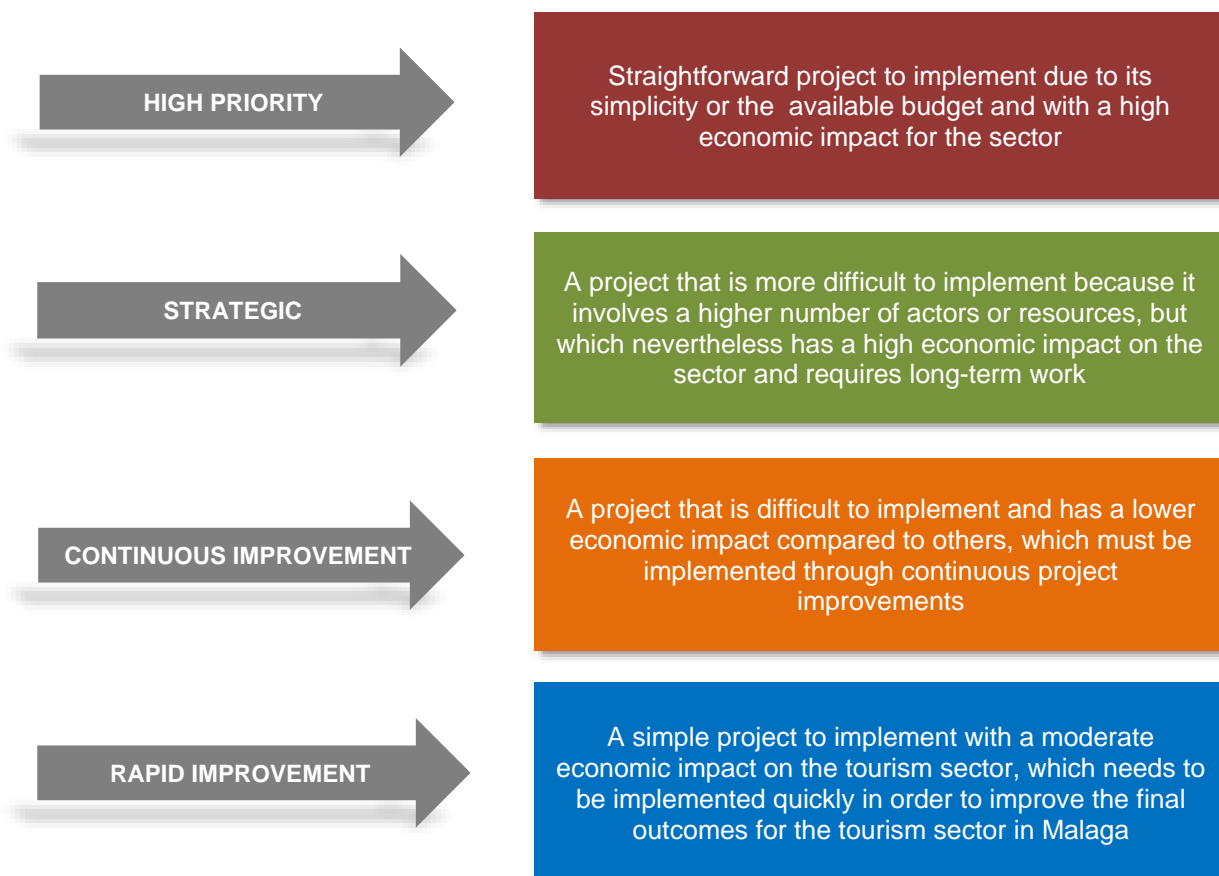
ACTION	
E.4 – DESIGNING ACTIONS TO DISSEMINATE AND PROMOTE MALAGA'S ACCESSIBLE TOURISM OFFER	
STRATEGIC PLAN	Promoting and positioning the city of Malaga as a leading inclusive destination
DESCRIPTION	<p>This action is designed to correct the shortcomings identified in the way the city of Malaga's accessible offer is promoted. Therefore, this action is aimed at developing promotional activities to raise Malaga's profile and position it as an inclusive destination among its target markets and segments. The purpose of this action will be to identify and learn about the accessibility features of the tourism products and services, so that relevant, objective and accurate information can be generated.</p> <p>The accessible offer should be included in the usual promotional circles for each tourist season, using both online and offline channels, as well as promotional material, with attention being paid to the target audience (e.g. end users, intermediaries, the press, influencers, etc.) and the formats used.</p> <p>Key actions include producing promotional material, attending trade fairs and congresses, blog trips and fam trips, and, of course, including all the available information in the destination's own channels, such as the tourism website, the Málaga Turismo mobile app (plus all applications used to promote the destination's offer) and tourism-related social media pages.</p> <p>The destination will therefore have a marketing strategy and short-medium term operational plans covering the actions to be carried out and including the destination's accessible offer.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • 1 marketing strategy that includes the accessible offer. • Number of actions included in the marketing strategy. • Number of actions implemented to promote the accessible offer (e.g. annually, for each market, channel type, etc.).

