

**Mobility and Access Committee for Scotland  
(MACS)**

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Scottish Governemnt

Ferry Unit Policy Officials

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Dear Colleagues

**IMPROVING ACCESSIBILITY AT FERRY TERMINALS**

The Mobility and Access Committee for Scotland (MACS) is a non-departmental public body, which advises the Scottish Ministers on transport accessibility in Scotland.

Last year the Committee's Rail Workstream produced a toolkit document detailing the key issues and barriers disabled people experience when accessing train stations to help rail services providers make travel for people with disabilities as accessible and inclusive as possible.

This document proved to be useful and it became clear that a similar guidance covering ferry terminals would be beneficial.

Therefore, the Ferries Workstream, led by Hilary Stubbs, produced the below toolkit to advise ferry and terminal operators what the biggest barriers people with disabilities face when traveling on ferries. In addition this document provides a baseline to assist terminal providers in their applications for funding from Transport Scotland Ferry Accessibility Fund. As ferry travel rarely stands in isolation, issues relating to transitions to another mode of travel have also been referred to in this document.

I hope you will find the toolkit useful and it would be appreciated if you could circulate it to the appropriate stakeholders. We would very much appreciate any feedback or comments you or partners might have.

Yours sincerely,

**Linda Bamford**

MACS Convener

[www.macs-mobility.org](http://www.macs-mobility.org)

## 1. Introduction

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Ferry Services are fundamental to the sustainability and development of a significant proportion of people living in Scotland. Unlike other forms of public transport there is no effective alternative to the link that ferries provide to island and peninsular communities, and many ferries provide lifeline services to island communities.

There are approximately 66 routes connecting mainland Scotland and its islands, managed by a number of public and private operators. Every year about 9 million passengers and 2.8 million cars travel on these routes. Ferries also transport essential goods to remote communities and help export large amounts of island products, which contribute significantly to Scotland's economy.

In 2012 Transport Scotland published its 'Ferries Plan' detailing the need for ferry terminals to be accessible<sup>1</sup>.

The ownership and operating arrangements for ferries and harbours is complex. This document concentrates on the terminals and harbours, where ferry operators pay harbour dues to use the facilities provided. CMAL own 25 harbours, with the remaining 28 harbours owned by local councils (21), independent harbour authorities (4), a private company (1), the National Trust for Scotland (1) and an independent harbour (1).

On most routes there are no figures available on the number of disabled people travelling by ferry. Disabled travellers, and in some cases, their companions, are often entitled to concessionary tickets, but ferry operators do not record the number of concessionary travellers who have a concessionary ticket based on a disability. As the percentage of disabled people in Scotland is estimated at 20%<sup>2</sup> of the population, it can be extrapolated that each year approximately 1,080,000 ferry passengers have a disability.

With the introduction of Road Equivalent Tariff (RET) there has been an increase in both foot and vehicle travellers. This increase is likely to continue.<sup>3</sup>

Ferry terminal buildings are covered by the Scottish Building Standards: Non Domestic Building Standards 2017. This document takes cognisance of the Equality Act 2010, with the inclusion of mandatory standards for buildings.

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<sup>1</sup> <https://www.transport.gov.scot/publication/scottish-ferry-services-ferries-plan-2013-2022/j254579-13>

<sup>2</sup> <http://www.gov.scot/Topics/People/Equality/Equalities/DataGrid/Disability/DisabPopMig>

<sup>3</sup> <https://www.transport.gov.scot/public-transport/ferries/road-equivalent-tariff/>

Section 4.0.1 of the standards requires an access statement which would be a useful tool in assisting providers to ensure that their building is accessible.<sup>4</sup> Certain obligations are placed on ferry operators and terminal operators by way of regulation EU1177/2010, which is still applicable after leaving the EU. This regulation is applicable to most ferry services though some smaller operations are exempt (see EU1177/2010).

## 2. Land Ownership and Responsibility

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There is often confusion as to who owns and who has responsibility for the harbour and the buildings, which make up the terminal, and, in some cases, this may be more than one organisation. However, once responsibility of ownership is established it becomes clearer as to who should be providing the facilities at the terminal.

Further complexities arise in the ownership and responsibilities for the areas between the terminal and a transitional mode of travel such as a railway station, taxi rank or car parks. Many travellers with disabilities can cope or receive assistance at one form of transport, but the transition to the next form of transport isn't suitable.

Passenger Assist<sup>5</sup> provides assistance to the exit point of a station, but this may be some distance from a terminal building. It is therefore important for transport providers to consider the whole journey across each land in different ownership.

## 3. Intermodal Change between Ferries and other Transport Modes

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Information on, and access to connecting services is frequently not available in a terminal building or on the electronic information pages. For a passenger who has reduced mobility or is affected by learning disabilities or sensory loss it is often overwhelming to try and connect between various modes of transport.

Information in a range of accessible formats, clear signage and staff to assist with transfers are key to reducing these barriers.

