

## Bus Users UK in Wales

PO Box 1045, Cardiff  
CF11 1JE

Telephone: 029 2022 1370

Email: [wales@bususers.org](mailto:wales@bususers.org)

[www.bususers.org](http://www.bususers.org)

[www.bususerswales.org](http://www.bususerswales.org)



WORKING FOR PASSENGERS

# PUBLIC TRANSPORT FOR PEOPLE WITH SENSORY LOSS

Best Practice Guidance for operators and local authorities  
on the Provision of Public Transport Services in Wales for  
People with Visual and Hearing Loss



# the public transport info service for Wales...

- ✓ Plan your journey online
- ✓ Bus timetable search
- ✓ Bus times by text
- ✓ Call us on 0871 200 22 33\*



Download our new  
iPhone App – FREE!



\*Calls cost 10p per minutes plus any  
charges your network provider makes.



[www.TravelineCymru.info](http://www.TravelineCymru.info)

0871 200 22 33

Gwybodaeth teithio didrafferth  
Trouble free travel info

# contents

|                                |    |
|--------------------------------|----|
| 1. Introduction                | 03 |
| 2. Terms of reference          | 06 |
| 3. Membership                  | 07 |
| 4. Recommendations             |    |
| training                       | 08 |
| engagement                     | 10 |
| information                    | 12 |
| 5. Legislation & accessibility | 15 |
| 6. Research findings           | 17 |
| 7. Analysis                    | 25 |
| 8. Conclusions                 | 38 |
| 9. Further information         | 42 |

---

**Note 1:** Copies of this document are available in alternative formats upon request from Bus Users UK in Wales.

**Note 2:** For brevity, the term “sensory loss” has been used throughout in place of other terminology.

---

# introduction

“We shouldn’t have to ask people about where we’re going when we get on a bus, or where to get off once on the bus. We shouldn’t necessarily be compelled to interact with people either if we choose not to... the system should work so that we can be independent travellers. The general population do [travel independently], why can’t we? It’s not only for my benefit... it’s for everyone’s.”

Focus Group Participant (June 2005)<sup>1</sup>

---

## 1.1

Every day thousands of people use public transport to get to work, to visit friends and family, to attend healthcare appointments, to pursue leisure activities or to go on holiday. But disabled people still face many barriers that can make travel by public transport difficult, or even impossible.

## 1.2

This best practice guidance covers the three main modes of public transport used by people with sensory losses or impairments – buses, trains and taxis. It summarises the legal position, what the passenger with sensory loss can and should reasonably expect, along with what transport providers and local authorities can do to improve the journey from start to finish.

## 1.3

The Disability Discrimination Act (DDA) made great progress in stopping discrimination against disabled people.

## 1.4

The DDA has now been replaced by the Equality Act of 2010. This Act stipulates that businesses must not unlawfully discriminate in the provision of goods and services. It defines nine “protected characteristics” which are Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Religion or Belief, Sex, Sexual Orientation and Race.

---

<sup>1</sup>“Audio and Visual Information on Buses: Moving Towards Inclusion”, a report produced for Guide Dogs. ISBN 0-9524038-4-6

## 1.5

Under the 2010 Act, a person has a disability if s/he has “a physical or mental impairment, which has a substantial and long-term adverse effect on that person’s ability to carry out normal day-to-day activities”.

## 1.6

Under the Equality Act “service providers” are most companies or organisations that offer goods, facilities or services to members of the public.

It does not matter whether the services are free or paid for. It does not matter how big or small the organisation is (one person or a large company) or who runs it (government, voluntary organisation or a commercial business).

## 1.7

Transport authorities are covered by the General Equality Duty described in the Equality Act as are organisations that exercise functions of a public nature. This would therefore cover operators of public transport.

## 1.8

Guidance states that whether or not an organisation is exercising a function of a public nature depends on a number of factors. These include – among others – whether it is publicly funded, if it is exercising powers assigned to it by statute, or if it is taking the place of central or local government.

## 1.9

Other factors include if it is providing a public service, if its structures and work are closely linked with the delegating State body, and if there is a close relationship between the private body and any public authority.

## 1.10

The general duty basically states that those subject to the Equality Duty must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

## 1.11

This report centres on 4 important cross-cutting themes – training, engagement, information and accessibility.

# terms of reference

## 2.1

### Background

---

#### 2.1.1

In April 2008, DeafBlind Cymru met Lord Dafydd Elis Thomas AM to discuss access to public transport for those with sensory loss.

#### 2.1.2

Following the meeting a group of key stakeholders have worked together to identify best practice and produce recommendations that could be disseminated throughout the public transport industry.

#### 2.1.3

In undertaking its work, the group was mindful of the prevailing difficult financial climate, and that its recommendations should assume that no new money would be available to implement them. Production of this report has been informed by the provisions of the Equality Act 2010.

## 2.2

### Terms of Reference

---

#### 2.2.1

The Group's Terms of Reference for its inquiry into the provision of public transport for people with sensory impairment or loss were as follows:

- "The task and finish group will produce a report that:
- Highlights examples of best practice in accommodating the public transport needs of people with sensory impairment or loss; and
- Makes recommendations to operators and local authorities on how to improve the door-to-door public transport experiences of people with sensory impairment or loss."

# membership of the group

## 3.0

---

### 3.1

The groups involved in the preparation of this best practice guide are:

**Action on Hearing Loss Cymru**

**Arriva Buses Wales**

**Arriva Trains Wales**

**Bus Users UK in Wales**

**Community Transport Association in Wales**

**DeafBlind Cymru**

**Guide Dogs for the Blind Association Wales**

**Passenger Focus**

**SENSE Cymru**

# recommendations

## 4.0

---

### 4.1

If implemented, we believe that our recommendations will help to improve the lives of people with sensory loss. Individuals and organisations representing people with sensory loss will wish to take a close interest in how operators and authorities respond to our recommendations.

### 4.2

Although our recommendations are directed at what operators should do, and what local authorities should do, all of them should take a keen interest in others' responsibilities and performance. All operators and local authorities should involve and work with GoSkills and sensory impairment representative organisations to take forward recommendations that will improve staff awareness of sensory loss.

### 4.3

**Training** – relevant employees must be trained appropriately.

#### 4.3.1

##### **What should passengers expect?**

A smooth and stress-free journey with assistance from staff who are trained and understand the needs of passengers with sensory loss or impairments.

