

Respondent Information Form and Questions

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Action on Hearing Loss Scotland

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

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3. Permissions - I am responding as...

Individual / Group/Organisation

Please tick as

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No



Consultation Response

Rail 2014 (Transport Scotland) 20th February 2012

About us

1. Action on Hearing Loss Scotland is the new name for RNID Scotland. We're the charity working for a world where hearing loss doesn't limit or label people, where tinnitus is silenced and where people value and look after their hearing.
2. Our response focuses on key issues that relate to people who are deaf or hard of hearing. Action on Hearing Loss Scotland is happy for the details of this response to be made public.
3. We welcome the publication of *Rail 2014*, Transport Scotland's consultation document on the future development of Scotland's railways. There are specific areas which we believe need to be highlighted to ensure equal access to railway facilities for people with hearing loss. We have outlined these in this response. As one in six people in Scotland has some hearing loss, this means that one in six users of a railway service is likely to be deaf or hard of hearing. Therefore, ensuring that rail facilities are accessible to people with hearing loss would benefit a large number of rail passengers and rail facilities users.

Deafness and hearing loss

4. There are 850,000 people with hearing loss in Scotland. It is estimated that 1 in 6 of the general population has some degree of hearing loss. There are many reasons why some people are deaf or hard of hearing or lose their hearing. The most common is age-related deafness, with more than 50% of people over the age of 60 with some hearing loss. Other people may lose their hearing because of exposure to noise at work or because of prolonged and repeated exposure to loud music. Deafness can be congenital, and Universal Newborn Hearing Screening, introduced in Scotland in 2005, is identifying more deaf babies than ever before. There are also some conditions such as damage to the eardrum or inflammation in the middle ear that cause deafness. There is a broad spectrum of levels of hearing loss, ranging from people with mild deafness to people who are profoundly deaf.
5. Depending on their level of deafness and on when they became deaf or hard of hearing, deaf and hard of hearing people use a range of methods to communicate. Between 5,000 and 6,000 deaf people in Scotland use British Sign Language (BSL) as their preferred or first language; many rely on lip reading, others use note takers or rely on equipment such as hearing aids and some use a combination of these. For those who use BSL as a first language, English is often a second language and access to written English can be challenging.

Deaf or hard of hearing people's access to transport

6. People who are deaf or hard of hearing face barriers when accessing public transport. This is largely due to inaccessible forms of communication and resulting lack of access to information. Public information is often relayed by audible means only, leaving many passengers who are deaf or hard of hearing without access to relevant and up-to-date facts about their journey. For example, real-time visual displays are not always available in waiting areas or in vehicles or train carriages. Real time visual displays should provide the same information as audible announcements, for example next stops, final destinations, change of platform, delays and emergency information. But in practice, there is often a delay between audible announcement and visual display of information, and some audible announcements are not displayed visually at all. Similarly, visual alarms are not always fitted, which puts people who are deaf or hard of hearing at great risk should there be emergency evacuations.
7. Communication with frontline staff at stations and in vehicles/on trains can also be difficult because many staff are not deaf aware. They may not face passengers when talking to them and customers who are deaf or hard of hearing may thus not be able to lipread. Moreover, staff may sit behind a reflective glass panel, which makes it harder for people to lipread. Hearing loop systems are not always installed, or switched on and regularly tested, which makes it difficult for customers who have a hearing aid to communicate with staff.
8. RNID's research report *Transport for All*¹ surveyed over 1,000 deaf and hard of hearing people about their experience of using public transport. The results showed that more than half of people find it difficult to communicate with staff who sit behind glass screens in ticket booths. The vast majority of people also felt that train and station staff as well as ticket inspectors are not deaf aware. Most people could not hear announcements when travelling on the train and most respondents also said that visual information screens do not give enough real-time information about unexpected events such as delays, platform alterations or route changes.

'Rail 2014'

¹ RNID (2005), *Transport for All*.

9. Having outlined some of the issues which people with hearing loss experience when accessing public transport, we have specific comments relating to the franchise specification as well as to access to travel information on trains and in railway facilities:

Franchise specification and SQUIRE

10. An outcomes-based approach to the franchise specification - as described in the consultation document – should take into account the needs of deaf and hard of hearing people when defining contractually binding service measures such as levels of customer service and information provision. A commitment around accessibility – perhaps enshrined in a Passengers' Charter - would be welcome to ensure that the 'customer service' which deaf and hard of hearing passengers receive is equal to that of hearing passengers. As is explained further below, information provision and staff communication skills have key parts to play in this.
11. Additionally, assessments under SQUIRE should include criteria relating to accessibility – for example, the presence/absence of visual displays to relay information to customers. Similarly, passenger surveys should include a wide range of service users, including people who have hearing loss.

Stations and platforms

12. We welcome the inclusion of discrete funding for access improvements for disabled passengers in previous franchises and would like to see this retained and, ideally, expanded.
13. We would like all staff who are likely to come in contact with passengers who are deaf or hard of hearing to be trained in deaf awareness. Deaf awareness should focus on issues such as communication techniques like speaking slowly, keeping your voice at a normal level and facing the person so they can lipread.
14. Stations should provide real-time visual information in concourses, waiting rooms, platforms and other relevant public areas. Information should include up-to-date journey details, platform alterations and train cancellations.
15. Hearing loop systems² should be fitted throughout all stations, in particular at the ticket offices, and clearly advertised. As part of standard maintenance procedures, loops must be regularly tested. If broken, they must be repaired as soon as reasonably possible and information displayed highlighting the alternatives available.
16. Glass barriers at ticket and information points create communication difficulties for people who rely on lipreading. If glass barriers are necessary, they should be non-reflective and kept clean to enable people who are deaf or hard of hearing to lipread. For the same reason, all stations should have good lighting.
17. Stations should have visual emergency alarms throughout. Along with real-time visual display units, these would help to ensure the safety of deaf and hard of hearing people if there is an emergency.

² Induction loop equipment amplifies speech over background noise. It is essential to help hearing aid users access information.

18. There should be timetables available for all trains that use the station and all written information should be in plain English to minimise difficulties for BSL users. Additionally, ticket prices should be displayed at point of sale.

Trains

19. We would like all staff who work aboard trains and who are likely to come in contact with passengers who are deaf or hard of hearing to be trained in deaf awareness.
20. Working real-time visual information displays should be installed in each train carriage, notifying passengers of next stops, final destinations and any voice announcements made by the driver. When a problem occurs, the visual information display should be updated to ensure that hard of hearing passengers have the same information as passengers without hearing loss.
21. There should be interior visual warnings to inform passengers of doors opening or closing as well as visual alarms for emergency evacuations. All audible warnings should be available visually. This helps to ensure the safety of deaf and hard of hearing people.
22. Destinations should be clearly displayed on each carriage as well as on the front of the train.

Conclusion

23. Action on Hearing Loss Scotland welcomes the consultation document on the future development of rail services in Scotland. We want to ensure that people with hearing loss have equal access to public transport. Although Transport Scotland may not be able to counterbalance all the barriers that people with hearing loss encounter when travelling, these can be minimised by ensuring that staff likely to communicate with passengers who are deaf or hard of hearing are trained in deaf awareness; stations are equipped with working hearing loop systems; real-time visual information equipment is installed in stations and on trains and regularly tested.

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