ACTION	
E.5 – INITIATIVES TO RAISE THE INTERNATIONAL PROFILE OF MALAGA AS AN INCLUSIVE CITY	
STRATEGIC PLAN	Promoting and positioning the city of Malaga as a leading inclusive destination
DESCRIPTION	<p>The city of Malaga already has experience of submitting applications for national and global awards, having received several accolades over the years. Given that the disabled population, elderly population and universal accessibility are all issues that are under the spotlight in the European Commission, we believe that this area of work should continue and we suggest the following events:</p> <ol style="list-style-type: none"> 1. European Capitals of Smart Tourism. This recognises outstanding achievements in tourism by cities. Malaga is already familiar with this competition and it is one of its past winners. 2. European Access City Awards. Awards that recognise cities that are pioneers in accessibility. They usually feature Europe-related themes specific to the year (e.g. European Year of Culture). This competition is also well known to Malaga, which received a special mention award. 3. Creative Cities. The UNESCO Creative Cities Network (UCCN) was created in 2004 to promote cooperation with and among cities that have identified creativity as a key factor for sustainable urban development. The Spanish cities participating include Barcelona, Liria, Granada, Bilbao, Denia, Seville, Burgos, Valladolid and Terrasa. <p>These competitions usually assess the city's visibility in the relevant online channels, as well as promotional material, e.g. video presentations.</p>
MONITORING INDICATOR(S)	<ul style="list-style-type: none"> • Number of applications submitted (e.g. over a four-year period).

7.4. Summary of the working proposal and types of actions

Certain resources will be required for each of the proposed actions, and the manner and timing of their implementation will have a bearing on their impact on the destination. There are four different types of actions, each defined according to a combination of these two factors.

Figure 57. Types of actions



There follows a summary of the working proposal, including details of the types of actions.

Optimising accessible tourism management and planning processes in the destination

A.1 Increasing awareness of the accessible tourism offer	HIGH PRIORITY
A.2 Greater knowledge of demand for tourism among people with accessibility needs	STRATEGIC
A.3 Creation of a tool to monitor compliance with accessibility regulations in the tourism sector	STRATEGIC
A.4 Further embedding accessibility requirements in public procurement	RAPID IMPROVEMENT

Promoting governance and creating synergies between the public, private and social sectors

B.1 Participation of the Department of Tourism in the Sectoral Committee for Social Rights, Accessibility and Inclusive Policies	STRATEGIC
B.2 Accessible Tourism Committee in the Tourism Forum	CONTINUOUS IMPROVEMENT
B.3 Accessible Tourism Cluster for the city of Malaga	STRATEGIC

Awareness-raising and training in tourism accessibility and demand from people with accessibility needs

