

Assessing the impact of the Accessible Transport Strategy on the provision of information about transport in Northern Ireland

September 2014

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About us

Imtac is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Regional Development.

About this report

Disabled people and older people experience barriers to accessing everyday services such as transport. These barriers are not just physical, for many people the absence of appropriate information about services means that the service is not accessible. The barrier may be that the information required simply does not exist or that it is provided in a way that is not accessible to the individual concerned. As part of our Work Programme 2014/15 Imtac committed to undertake the following task:

"Imtac will undertake an assessment of the current provision of information about transport services measured against policies 27,28 and 29 of the ATS [Accessible Transport Strategy]. We plan to produce a report on this assessment with recommendations for change by December 2014."

What the ATS says

The Accessible Transport Strategy (ATS) 2005 and associated Action Plans were published after extensive consultation with disabled people and older people. Information was clearly identified during the development of the ATS as a major barrier to travel. The ATS recognised the importance of information in making transport services accessible to disabled people and older people. The Strategy acknowledges that if older people and disabled people are to use improving public transport services there is a need to ensure accurate information is available including information about the accessibility of specific journeys.

The ATS makes clear the importance of designing information to be inclusive.

The importance of information as a barrier to travel is reflected by the issue being addressed by one of the seven Strategic Objectives in the ATS. Strategic Objective 6 seeks:

"To ensure that information in a range of formats is available for all public transport services, including the full range of accessible services supported by the Department, to enable people to plan and make journeys easily."

Strategic Objective 6 has a number of related policies. Policy 27 highlights the importance of standards for the inclusive design of information:

"Adopt best practice in the design of all information produced about transportation policies, initiatives and other guidance material and disseminate guidance about good practice in information design to transport providers."

Policy 28 highlights the importance ensuring transport providers and others meet these standards when providing information about services:

"Ensure that all information provided about transport services that are financially supported by Government is made available in formats that are appropriate to the particular needs of older people and people with disabilities [disabled people]."

Policy 29 highlights the need to ensure that systems are in place to ensure that people can get information about specific journeys:

"Ensure that information systems are put in place to support the development of accessible transport chains."

Other sections of the ATS recognise the need to be proactive in making disabled people and older people aware of increasing travel opportunities. Policy 25 seeks to:

"Promote independent mobility by raising awareness among older people and people with disabilities about the

accessible transport opportunities available to them and provide help and support to address the concerns they may have about using these services."

Progress to date

Since 2005 a further three associated ATS Action Plans have been published. Each Action Plan identified information as a key issue and included actions to improve access to information.

Imtac has published two reports around information since 2005. The first report¹ was developed jointly by Imtac and the Mobility Inclusion Unit in DRD in 2007. The second report² was an update on the 2007 report prepared by Imtac in 2012. Both reports looked at the provision of information as measured against the policies of the ATS.

A key issue identified in the 2007 report was a gap in the knowledge and skills amongst transport providers on how to make information accessible and inclusive. The report contained recommendations that sought to assist transport providers to address this gap.

The 2012 update recognised that significant progress had been made in addressing this issue. DRD had developed and updated a Guide to Making Information Accessible and had disseminated this to providers. This Guide and a similar Guide produced by Imtac³ broadly reflects current best practice in relation to designing information to be inclusive. In addition to this Imtac provided training sessions around providing accessible information for both community transport operators and the Translink Marketing Team. By way of example the increased awareness of how to provide more inclusive information is reflected in posters produced by Translink advertising the availability of information and the inclusion of a message about accessible formats as standard in most Translink publications.

¹ Improving travel information for older people and disabled people

² Improving travel information for older people and disabled people - an update (Imtac 2012)

³ Making your information accessible - Guidelines for transport providers (Imtac 2007)

Despite improvements the 2012 update highlighted ongoing issues with the small text size used by Translink in printed timetables.

The 2007 report identified specific issues around the accessibility of information for people with a learning disability. The report highlighted the need for the provision of more information in an easy read format. A subsequent report⁴ looking more broadly at issues for people with a learning disability again highlighted this issue and specifically made reference to the provision of timetables in 12 hour rather than 24 clock.

Some progress has been made since 2007 in relation to the provision of information in an easy read format. The DRD has published a number of versions of its Travel Safe Guide⁵ and made this available in hard copy and online via NI Direct. There are a number of other good examples of information being provided in easy read including a Consumer Council guide to travelling by air⁶. However it is fair to say that we are some way off easy read formats being provided as standard for information provided about transport services.

The 2007 report also highlighted significant issues around the availability of information about transport services and the way this information was provided. Specifically the report highlighted the absence of both online and printed information about key services. The report also highlighted the poor accessibility and usability of some of the websites providing information including the Translink website.

