

Consultation Response

Civil Aviation Authority guidance for airlines on assisting people with hidden disabilities 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 respond to the Civil Aviation Authority guidance for airports on providing assistance to people with hidden disabilities. 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 important that the air travel is accessible for this large section of the population. In particular, we would like to see the following broad points realised to make planes and airports 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. Our vision is for all airports and planes to have real-time information available for people with hearing loss. Ideally this would be via both screens on planes and in airports, in addition to push-notifications via apps.

Comments on the draft guidance

Chapter 1: Prevention and refusal of carriage

We agree with the content in this chapter. We welcome the assertion that it may not be immediately obvious that someone has a disability and therefore any decisions to refuse travel must be taken from an informed viewpoint. Reference for the need of appropriately trained cabin crew is also welcomed. However, we suggest that reference is made to chapter 4 where information on training can be found. We also suggest that this reference is hyperlinked for ease of navigation throughout the document. We also advise that reference to paragraph 2.5 is hyperlinked.

Chapter 2: Information and communication prior to travel, at the airport and onboard the aircraft

Paragraph 2.1 focuses on the need for airlines to work together to capture accessibility information, prior to a passenger's flight. While this is important, we recommend that, like the CAA's guidance for airports, a point is included that airlines must still make all reasonable efforts to provide the necessary assistance even if no notification has been provided. Many people with hearing loss may not realise that they can notify the airport of their needs in advance. In addition, some people with hearing loss may not identify as disabled, but may still approach the information desk for support once they arrive at the airport.

Paragraph 2.5 recommends that airlines have information about assistance available to passengers in an "accessible format, where requested." We agree with this recommendation, however passengers may not be aware of accessible formats. We recommend that examples of available formats are presented on airlines' websites, such as 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.

It is good to see the inclusion that airport staff should make provision for people who are less able to use visual displays or audible announcements. Our research has found that people with hearing loss face challenges in accessing accurate, real-time information. However, we urge the CAA to also reiterate that staff should be hearing loss aware, in order to best convey any information. For

example, if a passenger has hearing loss, the member of staff should face them in a well-lit environment, and should not cover their mouth when speaking.

In addition to improved hearing loss awareness amongst staff, an improvement in audio-visual displays or the widespread introduction of push notifications via apps would also greatly assist people with hearing loss. For example, the American Airlines app sends push notifications with real-time updates to passengers including any cancellations. The guidance should recommend that airlines have this feature on apps and that they advertise this feature to customers and in particular customers who request assistance.

Hearing loops can also assist those who use them and are particularly useful in an airport. Where possible, hearing loops should be made available at information points and check-in desks, as well as other customer-facing points of contact.

Information about what to do in an emergency must also be accessible. Failure to do so could mean that people with hearing loss do not receive potentially life-saving information. To ensure this happens, the same safety information that is provided orally must be available visually, such as in leaflets or via subtitles and in-vision signing on TV screens. If it is not possible for this information to be available to everyone, then it must be very clear before a flight that accessible information can be accessed.

Chapter 3: Boarding and onboard the aircraft

We welcome the inclusion in paragraph 3.1 that mentions that ground staff should check if passengers wish to board first. It is important that assumptions are not made about what support passengers might need. Rather, they should always be asked how they can be supported.

Paragraph 3.5 describes the use of lanyards as a way of identifying if someone has a disability. However, it is important to consider that not every person with hearing loss will feel comfortable to declare that they have a disability; or they may not be aware that such identifiers exist. We urge CAA to include a line to say that not everyone will choose to wear these identifiers and therefore staff training is also crucial to understanding when someone with a hidden disability might need assistance.

Chapter 4: Training

We very much welcome the weight that this chapter gives to the importance to training. This 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.

In paragraph 4.4, the guidance states: "a number of organisations run accreditation schemes for such training." To make it as easy as possible for airlines to find these schemes, we recommend that a list of accreditation schemes is included in the guidance. Action on Hearing Loss's Louder than Words[™] charter can help airlines meet the needs of people with hearing loss, increase their 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).

Chapter 5: Priority following disruption

In this section, or in a separate chapter, this guidance would benefit from a section on emergency situations. The need for up to date information and staff awareness becomes even more acute in emergency situations. In the most extreme cases, such as the evacuation of an airplane, inadequate access to information may put people in danger. Our supporters have told us that they have found themselves in potentially dangerous situations when trains have been evacuated where they have not been sure what is happening. The situation could be more serious in an airport or plane. Ideas suggested to us include simple visual aids in these situations, for example staff could wear sashes or tabards which give key messages in these situations.

Contact details

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

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