This is vital to ensure a positive experience for passengers with sensory loss. Negative attitudes and/or a lack of awareness, and staff who are poorly equipped to meet the needs of passengers with sensory loss contribute to poor experiences for someone attempting to use public transport. The training should include specific guidance on deaf awareness and visual impairment awareness.

### 4.3.2

#### What should operators do?

##### T1

Operators of trains, buses and taxis should set out clear, measurable steps and timelines for meeting their duties under the 2010 Equality Act.

##### T2

Bus, train and taxi operators should ensure that their staff undergo robust training in sensory awareness, specifically visual and deaf awareness training, including the use of equipment, led by disabled people, as part of their induction and ongoing development. This should be reviewed and measured so that staff are equipped to respond to the needs of disabled passengers. Operators should work with and consult GoSkills and sensory impairment representative organisations. A good way of doing this would be via the Certificate of Professional Competence.

##### T3

Operators of trains, buses and taxis should recognise the often different challenges facing people with sight and hearing loss. Although there are some similarities with regard to staff training and accessible information, there are also major differences in how transport providers need to respond. A much more considered approach is necessary, not one which puts all disabled people into one group with the same needs.

##### T4

Taxi operators should provide training for their drivers on the needs of passengers with sensory loss and reinforce the legal requirement to carry a guide or assistance dog.

##### T5

Taxi operators should provide all new taxi drivers with training in equality, diversity and disability awareness (currently available in Level 2 of the BTEC Award "Transporting Passengers by Hackney Carriage and Private Hire Vehicles").

##### T6

Taxi operators should provide training in customer service for telephone staff at the taxi booking office.

## **4.4** **ENGAGEMENT**

### **People with sensory loss must be involved in decisions affecting them**

#### **4.4.1**

##### **What should passengers expect?**

It is particularly important that people with sensory loss are involved in the planning and design of all changes to policies, practices and service provision. The needs of people with sensory impairment or loss must be taken into account when changes are made to avoid unintended consequences. All operators and local authorities should involve and work with sensory impairment representative organisations to take forward recommendations that will improve public transport engagement.

#### **4.4.2**

##### **What should operators do?**

###### **E1**

Operators of trains, buses and taxis should set out clear, measurable steps and timelines for meeting their duties under the 2010 Equality Act.

###### **E2**

Operators of trains, buses and taxis should meaningfully involve people with sensory loss and representative organisations in all changes to design, policies, practices, service provision, reviews and evaluations.

###### **E3**

Bus operators should engage with sensory impairment groups to consider the internal design and seating arrangements in order to ensure that buses allow sufficient space for a guide dog, and they should check the accessibility features (e.g. ramps) on buses regularly, thus reducing breakdowns. A good example of this is the work done on the new vehicles for the TrawsCymru long distance bus network.

###### **E4**

Taxi operators should enable passengers with wheelchairs to pre-book to ensure that a suitable vehicle is provided.

### 4.4.3

#### What should local authorities do?

##### E5

Set out clear, measurable steps and timelines for meeting their duties under the 2010 Equality Act.

##### E6

Ensure that relevant staff undergo robust training in sensory awareness, specifically visual and deaf awareness, including the use of equipment, led by disabled people, as part of their induction and ongoing development. This should be reviewed and measured so that staff are equipped to respond to the needs of disabled passengers.

##### E7

Meaningfully involve people with sensory loss and representative organisations in all changes to design, policies, practices and service provision, and also in reviews and evaluations.

##### E8

Ensure that their Public Protection Committees (or equivalent) continue to monitor taxi performance, revoke licences when necessary or decide that a driver needs to complete a BTEC course.

##### E9

Introduce Traffic Orders and enforce parking regulations at bus stops.

##### E10

Work with train operators and others to improve access to railway stations, remove physical barriers, provide level access or ramps to stations, and provide hand rails and appropriately colour contrasted tactile warning surfaces and markers to indicate steps.

##### E11

Include in tenders for contracted services the provision of accessible and accurate audio-visual information, including clear and easily understood signage, as well as using the process to more generally improve the quality of vehicles for passengers with sensory loss.

##### E12

Review the exemptions for taxi drivers from taking a guide or assistance dog for medical reasons and, taking this into account, ensure that there are sufficient taxis and Private Hire Vehicles available that will accept dogs.

## **E13**

Be proactive – perhaps through mystery shopping – in monitoring and enforcing the requirements for carrying guide and assistance dogs. A blind or partially-sighted assistance dog owner travelling alone who is refused carriage with their dog will find it difficult to identify the vehicle and/or driver so some cases go unreported.

## **4.5**

### **INFORMATION**

#### **Accessible Information is vital to people with sensory impairment**

##### **4.5.1**

#### **What should passengers expect?**

A smooth and stress-free journey after obtaining all the information necessary to complete the trip.

Helpful, accessible and up-to-date information about service provision is crucial to encourage everyone to use public transport and to ensuring they enjoy a safe, successful journey. It is especially important to people with sensory loss.

All operators and local authorities should involve and work with Traveline Cymru and sensory impairment representative organisations to take forward recommendations that will improve public transport information. Operators and authorities will also need to consider any recommendations from the Public Transport Users' Committee on the provision of information for passengers.

##### **4.5.2**

#### **What should operators do?**

##### **I1**

Operators of trains, buses and taxis should set out clear, measurable steps and timelines for meeting their duties under the 2010 Equality Act.

##### **I2**

Train operators should provide accessible information on how to obtain a list of unstaffed stations, how to complain, and about safety.

##### **I3**

Train operators should ensure that real time visual information displays are installed at all stations, and maintained properly.

