Standards Series 2

Recommended Accessibility Guidelines for Public Transport Operators in Ireland

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Acknowledgements

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Foreword - National Disability Authority

Transport is an essential prerequisite to enabling people with disabilities to participate in normal activities of daily living, i.e. work, education, leisure and social activities. Almost a decade ago, the Commission on the Status of People with Disabilities commented on the negative experience of people with disabilities in using public transport in Ireland. Since the Commission published its report, the Department of Transport has started a process of reform of the way in which transport infrastructure and services are delivered in Ireland. As part of this reform the Department has undertaken substantial work in rolling out a comprehensive programme of accessible transport.

In 2004, to assist and support the Department of Transport in achieving the highest possible level of accessibility, the National Disability Authority (NDA) undertook to develop draft Guidelines for improving access to Bus, Rail and Light Rail Services for people with disabilities in Ireland. On behalf of the NDA, I am now delighted to be in a position to recommend these draft Guidelines to the Department of Transport.

These recommendations are based on the principle of ‘Transport for All’ which focuses on the whole experience of a journey, from information that is accessible, vehicles and buildings that are accessible, to disability awareness training for staff, and consultation and communication with people with disabilities.

The provision of accessible transport is an issue that cuts across a number of Government Departments, and although these Guidelines are targeted at public transport providers and as such fall within the remit of the Department of Transport, I have also circulated this document to a number of other Government Departments.

On behalf of the NDA, I would like to thank the Minister of State at the Department of Transport, Ivor Callely, T.D. and his officials for their support in the preparation of this document. I would also like to thank the consultants from Booz Allen Hamilton and Future Inclusion for their work. The NDA is looking forward to continuing to work in partnership with the Department of Transport in finalising these recommended Guidelines and putting them into practice.

Dr Angela Kerins, Chairperson,
National Disability Authority.
Subject to approval by Department of Transport: 

Foreword – Department of Transport

On behalf of the Department of Transport, I am pleased to accept these Recommended Guidelines, developed by the NDA, in consultation with key stakeholders and in partnership with my Department.

This report is a key element of the Department of Transport’s overall strategy to ensure the delivery of accessible public transport services for the greatest number of people possible. The principle of ‘Transport for All’ is the cornerstone for all our work and this report is yet another building block upon which a fully accessible public transport service will be built in Ireland.

Other key initiatives undertaken by the Department of Transport include the establishment of the Public Transport Accessibility Committee, the ongoing work on the preparation of a Sectoral Plan under the Disability Act 2005 and the sustained investment in purchasing accessible vehicles and upgrading existing facilities by the Public Transport Operators.

The Department of Transport is responsible for the regulation of public transport, including the issuing of guidelines, such as those contained in this document. Therefore, I have requested the officials in my Department to continue to work with the NDA in order to finalise the recommendations contained in this report.

I would like to thank the NDA for bringing this important piece of work to fruition and I look forward to continue working with the NDA and other stakeholders to provide the highest possible degree of accessibility of public transport, having regard for resource and technical constraints.

Ivor Callely, T.D. 
Minister of State, Department of Transport
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Part 1 – Context of the Guidelines

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Chapter 1 - Introduction

1.1 Who are these Guidelines for?

The Guidelines represent the first step in assisting and supporting bus, rail and light rail operators in Ireland in making their services more accessible to passengers with disabilities (see Appendix 1, reference 1). The intended primary audience for this document comprises the following operators/organisations:

- Iarnród Éireann/Irish Rail;
- Bus Átha Cliath/Dublin Bus;
- Railway Procurement Agency;
- Connex Transport Ireland;
- Bus Éireann/Irish Bus; and
- Private bus and coach operators providing public transport services.

Although a number of other transport providers, such as community, voluntary or private operators, fall outside this scope, they may use these Guidelines in improving the accessibility of their services. People who need accessible public transport services, especially people with disabilities, will also find the Guidelines helpful in understanding what they can expect from bus, rail and light rail operators. In addition, other stakeholders, such as the Garda Síochána and Local Authorities may also find these Guidelines of use.

1.2 What do the Guidelines cover?

The Guidelines are intended to help public transport operators provide a good, comprehensive and readily usable service to people with disabilities. They cover information provision, infrastructure and buildings, vehicle design, customer relations, disability awareness training and procedures for disruption and emergencies. In addition, the Guidelines explain the barriers to travel faced by passengers with disabilities, and outline the current Irish legal and regulatory position.

1.3 How to use this document?

This document is structured in two parts. Part One, Chapters 1-3, provides information on the rationale for improving accessibility and information on the barriers to accessibility. Part Two, Chapters 4-9, is structured so that there are individual chapters for different
elements of the public transport business. The main recommendations are summarised at the end of each Chapter. Each of the Chapters also contains a "Where should Operators go Next?" section that provides information and sources of more specific and detailed guidance that can be used.

The document also contains a List of Useful Contacts, including the contact details for the National Disability Authority Library which is the largest library in Ireland dedicated solely to the topic of disability. The NDA Library has, in its collection, most of the documents referred to in the "Where should Operators go Next" sections of these Guidelines.

1.4 Why improve access to Public Transport?

There are a number of reasons why operators should improve the accessibility of their services.

Firstly, improving accessibility is good for business. The profile of passengers (and potential passengers) of public transport is changing. Not only is the number of people with disabilities growing but the proportion of older people in the population is also increasing. These demographic changes will require improvement in the accessibility of public transport services. Improving accessibility will attract passengers who would not previously have considered using public transport.

Existing passengers, who may or may not have disabilities, will be encouraged to make more trips by public transport because it is easier or more convenient to use, more pleasant, and satisfies their needs to a fuller extent. The introduction of low floor, accessible vehicles may also lead to reduction in dwell times at stops and stations as passengers can get on and off low floor vehicles more easily and quicker, thereby enabling vehicles to complete journeys quicker and thus possibly reducing the number of vehicles required to provide the same level of service.

Secondly, the legislative and regulatory framework has become more demanding for all parties (the State and operators) in relation to providing fully accessible public transport services (see Section 3.2). The Government, in the National Development Plan 2000-2006 (NDP), makes a commitment that "new and upgraded bus and rail stations, light rail vehicles, new suburban railcars and new urban buses will be fully accessible".

In the Outline Sectoral Plan under the Disability Act 2005, the Department of Transport has stated that obligations arising from its objectives with regard to accessibility "will
apply to all providers of public transport services, both public and private" (see Appendix 1, Reference 2). Public transport providers, like any other service providers, have statutory obligations under the Equal Status Acts 2000 to 2004 to do all that is reasonable to accommodate the needs of a person with a disability (for more information see also section 3.2 of this document).

Finally, all citizens should be given equal consideration in the design and provision of public transport. The principle of equal treatment is particularly relevant to the public transport sector as it has the ability to enable people to gain access to all that society has to offer.

1.5 How can the change be managed?

Improving access for passengers with disabilities is similar to implementing any type of change – there are challenges that need to be managed. This can be achieved by:

- having a clear and shared vision across the company, backed by an understanding of the business case;
- having visible and effective leadership from senior management;
- developing relationships with passengers with disabilities and their organisations through effective consultation;
- acquiring functional and technical skills through training;
- communicating changes in a timely and accessible fashion to all the operator’s staff, to passengers and to potential passengers; and
- setting out detailed plans for improving accessibility and monitoring progress.
Chapter 2 - Barriers to Travel

2.1 Introduction

When passengers with disabilities make a journey, they have the same expectations as other members of the public. They expect to be able to leave the house, get to the station or stop from which they are catching the bus, light rail vehicle or train, board the vehicle, travel in reasonable safety and comfort, alight from the vehicle and get to their destination without any difficulties. Passengers with disabilities, in particular, need to be confident that every stage of a journey will work effectively and consistently. If even one component of the journey presents a barrier, then the journey cannot be undertaken.