Passenger Assistance is provided by rail operators but this is to the perimeter of a station, ferry terminal staff are frequently willing to help within their working area but there is often a 'no-man's land' between the two connection points on a journey. It would be extremely beneficial if both

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<sup>4</sup> <http://www.gov.scot/Topics/Built-Environment/Building/Building-standards/techbooks/techhandbooks/th2017nondom>

<sup>5</sup> [http://www.nationalrail.co.uk/stations\\_destinations/disabled\\_passengers.aspx](http://www.nationalrail.co.uk/stations_destinations/disabled_passengers.aspx)

parties in this situation could come to an agreement about joining up the provision of assistance for their passengers.

#### 4. Terminal Buildings and Access to a Ferry

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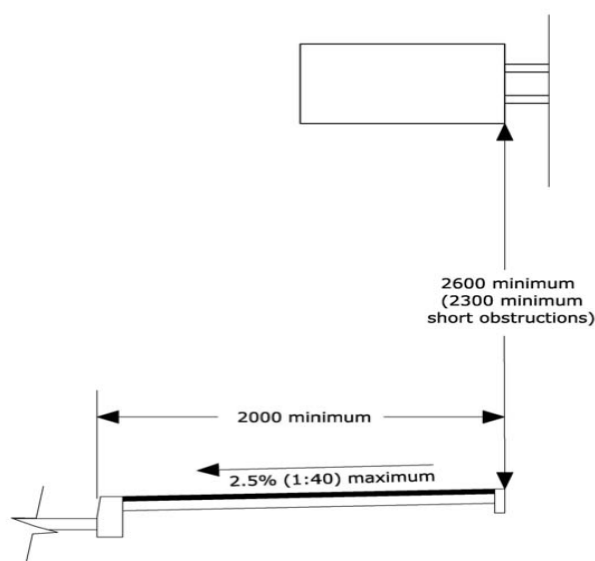
Terminal buildings vary in size and facilities from purpose built, fully accessible buildings, such as Brodick's new terminal, to a bus shelter at Coran or a wooden cabin at Ardminish on Gigha. Whilst we are not expecting all terminal buildings to be upgraded or replaced, simple housekeeping or adjustments can enable people with disabilities the opportunity of travelling by ferry.

The route between the terminal building and the ferry, the car park, bus stop or taxi rank should be across even ground, with any gradients suitable for wheel chairs. It needs to be clearly signed and covered where possible when open to the weather. Seats should be provided to allow a disabled passenger to rest.

The minimum width of a corridor/footway should be 1800 millimetres in normal circumstances, since this width allows two wheelchair users to pass, or a buggy and a wheelchair.

In existing constrained environments and where obstacles are unavoidable, an absolute minimum width of 1500 millimetres should be sought.

Figure 1:



Flat access and egress through automatic doors or via a ramp with railings into an area free from obstacles, such as display stands, plants or low level benches is ideal to allow the easy movement of wheelchairs and individuals with mobility limitations.

Good lighting with hazards clearly marked assists travellers with visual impairments. Those with hearing loss require clear announcements, supported by a visual display, about key messages such as changes to a timetable or delays.

Lighting levels should be consistent across the building and, where possible, glare from the sun through windows should be avoided. We have seen good practice with the introduction of braille sign and braille boards showing the layout of ferries.

All new buildings and those undergoing major refurbishment should meet the Non-domestic and Domestic Scottish Building Standards 2017<sup>6</sup> and space permitting provision should be made for a Changing Places facility<sup>7</sup>. Terminal buildings should always have accessible toilets of the recommended layout and size as recommended in the Scottish Building Standards 2017 (3.12.6 to 3.12.8).

Disabled foot passengers arriving / leaving by car should have a pick up / drop off point as near to the terminal access point as practicable. Safe and clearly marked routes for foot passengers to the terminal building should be provided, which is on even ground and as level as practicable. If the route crosses a road way, this should be identifiable by clear signs and rumble strips on the road surface, similar to that used at pedestrian crossings.

Disabled passengers requiring assistance, arriving by vehicle to be transported on the ferry, should have a means by which this is easily communicated to the boarding staff. Boarding arrangements should facilitate the provision of the assistance required, including sufficient space for the disabled passenger to exit / enter the vehicle.

Disabled passengers have a right to assistance in moving through the port or terminal and accessing the vessel and similarly when leaving the vessel (EU1177/2010 annex ii). A notice providing information of passenger rights is to be displayed in the port or terminal.

Further guidance can be found at

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/425977/design-standards-accessible-stations.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425977/design-standards-accessible-stations.pdf)

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<sup>6</sup> <http://www.gov.scot/Topics/Built-Environment/Building/Building-standards/techbooks/techhandbooks>

<sup>7</sup> <http://www.changing-places.org/>

## 5. Access on and off a ferry

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The distance between the harbour or slipway and the vessels changes, depending on the tide, the weather and the berthing of the vessel, but consideration should be given to minimise the challenges of boarding a vessel for people with a disability.

People who are within the autism spectrum or who have dementia in particular, find these changes the most difficult part of travelling by ferry. For many it's like taking a leap of faith, which they cannot cope with.