- I4**  
Using a range of accessible formats, operators of trains, buses and taxis should inform disabled people of improvements to the information available about public transport services.
- I5**  
Train operators' websites should verbally describe stations and should be accessible to screen reading software – e.g. how to get there, if there are steps to the platform, whether the station is staffed, and whether buses and taxis will facilitate an onward journey.
- I6**  
Operators of trains, buses and taxis should provide timetables and other information (e.g. which buses are accessible or have audiovisual announcements, or travel guides) through a range of accessible formats.
- I7**  
Bus and train operators should ensure that audible and visible information in vehicles or carriages, or at stations or stops, notifies passengers of next stops, final destinations and any changes in the service.
- I8**  
Train operators should advertise their Disabled Assistance number and details of the Assisted Passenger Reservation System (APRS) more prominently and accessibly at all stations.
- I9**  
Bus operators should consider providing audiovisual information on buses, and meanwhile ensure drivers make announcements.
- I10**  
Train operators should promote the fact that ticket offices can often be found at stations in addition to ticket machines; and that when ticket offices in Wales are unstaffed, tickets will be available on the train and all ticket gates will be locked in the open position.
- I11**  
Train operators should promote the fact that ticket gate sensors detect when a passenger has moved beyond the gate to avoid closing too soon, but cannot detect low, wheeled luggage pulled behind a passenger.

**I12**

Train operators should promote the fact that, generally, no train is dispatched before all passengers have got on or off the train. Anyone who might have difficulty alighting from a train but who has not previously arranged help should let the Conductor know, so that they may be assisted at their destination station.

**I13**

Train operators should make it clear to passengers that the Conductor should be on the platform at unstaffed stations to assist anyone on and off the train.

**I14**

Operators of trains, buses and taxis should ensure that audible announcements are easy to hear, replacing poor quality systems.

**I15**

Taxi operators should offer text messaging for people who are deaf or hard of hearing.

**I16**

Operators of trains, buses and taxis should ensure that health and safety announcements are available in a range of accessible formats.

**4.5.3****What should local authorities do?****I17**

Set out clear, measurable steps and timelines for meeting their duties under the 2010 Equality Act.

**I18**

Encourage operators to ensure that audible announcements are easy to understand, that they replace poor quality systems and improve the ability of operators' staff to speak clearly.

**I19**

Identify and address integration and capacity issues and explain their proposals to overcome them in Regional Transport Plans.

**I20**

Work with bus operators to provide real-time audiovisual accessible information at bus stops in addition to Traveline's text number.

**I21**

Provide details of community transport services within their areas, working in partnership with the Community Transport Association.

**I22**

Provide stronger advice on disability issues, with particular reference to guide dogs and hearing dogs.

# legislation & accessibility

## 5.1

### Overall Legislative Provisions

---

#### 5.1.1

There have been significant and welcome improvements to public transport accessibility in recent years, as transport operators have started to take on board the customer service elements of the DDA and now the Equality Act 2010.

#### 5.1.2

The introduction of accessibility features on regulated coaches and buses has been undertaken as a result of the Public Service Vehicles Accessibility Regulation (PSVAR) 2000.

#### 5.1.3

The accessibility of rail vehicles derives from the Rail Vehicles Accessibility Regulation (RVAR) 1998 and its subsequent revision in 2010 for light rail vehicles. There is also the RVA Interoperable Rail System Regulation 2008 which governs heavy rail vehicles and station infrastructure. Network Rail also has a key role in the management of stations and train services.



#### 5.1.4

The requirements of the RVAR are reviewed and amended regularly. The latest version of the RVAR adopts the rail vehicles section of the European Technical Specification for Interoperability for persons with Reduced Mobility (PRMTSI), which must be implemented fully by 2019-2020, when all trains and stations must meet its requirements.

#### 5.1.5

The Department for Transport's (DfT) "Railways for All"<sup>2</sup> strategy sets out wide-ranging commitments to increase journey opportunities for disabled people by improving stations, trains and related services.

#### 5.1.6

Part 12 of the 2010 Equality Act refers to guidelines that newly built transport vehicles need to meet. All buses must be accessible by 2017, and all trains by 2020. New vehicles have had to be accessible for some time. Fortunately, there are many examples where bus operators have introduced accessibility improvements ahead of this deadline. This Stagecoach bus is an excellent example.

#### 5.1.7

Other examples include ATW refurbishing its rolling stock with visual displays and a brighter environment in all areas of the train, fitting all their stations with visual displays and, with support from the Welsh Government, fitting raised platform "humps" over the next five years. These offer a safer means of getting on and off trains by reducing the gap between the platform and the train.



---

<sup>2</sup> [www.dft.gov.uk/transportforyou/access/rail/rfa/](http://www.dft.gov.uk/transportforyou/access/rail/rfa/)

# research findings

## 6.1

### What issues face people with sensory loss trying to use public transport?

---

#### 6.1.1

This report has been produced to help identify the problems facing people with visual or hearing impairment, or loss. There are common themes, but it is nevertheless important to take account of what we know about particular experiences.

## 6.2

### People with impaired hearing

#### 6.2.1

According to research by RNID Cymru<sup>3</sup>, 61% of questionnaire respondents perceive that being deaf or hard of hearing makes it more difficult to use public transport, while 66% perceive it makes it more difficult to use public transport alone. 65% identified a lack of deaf awareness as the main barrier to using public transport.

#### 6.2.2

The public transport system is key to ensuring that the public can access services outside their immediate environment. For people with sensory loss this need is heightened as external

contact helps to combat the isolation that can accompany sensory loss, particularly for older people.

#### 6.2.3

More than 70% of people over 70 have a degree of hearing loss and it is at this very age that people need public transport more than ever to ensure continuity of social interaction and independent living. RNID Cymru's evidence in "Open to All"<sup>2</sup> published in 2010 is that lack of deaf awareness by frontline transport staff and the lack of accessible information are barriers to people with hearing loss using public transport. These barriers can and should be easily overcome, by ensuring that public transport in Wales becomes open to all.

#### 6.2.4

Hearing impaired users of public transport identify trains as the most difficult mode for them to use.

---

<sup>3</sup> RNID Cymru (2010) "Agored I Bawb?", adroddiad RNID Cymru i'r rhwystrau i bobl fyddar a trwm eu clyw.

### 6.2.5

More than one in four (27%) respondents found it difficult to obtain information before travelling by train, while more than two out of five (42%) said it was difficult during the journey. Nearly 60% of respondents who use British Sign Language (BSL) or Sign Supported English (SSE) had difficulty finding information before a journey and nearly three quarters (72%) said it was difficult during a journey.

### 6.2.6

Forum participants raised the need for real time visual information displays in trains and railway stations, deaf awareness training for frontline staff, and difficulties in hearing audible announcements.