![Figure 1 The travel chain](image)

If a person using or attempting to use public transport has a bad experience it may undermine their confidence in public transport. The person may assume that they cannot rely on public transport to meet their travel needs and as a result their mobility and quality of life may diminish.

It is now accepted that it is barriers in the transport system that prevent people with disabilities using transport services, not their impairment. For example, it is the lack of audible announcements informing passengers where they are and what the next stop is, and inaccessible signage, that disables a vision impaired person and prevents them using public transport with confidence or at all.
Barriers in the transport system affect passengers with particular disabilities differently, for example:

- A flight of stairs is a barrier to a wheelchair user, whereas a person with a vision impairment might have less difficulty, depending on the design of handrails and the appropriate use of tactile warnings and colour contrast.

- Visual information with no audible backup might present a person with a vision impairment with serious difficulty, whereas a person who is Deaf or hard of hearing might not find it a problem.

- Lack of visual information is a problem both to passengers who are Deaf or hard of hearing and to passengers with intellectual disabilities.

- Glare from the glass screen at a ticket counter is a problem for passengers who are Deaf or hard of hearing because they cannot see the other person's face for visual clues or lip-reading. It is also a problem for passengers with a vision impairment because it makes use of their residual vision more difficult.

- Poor quality audible information is a barrier for people who are hard of hearing, especially where there is significant background noise. It is also a barrier for people with vision impairments who are relying solely on audible information.

- Poor signage, especially signage without appropriate pictograms, is a barrier for someone with an intellectual disability.

- A confusing station layout is a problem for someone with walking difficulties, who may in consequence have to walk farther. It is also a problem for someone with an intellectual disability, who may lose their way.

It can help to think of barriers in five categories:

- physical barriers;
- barriers created by policies, procedures and systems;
- barriers caused by staff practices;
- information barriers; and
- barriers caused by attitudes - staff or customer.
2.2 How does the physical environment create barriers?

Physical barriers are barriers in the built and external environment like steps and stairs, narrow doors, heavy doors and obstacles. These are the obvious barriers. Less obvious barriers may also exist, for example, confusing station layout, inadequate lighting, lack of seating, poor colour contrast or inadequate signage. An automated ticket barrier can present a barrier to someone who is oversized or easily hurt, for example: someone with brittle bones or someone with haemophilia. Equally, it may be intimidating for passengers who cannot see or understand how the barrier opens and closes.

Attention to detail is important. There are many examples of accessibility improvement schemes which have had to be rebuilt because of poor detailed design. Costly refits can be avoided by following appropriate design standards in their entirety, and by auditing (disability proofing) designs before proceeding to implementation.

2.3 How do policies, procedures and systems create barriers?

Policies, procedures and systems, even though they may have been set up for good reasons, can present barriers to passengers with disabilities in the transport environment.

In order to minimise boarding times and reduce staffing levels, for example: a transport operator might require passengers to purchase a ticket before they board a vehicle. If it is difficult or impossible for a passenger with a disability to purchase a ticket because the ticket machine is not accessible or too complex to operate, then the requirement of having to buy a ticket beforehand compounds the barriers that a person with a disability experiences. The effect of this can be lessened if staff understand that certain passengers may not have been able to purchase tickets, and staff are flexible in their response to this. Quality customer service policies, procedures and systems can help to compensate for poor access in the physical environment, as an interim measure.

2.4 How do staff create barriers?

Even when policies, procedures and systems are well-designed and flexible, the way that staff implement these may in itself create barriers to passengers with disabilities. For example, a bus stop may be well designed and the policy may state that drivers should pull in to the kerb so that passengers can board more easily, but if drivers do not or cannot follow this practice consistently, the result is that some passengers experience difficulties when attempting to board.
When implementing changes to infrastructure and vehicles, procedures need to be in place that ensure the correct use of the facilities by staff. Unless everyone in the chain of command is clear about the importance of accessibility and is familiar with working new systems, then the potential exists for small ‘errors and omissions’ to become significant barriers to access, and efforts to create an improved facility may fail.

2.5 What barriers arise in the provision of transport information?

Transport information needs to be accurate, consistent and accessible. Not providing enough information, providing information in the wrong format or providing conflicting or inconsistent information creates barriers for passengers. Issues of availability of information, format, print size and colour should be addressed in a user friendly manner.

2.6 How do people’s attitudes create barriers?

Public attitudes towards people with disabilities have improved considerably over the past few decades. However, there are still those who may believe that passengers with disabilities should not be out and about by themselves - or perhaps should be using some other form of (segregated) transport.

Operators’ staff can be educated to understand more about the barriers faced by passengers with disabilities. Standards can be set for customer service and expectations for passengers on transport services that will result in an improved journey experience for passengers with disabilities and other passengers alike.

Customer service standards can be assessed in a variety of ways, for example, through customer research, customer service surveys and consumer panels. The organisations selected to carry out this work should be experienced in doing so in relation to disability, and consult with a range of passengers with disabilities.

2.7 How can a service be audited?

In order to ensure that a service is barrier free, public transport operators can carry out a customer service audit. Assistance may be required in setting this up, for example, by creating a clear methodology and identifying the needs of particular groups of passengers with disabilities. This is something that public transport operators can implement with limited effort and preparation, as follows:
• Describe each stage of the journey;
• Determine what a passenger needs (or may want) to achieve at each stage;
• Use these Guidelines to help identify the barriers that passengers with different disabilities will come across when they are using public transport services;
• Ask passengers with different types of disabilities to take part in the audit and record their observations;
• Review all company information available (management information, results of surveys etc.) to understand the needs and aspirations of passengers with disabilities and whether existing services meet those requirements; and
• Establish a plan to remove these barriers - some will be easily removed and can be addressed quickly, others will need building into future maintenance and development plans.

In many circumstances, for example if there has been investment in a particular service, or investment is being considered, or issues have been raised by passengers, a more formal and structured way of access auditing is recommended. The purpose of a formal access audit should be to establish how well a particular service performs in terms of access and ease of use by a wide range of potential users, including people with mobility and sensory impairments (adapted from the Centre for Accessible Environments, 1999). The access audit is the starting point for a planned programme of access improvements. Access auditing involves an inspection of a service to appraise its accessibility - judged against predetermined criteria.

Each of the chapters in the next section contains information about access auditing. Currently no register of approved auditors, system for approving auditors, or accredited courses for access auditors exist in Ireland.

The NDA has started work in this area and will initially focus on the development of clear guidance for professionals involved with access auditing, including a template for access audits in Ireland and a directory of access consultants.

In addition to this, under the Programme for Prosperity and Fairness (1999, PPF), the Government has committed itself to improve the accessibility of Public Services. Under this commitment, the NDA has been given the task of developing guidelines, monitoring progress in the achievement of more accessible public services and awarding an accessibility symbol to compliant public services. The Excellence through Accessibility
(EtA) award uses a model of continuous improvement to encourage public sector bodies to continuously improve the accessibility of their services for people with disabilities. The award will be launched in October 2005.

