

Consultation Response

Office of Rail and Road: Improving Assisted Travel

January 2018

About us

Action on Hearing Loss is the charity formerly known as RNID. Our vision is of a world where deafness, hearing loss and tinnitus do not limit or label people and where people value and look after their hearing. We help people confronting deafness, tinnitus and hearing loss to live the life they choose. We enable them to take control of their lives and remove the barriers in their way. We give people support and care, develop technology and treatments and campaign for equality.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

Introduction

Action on Hearing Loss welcomes the opportunity to comment on the Office of Rail and Road's (ORR) consultation. Overall, we are pleased with the approach that ORR is taking with regard to improving Assisted Travel. There are 11 million people with hearing loss in the UK and this number is set to rise to 15.6 million by 2035. It's vital that the rail system is accessible for this large section of the population.

We would like to see the following broad points addressed to make Assisted Travel more accessible for people with hearing loss:

- **Staff training** plays an important role in creating an accessible transport system. If staff can communicate effectively with people with hearing loss, this will mitigate some of the risks and barriers that people with hearing loss can face when using transport.

- People with hearing loss are often struggling to access **real-time information**. This is because announcements are often audio only and not visual too. The need for Assisted Travel could be reduced if real-time information is improved. Our vision is for all stations and trains to have real-time information available for people with hearing loss. Ideally this would be via both screens at stations and on trains, and could include push-notifications via apps for smartphone users.

We have written responses to the consultation questions we are able to comment on.

Our response to the consultation questions

Q1. How can rail operators' improve the availability and promotion of Assisted Travel information in stations?

British Sign Language (BSL)

Based on the 2011 census, we estimate that there are at least 24,000 people across the UK who use sign language as their main language, although this is likely to be an underestimate. People who use or rely on BSL would benefit from accessing BSL video content about Assisted Travel rather than relying on written English. At a station, a help screen could be located with information in BSL. New technology has also made it easier for BSL users to access information. For example, a Signly Network Rail app enables users to point their smart phone at an image (similar to a QR code) which then activates videos in BSL (footnote 1). The app is currently used to deliver information about level-crossings, and has clear application for a wider variety of settings.

Staff promotion

As the ORR research reveals, the most popular source of information about Assisted Travel is via a member of staff (footnote 2). Although respondents were most likely to say they would prefer a leaflet or information booklet to receive information about assisted travel, if passengers are finding out about it from staff, this channel could be maximised. For example, training could include the need for staff to signpost passengers to further information about Assisted Travel, such as leaflets or websites.

In order for this method of promotion to work, staff need to effectively convey the information. And effective communication isn't always happening:

"I don't find that staff are very deaf aware. Some of them mumble or don't take care to make sure you can see their face. I recall trying to get advice from a

Footnote 1 <https://signly.co/apps/network-rail/>

Footnote 2 http://orr.gov.uk/_data/assets/pdf_file/0008/25982/research-into-passenger-awareness-of-assisted-travel-services-april-2017.pdf

staff member at Kings cross and she just kept walking and not looking at me whilst speaking. Not helpful..." (Action on Hearing Loss Supporter)

Staff can aid communication using simple techniques, such as enabling lip reading by facing the other person and not covering their mouth when speaking.

Spontaneous assistance

The information provided about Assisted Travel should make it clear that assistance does not have to be booked in advance. It is clear that more awareness raising of this information is needed: the ORR research shows that only 17% of people are aware that this method of assistance is available (footnote 3) . Spontaneous assistance is extremely relevant for people with hearing loss. If a passenger's journey goes to plan, there is no reason why a person with hearing loss, who has no additional needs, cannot travel independently. However, issues arise when there are disruptions to services, which can be frequent. It is important that assistance, in case of disruption, is given to those with hearing loss. Failure to do so can lead to frightening situations:

"While I was on my [smart] phone, I didn't realise that the people had all left the carriage... I was confused and carried on my phone, and then the door closed, and lights went out until it was pitch black and it moved against the walls. I was gob smacked. I used the emergency handles to pull, saw the message which said the driver was aware that I pulled it and there was a voice but I can't hear nor speak" (Action on Hearing Loss Supporter)

Should such disruption arise, real-time information could be posted via an app or a screen in the carriage. Alternatively, members of staff could walk up and down the carriage with tabards displaying key messages.

Q3. What steps can be taken to increase website accessibility?

Similar to our response to consultation question 1, information should be available in BSL. Based on the 2011 census, we estimate that there are at least 24,000 people across the UK who use sign language as their main language, although this is likely to be an underestimate.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

We welcome the suggestion that operators should use social media to increase awareness of Assisted Travel. In addition to operators using their own social media channels and utilising social media advertising, it may be beneficial to seek out disability communities online and raise awareness via these groups.

Footnote 3 Ibid.

Q5. Are there any obstacles to providing Assisted Travel information no more than ‘oneclick’ from rail operators’ website home pages?

We welcome this suggestion; Assisted Travel information is often difficult to find online.

Q6. Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

We very much agree with this proposal. Virgin East Line is a good example of how this can work in practice (see a screen shot of their booking system below). However, to promote the use of the service amongst people with hearing loss, we recommend that "communication support" is included in the description of journey care.

It is also important to note that some people with multiple needs may have hearing loss in addition to other visible or hidden disabilities. As with other travelers, people with multiple needs may not request assistance related to their hearing, and this might be true even if they have requested support for other conditions. For example, elderly people with mobility issues may well have some level of hearing loss (footnote 4) but may not disclose this. Support should be provided regardless, and staff should be aware that passengers with or without visible disabilities could benefit from proper communication and support.