### 6.2.7

Nearly one in five respondents (18%) had difficulty finding information before travelling by bus or coach, while 28% said it was difficult to get information during a journey. Young open forum participants in particular identified a lack of deaf awareness among bus drivers and the barrier that can create for passengers who are deaf or hard of hearing.

### 6.2.8

One fifth of respondents (20%) said it was difficult to find information before travelling by taxi or mini cab, while over a quarter (28%) said it was difficult to get information during a journey.

### 6.2.9

Overall, therefore, a significant proportion of respondents in "Open to all?" have difficulty obtaining information when using public transport.

## 6.3

### People with impaired vision.

#### 6.3.1

The "Functionality and the Needs of Blind and Partially Sighted Adults in Wales"<sup>4</sup> report was published by Guide Dogs in September 2007. The report showed that 27% of visually impaired people in Wales find buses very difficult to use. The main reason for this was not being able to tell when the desired destination had been reached, so that a visually impaired passenger could alight at an unfamiliar stop.

#### 6.3.2

It is not surprising, therefore, that a reported 70% of visually impaired people in Wales never go out alone, and that many find it hard to use buses independently.

#### 6.3.3

The quotations overleaf are from the "Audio and Visual Information on Buses: Moving Towards Inclusion" report of the focus group mentioned elsewhere in this report.

“The worst thing about travelling on buses... is that you’re not in control unless you know where you’re going and when to get off.”

“I have to say that sometimes I get really nervous about where I’m going to end up.”

“Using the buses often as I do is quite a stressful experience. I get stressed from missing the bus because I didn’t know when it arrived and left, and I get stressed from the possibility of not getting off at the right bus stop...”

“When it’s unknown territory that you’ve never done before, it can be a lot more nerve racking and risky for me...”

“Getting off at the wrong stop is very stressful... not somewhere you’d want to be...”

#### 6.3.4

Despite much good work being carried out in some areas, more needs to be done to improve the experience for these passengers. This guide seeks to provide some examples of actions that can be taken to improve the experience of public transport for users with sensory disabilities.

### 6.4

#### Accessibility

##### 6.4.1

We have identified several issues that, if addressed, would greatly improve the experience of people with sensory loss.

#### Approaching the station

- All dropped kerbs on approach to the station entrance should have the recommended tactile blister paving.
- All routes must be free of obstructions.
- There should be clearly-defined pavement or pedestrian paths to and from the transport services.
- Signage on approaches to stations should be clear and informative.
- All signs must contrast against their surroundings and the text must also contrast against the background of the sign.

---

<sup>4</sup> ‘Functionality and the Needs of Blind and Partially Sighted Adults in Wales’. Guide Dogs (2007).

## The station concourse

- There should be a good way-finding system around the concourse.
- The reception counter should be easy to identify with clear signs. If the ticket office has a glass screen, the screen should have manifestations to highlight its presence. The ticket office should have a hearing loop system installed and maintained.
- Signs should be permanent, clear, and with good contrasts to assist with the identification of facilities.
- Display screens should be accessible. If they are located too far away or too high to be used by partially-sighted commuters, extra screens should be provided near ticket machines or routes to the platforms to allow partially sighted commuters to view the displayed information.

## Platforms

- Steps leading to platforms should have contrasting strips (“nosings”) to identify the edge of the step.
- Contrasting handrails with corduroy paving at the top and bottom of the steps.
- The edge of the platform should also have the recommended offset blister paving.
- Display screens should be accessible and kept up to date to reflect any last minute changes.



### 6.4.2

The Welsh Government is taking forward a number of measures to improve accessibility at rail stations.

### 6.4.3

These include:

- A commitment to deliver greater integration between transport modes. This is a key aim under the National Transport Plan and under the £40m Wales Station Improvement Programme, and in other investments such as the Bangor Interchange scheme. The Welsh Government's vision is that all people, including those with disabilities, should be able to make easy door-to-door public transport journeys to their chosen travel destinations.
- Maintaining a close and productive working relationship with the Association of Train Operating Companies (ATOC), and helping ATOC to improve its engagement with people and user groups in its review of the APRS. Working with ATOC and train operators to develop mechanisms for the future monitoring of quality and delivery under the APRS, and about frontline staff training assisting disabled people.
- Including in the specification of the next Wales and Borders franchise a requirement for the franchisee to monitor passenger satisfaction with the APRS and to report on those regularly. The Welsh Government will then require the franchisee to agree any action required as a result.
- Encouraging local authorities and others to work with the rail industry to improve the take-up of disabled people's railcards. There is a role in this for representative bodies and user groups.
- Ensuring that Arriva Trains Wales (ATW) improves the posters, leaflets and other information available to assist disabled people. ATW's guide "Making Rail Accessible: Helping Older and Disabled Passengers" contains very helpful information but should be better publicised.
- Working with its railway industry partners to achieve exemplary status in actively involving disabled people in planning rail improvements and in monitoring accessibility issues. A good example is the modernisation of Swansea High Street Station.

- A commitment to fund the rollout of customer information screens for all stations under the Wales Station Improvement Programme.
- Continuing to keep closely in touch with DfT and Network Rail – the two organisations responsible for the “Access for All” programme - to discuss improvements at Welsh stations under the Major Schemes programme.
- Including in specifications for future Wales and Borders franchises a requirement for the franchisee to set out service quality targets for improving assistance and information for disabled passengers and to report on progress against these targets.
- The Welsh Government is producing guidance on minimum accessibility requirements for buildings in which it invests. In future, the Welsh Government will require all recipients of its funding for rail improvements to engage actively with disabled people and people with protected characteristics under the Equality Act 2010. This will build on the current requirements for Equality Impact Assessment under the WelTag transport appraisal process and for all schemes under the Station Improvement Programme.
- Following the Welsh Government’s Accessibility Railtours, there has been a series of detailed discussions and site visits involving all partners in the scheme and local user groups. As a result, design improvements have been made to the scheme so that, for example, a “Changing Places” facility is now incorporated to mirror the one being provided at the Quadrant Bus station and elsewhere in Swansea. This active involvement is being extended to protected groups under the 2010 Equality Act.
- Informal but intensive community consultations were undertaken on the pilot Easier Access Installations at Aberdovey and Valley.