The EtA accessibility guidelines have been structured to take account of three critical areas common to all organisations:

- Access to Quality Customer Services;
- Access to the Built Environment; and
- Access to Information and Communication Technology.

In the UK, the Centre for Accessible Environments (CAE) in collaboration with the JMU Access Partnership established the National Register of Access Consultants (NRAC) in 2000. The NRAC is an independent register of accredited Access Consultants and Auditors who meet professional standards and criteria established by a peer review system. For more information, see <http://www.nrac.org.uk>
Chapter 3 - The Supporting Framework

3.1 Why is Guidance required?

One of the more important findings from the NDA’s recent research work (2004, Towards Best Practice Report on Transport) was the absence of national guidance which public transport operators could utilise in their efforts to improve the accessibility of their services to passengers with disabilities.

As a result of these findings the NDA undertook to produce a document for consultation on the development of Guidelines for improving access to bus, rail and light rail services for people with disabilities in Ireland, in partnership with the Department of Transport. The Department of Transport envisages developing Guidelines based on this consultation document in due course.

3.2 What is the policy and legislative support?

Clear Government support for improving the accessibility of public services and, in particular, public transport has been demonstrated in recent times. Support and commitment was explicit within the Social Partnership agreements ‘Programme for Prosperity and Fairness’ (PPF) and ‘Sustaining Progress’ (for further explanation see Appendix 1, References 3 and 4).

Further Government support and commitment to accessibility is outlined in the National Development Plan 2000–2006 (NDP) which states that:

"The Government is committed to improving accessibility to public transport for mobility impaired persons and people with disabilities. New and upgraded bus and rail stations, light rail vehicles, new suburban railcars and new urban buses will be fully accessible. New implementation structures will be put in place."

In the Disability Act 2005, Part 3 provides for the development of sectoral plans by a number of Government Departments, including the Department of Transport. Section 32 explains that the sectoral plan for the Minister of Transport is intended to give information on the programme of measures proposed to ensure access for people with disabilities to passenger transport services, the time within which the measures planned will be implemented and arrangements to be made between the Minister and the Minister for the Environment, Heritage and Local Government to facilitate access by such persons from a public road to the vehicles providing the passenger transport services.
Coinciding with the launch of the Government’s National Disability Strategy in September 2004, the Minister for Transport issued a draft consultation document entitled the ‘Outline Sectoral Plan’ (Department of Transport, 2004). In this Outline Sectoral Plan, the Minister states that:

"the Department is committed to the comprehensive development of accessible public transport services for the greatest number, and the largest categories as possible, of those with mobility and sensory impairments in the shortest possible time having regard to resource, technical and other constraints".

The Department’s objective is:

"That all passenger transport providers should provide the highest possible degree of accessibility, subject to available resources and competing priorities and rules of practicality".

In promoting this objective, and the consequent obligations on providers of public transport services, the Department stresses that the benefits of improved transport accessibility extend to all transport passengers. The Outline Plan also notes that "it is inevitable that some people, because of the severity of their disabilities, will not be able to be accommodated on public transport services. In these cases, specialised non-public transport services would be the alternative form of transport".

In the Outline Plan, the Department has set targets for improving the range of accessible services in the bus and rail sectors. The Outline Plan has been prepared having regard to the likely lifespan and replacement costs of existing public transport vehicles and infrastructure. It will be reviewed and updated on a periodic basis.

Further legislative support is provided by the Equal Status Acts 2000 to 2004. This legislation outlaws discrimination in the disposal of goods and delivery of services. It is illegal for people to discriminate when they are providing goods or services to the public, in respect of their being provided free of charge or for a price.

The Equal Status legislation makes it illegal to discriminate on the grounds of gender, martial status, family status, sexual orientation, religion, age, disability, race and membership of the traveller community.
In the Equal Status Acts, "service" means a service or facility of any nature which is available to the public generally or a section of the public, and, without prejudice to the generality of the foregoing, includes –

a) Access to and the use of any place

b) Facilities for-
   i. Banking, insurances, grants, loans, credit or financing,
   ii. Entertainment, recreation or refreshment
   iii. Cultural activities, or
   iv. Transport or travel ….
Part 2 – Recommended Guidelines

(Section Start to go here based on chosen cover)
Chapter 4 – Information Provision

4.1 Introduction

Clear, concise, accurate and timely information is crucial to people making journeys by public transport. For passengers with disabilities, good information can be the difference between being able to make a journey or not.

4.2 Why does information matter?

Good, accessible, information that enables passengers, including those with disabilities, to make journeys safely and successfully can build confidence in the public transport system. Good information enables independence and reduces reliance on staff and on other passengers. It also increases passengers' safety by reducing the risk of unplanned incidents occurring, such as, for example, a passenger getting off at the wrong stop.

The majority of passengers do not have to rely on one information source. For example, they hear an announcement and visual clues in the environment confirm that announcement or aid in their comprehension. However, a person with a vision impairment may not benefit from these visual clues and will need to depend solely on the announcement which, if unclear or not given, can cause confusion or travel disruption.

4.3 What information should be provided and when?

There are four key stages at which passengers, including those with disabilities, need information:

1. Before they set out on their journey;
2. When at the train station or the bus or light rail stop (including at interchanges);
3. When on the vehicle;
4. When they have completed their journey.

The sort of information that should be provided at each of these stages is presented overleaf.
Before the Journey:

• Easy to use journey planner;
• Timetable information – routes, times etc.;
• Information on which services are accessible and which are not and what to do if services are not accessible;
• Information on connections with other modes of transport.;
• Facilities available: lifts, seating, services, toilets, shops;
• Details of the assistance available and how to get that assistance;
• Requirements such as ticket purchase, fares, making reservations, booking seats, etc.;
• Information about time limitation for Free Travel pass holders.

At the stop or station:

• Service and timetable information – arrivals and departures, routes and destinations served;
• Instructions on how to get assistance;
• Instructions on how to buy tickets – especially at ticket machines;
• Information on safe boarding, alighting and waiting;
• Information on facilities available, if any;
• Information on how to make a complaint;
• Information on delays, including how long the delay will be;
• Instructions on what to do in the event of disruption;
• Useful telephone numbers and help phone.

On the vehicle:

• Visible external information on vehicle destination
• Instructions on how to get assistance;
• Visual and audible information at each stop and in advance of the next stop;
• Location and details of the facilities on board, if any;
• Information on delays, including how long the delay will be;
• Instructions on what to do in the event of an emergency or a disruption to the service.

After the journey:
• Details of connecting services (rail, light rail, bus and taxi), and how to get to them;
• Instructions on how to provide feedback.

An operator should have policies and procedures in place to ensure that certain (predetermined) information is available in the most requested formats and media, and that all other information is available in accessible formats on request.

4.4 Who should provide the information?
In terms of verbal enquiries, not all staff will be able to know everything about all services or be able to answer all the questions that passengers might want to ask. However, all relevant staff should be able to tell passengers with disabilities where to get the information they need. In addition, all relevant staff should know how to provide information to passengers with disabilities. They should also know about the specific needs of passengers with disabilities. Training can help to ensure that staff can fulfil the information needs of passengers with disabilities. (Chapter 8 of this report which deals with Disability Awareness Training can aid with this.)

4.5 Where should information be provided?
Information should be easy to find. Passengers may require specific information, for example: about how to board vehicles and how to receive assistance. Information may be delivered through different mechanisms and at different locations such as public counters, public address systems, queuing systems, loop systems, telephones and public access terminals. For each mechanism, different accessibility issues may arise. For example, a transport operator needs to ensure that the LED displays (information boards) are accessible to people who are Deaf and hard of hearing and people who have a vision impairment.