C.1 Training in tourism accessibility for municipal technicians	HIGH PRIORITY
C.2 Training and awareness-raising actions for the private sector	HIGH PRIORITY
C.3 Development of thematic handbooks on good accessibility practices	RAPID IMPROVEMENT
C.4 Dissemination of the regulatory framework on universal accessibility and disability	RAPID IMPROVEMENT

To increase levels of accessibility in the tourism value chain

D.1 Ensuring the accessibility of technological and online tools used to promote tourism	HIGH PRIORITY
D.2 Support for the private tourism sector	STRATEGIC
D.3 Ensuring that tourist signs meet accessibility criteria	CONTINUOUS IMPROVEMENT
D.4 Facilitating the assessment and improvement of the Eurotaxi service in the city of Malaga	HIGH PRIORITY
D.5 Encouraging the inclusion of accessibility officers in the tourism sector	RAPID IMPROVEMENT
D.6 Improving the accessibility of public thoroughfares and spaces	STRATEGIC
D.7 Improving the accessibility of popular festivals and events	STRATEGIC
D.8 Promoting sensory and cognitive accessibility in the tourist areas of the city	STRATEGIC

Promoting and positioning the city of Malaga as a leading inclusive destination

E.1 SEO benchmarking	HIGH PRIORITY
E.2 Bringing together and disseminating information on accessibility in the tourism value chain	STRATEGIC
E.3 Supporting the creation and marketing of accessible products and experiences	STRATEGIC
E.4 Designing actions to disseminate and promote Malaga's accessible tourism offer	STRATEGIC
E.5 Initiatives to raise the international profile of Malaga as a destination	CONTINUOUS IMPROVEMENT

Table 9. High priority actions

HIGH PRIORITY ACTIONS
A.1 Increasing awareness of the accessible tourism offer
C.1 Training in tourism accessibility for municipal technicians
C.2 Training and awareness-raising actions for the private sector
D.1 Ensuring the accessibility of technological and online tools used to promote tourism
D.4 Facilitating the assessment and improvement of the Eurotaxi service in the city of Malaga
E.1 SEO benchmarking

Table 10. Strategic actions

STRATEGIC ACTIONS
A.2 Greater knowledge of demand for tourism among people with accessibility needs
A.3 Creation of a tool to monitor compliance with accessibility regulations in the tourism sector
B.1 Participation of the Department of Tourism in the Sectoral Committee for Social Rights, Accessibility and Inclusive Policies
B.3 Accessible Tourism Cluster for the city of Malaga
D.2 Support for the private tourism sector
D.6 Improving the accessibility of public thoroughfares and spaces
D.7 Improving the accessibility of popular festivals and events
D.8 Promoting sensory and cognitive accessibility in the tourist areas of the city
E.2 Bringing together and disseminating information on accessibility in the tourism value chain
E.3 Supporting the creation and marketing of accessible products and experiences
E.4 Designing actions to disseminate and promote Malaga's accessible tourism offer

Table 11. Continuous improvement actions

CONTINUOUS IMPROVEMENT ACTIONS
B.2 Accessible Tourism Committee in the Tourism Forum
D.3 Ensuring that tourist signs meet accessibility criteria
E.5 Initiatives to raise the international profile of Malaga as a destination

Table 12. Rapid improvement actions

RAPID IMPROVEMENT ACTIONS
A.4 Further embedding accessibility requirements in public procurement
C.3 Development of thematic handbooks on good accessibility practices
C.4 Dissemination of the regulatory framework on universal accessibility and disability
D.5 Encouraging the inclusion of accessibility officers in the tourism sector

7.5. Strategic alignment with other plans with an impact on the destination

It is common for regions to simultaneously implement plans and strategies of varying scope and scale. These should be coordinated to ensure that resources are used appropriately, and aligned to achieve the best possible results. The strategy proposed for Malaga will therefore have to take into account existing strategies that will have an impact on/be impacted by this Accessible Tourism Plan.