## Humps

These are innovative solutions designed by Network Rail to address the problem of low platforms. They provide easier access where there is a stepping-height problem at stations. The installation is a special structure that reduces the distance between the platform and trains without requiring a full rebuild of the platform. A graded hump made of glass reinforced plastic is installed, which is adjusted in the factory to suit the features of the particular station.

It comes in sections that join together so can be made to any length. It allows on-train ramps, which are available on all ATW trains, to be used for wheelchairs and other users on platforms where the gradient is otherwise too steep. Normally, it would cost a minimum of £250,000 to rebuild one basic platform to bring it up to modern standards.

The Easier Access Scheme has already been successfully installed at Aberdovey and Valley stations. The Welsh Government is funding a feasibility study, being developed in partnership with Network Rail and ATW, on possible additional humps in Wales.



- All train operating companies and Network Rail – where it owns stations – should ensure that accessibility improvements are included in any station refurbishment or redevelopment. Local authorities may also have a role.
  - Train operators should ensure that induction loop systems are fitted in ticket booths and that all induction loop systems are clearly advertised, and maintained and tested regularly, and that all staff have been trained in their operation.
  - Reflecting the needs of people with sensory loss, bus operators should prioritise low-floor accessible buses to replace less accessible vehicles and provide a consistent service.
  - Where possible, taxi operators should install loop systems in their vehicles to enable easier communication between hearing aid users and drivers.
  - Where possible, taxi operators should ensure visible taximeters so that the cost can easily be seen by the passenger.
- At bus stops – which should be clearly visible to passengers and drivers – ensure that there are:
- Level access/raised kerbs
  - Clear, obstacle-free footways with no obstructions between bus and passenger
  - Well-lit shelters with seating, that are transparent with manifestations on the glass to differentiate it from openings
  - Shelters with fixtures and fittings with recommended contrasting colours
  - Clear and legible Real Time Information displays
  - Easy to read timetables and bus information

# analysis

## 7.0

---

### 7.1

There are many examples of good practice throughout Wales, such as at Blackwood bus station, below. We cannot highlight all of them but have tried to refer to several that represent some of the best. They show the sort of practical assistance that people with sensory impairment need to travel like anyone else on public transport.

### 7.2

#### Service providers

##### 7.2.1

Service providers have an “anticipatory duty” to think in advance about reasonable adjustments they may need to make and plan ahead. This is because duties are owed to disabled people generally and apply whether or not the service provider knows that a particular person is disabled.



### 7.2.2

Passenger Focus published a report “Assisted Passenger Reservation System: mystery shopper” in September 2008<sup>5</sup>, with a follow-up report released in January 2011.

### 7.2.3

This found that for many passengers the APRS is crucial in enabling them to travel on the national rail network. Users can ring a central number and book assistance in using the rail network from journey start to end including change of trains.

### 7.2.4

Booking should not be a requirement but priority may be given to those who have booked assistance. Booking may be fine for journeys planned in advance, but would be difficult for spontaneous trips and for regular journeys such as commuting.

## 7.3

### Common issues

#### 7.3.1

A number of common issues face passengers with sensory loss when using public transport. Reflecting others’ research and additional sources of information, we believe these are:

## Colour contrast

### 7.3.2

This is obviously especially significant for anyone with visual impairment. Appropriate contrast is required for door handles, handrails, steps and station furniture such as seating and sign boards. Again, there are many examples of existing good practice, as shown in this Stagecoach vehicle.



## Lighting

### 7.3.3

When installing lighting, operators and local authorities should bear in mind the particular requirements of passengers with sensory loss. So, lights should be fit for purpose and appropriate to the location, and they should be maintained regularly to ensure that they remain effective.

---

<sup>5</sup> [www.passengerfocus.org.uk/news-and-publications/document-search/default.asp?go=1&keywords=September+2008&x=36&y=7](http://www.passengerfocus.org.uk/news-and-publications/document-search/default.asp?go=1&keywords=September+2008&x=36&y=7)

## Accessible information

### 7.3.4

As for all public transport users, blind and partially-sighted travellers need accurate, accessible information about the whole journey before they set out. Operators need to provide comprehensive and accurate information, including on destination blinds, as demonstrated by this Stagecoach bus. It must also be remembered that blind and partially sighted people often struggle to get information in their chosen format. Many of them cannot access a website at all.

### 7.3.5

As a result, it is vital to include:

- Where buses go from and to.
- Whether buses are low-floor, or have visual or audible announcements.
- How to locate the train station from the bus stop.
- Whether they need to change trains on the way, and how to do this.
- How and where to book help on train journeys using the APRS.
- Whether they need a taxi to complete any part of the journey and how to locate the taxi rank from the bus or train station.

## Consistency in the livery used in the interior of trains

### 7.3.6

This is linked to the need to promote appropriate colour contrast. Brighter is not necessarily better for blind and partially sighted travellers, and colour contrast needs to be used to show where doorways and seats and facilities are located, and not just for aesthetic purposes.

## Announcements at stations

### 7.3.7

Many people have difficulty hearing and understanding announcements. However, a clear and audible announcement is especially important to passengers who have a sensory loss.

So, audible information at stations should be clear and intelligible, and visual displays must be at the correct height and use appropriate colour contrast, and large print.



## Pembrokeshire Passport

The Pembrokeshire Passport is a joint initiative between Pembrokeshire Access Group and Pembrokeshire County Council. It is a bright orange wallet with clear pockets in which disabled people can put words, pictures, or cards to show where they want to travel or the help they might need.

The passport received initial funding from Health Challenge Pembrokeshire, and can be used any time day or night and at weekends and will tell bus drivers and rail staff what help a person may need on a journey. In doing so, it aids communication and may contain important information about the support that is needed if a person has a problem on their journey. The Passport can be used on any bus in Pembrokeshire and on Arriva trains and stations. Taxi drivers will also know about the wallet.



### Integration between services, and between modes

#### 7.3.8

Too few bus and train stations in Wales are close together.

- Local authorities and operators must bear in mind their responsibilities to ensure – wherever possible – that train stations have bus stops located very close by to allow passengers to continue their journey, or to reach the rail station by bus.
- This also applies to the location of taxi ranks, which need to be accessible from rail stations.