Specific information on how to get assistance needs to be available. Passengers who have problems standing need to know what seat provision will be made available to them. This kind of ‘specialist information’ can sometimes be hard to find for passengers with disabilities who do not know how the system works, passengers who recently acquired a disability, or passengers with disabilities who have not travelled before or do not travel
often. Making it easy for people to find the required information will encourage more people with disabilities to use public transport services.

In providing this information, operators should consider creating a clearly identifiable section on websites, timetables, brochures, signage etc. dedicated to people with disabilities. Good, accessible design and appropriate naming of this section will ensure that those who most need assistance will receive it. If it is called 'disabled assistance', some passengers who need it, for example, frail older people, may not think it is for them. On the other hand, some passengers with disabilities reject the notion that they have 'special needs'. The best approach may be to give the section a title such as "additional assistance for passengers with mobility and/or sensory impairments" or simply "for passengers who need extra assistance", with an explanation of what the operator means by that.

4.6 How should information be provided?

The European Conference of Ministers of Transport (ECMT, 1999, Improving Transport for People with Mobility Handicaps: A guide to good practice) advises that transport information should be clear, concise, accurate and timely.

Clear

Clarity of information can be defined as information that is legible and easily understood. Clarity of information therefore presupposes that people will be able to distinguish between the different types of information that they receive in the transport environment. Information on the transport environment can be divided into three levels:

1. Level 1 information, such as urgent safety information or immediate bus or train departures;
2. Level 2 information, such as general timetable information, information about how to make a complaint and general safety information;
3. Level 3 information, such as advertising.

It is important that these three levels of information are clearly distinguished.

Although commercial advertising can be an important source of revenue, advertising that is too prominent can distract passengers who are relying on clear visual information to make their journey. If background information is given equal weight to immediate information, timetable changes or disruption information may not be sufficiently clear and understandable. All passengers will also experience the benefits of information which has been ‘rationalised’ in this way. They will be able to find their way much more quickly and easily.
Concise
Information should be complete but concise. Too much information makes it difficult for people to retain.

Accurate
All information provided should be accurate and consistent. Information that is not accurate is worse than useless. Conflicting information can add to the stress that passengers experience and, because this consistency is so important, failure in provision, however infrequent, will diminish passengers’ confidence in the system.

Timely
In general, information should be provided at the time when it is needed, for example: at the point of departure on a journey. However, many people with disabilities would like to have information about their intended journey well in advance. Timely information also means that the information should be up-to-date. Where, for example, a lift or a toilet is out of service, passengers with disabilities need to be informed promptly.

4.7 In what formats should information be provided?
Operators need to understand that the format in which information is provided is as critical as the information itself. Information which is typically provided in printed form, in spoken form and in electronic form, should be in a format that is accessible to people with disabilities. In many cases this will involve providing the information in an alternative format, such as large print, Audio/Video Tape, Braille or Easy to Read.

It is good practice to ensure that the marketing department, communications staff and anyone else who produces information in the organisation follow the requirements of clear print and plain language. For example, producing printed documents in a 14 point Sans Serif font makes them more readable to a wider range of people with vision impairments and people with intellectual disabilities as compared to documents printed in a smaller font. It also means that fewer people will need to be provided with alternative formats.

- For written documents, people with vision impairments may need large print (18 point or larger), Braille or audiotape.
- People with intellectual disabilities may find audiotape or an Easy to Read version useful. Simple pictures and/or symbols should be added to information wherever possible as these should make information more accessible. Signage should also include internationally approved pictograms to assist people who find the written word a barrier.
People who are Deaf or hard of hearing will use visual formats and may also find Easy to Read and plain language information helpful.

It is particularly important that clear and accurate information is provided to alert passengers when they are approaching a stop and at prominent locations within the terminals/stations. This will be achieved by clear audio and visual announcements.

Alternative methods of information provision such as videos/DVD’s, subtitling, clear visual displays or SMS services on mobile phones may also need to be considered by transport operators.

It is reasonably easy to produce information in large print. In addition it may be necessary to get Braille, audio/videotape and Easy to Read versions produced by professionals who have experience working in the relevant area. If there are a substantial number of documents to produce in alternative formats, it may be worth acquiring the equipment and developing the expertise in-house. To begin with, it is advisable to find an agency that can produce good quality translations.

Operators should consider the use of journey planners on websites and maps on different locations which offer the potential for detailed and precise journey details to be worked out before or during the trip. Maps are crucially important to depict journeys as well as to discern present location in buildings.

Some people with disabilities may experience difficulties with conventional website design. Many people with vision impairments use a screen reader to access a website. A screen reader is a piece of software that reads out, in a synthesised voice, the text of a webpage. However, many websites are not designed with accessibility in mind and so screen reader users cannot access the content on these sites. Websites that have auditory content or that require the use of the mouse for navigation, for example, also present problems to people with disabilities. Taking accessibility fully into account when developing or updating a website is worthwhile as it can reduce problems associated with trying to improve accessibility at a later stage. See the ‘Where should operators go next?’ section for additional guidance.

State-sponsored public transport operators need to continue to comply with the Official Languages Act 2003, which obliges public bodies to provide information in Irish. This presents a particular challenge when there is limited space within which to provide information, for example on the front of a bus. In this situation, variable signs which show the destination firstly in one language and then the other have been successfully used.
4.8 How can information be audited?

Information can be audited to ensure that it is accessible. The audit will need to:

- make a list of the information that is provided: visual, web-based, printed and spoken;
- prioritise which pieces of information need to be developed in alternative formats and made readily available;
- identify suppliers of alternative formats, such as Braille and audiotape, and provide them with copies of the text so that they can provide alternative formats on request;
- develop a plan for putting all information into accessible formats in priority order;
- consult passengers with disabilities about their information needs and they find easy to use. (It may also be useful to ‘pilot’ information with a group of passengers with a range of impairments, as the experience of using the information in a ‘live’ situation is a very different test to a more controlled audit situation); and
- review the quality of the information on a regular basis to determine how much is accessible by checking it against the guidance. This will necessitate consultation with organisations for and of people with disabilities in order to prioritise actions.

A website accessibility audit, carried out by an accessibility consultant, will give a measure of the website’s level of accessibility against an internationally accepted set of standards such as the Web Accessibility Initiatives (WAI) Web Content Accessibility Guidelines (WCAG 1.0). Such an audit will list improvements that can be made to the site.
Where should operators go next?