Thus, this section contains a summary of these strategies and documents, whose implementation will have a positive impact on the degree of accessibility of the destination. They are as follows:

- General Plan for Sustainable Tourism in Andalusia, Meta Plan 2021-2027
- Costa del Sol Marketing Plan 2020-2023
- Malaga Strategic Tourism Plan 2021-2024

General Plan for Sustainable Tourism in Andalusia, Meta Plan 2021-2027

The Andalusia Meta Plan is the most comprehensive strategic framework for the Andalusian tourism sector for the next six years. Although it is yet to be published, the future strategy for accessible and inclusive tourism in Andalusia, whose final paper is expected in 2022, is based on the Meta Plan.

Overarching Objective - OS03. To deliver a tourism development model based on integration and excellence and an inclusive, accessible and multi-generational tourism and leisure offer in which local values and coexistence between tourists and residents are paramount.

Strategic Plan – LE4. Quality as the cornerstone of Andalusia as a destination. Competitiveness is a key factor that should be accompanied by a substantial improvement in the services offered at destinations. Therefore, this plan is focused on achieving excellence in destinations, on promoting safe destinations and on all aspects of the quality criteria of the tourism offer, with special emphasis on social aspects such as inclusivity and universal accessibility.

(CTRJAL 02 Programme) Accessible and inclusive destination.

(Project 01) Strategy for Accessible and Inclusive Tourism in Andalusia:

Development of the Strategy for Accessible and Inclusive Tourism in Andalusia, including the publication of Interactive Guides to Accessible Beaches in Andalusia and the Directory of Accessible Tourist Establishments and Services in Andalusia.

(Project 02) Collaboration with organisations that represent people with physical disabilities: Support for organisations that represent people with physical disabilities, to assess the state of universal accessibility in tourism infrastructures, products and services, to help plan areas for improvement, and to provide training in universal accessibility and inclusion for public and private stakeholders in the tourism sector.

(Project 03) Promoting universal accessibility projects: Promotion and financial support for projects to improve universal accessibility in destinations, companies and local organisations.

(Project 04) Universal accessibility criteria in grant schemes: Establishing and applying universal accessibility criteria in any grant schemes that are announced (sustainable use of the coastline).

(Project 05) Training in universal accessibility: Training in universal accessibility for SMEs, professionals and business owners in the Andalusian tourism sector, through participation in digital workshops, specialised courses and master classes organised by the Andalucía Lab tourism innovation centre.

(Other regional ministry programme 01) Universal accessibility of the leisure and tourism offer for people with disabilities.

(Other regional ministry programme 04) Incorporation of quality of accessibility and customer service in craft workshops.

Costa del Sol Competitiveness and Marketing Plan 2020-2023

PROGRAMME A.8 AN INCLUSIVE DESTINATION: A.8.1 ACCESSIBILITY

(Action A.8.1.1) Analysis and inventory of the accessible tourism offer in Malaga.

(Action A.8.1.2) Technical advice from the government department that specialises in tourism accessibility.

(Action A.8.1.3) Creating protocols to monitor, measure, analyse and improve accessibility.

(Action A.8.1.4) Developing a tourism accessibility policy for each municipality.

(Action A.8.1.5) Promoting accessibility throughout the tourism value chain (establishments, resources, services, transport, etc.).

(Action A.8.1.6) Signage for sign language and verbal communication aids.

Additionally, insofar as accessible criteria were included in their design, the following actions have been identified as having an impact:

PROGRAMME A.1 WE COMPETE ON QUALITY, WE IMPROVE OUR QUALITY: A.1.1 QUALITY

(Action A.1.1.1) Certification as Smart Tourism Destinations, in accordance with standards UNE 178501 and UNE 178502. In progress.

(Action A.1.1.4) Introduction of accessibility features as a requirement in quality standards.

(Action A.1.1.5) Monitoring and control of companies and professionals that do not meet the legal requirements.