Outward Journey

Facing	<input checked="" type="radio"/> No preference	<input type="radio"/> Backwards	<input type="radio"/> Forwards
Position	<input checked="" type="radio"/> No preference	<input type="radio"/> Aisle	<input type="radio"/> Window
Proximity	<input type="checkbox"/> Table	<input type="checkbox"/> Power	
Preferred coach	<input checked="" type="radio"/> No preference	<input type="radio"/> Quiet coach	

Save your seat preferences

Reserve seats >

Journey Care

 **Book Journey Care**

Our Journey Care team are pretty awesome. They're around to help anyone with restricted mobility or access needs, and ensure everyone's journey is as fabulous as possible.

Make a request for Journey Care +

Footnote 4 71% of over-70-year-olds have some kind of hearing loss. See our [Hearing Matter report](#) for more information.

Q7. How can rail operators improve the availability and promotion of Assisted Travel information to third-party agencies?

We agree with the consultation that not everyone will be internet users and therefore we welcome the suggestion that offline methods of awareness raising are used. It is recommended that further research is conducted to understand who would benefit from offline materials, in order to effectively target communications. For example, studies show that people with hearing loss either have the same internet usage as the general population (footnote 5) or higher internet usage than the general population (footnote 6). Therefore it cannot be assumed that people with hearing loss are more likely to prefer offline channels than the wider population would.

Q8. How can rail operators engage productively with third-party agencies? If there are particular obstacles to doing so, how can these be overcome?

We would welcome the opportunity to partner with rail operators. We are keen to work with operators to explore effective ways of promoting good assistive technology related to hearing loss. This could include tools that operators might develop, for example apps with push notifications or audio-visual real-time announcements on platforms and trains.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

A refund would go some way to demonstrate a commitment to providing a reliable service. However, passengers with hearing loss might be more likely to need spontaneous assistance, for example when a platform changes:

"I was once stranded at Cardiff station. It's a huge place and although I knew the time of the train there had been a change of platform. I had to go around asking station staff where the train was. By the time I found the platform I was just in time to see the back of the train disappearing round a bend. I was about 3 hours late getting home to Cornwall. Lots of stress."

Therefore operators should be held to account if an unplanned disruption takes place and suitable communication is not in place. Examples of suitable communication in this context could be available staff who are hearing loss aware who are available on the train or station or visual announcements which display details of the disruption.

Footnote 5 Thorén ES1, Oberg M, Wänström G, Andersson G, Lunner T (2013) *Internet access and use in adults with hearing loss*. J Med Internet Res. 9;15(5)

Footnote 6 https://www.sheffield.ac.uk/polopoly_fs/1.268538!/file/d-deaf_report.pdf

Q13. How can consistency in training for company staff across the industry on disabilities be achieved?

Consistency in training is easier to achieve when the same course is delivered across an organisation or industry. At Action on Hearing Loss, we have training to help organisations meet the needs of people with hearing loss. We increase service quality and customer loyalty, and help meet the requirements of the Equality Act and the public sector Equality Duty (or the Discrimination Act 1995 for Northern Ireland). Organisations who take part receive the Louder than Words™ charter (footnote 7) which signals to customers that they can approach staff of that company with confidence.

We have experience delivering training on a large scale. For example, we delivered training to 8,000 employees at TransPennine express. To deliver training to this many employees, we delivered face-to-face training to disability champions or key managers and for the remaining staff online training was given.

Q14. How frequently should disabilities training take place and its content be refreshed?

We recommend to the organisations we work with that their employees re-take our training every 12-18 months. The first training session is often face-to-face, as this is much more impactful (particularly as someone with hearing loss delivers the training). Online refresher training is then delivered after this.

Q15. Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

For Action on Hearing Loss, it is important that training is delivered which is specific to those with hearing loss. Findings from our research echo findings from ORR's study, where it was found that:

"Users want staff to better understand the complexity of disabilities and appreciate challenges each person faces. Staff understanding that passengers, who are often anxious, need extra time and assurance is important. People with hidden disabilities reported lower satisfaction and poorer outcomes across a number of end-to-end metrics so this should be a particular area of focus" (footnote 8)

Anecdotal evidence from our supporters demonstrates that poor hearing loss awareness can cause disruption and distress for customers:

Footnote 7 <https://www.actiononhearingloss.org.uk/how-we-help/businesses-and-employers/access-auditing-and-benchmarking/louder-than-words-accreditation/>

Footnote 8 http://orr.gov.uk/_data/assets/pdf_file/0009/25983/research-into-passenger-experiences-of-passenger-assist-november-2017.pdf

"People can be so rude to you, they never guess you can't hear and can treat you in an awful way."

In addition to improved staff awareness, it is also important for transport providers provide accessible real-time information such as audio-visual announcements.

If the Disabled Persons Transport Advisory Committee's (DPTAC) framework is to be mandatory, we urge ORR to encourage DPTAC and the Department for Transport (DfT) to update the document, as there are elements in it which are not up-to-date: for example there is reference to out of date legislation.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/Another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

We strongly welcome an annual independent review of training and an initial benchmarking exercise. Training is a significant factor affecting how people with hearing loss receive assistance and therefore it would be beneficial to assess the training landscape and monitor this.

Q20. Do you agree with our proposed approach to updating the guidance?

We agree with this proposed approach. It is pleasing to see that areas of technology will be updated. However, as is asserted in paragraph 1.24 in the consultation, not everyone will have access to the internet. Therefore, it will be important for the disabled people's protection policy (DPPP) guidance to ensure that stations and trains are implementing the latest technology which doesn't depend on a passenger having access to the internet. An example would be screens at stations and on trains which show real-time information.

Contact details

We would be very happy to input further into this consultation. Please do not hesitate to contact us:

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