General information:

Easy to Read and Plain English
The National Adult Literacy Agency (2002) has produced guidelines (Writing and Design Tips) on how to make documents easier to read. For more information on this document visit their website: <http://www.nala.ie>

Summary of Recommended Guidelines – Information

1. Public transport operators need to ensure that information is provided in a variety of accessible formats during the main stages of transportation i.e. before setting out, at the station or stop, on the vehicle and after leaving the vehicle.
2. At a minimum, public transport operators should ensure that timetables, websites, urgent safety and emergency information are accessible to all.
3. Public transport operators need to ensure that specific information on how to get assistance is provided to people with disabilities.
4. Relevant staff members who are employed by the public transport operator need to able to provide passengers with disabilities accurate and clear information.
5. Public transport operators should conduct frequent audits of the accessibility of the information they provide to their customers.
Websites:
• For guidance on website accessibility and the manual checklist to test a website for accessibility visit <http://www.accessit.nda.ie/technologyindex_1.html>
• The W3C Web Accessibility Initiative (WAI) homepage <http://w3.org/wai>
• The Web Content Accessibility Guidelines v 1.0 (WCAG 1.0) <http://www.w3.org/TR/WCAG10/>

Interactive information:
• The Irish National Disability Authority IT Accessibility Guidelines include guidelines for the web, telecoms, software applications and public access terminals: <http://www.accessit.nda.ie>

Passengers with vision impairments:
• For more general guidance on making various kinds of information accessible for vision impaired people, see the UK RNIB's website. <http://www.rnib.org.uk/xpedio/groups/public/documents/code/public_rnib001951.hcsp>

Passengers who are Deaf or hard of hearing:
• For more general guidance on making information accessible for people who are Deaf or hard of hearing, see the UK RNID’s website <http://www.rnid.org.uk/html/factsheets/stop.htm>

Passengers with intellectual disabilities:
• To buy a picture resource for making information more accessible for people with intellectual disabilities, see the UK CHANGE website <http://www.changepeople.co.uk/>
• At a European level the MAPLE Project (improving Mobility and Accessibility for People with Learning disabilities in Europe) is a trans-national project to promote and enhance the mobility of people with intellectual disabilities, and people with mental health difficulties, by identifying, investigating and disseminating best practice in making public transport facilities more accessible for them, <http://www.maple-eu.com>
Chapter 5 - Infrastructure and Buildings

5.1 Introduction

Accessible infrastructure and buildings are essential if people with disabilities are to access and use public transport services in a safe, secure and confident manner.

It is recognised that it is challenging to improve the accessibility of some existing historical buildings and infrastructure which are not fully accessible. Operators should proceed with practical, achievable measures to improve accessibility in the short term while putting in place a longer term accessibility programme to overcome any outstanding challenges. Operators should not allow challenges presented by older infrastructure and buildings to prevent new construction or refurbishment being designed, built and managed according to best practice (see NDA's Building for Everyone, 2002).

Bus, rail and light rail operators, working with other stakeholder agencies, can do a great deal to improve access to buildings, stations and stops. The aim of this Chapter is to provide guidance in making these improvements. A more strategic issue, which these guidelines do not address, is that of route and network design. It is recognised that many people do not use public transport because the distance from their home to the stop or station is simply too great. Although this problem applies to many people, it applies to a much greater extent to some people with disabilities who can only walk short distances. Mainstream public transport operators, who are the primary audience for these guidelines, are limited in their ability to address this issue, but when opportunities for route and network revision do occur, the need to bring services as close as possible to passengers should be considered. Public transport operators should liaise, as appropriate, with taxis and other operators such as private, community, voluntary and specialised operators who have a role in improving access to mainstream public transport services and in improving access within areas not well served by mainstream public transport.

5.2 How to improve access to Bus and Light Rail Stops or Stations?

Bus, rail or light rail rarely provide “door-to-door” services (as a taxi can, for example). To access a stop or station, most passengers need to walk, cycle, use a wheelchair or travel by car. Satisfactory access arrangements are consequently an important factor in determining whether people with disabilities can actually use a bus, rail or light rail service.
Features that need consideration include:

- smooth, level footpaths to and from stops and station entrances and exits with dished pavements at road crossing points;
- safe, accessible, road crossing facilities;
- good lighting; and
- safe, convenient drop-off and pick-up facilities for people with disabilities at bus and railways stations.

Locating bus and light rail stops and bus and railway stations entrances as close as possible to the activities they serve optimises access, because walk distances are minimised.

Routes and the location of stops (existing or proposed changes) should be audited by public transport operators in consultation with local stakeholders to ensure that they meet the needs of the communities they serve.

Improving access to stops and stations, by providing footpaths, crossings and lighting are primarily functions of the Local Authorities, sometimes with the involvement of the Garda Síochána, as operators very rarely own the surrounding infrastructure. Therefore, improving access to bus and light rail stops will normally require multi-agency involvement.

Transport operators have an important role to play in such multi-agency initiatives which may involve the Departments of Transport and Environment, Heritage and Local Government, local authorities, the Garda Síochána and possibly other stakeholders such as schools and hospitals' administrators, and representatives from other community based facilities.

In the recently published ‘Outline Sectoral Plan’, the Department of Transport indicates (2004, page 15) that it will work ‘with the Department of the Environment, Heritage and Local Government in developing appropriate structures to address these and other public transport issues for which there is multi-agency responsibility’.

Bus and Light Rail Stops
During the design and maintenance of bus and light rail stops, public transport operators should take into consideration the following points as critical to the development of high quality accessible transport infrastructure:
• Location;
• Raised kerb;
• Footpaths and crossing facilities;
• Traffic management, including parking and loading/unloading restrictions;
• Shelters;
• Lighting;
• Security;
• Markings and signage including bus stop poles;
• Seating;
• Bicycle parking facilities;
• Information provision;
• Maintenance and cleaning.

Transport Buildings and Stations
Bus and rail stations and transport buildings are accessed by a variety of methods including on foot or wheelchair, by car (drop-off or parked), other public transport modes including buses and light rail and other transport means including specialised transport services and taxis. The general principle is that no matter what method is used to arrive at the station or building, the approach should be accessible.

Public transport operators should ensure that the approaches to and the environment around the station or building are clearly signed so that passengers know where they are going.

The access approach to and within transport buildings and stations requires careful consideration through the design and construction process when developing new or refurbishing existing buildings and stations. The ‘Where should operators go next?’ section at the end of this chapter highlights useful publications which provide more detailed guidance on how to make these environments more accessible.

It is often useful to assess the reasons why people visit transport buildings and stations and what their resulting needs are with regard to accessibility. People visit transport buildings and stations for a:
primary reason – to use the services themselves or to meet or ‘drop-off’ someone else using services; and/or

secondary reason – to deal with customer services, for example, obtaining information, purchasing tickets in advance, or making complaints etc.

Operators can reduce the need for all customers to visit their buildings for secondary reasons through the introduction of initiatives such as web based ticket sales and information provision. Web-based initiatives should complement but not replace other methods of communication.

Improving accessibility for visitors will involve taking a holistic view of the building in question and ensuring that all the following areas are considered:

• Access to and from buildings;
• Movement within buildings including changing levels (horizontal and vertical circulation), space, lifts, escalators, footbridges, steps;
• Interface with trains, taxis or buses - station platforms and boarding the train;
• Facilities, including ticketing offices and machines, information points, telephones, waiting and refreshment areas/rooms, seating, luggage, toilets;
• Signage and information;
• Car parking facilities, including a drop off zone and ticket purchasing machines; and
• Lighting and security.

Where existing infrastructure and buildings present physical challenges, easily achievable elements of accessibility should be addressed first. More emphasis can be placed on customer care to compensate for poor physical access.

Interventions such as modifications to heritage (listed) buildings or even installing new bus stop shelters require planning permission and this should be factored into improvement programmes. Public transport operators should work in partnership with planning authorities in order to reach balanced solutions.

When contemplating improvements in access as part of refurbishment projects, the consultation and decision-making process should be similar to that for new buildings (see NDA (2002) Building for Everyone: Chapter 11, Retro-fitting and Refurbishment). Also, the option of a significant improvement in accessibility over a short period of time against a
series of less significant improvements over a longer period of time should be examined, because the more significant improvement may represent better value for money.