The 2012 update recognised that some improvements have been made in relation to these issues. Online information has been improved. The Translink website has been changed a number of times since 2007 and accessibility and usability have been improved. The launch of the NI Direct website provided the opportunity to provide an on-line one stop shop for information for

⁶ Access to Air Travel (2013)

⁴ Report into the impact of the Accessible Transport Strategy in improving access to transport for people with a learning disability (Imtac 2010)

See http://www.nidirect.gov.uk/index/information-and-services/people-with-disabilities-motoring-and-transport/public-and-community-transport/travelsafe

disabled people and older people about transport services. However the 2012 update raised some concerns about gaps in the content of the website but these have now generally been addressed during the ongoing development of the site.

Availability of other forms of information about services has also improved. Translink, working with Imtac, has published an Access Guide and an Access Policy setting out minimum service standards disabled people and older people can expect using Translink services. This has been made available in hard copy, in alternative formats and online⁷. However the 2012 report did highlight the continued absence of information, other than online, about key services. Information about concessionary fares for disabled people was used as an example.

Both the 2007 report and the 2012 update highlighted the need to both make information about services available and also to proactively promote services and information about services to disabled people and older people (in line with Policy 25 of the ATS). The 2012 update in particular raised concerns that not enough was being done to promote and raise awareness amongst disabled people of improved travel opportunities. The report identified the formation of Transport NI as an opportunity to better co-ordinate the promotion of inclusive transport.

Both the 2007 and 2012 reports highlighted the need for better engagement between Imtac, disabled people and older people, DRD and Translink to identify more focused and achievable actions to improve the provision and accessibility of information. To date recommendations for partnership working in both reports have not been significantly progressed.

Assessing the current provision of information

As outlined above there has been positive progress around the provision of information since the publication of the ATS and associated Action Plans. It is also fair to say that some of these developments are directly attributable to the ATS and would not, in all probability, have happened without the ATS and associated Action Plans. Perhaps the best example of this is the increased awareness amongst transport providers of how to make

⁷ See http://www.translink.co.uk/accessibility

information about their services accessible and inclusive. This progress is reflected in the increased availability of information in formats such as audio, Braille and large print and improved accessibility of websites.

Despite this progress Imtac believes much of change since 2005 has been piecemeal and falls someway short of representing a focused and strategic approach to addressing the issue of information as a barrier to travel. We believe there remain significant challenges and gaps to be addressed before we can say with a degree of certainty that disabled people and older people can plan and make journeys easily.

Firstly there is a lack of detail available about the accessibility of current services. Using public transport as an example many older and disabled people will require assurance that every stage of their journey by bus or rail will be accessible before they travel. This requires the provision of information about the accessibility stations and halts, the accessibility of vehicles and the assistance available during the journey. Currently this level of detail of information is not available from printed information, the Translink website or other sources such the Contact Centre.

Imtac has previously published a report⁸ assessing the progress made in making public transport more inclusive in Northern Ireland. The report makes clear that significant progress has been made but also highlights that significant barriers remain on the bus and rail network. For example many unstaffed rail halts still have significant physical barriers that make their use difficult for some disabled and older people. Despite this there is currently no mechanism for passengers to get information about potential barriers in the system when planning a journey.

Secondly challenges do still remain with the design of current information about transport services. Text size remains a significant issue with Translink information. Printed timetables for example are provided using small 8pt print size as standard. This meets the minimum requirements of guidance developed by

⁸ All Aboard - an assessment of the current accessibility of public transport in Northern Ireland (Imtac 2013)

DPTAC in 1996⁹. However other, more recent guidance¹⁰ around printed information recommend 14pt as the best and most accessible print size. The ATS itself is explicit in with regard to the design of printed information; "Written information is generally easier for people to understand when written in lower case, in a clear typeface and with a minimum font size of 14."¹¹

With an increasingly older population more needs to be done to ensure standard printed information about services is accessible and usable for everyone. Similarly more needs to be done to ensure that easy read formats for information about services are made available in the same way information on a wide range of public services is now routinely available in Braille, audio and large print.

Thirdly despite a number of commendable initiatives there has been no significant or sustained effort to raise awareness amongst disabled people and older people of the improvements made to services here. Where campaigns have been run, such as the advertisement of Door2Door transport, Imtac has argued opportunities have been missed to more effectively employ resources to promote broader mainstream travel opportunities.