### Ticketing

#### 7.3.9

A valid ticket is clearly essential for anyone undertaking a journey by public transport. But there are some particular obstacles faced by passengers with a sensory loss. These include:

- Ticket gates need to allow sufficient time for passengers with disabilities to pass through them before they close.
- Blind and partially sighted travellers cannot use touch screen ticket dispensers.

## Case study: Cardiff Bus

### “Accessibility to our buses” policy

Cardiff Bus recognises that a range of disabilities – including mobility, sensory and cognitive - that may require additional attention from drivers. It recognises that not all disabled people use wheelchairs, and that disabled people may require different forms of assistance to be able to access the transport system. The company’s staff use all reasonable endeavours to maximise accessibility for passengers with disabilities.

Staff should ask passengers if they need help – e.g. a visually impaired passenger might not know that staff are waiting to help. Passengers with a hearing difficulty may not be easy to identify, and staff are encouraged to be mindful of this and to act accordingly.

Staff should also be patient. Staff should help passengers to get to their seats by giving clear instructions and allowing time for them to sit down. Passengers with walking sticks use them for balance as well as mobility and need extra time to get up and sit down.

Assistance dogs will normally be identified by their jackets or by their distinctive harnesses. Guide dogs and their owners need to be given time to settle down. However, dogs cannot read bus timetables, they don’t know which their stop is and they often rely on their owners knowing where they are to give instructions. In turn, owners may rely on drivers to provide that information. So, if a passenger requests a stop, staff help them by announcing when the bus stops there.

Cardiff Bus does not operate a “request stop” system so all drivers should stop at a bus stop where passengers are standing unless it is made obvious to the driver that they do not require that bus. A Bus Card is a handy plastic card with the word “BUS” written on both sides used to signal to drivers.

Staff should also recognise and understand the significance of badges such as the Partially-Sighted Society badge. Some other organisations have similar badges. Canes of different colours and lengths indicate that the passenger has visual and/or mobility impairment or loss, or in the case of a cane with red stripes, that the person is deafblind and signifies poor vision and hearing loss.

## Having enough time to get on and off vehicles

### 7.3.10

Boarding and alighting is a potentially dangerous part of their journey for any passenger, but the risk of an accident is especially acute for a passenger with sensory loss.

### 7.3.11

Practical help is underpinned by detailed policies so that operators and local authorities can be measured against their performance.

### 7.3.12

Cardiff Bus has an especially helpful and detailed accessibility policy.

### 7.3.13

Stepping from a platform on to or off the train is particularly dangerous for blind and partially sighted people. The gap between the two varies horizontally and vertically, and on unstaffed stations there might well be nobody to help. In addition, the provision of appropriately colour contrasted tactile warning strips is inconsistent and often absent.

### 7.3.14

In order to board a train, a blind or partially sighted passenger needs carefully to locate the edge of the platform, and then the door of the train, whilst being aware of the time they are taking and the need to act quickly.



### 7.3.15

When getting off the train, they have to locate the platform on to which they are stepping, again acting quickly, and alight safely before the train departs.

At an unstaffed station the onward journey depends on knowing exactly where they are going and how to find their way to the exit.

### 7.3.16

Consequently, enough time needs to be given to allow this to happen without passengers being stressed, or their safety compromised.

## Staff training and awareness

### 7.3.17

Unhelpful attitudes are not common but still occur in public transport, and this is often because of the staff's lack of understanding rather than ignorance or rudeness. Nevertheless, this can come across otherwise to people with sensory loss.

### 7.3.18

As a result, deaf and visual awareness training should be embedded into training programmes to ensure staff are aware of and understand how to communicate effectively with people with sensory loss.

### 7.3.19

There is also a need for staff to communicate with each other. This is particularly important when onboard train staff change over mid-journey. Passengers with sensory loss should not have to repeatedly give information about their support needs, so every attempt should be made by staff to share information.

### 7.3.20

Service providers should make sure that their staff are trained in deaf and disability awareness. This should include managers and directors, but it is particularly important for staff who deal directly with customers. This will help them adopt best practice when dealing with disabled customers, in particular those who are deaf. This could be a reasonable adjustment, and will be good for business.

“They were waiting for me as the train pulled in, looked after me well and took me to the customer lounge. They asked me if I needed to go to the toilet, got tea for me and offered to carry my bag.”

## **Case study:**

# **STAGECOACH UK BUS**

### **Disability awareness and social inclusion training helps drivers to:**

- Understand disability legislation as it applies to the transport industry.
- Understand their responsibility in providing a service.
- Know what assistance they should and can offer a disabled customer.
- Understand disabled people's difficulties when using public transport.
- Understand "social inclusion" and the implications for customers and drivers.
- Develop the skills to deal with customers with a variety of disabilities.
- Understand when and how to use bus equipment to help disabled customers.
- Confront preconceptions and learn to value the mix of people in communities.

### **Perspectives of blind or visually impaired people**

- Look out for me.
- Pull up to the bus stop and right up to the kerb.
- Say Hello and tell me the bus number.
- Help me with the fare system.
- Let me know when I've reached my stop.
- Tell me where there's a vacant seat.
- Wait until I sit down before moving off.

### **Perspectives of deaf or hearing impaired people**

- Always face me and a smile would be nice.
- Look me in the eye.
- Speak normally.
- Sometimes it helps if you show me a map or write things down.

## Reasonable adjustments

### 7.3.21

Part 3 of the Equality Act is the part of the law that requires providers of services to make “reasonable adjustments” to ensure that their service is accessible. For stations and transport infrastructure this includes making adjustments to the physical features of the facilities, as well as adjustments to the way in which the service is delivered.

### 7.3.22

If disabled customers find it “impossible or unreasonably difficult” to access goods, services or facilities, providers have to make “reasonable adjustments” to the ways they provide those goods, services or facilities.

### 7.3.23

They include:

- Changing the way a service is provided – “practices, policies or procedures”.
- Providing an additional aid or service if this will help or enable someone to access the service – for example, an induction loop or communication support.
- Removing or altering physical features, such as doors, lighting or glass screens, if these create barriers to accessing the service – or providing the service in an alternative way.

### 7.3.24

“Reasonable adjustments” include providing additional aids or services to enable passengers to access a service, or making it easier for them to do so.

“The Cambrian line is very good; it has visual signs to show the next stop.”