5.3 How to audit Infrastructure and Buildings for accessibility?

Auditing can play a very important role in a number of ways. Auditing can assist operators, regulators and passengers to determine just how accessible the current infrastructure and buildings are and how effective accessibility improvements have been. Professional accessibility auditors should be employed to do this type of work.

The audit should:

• examine the access features and requirements for all passengers; and

• identify existing physical and communication barriers to access, (see also NDA (2002) Building for Everyone: Chapter 11, Retro-fitting and Refurbishment).

In order to ensure that the accessibility of the built environment is of the highest standard, the audit needs to include a number of essential elements, such as:

- Management - access handbook, access and safety, responsibilities and commitment;
- Transport – getting to the building, location, set down areas;
- External Environment - car parking, routes, ramps, steps and doors;
- Vertical and Horizontal Circulation - steps and stairs, lifts, corridors and internal doors;
- Facilities - reception, toilets, seating areas, changing rooms, restaurants and refreshments;
- Interior Design - lighting, colour and contrast, fixtures;
- Evacuation - emergency equipment, alarms, signage, evacuation equipment, evacuation plans (see also Chapter 9 – Disruption and Emergency); and
- Communication Facilities - signage, telephones, tactile features, acoustics.
Summary of Recommended Guidelines –
Infrastructure and Buildings

1. Public transport operators need to put in place programmes of measures to improve the accessibility of infrastructure and buildings and make these programmes available to people with disabilities.

2. Public transport operators need to consult with and, where relevant, work in partnership with other agencies, such as Local Authorities, in improving the overall accessibility of the public transport infrastructure and built environment.

3. When developing or refurbishing buildings, stops or stations, public transport operators should ensure that they are fully accessible to all people with disabilities, in line with the guidance given by the NDA in Building for Everyone (2002).

4. Public transport operators should ensure that frequent and regular accessibility audits of the infrastructure and built environment are conducted by trained and experienced auditors. People with disabilities need to actively take part in these audits.

Where should operators go next?

General information:


• To keep informed of the development of further guidance in relation to the accessibility of the built environment, including the development of a Template for an Access Handbook, please check out the NDA website: <http://www.nda.ie>.


• UK BS 8300: 2001 - Design of buildings and their approaches to meet the needs of disabled people, Code of practice, British Standards Institution, UK.


Access audits:

Signage:

Rail:

• UK Health and Safety Executive, The Railway Safety Principles and Guidance (RSPG), Part 2, Section G, Guidance on Tramways.


Bus and coach:
• For information and guidance on bus stop infrastructure, including the location and physical layout of the stops, refer to:

Other relevant information:
Chapter 6 - Vehicles

6.1 Introduction

Public transport vehicles including buses, coaches, trains and light rail vehicles are perhaps the most important element of the total journey process, as described in Chapter 2. Chapter 2 also highlights how important a role personal confidence plays in travelling and how a positive experience of travelling on public transport can play a significant role in developing this confidence.

The current transport situation for people with disabilities in Ireland has changed greatly since the 1990s with a significant increase in the number of accessible vehicles in use by both bus and rail operators throughout the country. This is primarily because all the CIÉ Group companies (Iarnród Éireann, Bus Átha Cliath and Bus Éireann) and some private operators have undertaken significant fleet/vehicle renewal programmes. New vehicles, whether bus or rail, are much more accessible than the vehicles they are replacing.

6.2 What is an accessible vehicle?

The ECMT Charter on Access to Transport Services and Infrastructure, adopted at the ECMT Council of Ministers on 19-20 May 1999 in Warsaw, states that accessible vehicles must incorporate as a minimum:

- full access for wheelchair users, including where appropriate accessible toilet facilities;
- features to aid people with difficulties in walking, gripping, reaching or balancing (including non-slip surfaces, hand rails and handholds);
- facilities to assist people with vision impairments (including consistent use of colour contrast, clear sighting and lighting, non-reflective surfaces, audible as well as visual announcements and tactile and audible guidance and warning surfaces and systems (where appropriate); and
- facilities for people who are Deaf or hard of hearing (including visual as well as audible announcements and clear signs).

It is also important that vehicles are be kept clean (for further explanation see Appendix 1, reference 5) and equipment is kept in good working order.
6.3 What is best practice Guidance for accessible vehicles?

Current practice in Ireland is to follow the UK Public Service Vehicles Accessibility Regulations 2000 (PSVAR) and the UK Rail Vehicle Accessibility Regulations (RVAR) and the guidance accompanying these regulations. For example, the RVAR Guidance was used by Iarnród Éireann and the Railway Procurement Agency in specifying the new suburban commuter trains (Diesel Multiple Units) and the Luas light rail vehicles respectively.

In relation to buses designed to carry 9 to 22 passengers, the UK Department of Transport Disabled People’s Transport Advisory Committee’s (DPTAC) Accessibility Specifications for Small Buses (2001) are used.

It is recommended that operators continue to use the UK DPTAC, PSVAR and RVAR guidance. It is critically important that the guidance is followed to the fullest extent possible; otherwise, the investment may not result in the fullest possible level of accessibility.

Today there are a number of different wheelchairs and mobility devices on the market including manual, powered wheelchairs and mobility scooters. Not all of these will fit onto accessible public transport vehicles which have been designed and specified according to the above guidance, causing problems for both the operator and the wheelchair user. In the UK, the Department of Transport has outlined the key dimensions of the wheelchairs available there, and has provided information in relation to which of them will fit onto public transport (Wheels within Wheels, 2003). As there is not yet a comparable document for the situation in Ireland, it is recommended that operators and wheelchair users refer to the UK document if clarification on this issue is required. It is also recommended that operators co-operate with wheelchair manufacturers and wheelchair users to mitigate problems now and in the future.

6.4 How to deliver an accessible fleet of vehicles?

**Buses and Coaches**

Buses and coaches provide different types of services and are therefore designed differently. A bus is used for local urban or rural services, typically over shorter journey distances, whereas a coach is unlikely to be used for local services, instead being used for long distance and express services, and also for touring. Coaches generally have a high floor and a hold for storage of luggage under the floor with the result that it has steps leading into it.
The availability of low-floor accessible buses for urban services has meant that the urban bus fleet is more accessible than the coach fleet in Ireland. However, it is worth noting that the introduction of audible and visual information on buses is still some years away. Details of UK trials of accessible information on board buses are provided in UK Department for Transport (2003) – The Announce System – Making Bus Travel Accessible for All, <http://www.dft.gov.uk>.

While progress has been made in the design and production of wheelchair accessible coaches in the last number of years, these coaches are still not generally available for scheduled public transport services. In a number of countries, such as the USA, the UK and Italy, particular types of wheelchair accessible coaches have become available but only for tours and charter, not for scheduled public transport services. The ‘Where should operators go next?’ section at the end of this chapter gives more details on recent developments in this area. Operators should monitor the development in wheelchair accessible coaches and replace life-expired coaches with wheelchair accessible coaches when they become available.

Transport operators should consider non-structural improvements to their existing fleet of buses and coaches to improve accessibility. However, vehicle replacement is considered to be a more cost effective option than structural modification.

Rail and Light Rail Vehicles

New rail vehicles
The best way for operators to ensure that a new vehicle is fully accessible is to purchase fully accessible vehicles which have been designed and specified in accordance with the guidance outlined in the previous section.

Care is required to ensure that vehicles built by different manufacturers are consistent in terms of features such as the position of door opening controls or the sound of the door opening audible warning.