Fourthly and linked to the above, disabled people, and to a lesser extent older people, remain to a large degree invisible in the marketing of mainstream transport services in Northern Ireland. Imtac firmly believes that a significant attitudinal change towards disabled people and older people is still required amongst policy makers, service providers and society in general. Part of this attitudinal barrier is reflected in the promotion of mainstream services. Imtac acknowledges that Translink has made progress since 2005 including the use of positive images of disabled people and older people using services in a number of key publications. However too often accessibility is still portrayed as something distinct and additional from the mainstream, illustrating how disabled people can be accommodated on public transport. Much

⁹ Legibility of Bus Timetable Books and Leaflets, a Code of Good Practice (DPTAC 1996)

¹⁰ See for example the DRD Guide to Making Information Accessible

¹¹ Page 36, paragraph 4.4.2 of the Accessible Transport Strategy 2005.

more needs to be done in the marketing of services in future to reflect the inclusive nature of public transport.

Finally information is not only an issue when planning a journey, it is equally important during journeys. Information during journeys was not addressed in the 2005 ATS. However it is an important issue for people taking unfamiliar journeys or journeys which require using a number of services. Better provision needs to be made to ensure that disabled people and older people can access the right information during journeys. There are a number of practical ways this can be delivered such as making audio and visual information systems available on all modes of public transport and all stations, improving timetable information and signage at stations, halts and stops and improving the accessibility and usability of websites and smartphone apps. Perhaps the most effective way people can obtain information during journeys is from transport staff. It is of vital importance that all staff including bus drivers and train conductors are trained to provide appropriate assistance to disabled people and older people including requests for information. Transport staff at stations should be visible and again trained to provide appropriate assistance to disabled people and older people including requests for information.

Learning from elsewhere

Imtac has recently undertaken research into good practice around access and inclusion in other areas of the United Kindgom¹². This work quickly identified the work of Transport for London (TfL) as an exemplar. Subsequently Imtac undertook at study visit together with DRD and Translink to London to learn more about the approach of TfL. One of the key areas that TfL has identified as important in making services more accessible and inclusive is the provision of information.

TfL has published a strategic commitment¹³ to improve access to services for disabled people and older people (also available in an easy read format). The related actions within the plan are all

¹² Lessons from the current approach of the Passenger Transport Executives (PTE's) to Access and Inclusion (Imtac 2014)

¹³ Your accessible transport network - The Mayor's commitment to making it even easier for you to travel around London (TfL 2012)

based on engagement with disabled people and older people and their organisations.

Improving access to information is seen as a key way to improve access to services. Essential to this is the provision of accurate information to disabled people and older people about what the network can and can't deliver. This is reflected for example in step-free guides to the rail and tube network which highlight which stations offer good levels of access and which don't. This information is also available via the online journey planner which has options for passengers to select journeys with specific access requirements.

In addition TfL provides a series of guides about the accessibility of their services available in a range of formats and readily accessible online from a prominent section of the TfL website. The TfL website contains other useful detailed information about assistance available and other support services offered by TfL to make using public transport easier for disabled people and older people. Some audio information is also provided on the website. Printed information gathered during our trip meets good practice in relation to accessibility including appropriate type size and font.

Commitments made by TfL around improving information also recognises the importance of information provided during journeys including at stations and on-board transport. Significant improvements have already been made to improve signage at stations and provide good quality audio and visual information at stations and on-board vehicles across all public transport modes. Staff are available and visible at all stations when services are running. Staff have received training around providing appropriate support and assistance to disabled and older passengers.

TfL has recognised that providing the information is simply not enough and equal weight has been given to ensuring the organisation is proactive in making disabled people and older people are aware of what services are available. Much of this is done through an engagement programme with disabled people and older people. However TfL also runs campaigns and in April 2014 launched a campaign called "Come Aboard" targeted at encouraging more disabled people and older people to use the public transport network. Previous campaigns, such as a poster campaign to encourage passengers to move from the wheelchair

spaces on buses, have been demonstrated to be a success. Although too early to tell it will be useful to monitor how successful the current campaign has been.

TfL has also been keen to use technology to improve information and promote its services. Initiatives have included a competition to design apps useful for disabled passengers and the development of a series of "how to films" illustrating accessible journeys using public transport. These are made available online including the use of social media. The films are designed to be fully inclusive with features including audio description and subtitles. Signed versions are also available.

The United Nations Convention on the Rights of People with Disabilities (UNCRPD)

The ATS acknowledges and is framed by equality legislation, including the Disability Discrimination Act 1995, which gives disabled people rights when accessing services. These rights include accessing information about transport services. However since the publication of the ATS the UK Government has ratified the UN Convention on the Rights of People with Disabilities (UNCRPD)¹⁴. This requires the UK Government (including devolved Governments) to take concrete actions to comply with the legal rights and obligations contained in the Convention.

There are 50 articles in the UNCRPD many of which are interrelated and impact on the provision of transport services. However Articles 21 and Article 8 relate specifically to issues raised in this report.

