

Correct as at 28th April 2026. It may be superseded at any time.

**Extract taken from:** Entry certification > Technical bulletins > Recording the number of seats in a vehicle with wheelchair positions

## 45 Recording the number of seats in a vehicle with wheelchair positions

### Background

Some vehicles have dedicated wheelchair positions and multi-use positions where an occupant can sit if a wheelchair isn't present. This technical bulletin provides clarity over how to record the number of seats.

### Determining a vehicle's class

Because wheelchair positions are included in the total seat count, they have an impact when determining a vehicle's class.

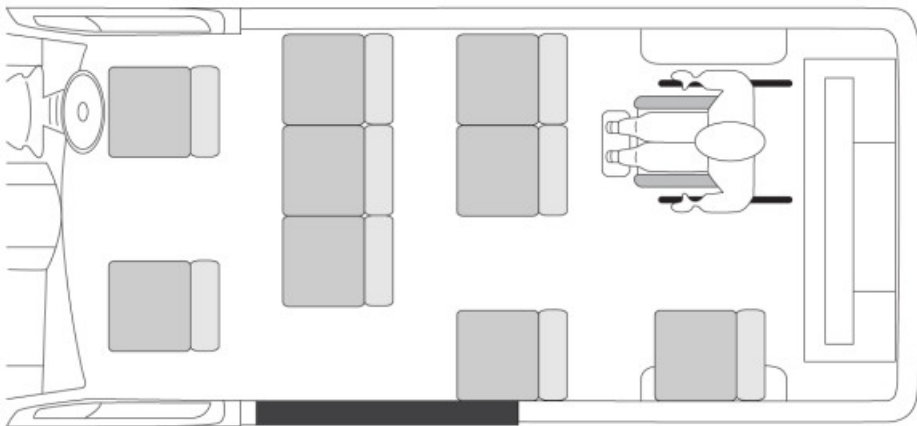
**Note:** vehicles of class MA, MB and MC do not have an upper GVM limit so a 9-seat van with a GVM of 4,000kg could be class MB.

### Dedicated wheelchair positions

A dedicated wheelchair position is a seating position for transporting a wheelchair and its occupant that is unavailable for other passengers when it is not occupied by a wheelchair.

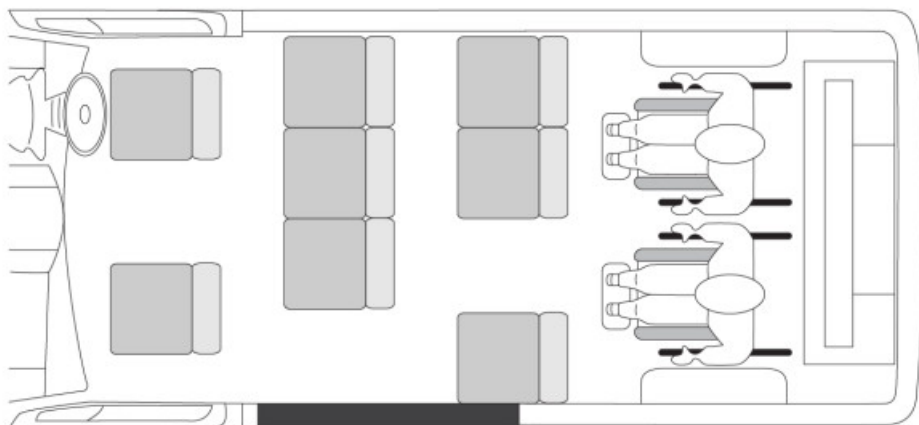
All dedicated wheelchair positions are included in the total seat count.

**Figure 45-1-1. 10 seat omnibus**



- This vehicle has 1 dedicated wheelchair position.
- **The total number of seats should be recorded as 10.**
- **It's classed as an omnibus.**

**Figure 45-1-2. 10 seat omnibus**



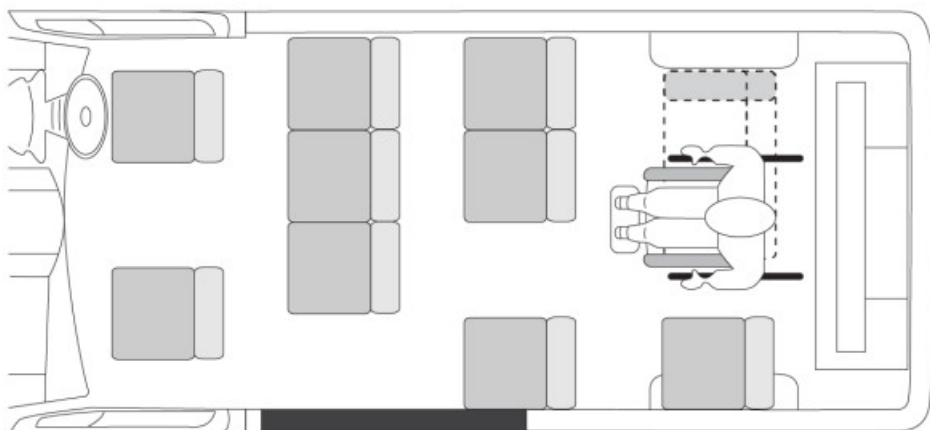
- This vehicle has 2 dedicated wheelchair positions.
- **The total number of seats should be recorded as 10.**
- **It's classed as an omnibus.**

### **Multi-use wheelchair positions**

A seating position that can be used for either a wheelchair or seat, but not both simultaneously, is only to be counted as one seat.

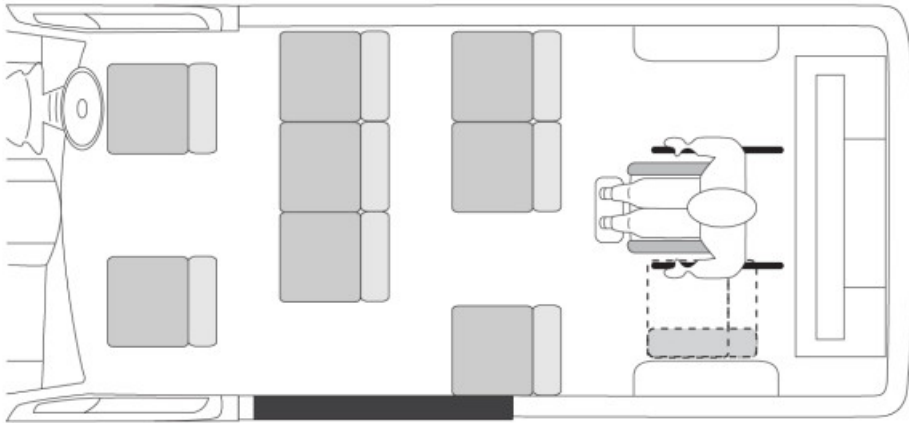
If a wheelchair position takes up more than one multi-use seating position, the number of seating positions is the highest possible count of seated passengers.

**Figure 45-1-3. 11 seat omnibus**



- This vehicle has a multi-use wheelchair position.
- There could be 9 occupants in seats and 1 occupant in the wheelchair.
- If the wheelchair position isn't used, there could be 11 occupants.
- **The number of seats should be recorded as 11.**
- **It's classed as an omnibus.**

Figure 45-1-4. 9 seat class MB vehicle



- This vehicle has a multi-use wheelchair position.
- There could be 8 occupants in seats and 1 occupant in the wheelchair.
- If the wheelchair position isn't used, there could be 9 occupants.
- **The number of seats should be recorded as 9.**
- **Its class is MB.**