It is recommended that the accessibility requirements should be treated as an integral part of the vehicle specification and consequently should be checked at the normal design review phase and also during the vehicle construction phase as part of the standard vehicle construction checks.

Purchasing second-hand rail vehicles which have not been modified for improved accessibility is not recommended.
Existing rail vehicles and interim improvements
Rail vehicles (trains and light rail) are generally designed to last about 30 years. During this period there will be a number of opportunities to make accessibility improvements to the vehicles during the periodic maintenance overhauls and vehicle refurbishment programmes. Operators should take advantage of these opportunities, and people with disabilities should be consulted prior to the refurbishment.

6.5 How to make sure operating practices are not a barrier?
Where equipment is used that is designed to improve the accessibility of the service, transport providers should ensure that it is used effectively and efficiently. Equipment on board vehicles, in particular Passenger Information Systems, should be regularly checked to ensure that they are working correctly and that they are used appropriately. It is vital that the use of the best possible equipment is matched by efficient and effective staff, fully trained in the use and limitations of the vehicles and systems.

During the transition period between partially and fully accessible services, when there may be a mixture of accessible and non-accessible vehicles in the fleet, the accessible vehicles should be introduced on a route-by-route basis, to create accessible routes. A casual mix of vehicles on the same route creates uncertainty for passengers with disabilities. If a mixture of vehicles is absolutely unavoidable then the timetable should clearly display which services are accessible.

6.6 How to audit the fleet?
In order to ensure that the current fleet of vehicles is accessible, it will help to perform an accessibility audit of the vehicles. Annex A of the UK Rail Vehicle Accessibility Regulations (RVAR) Guidance contains a "Compliance Checklist" for rail vehicles which would be suitable to use in Ireland.

As there is no similar checklist within the UK Public Service Vehicle Accessibility Regulations (PSVAR) Guidance with regard to buses and coaches, it is recommended that operators should develop their own.
Summary of Recommended Guidelines – Vehicles

1. Public transport operators need to continue to purchase vehicles that are in full compliance with relevant international accessibility norms and regulations, which are set out in this document, and follow the norms and regulations to the fullest extent possible and treat them as an integral part of the vehicle specification.

2. Public transport operators should closely monitor and – where relevant – respond appropriately to any new developments aimed at improving the accessibility of the transport fleet;

3. Equipment that is used to improve the accessibility of the fleet should be regularly checked and properly maintained;

4. Where there is a mixture of accessible and non-accessible vehicles in the fleet, the public transport operators should introduce accessible vehicles on a route by route basis and clearly display the accessible routes and services on timetables and other relevant information;

5. Public transport operators should conduct frequent accessibility audits of their fleet.

Where should operators go next?

Rail:


Bus:


Coach:

For information on wheelchair accessible coaches and current trials and operations visit the following websites:

- <http://www.redwing-coaches.co.uk/mobility_coach.html>;


General information:


Chapter 7 - Customer Relations

7.1 Introduction

Good customer service will help to alleviate the barriers currently encountered by passengers with disabilities.

Many people with disabilities have never or rarely used public transport because of its historical inaccessibility. Others are likely to have experienced some poor or failed journeys. Because of this, passengers with disabilities need to experience a high quality of service each time they travel if their personal confidence in using public transport is to improve.

The transport operator should, where relevant, clearly and concisely outline the accessibility investment programme in order to improve customer relations and manage the expectations of customers.

7.2 What approach should be taken?

The corporate values of a public transport operator need to reflect principles of quality customer service (for further reference see Appendix 1, reference 6). Service to passengers with disabilities should be an integral part of an operator’s service standards. Passengers with disabilities should be involved in the development of these service standards. Standards must be clear, relevant and consistently communicated to all staff. They should be available to people with disabilities on request.

Operators should employ people with disabilities, where possible and practicable. Doing so will help to deliver good customer services to passengers with disabilities. Employing people with disabilities will also assist the operator in gaining a better understanding of the preferences and requirements of people with disabilities.

It is worth noting that in 1977 the Government introduced the 3% employment target for people with disabilities in the Public Sector. The Disability Act 2005, has made this target a statutory obligation for Public Bodies.

In order to further improve the operators’ understanding of the preferences and requirements of people with disabilities, operators should undertake market research and regularly consult with people with disabilities on the quality of service.
7.3 What is important when communicating with people with disabilities?

Public transport operators need to ensure that passengers with disabilities are informed as to how they can make best use of the system, and what to do when the system fails. When developing advertising and customer communication campaigns, there is a need to reflect a diverse customer base that includes passengers with disabilities.

Customer feedback mechanisms, such as complaints procedures or customer comments, should be accessible to passengers with disabilities and take into account additional needs. A wide range of formats should be used in communications with customers. Chapter 4 of this document which deals with Information Provision can help with this. Customers should also be made aware of the accessible services provided and kept informed of new developments.

Contact with passengers with disabilities can be formal or informal. Public transport operators need to make sure that, where contact is informal, there is a way of capturing feedback on the service from passengers with disabilities. Informal contact is generally made by staff who work with customers on a daily basis and who may come across passengers with disabilities more regularly. Where staff have regular contact with passengers with disabilities, their experiences can be drawn upon to improve services. Operators should establish an effective feedback mechanism so that staff can let managers know where changing the service delivery system could improve levels of service to passengers with disabilities. Staff should be encouraged to provide feedback, possibly with a rewards system.

Internal systems that can cope with different feedback formats should be set up, for example, if someone chooses to provide feedback by telephone, a member of staff will need to record and process that feedback accurately. This requires a little more organisation than just processing printed feedback forms.

Public transport operators may want to consult people with disabilities about specific issues. This can be achieved by meeting people in groups, or by issuing a consultation document, or by a combination of the two. Operators should remember to give plenty of advance notice and try to schedule meetings at times that are convenient for people. The NDA’s (2002) ‘Ask Me’ guidance on consultation will help to do this effectively (see ‘Where should Operators go Next?’ section).
It is essential to be clear about why consultation is being carried out, and what is planned to be done with the feedback received from people with disabilities. Action should be undertaken as a result of consultation, as it is also disrespectful to people with disabilities to consult them if it is not intended to take their views seriously. The views of people with disabilities are frequently sought by private and public sector bodies. This can lead to 'consultation fatigue'. One way of addressing this is to establish formal Customer Panels or User Groups. The Department of Transport’s Outline Sectoral Plan (2004, p. 20) outlines the view of the Minister of Transport that ‘each of the CIÉ operating companies, the Railway Procurement Agency and Connex Transport Ireland Ltd. should establish such groups, which should meet on a regular basis’.

Operators should also be aware that a person with a specific disability cannot automatically be seen as a spokesperson for other people with the same disability. See List of Useful Contacts for more information on the different umbrella and representative groups.

7.4 What about training?

Specific steps should be taken to raise awareness of disability and equality among all employees. Training should communicate service standards and equip employees to achieve these. Staff will need training in communication with passengers with disabilities. Chapter 8 of this report which deals with Disability Awareness Training can help with this.

7.5 How to make sure Standards are maintained?

It is important to monitor the delivery of the service to passengers with disabilities to ensure that the established standards are being met consistently. Information obtained from monitoring the service to passengers with disabilities should be part of the routine performance review process of the business, with reporting at an appropriately high level.

Where there is a failure in service delivery an improvement/action plan should be developed, with specified goals, a clear timeframe and agreed responsibilities. Any improvement/action plan in relation to accessibility needs to be in line with customer service policy; otherwise staff will cease to respect the importance of providing good customer service to passengers with disabilities. Likewise, where staff are providing effective customer service they should receive credit for it.