Ferry operators and terminal staff can assist in minimising this obstacle by giving reassurance to traveller, by providing assistance either by accompanying a passenger on foot or providing a wheelchair. Consistent and approved staff training in disability awareness would also assist in this area and should be recognised as mandatory under EU1177/2010 and best practice.

The angle of a gangway and the surface of the gangway need to be carefully considered for all people with a disability. Wheelchair users cannot negotiate a surface which is uneven, those with a visual impairment need an obstacle free gangway and mobility impaired people often find steep gradients impossible. The Scottish Building Standards advise that 'Gradients of more than 1 in 12 are considered too steep to negotiate safely and are not recommended'.



*Photo 1. The gangway at Ardrossan showing a 45° angle, which is extremely difficult for disabled travellers to negotiate.*

The alternative is often to escort wheelchair users on and off a ferry by the vehicle deck, however passengers might find this practice both embarrassing and humiliating.

On some small ferries, where access at certain tides is via a set of steps, present significant barriers to many disabled travellers. Whilst reasonable adjustments should be considered, we acknowledge that sometimes this isn't possible. In deciding on the design of new ports and terminals, and as part of major refurbishments, the bodies responsible for those facilities should take into account the needs of disabled people, in particular with regard to accessibility, paying particular consideration to 'design for all' requirements (EU1177/2010).

At terminal where there is no building and gangway, with only a slipway access, clear signage and handrails should be in place to assist travellers. The route to the ferry should be kept clear of slip and trip hazards, such as seaweed, fishing equipment and algae.

Disabled passengers have a right to assistance in boarding the vessel, getting to a seat / cabin / toilet facility and leaving the vessel (EU1177/2010 annex iii). A notice providing information of passenger rights is to be displayed on the vessel and should be available in accessible formats.

## 6. Customer Service and Interfacing

Most disabled passengers need to contact the ferry terminal about access and facilities before they make the journey. Frequently this information isn't readily available, as the information about a sailing is provided by the ferry operator whereas the terminal or slip way are owned and operated by other companies. Ferry operators who are not currently a subject to EU 1177/2010 Regulations, should clearly indicate how and where this information can be found, if they do not provide it themselves. Those services covered by EU1177/2010 regulations are obliged to provide information as to access conditions for disabled passengers, which is to be available in accessible formats.

Terminals, which are staffed, should have clear signage to the ticket office and facilities. Visually impaired travellers find it difficult to navigate in a new environment and need to focus on a clear 'landmark' to help guide them to their intended point.

At unmanned departure points there should be sufficient information in appropriate formats to suit the needs of all disabled travellers. A help point linking to a control centre is recommended.

Staff training is vital and a requirement (EU1177/2010 annex iv) for all customer facing staff. This should make them aware of the wide range of disabilities, which they may come across and how to provide assistance. This includes not only people with visual disabilities, such as those experiencing mobility challenges but those with sensory loss, disabilities on

the autism spectrum, learning disabilities, invisible disabilities and long-term illness. Information on passenger rights is to be available in accessible formats (EU1177/2010).

It is also important to understand that a physical adaptation is not always the only solution to overcome challenges which disabled passengers may face.

## 7. Parking

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Terminals which provide car parking for visitors are subject to one or more overlapping duties under the Equality Act 2010 as an employer, a tenant and/or a service provider<sup>8</sup>. These spaces should meet the required dimensions, be well signed, near the terminal and be in a well-lit area. With 1 in 5 people in Scotland declaring themselves as having a disability, there should be adequate provision of spaces for non-wheelchair users and wheelchair users.

## 8. Smarter ticketing

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Transport Scotland has announced its commitment to smarter ticketing which will significantly benefit disabled travellers.<sup>9</sup>

### Case study

A disabled passenger wants to travel by ferry from Isle of Arran to Glasgow. As he has a Blue Badge and concessionary ticket, he is entitled to reduced fares on the ferry. A booking for his car can be made on the phone, quoting the Blue Badge number, but his concessionary ticket as has to be bought at the terminal. This involves parking the car and walking to the terminal to show the appropriate concession card. If he was to do the journey to Glasgow on the train he could buy a through ticket covering both the ferry and train, but in order to utilise his disabled rail card he has to buy 2 separate tickets.

This case study highlights the need to consider how tickets can be purchased by disabled traveller and how smarter ticketing needs to be implemented across all modes of public transport using a single concessionary ticket.

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<sup>8</sup> [https://www.eversheds-sutherland.com/global/en/what/articles/index.page?ArticleID=en/Discrimination\\_and\\_equal\\_pay/DLR\\_disabled\\_parking\\_230812](https://www.eversheds-sutherland.com/global/en/what/articles/index.page?ArticleID=en/Discrimination_and_equal_pay/DLR_disabled_parking_230812)

<sup>9</sup> <https://www.transport.gov.scot/public-transport/smart-and-integrated-ticketing/>

## 9. Summary

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Ferry passengers, whether they have a disability or not, deserve first class service and facilities which are fit for purpose. Many of the recommendations in this report can be implemented by collaborative working, staff training or small changes to working practices.