(Male, over 60, hard of hearing, north Wales)

“I know some trains do have a rolling display screen telling you where the train is going, and when the next stop is. I saw it on a Virgin train; I think if our local network did that it would be really useful.”

(Female, 40 – 50, BSL-user, north Wales)

## Knowing where to get help in an emergency

### 7.3.25

All passengers find it reassuring to know how to get help if they need to. Again, this is especially true for people with a sensory loss. So, there needs to be consistency in how people obtain useful information, so that people with sensory loss are able to locate help points at stations.

## Unlawful discrimination

### 7.3.26

The Equality Act says that there are four types of unlawful discrimination:

- Refusing or deliberately failing to serve someone because of their sensory loss.
- Offering a lower standard of service or providing a service in a worse manner.
- Providing a service on worse terms.
- Not making “reasonable adjustments” if this is necessary to enable someone to use the service fully.

## Additional aids or services

### 7.3.27

Providing communication support, such as qualified BSL/English interpreters (face-to-face or via videophone), lipspeakers, notetakers or speech-to-text reporters.

### 7.3.28

Providing equipment such as an induction loop or infrared system, textphone, telephone with an amplifier or an inductive coupler, videophone or a fire alarm with flashing lights.

### 7.3.29

Making printed and online information accessible by writing in plain English; making sure that DVDs or videoclips on any websites are subtitled, signed, or both.

### 7.3.30

Service providers have to take steps to deal with barriers to access caused by “physical features” of a service provider’s premises.

- Physical features include steps, lighting, parking areas, escape routes, kerbs, internal/external doors, public facilities (telephones/counters), signs and temporary/moveable items (such as display racks).
- Any feature relating to the design / construction of a building or the way you get in and/or out of it, or the way you access it – for example, doorways or car parks.
- Any fixtures, fittings, furnishings, equipment or materials. These can be either on the premises or brought onto them by the service provider or by someone doing work for the service provider – for example, a display rack, chairs or a reception counter.
- Any other physical feature of the land that is part of the premises.

### 7.3.31

Transport service providers using certain types of vehicles are covered by Part 3 of the Equality Act. These vehicles include buses, taxis and trains.

### 7.3.32

Transport providers must not discriminate when:

- Providing (or not providing) a disabled person with a vehicle – e.g. a train operating company should not forbid travel by a person who is deaf travelling with a hearing dog.
- Providing (or not providing) a disabled person with a service supplied while he or she is travelling in a vehicle – e.g. announcements of stops on board a bus.

## Assistance Dogs

### 7.3.33

If a train operating company normally does not allow dogs on their trains, they are likely to have to change their policy for registered assistance dogs. There are specific laws which say that bus drivers may not refuse to carry registered assistance dogs. These include hearing dogs.



### **7.3.34**

Licensing authorities are responsible for issuing licences for both Hackney (black) taxis and Private Hire Vehicles (PHVs). Taxis can be found at a rank or can be flagged down in the street. Drivers and their vehicles need to be licensed, as well as operators. PHVs take calls from a radio circuit and have no set fares.

### **7.3.35**

Currently, individual local (licensing) authorities are responsible for accessible taxi policies. Some authorities require drivers to undertake a disability awareness course in order to obtain their licence, and that new drivers undertake a BTEC course.

### **7.3.36**

Under the Equality Act it is a criminal offence for licensed taxi and private minicab drivers to refuse to carry a passenger accompanied by a registered guide dog or assistance dog, to charge more because of that fact, or to refuse to allow the dog to stay with the passenger.

### **7.3.37**

A taxi driver or minicab driver can only refuse to carry a registered assistance dog if the driver has a medical exemption certificate issued by the licensing authority. The driver must display the exemption certificate at all times. It is a criminal offence to forge an exemption certificate.

### **7.3.38**

Registered assistance dogs include those trained by Hearing Dogs for Deaf People. Owners/carers must make sure that their dog is wearing a jacket that says 'Hearing Dogs for Deaf People'.

If the training charity has issued the dog with an identification card, the owner / carer should carry it with them to show that the Hearing Dog is a registered assistance dog.

## Case Study: Arriva Trains Wales

Assistance Dogs (UK) represent five registered charities. These are: Canine Partners, Dogs for the Disabled, Hearing Dogs for Deaf People, Support Dogs and The Guide Dogs for the Blind. Arriva Trains Wales has introduced the 'Assistance Dogs Travel Guide' in partnership with each of the Charities.

The principal aim of the scheme is to raise awareness of the needs of Assistance Dog owners amongst our employees when travelling by train.

Increasingly, Assistance Dog owners are enjoying the benefits and freedom of travel. Their dogs undergo intensive training in preparing them to use public transport.

In most cases, dog owners do not experience problems when travelling with Arriva Trains Wales. One area where customer feedback has indicated an opportunity to further improve our service is the provision of a 'protected space' for the customer's dog.

Assistance Dogs are trained to sit at their owner's feet and naturally require additional space to sit or lie down during their journey. By following a few simple steps, the scheme will help to ensure that all Assistance Dogs and their handlers can travel safely and in comfort.

# conclusion

## 8.0

---

### 8.1

There is already lots of good practice going on, as demonstrated by this Stagecoach wheelchair space, shown below. The Welsh Government's National Transport Plan involved consultation with stakeholders to identify several themes critical to better accessibility.

The Welsh Government's priorities for developing a more integrated transport network in Wales include proposals for improving accessibility.

### 8.2

There is, nevertheless, much that still can and needs to be done to improve the passenger experience for people with sensory loss or impairment. We have identified three main areas that, if addressed, would significantly improve the experiences of these individuals. They are developed in more detail in our recommendations, but they are:



## Training

### 8.3

Providers of public transport services and information should ensure that their staff receive training on visual and deaf awareness at regular intervals. It is essential that senior staff are trained to the same level as public-facing staff to ensure they understand what is expected from their staff.

Deaf and visual awareness training is inherently different from equality training as it gives participants a basic understanding of the issues facing people with sensory loss and develops an understanding of how to overcome those issues, as well as promoting good ways of communicating with people with sensory loss.

### 8.4

Deaf and visual awareness training should be delivered by an accredited trainer (who is usually blind or deaf), and organisations representing people with sensory loss are well-placed to advise. Local authorities and operators should consult and work with GoSkills, the sector skills council for the passenger transport industry.