PROGRAMME A.2 PROFESSIONALISM HAS SET US APART AND MUST CONTINUE TO DO SO: A.2.1 TRAINING AND AWARENESS-RAISING

(Action A.2.1.2) Creating a comprehensive destination knowledge programme for the destination's information officers.

(Action A.2.1.8) Promoting training-engagement programmes on Smart Tourism Destinations for private and public stakeholders.

PROGRAMME A.3 WHAT MATTERS MOST, IMPROVING OUR DESTINATION: A.3.1 DESTINATION MANAGEMENT / A.3.3 TOURIST SATISFACTION

(Action A.3.1.5) Improving tourist signage.

(Action A.3.3.1) Establishing the methodological approach for measuring tourist satisfaction at a municipal level.

PROGRAMME A.7 WORKING ON INNOVATION AND TECHNOLOGY, THE BASIS FOR OUR GROWTH: A.7.1 TECHNOLOGY AND INNOVATION

(Action A.7.1.5) Promoting and improving digitised information in Tourist Offices.

(Action A.7.1.6) Promoting the development of technological applications adapted to mobile devices for Malaga's tourism services.

PROGRAMME A.9 A MODERN KNOWLEDGE-BASED APPROACH IS EFFECTIVE: A.9.1 TOURISM INTELLIGENCE

(Action A.9.1.3) Development and management of Costa del Sol – Smart Tourism Destination.

(Action A.9.1.6) Measuring trends in tourist loyalty.

PROGRAMME B.1 INTERNAL AND EXTERNAL COMMUNICATION, KNOWING WHAT IS BEING DONE: B.1.1 EXTERNAL COMMUNICATION

(Action B.1.1.7) Establishing a framework for messages tailored to each type of tourist.

PROGRAMME B.3 DIGITAL TRANSFORMATION, OUR MAIN MARKETING STRATEGY: B.3.1 DIGITAL CONTENT

(Action B.3.1.4) Including digital content on the accessibility of the destination and in channels that promote the tourism offer (website, social media, etc.).

(Action B.3.2.6) Creating an application that allows tourists to plan, manage and access booking engines from any device.

PROGRAMME B.4 ACTION PLANS, OUR OPERATIONAL TOOL: B.4.3 PROMOTION AIMED AT TOUR OPERATORS

(Action B.4.3.3) Promoting the accessible tourism offer in the usual communication, promotional and sales channels.

Malaga Strategic Tourism Plan 2021-2024

STRATEGIC CHALLENGE 11. INCREASING THE ACCESSIBILITY OF THE DESTINATION.

(Key project 11.1) Implementation of an Accessible Tourism Plan.

(Key project 11.2) Implementation of information and training actions on accessibility.

(Key project 11.3) Improving the accessibility of digital channels.

ANNEX I. Current legislation on accessibility in Malaga

State legislation

1. **Royal Legislative Decree 1/2013**, of 29 November, approving the Consolidated Text of the General Act on the Rights of Persons with Disabilities and their Social Inclusion
2. **Act 26/2011**, of 1 August, adapting the legislation to the International Convention on the Rights of Persons with Disabilities
3. **Order TMA/851/2021**, of 23 July, implementing the technical paper on basic conditions of accessibility and non-discrimination for access to and use of developed public spaces. Official State Gazette (BOE) no. 187, of 6 August 2021.
4. **Order VIV/561/2010**, of 1 February, implementing the technical paper on basic conditions of accessibility and non-discrimination for access to and use of developed public spaces. BOE no. 61, 11 March 2010
5. **Technical Building Code**: CTE-DB-SUA and CTE-DB-SI-3. (BOE of 12 September 2006) and Royal Decree 173/2010, of 19 February, amending the Technical Building Code, approved by Royal Decree 314/2006, of 17 March, on accessibility and non-discrimination for persons with disabilities
6. **Royal Decree 1544/2007**, of 23 November, governing the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities. BOE no. 290, 4 December 2007.
7. **Royal Decree 1494/2007**, of 12 November, approving the Regulation on the basic conditions for access to technologies, products and services related to the information society and social media for persons with disabilities.
8. **Royal Decree 1112/2018**, of 7 September, on the accessibility of websites and applications for mobile devices in the public sector.