Article 21, Freedom of expression and opinion, and access to information, requires Governments to do the following:

"States Parties shall take all appropriate measures to ensure that persons with disabilities can exercise the right to freedom of expression and opinion, including the freedom to seek, receive and impart information and ideas on an equal basis with others and through all forms of communication of

¹⁴ A copy of UNCRPD can be viewed here http://www.un.org/disabilities/documents/convention/convoptprote.pdf

theirchoice, as defined in article 2 of the present Convention, including by:

- a. Providing information intended for the general public to persons with disabilities in accessible formats and technologies appropriate to different kinds of disabilities in a timely manner and without additional cost;
- b. Accepting and facilitating the use of sign languages, Braille, augmentative and alternative communication, and all other accessible means, modes and formats of communication of their choice by persons with disabilities in official interactions;
- c. Urging private entities that provide services to the general public, including through the Internet, to provide information and services in accessible and usable formats for persons with disabilities;
- d. Encouraging the mass media, including providers of information through the Internet, to make their services accessible to persons with disabilities;
- e. Recognizing and promoting the use of sign languages."

Article 8 of the UNCRPD places an obligation on states to raise awareness;

- "1. States Parties undertake to adopt immediate, effective and appropriate measures:
- a. To raise awareness throughout society, including at the family level, regarding persons with disabilities, and to foster respect for the rights and dignity of persons with disabilities;
- b. To combat stereotypes, prejudices and harmful practices relating to persons with disabilities, including those based on sex and age, in all areas of life;
- c. To promote awareness of the capabilities and contributions of persons with disabilities.

Measures to this end include:

- a. Initiating and maintaining effective public awareness campaigns designed:
 - i. To nurture receptiveness to the rights of persons with disabilities:

- ii. To promote positive perceptions and greater social awareness towards persons with disabilities;
- iii. To promote recognition of the skills, merits and abilities of persons with disabilities, and of their contributions to the workplace and the labour market;
- b. Fostering at all levels of the education system, including in all children from an early age, an attitude of respect for the rights of persons with disabilities;
- c. Encouraging all organs of the media to portray persons with disabilities in a manner consistent with the purpose of the present Convention;
- d. Promoting awareness-training programmes regarding persons with disabilities and the rights of persons with disabilities."

In deciding future improvements around information about transport services Government must also be mindful of its obligations in relation to the UNCRPD.

Conclusions and recommendations

As with many of the barriers to travel experienced by older and disabled people the ATS and associated Action Plans have impacted positively on the provision of information. However as with other aspects of the ATS the objectives, policies and actions of the ATS have also failed to fully deliver the changes necessary to enable disabled people and older people to plan and make journeys easily. Much of this can be attributed to broad and ambiguous wording of policies in the ATS resulting in actions without a clear focus or action.

With the ATS due to end in 2015 Imtac believes the time is now right to look at future approaches to improving making transport and travel more inclusive. We believe it is essential Government, through a successor strategic policy document, make a new commitment to make further improvements on a planned basis. In relation to the provision of information we recommend:

 Improving information remains a strategic priority in any successor arrangements to the current ATS but that in future an action plan is developed with more focused and tangible outcomes.

- 2. Any successor arrangements must reflect the obligations placed on Government by the UNCRPD.
- 3. The development and implementation of future plans for improving information be underpinned by a commitment requiring improved engagement with disabled people and older people and their organisations. Engagement should focus on not only developing new solutions but also improving existing provision. For example focused engagement with disabled and older people around the usability of timetables and the Translink website could identify straightforward low-cost improvements.
- 4. As a priority work should be undertaken to improve the accuracy and detail of current information about the accessibility of specific journeys using public transport. Opportunities exist to make improvements in this area with planned redesign of the Translink website. The provision of a step-free option on the journey planner would be of major benefit. Other straightforward low-cost improvements could include the use of symbols on maps to indicate step-free stations.
- 5. In future all information should be produced to agreed and inclusive standards which should include requirements for minimum text size and easy read format.
- 6. Any future actions around improving information should also look at improving the provision of information during journeys. Audio and visual information systems should be used as standard across all public transport modes. In addition improvements should be made to timetables information and signage at stations and visible, well-trained staff should be available at stations and onboard train services.
- 7. Accessibility and inclusion should be more prominent in the mainstream marketing of public transport services with disabled and older passengers more prominent in publications about and advertising of bus and rail services.
- 8. Any future actions must include measures to promote and raise awareness amongst disabled people and older people

of improved access to public transport services. This could include targeted campaigns similar to those undertaken by TfL.

Much work is required over the next 12 months to identify an achievable action plan that could progress the recommendations we have made. However the approach of TfL does provide a useful template and many of the specific measures used in London could be replicated here. As an initial step Imtac has included in our 2014/15 Work Programme a commitment to work with Translink to identify a specific action that will help raise awareness amongst disabled people and older people of improved access to services.