## 8.5

By the end of the training, participants should be able to:

- Explain in general terms how the ear and eye works.
- List the communication techniques used by people with sensory loss.
- Define the basics of BSL.
- Recognise social groups and identity within a sensory loss community.
- List equipment available to people with sensory loss.
- Challenge stereotypes about people with sensory loss.
- Identify the issues facing people with sensory loss in daily life and possible solutions in relation to relevant legislation.
- Recognise communication needs and the communication support for the different social groups.

## Engagement

### 8.6

This should happen in all changes to policies, practices and service provision. Some operators already provide opportunities for disabled people to visit their local transport provider to become familiar with buses and trains. This gives extra confidence to some passengers, particularly those who are not familiar with public service vehicles.

### 8.7

Mystery shoppers could be used to evaluate the effectiveness of staff training. In the provision of accessible and accurate information, transport providers should be required to show what they do with actual examples of alternative formats.

### 8.8

Bus Users UK in Wales has considerable experience of undertaking mystery shopper surveys throughout the country, and works closely with bus operators, the Vehicle and Operator Services Agency – through its Bus Compliance Officers – and local authorities. Bus Users' network of local representatives is a valuable resource in this respect.

### 8.9

The involvement of review mechanisms which are inclusive of people with sensory loss is essential to ensure that policies are compliant. It is important to work with organisations such as Bus Users UK in Wales, Passenger Focus and the Public Transport Users Committee for Wales to ensure that appropriate review mechanisms are implemented.

### 8.10

The involvement of people with sensory loss is essential so that all reviews and review mechanisms are led by people with experience of the issues.

### **8.11**

Such an approach will ensure that reviews take directly into account the views of people with sensory loss.

By including people with sensory loss in the process of directly reviewing the process and results, feedback draws on their own experiences. Peer to peer review mechanisms ensure that the highest standards are achieved, maintained and continued by the service provider.

### **8.12**

There is potential for the groups representing disabled people to liaise with their local transport provider to make their journey experience trouble free.

## **Information**

### **8.13**

Information should be provided for people who have a single and dual sensory loss and operators should display more prominently the various ways of obtaining travel information.

### **8.14**

Transport providers must be encouraged to ensure that information is available by various methods, including ensuring frontline staff are deaf-aware, providing audible and visual real time information displays at stops, stations and on vehicles, and providing information in a range of accessible formats. Local authorities and operators should consult and work with Traveline Cymru, Wales's one-stop shop for public transport information.

### **8.15**

The Assisted Passenger Transport Information service will always be essential for some rail passengers. But the aim should be to create a service which is accessible without the need for "special" assistance – i.e. we should be looking for solutions which are complete fixes.

### 8.16

A further example of best practice is being shown in west Wales. Pembrokeshire County Council has installed the first tranche (33) of electronic displays at bus stops as part of a real-time information system in the county. Subject to successful testing, the installations will in due course be switched from scheduled to real-time information.

### 8.17

The displays are fitted with speakers that will inform blind or visually impaired people who have a suitable key fob of the location and time of the next departure, and its destination. Also included is the facility – in conjunction with Traveline Cymru – to get real-time information on mobile 'phones. Traveline will also interface to provide real-time on its website.

“People desire independent mobility. This means access to real-time information when it is required in order to facilitate their travel in a safe environment, in a timely, efficient and stress-free manner and with minimal or no reliance on drivers or fellow passengers.”

# further information

## 9.0

### Can be found via the following:

---

Action on Hearing Loss ([www.actiononhearingloss.org.uk](http://www.actiononhearingloss.org.uk))

Community Transport Association ([www.ctauk.org](http://www.ctauk.org))

Deafblind Association ([www.deafblind.org.uk](http://www.deafblind.org.uk))

Disability Wales ([www.disabilitywales.org](http://www.disabilitywales.org))

Guide Dogs for the Blind ([www.guidedogs.org.uk](http://www.guidedogs.org.uk))

Leonard Cheshire ([www.lcdisability.org](http://www.lcdisability.org))

RNIB ([www.rnib.org.uk](http://www.rnib.org.uk))

### Other Useful Links

Arriva Trains Wales ([www.arrivatrainswales.co.uk](http://www.arrivatrainswales.co.uk))

Bus Users UK Cymru ([www.bususerswales.org](http://www.bususerswales.org))

Confederation of Passenger Transport ([www.cpt-uk.org](http://www.cpt-uk.org))

First Great Western ([www.firstgreatwestern.co.uk](http://www.firstgreatwestern.co.uk))

GoSkills ([www.goskills.org](http://www.goskills.org))

DfT ([www.dft.gov.uk/transportforyou/access/tipws/inclusivemobility](http://www.dft.gov.uk/transportforyou/access/tipws/inclusivemobility))

Passenger Focus ([www.passengerfocus.org.uk](http://www.passengerfocus.org.uk))

Assisted Passenger Reservation System – Mystery Shop ([www.passengerfocus.org.uk/news-and-publications/document-search/document.asp?dsid=1897](http://www.passengerfocus.org.uk/news-and-publications/document-search/document.asp?dsid=1897))

Assisted Passenger Reservation Service – Best Practice Guidelines ([www.passengerfocus.org.uk/news-and-publications/document-search/document.asp?dsid=1898](http://www.passengerfocus.org.uk/news-and-publications/document-search/document.asp?dsid=1898))

Real Time Information ([www.rtig.org.uk/downloads.htm](http://www.rtig.org.uk/downloads.htm))

RNIB Customer Services Tel: 0845 702 3153.

Train and station services for disabled passengers – code of practice ([www.rtig.org.uk/downloads.htm](http://www.rtig.org.uk/downloads.htm))

Traveline Cymru ([www.traveline-cymru.info](http://www.traveline-cymru.info))

Welsh Government ([www.wales.gov.uk](http://www.wales.gov.uk))

## References

Audio and Visual Information on Buses: Moving Towards Inclusion.

ISBN 0-9524038-4-6

[www.dft.gov.uk/transportforyou/access/rail/rfa/](http://www.dft.gov.uk/transportforyou/access/rail/rfa/)

Functionality and the Needs of Blind and Partially Sighted Adults in Wales.

Guide Dogs (2007)

“Open to all?” RNID Cymru

Sign Design Guide ISBN: 1858784123