Regional legislation

1. **Act 4/2017**, of 25 September, on rights and care for persons with disabilities in Andalusia. Official State Gazette (BOE) no. 250, of 17 October 2017.
2. **Decree 293/2009**, of 7 July, approving the Regulations that govern the rules for accessibility in infrastructure, urban planning, building and transport in Andalusia. Official Gazette of the Regional Government of Andalusia (BOJA) no. 140, July 21 2009.

Amendment of errors in Decree 293/2009, of 7 July, approving the Regulations that govern the rules for accessibility in infrastructure, urban planning, building and transport in Andalusia. BOJA no. 219, 10/11/2009.

3. **Act 11/2011**, of 5 December, governing the use of Spanish sign language and verbal communication aids for deaf, hearing impaired and deafblind people in Andalusia.
4. **Order of 16 October 2013**, creating the Special Monitoring Committee for Act 11/2011, of 5 December, governing the use of Spanish sign language and verbal communication aids for deaf, hearing impaired and deafblind people in Andalusia.
5. **Order of 9 January 2012**, approving the standard forms and tables to show compliance with the Regulations that govern the rules for accessibility in infrastructure, urban planning, building and transport in Andalusia, approved by Decree 293/2009, of 7 July, and the instructions for their completion. BOJA no. 12, of 19 January 2012.

Amendment of errors in the Order of 9 January 2012, approving the standard forms and tables to show compliance with the Regulations that govern the rules for accessibility in infrastructure, urban planning, building and transport in Andalusia, approved by Decree 293/2009, of 7 July, and the instructions for their completion (BOJA no. 12, of 19 January 2012). BOJA no. 100, 23/05/2012.

6. **Act 5/1998**, of 23 November, on the use of guide dogs in Andalusia by people with visual impairments.

7. **Decree 32/2005**, of 8 February, governing guide dog tags and the procedure for issuing them and creating the Guide Dogs Register of the Autonomous Community of Andalusia.

Local legislation

1. **Regulatory By-law on Accessibility in the Municipality of Malaga** (Official Gazette of the Province of Malaga no. 35, 20 February 20 2004).

On examining the municipality's documentation, other by-laws relating to accessibility were identified:

- *By-law Governing the Use of Public Thoroughfares.* (BOP (Official Provincial Gazette) no. 129. Thursday, 5 July, 2018).
- *By-law Governing Kiosks and other Similar Facilities on Public Thoroughfares.* (BOP no. 39, supplement 1 of 26 February, 2014).
- *By-law on the Use and Enjoyment of the Beaches of the Municipality of Malaga.* (BOP of 16/07/2004).
- *Municipal By-law on Taxi Services.* (BOP no. 109 and 115 dated 9 and 17 June, respectively).
- *Mobility By-law of the City of Malaga.* (BOP no. 11, 19 January 2021).
- *Malaga Fair By-law.* (BOP (Official Provincial Gazette) no. 136. Monday, 16 July, 2018).
- *Municipal By-law on the Welfare, Protection and Responsible Ownership of Animals.* (V.12). (BOP no. 70, 12 April 2017).
- *By-law Governing the Processing of Town Planning Licences.* (BOP of Malaga no. 109, of 10 June 2019).
- *Municipal By-law on Urban Development.* (BOP no. 71 of 13 April 2007. BOP no. 108, amendment dated 5 June 2007).
- *General By-Law on Public Works and Utilities on Public Thoroughfares.* BOP of 22 July 2002.
- *By-law Governing E-Government.* BOP no. 215, 8 November 2012.
- *By-law Regulating the Processing of Planning Permits, Statements of Compliance and Other Means of Intervention in the Use of Land and Buildings.* (BOP of 10 June, 2019).

ANNEX II Sources

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