An example of an indicator of success is provided by measuring the number of people with disabilities using transport services when compared to the number of people with
disabilities living in the respective area. This can be done as part of regular customer surveys. It is also possible to set targets from this baseline data against which performance can be measured. Another mechanism is through consultation with representative groups for and of people with disabilities.

It is also important to ensure that those who do use public transport services are satisfied with the level of service they receive. It should be ensured that passengers with disabilities are adequately covered by customer service surveys and other customer service monitoring programs. Specific surveys for passengers with disabilities can be initiated, but it is also necessary to ensure that demographic information collected for mainstream surveys can be analysed along disability lines.

7.6 How to audit Public Transport service provision?

In order to ensure that the current customer service reflects good practice, it will help to perform an audit which will:

• consider the environment in which services are being provided and the barriers to passengers with disabilities;

• consider how enhancing the services might help to overcome those barriers, for example, by providing additional passenger assistance or training staff in new skills;

• review customer service standards to ensure that they reflect the needs of passengers with disabilities and draw up proposals for meeting those needs if they are currently not met;

• update customer service standards and procedures where necessary;

• measure the numbers of passengers with disabilities who are using the services and review this figure regularly; and

• ensure that staff are trained in the new standards and procedures and that senior management give out a consistent and clear message to the entire workforce that passengers with disabilities are as important as all other passengers.
Summary of Recommended Guidelines – Customer Relations

1. Public transport operators should, where relevant, keep customers informed of their accessibility investment plans;

2. Public transport operators need to provide appropriate customer service aimed at alleviating barriers currently encountered by people with disabilities.

3. Regular and accessible customer consultation mechanisms should be used by the public transport operators in order to establish an effective communication with passengers with disabilities;

4. Public Transport Operators need to continue to monitor the quality of their service delivery to people with disabilities.

Where should operators go next?


- For guidance on providing quality service as a public service body, see the Principles of Quality Customer Service for Customers and Clients of the Public Service, <http://www.bettergov.ie/index.asp?docID=120>.

- For information on entitlements and benefits for people with disabilities (including the Free Travel Pass): <http://www.oasis.gov.ie>.

- In the USA, the Easter Seals Project ACTION have developed a Transit Operators Pocket Guide: <http://projectaction.easterseals.com>.
Chapter 8 - Disability Awareness Training

8.1 Introduction
It is important that staff understand the needs of passengers with disabilities and are able to respond to them appropriately. One of the most effective ways of ensuring that staff learn about people with disabilities and their needs, and how to improve the industry’s employment record on disability, is to implement a programme of disability awareness training. Many operators have implemented training programmes and already have in-house guidelines for Disability Awareness Training.

8.2 Who should be trained?
All staff need training in disability issues including, but not limited to, drivers, mechanics, board members, cleaning staff, managers, designers and frontline/customer-facing staff. Everybody in the operator’s organisation should understand the needs of passengers with disabilities as they relate to their own jobs in order that individual members of staff can provide good quality, appropriate and respectful service to passengers with disabilities. Staff who have been trained on disability issues will also be better prepared to work alongside people with disabilities within an organisation.

8.3 What training should be provided?
The range of issues that needs to be covered in training can be considered as follows:

- The business case - including financial and marketing issues;
- The law - employment and customer service;
- Challenging stereotypes and assumptions;
- Relating to people with disabilities - language, etiquette;
- Working with people with disabilities - practical skills and use of equipment;
- Inclusive working - removing barriers in practices, policies and procedures;
- Inclusive design - removing barriers in the physical environment; and
- Inclusive information - removing barriers in communication and information provision.

The NDA is currently preparing Guidelines on Equality/Disability Training. When finalised, these Guidelines will assist trainers and purchasers by providing information on the content, delivery and follow up required to facilitate effective organisational development. These Guidelines will fit into the broader equality agenda and assist with diversity management.
Not all staff need the same training. It is necessary to provide the right sort of training to staff consistent with their functions within the organisation. Senior managers will need to know more about the law, the business case, and how to develop organisational systems and policies that will enable good employment practice and ensure quality customer service to passengers with disabilities.

Staff who work directly with passengers will need to understand the more practical aspects of disability, for example: how to guide a person with a vision impairment or how to use a particular piece of equipment. They will also need to know when it is appropriate to respond with flexibility to issues that passengers with disabilities may experience. Designers will need to understand the principles of inclusive design in whatever field they are working, for example, architecture, vehicle design, information technology and so on.

The following table provides an overview of the minimum requirements for different staff roles and levels. This table should be used as a guide only.
## Staff Training Requirements

<table>
<thead>
<tr>
<th>Staff role/level</th>
<th>The business case</th>
<th>The law</th>
<th>Challenging stereotypes</th>
<th>Relating to people with disabilities</th>
<th>Working with people with disabilities</th>
<th>Removing barriers -- practices etc</th>
<th>Removing barriers -- physical</th>
<th>Removing barriers -- information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior management</td>
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<td>✓</td>
<td>✓</td>
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<tr>
<td>Human Resources</td>
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<tr>
<td>Non-customer-facing operational staff</td>
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</tr>
<tr>
<td>Customer-facing operational staff</td>
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<tr>
<td>Designers/architects/architects/engineers</td>
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<tr>
<td>Property managers/Maintenance staff</td>
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<tr>
<td>Marketing/customer service</td>
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<tr>
<td>Occupational health</td>
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</tr>
</tbody>
</table>
8.4 How should the training be provided?

Disability awareness training should form part of an integrated training programme. It does not have to be delivered in the classroom. Depending on the nature of the training and on-the-job demands of the staff being trained, on-the-job training, distance learning, briefings, workshops, or project based learning can all be used to good effect. Senior managers may find a briefing on the business case for accessibility, for instance, the most acceptable way to receive the information. Training in the use of equipment for frontline/customer-facing staff is better delivered in the working environment, perhaps as part of a wider programme of training. General disability awareness training has also been successfully delivered via distance learning courses.

When it comes to who delivers the training, there are similar choices to be made to the choices that need to be made for other training courses. Using in-house staff ensures that trainers understand the operator’s specific business issues and the nature of the business. However, in-house staff may lack the expertise and the experience to deliver truly effective training. Using people with disabilities as trainers to deliver training face-to-face provides a role model for the staff who are receiving training, and helps to accelerate changing attitudes and behaviours.

In addition, there should be some consideration of the pace of the delivery of the training programme, so that staff can be trained within a reasonable period of time. The pace and resources of the training programme should reflect the size of the operator’s organisation. For large operators, it is more appropriate to measure progress in this area as a percentage of staff trained rather than absolute numbers of staff trained.

There are a number of important things to bear in mind with disability awareness training:

- Training should be equality orientated, focusing on the fact that the custom of passengers with disabilities is as valuable as that of all other passengers and that they must be afforded the same right to travel.
- It is essential to involve people with disabilities in the design of the training.
- Trainers should have a good track record of delivering effective training.
- If the trainers are not people with disabilities, it should be ensured that they have worked extensively alongside people with disabilities, or have been trained by appropriate registered organisations specifically to deliver the training.
- The views and experiences of people with disabilities should be heard in the training, however that training is delivered. Courses, for example, could include video footage...
of people with disabilities discussing their experiences. In printed training material, case studies of people with disabilities and their experiences could be included.

- Nominated trainers should have some understanding of how the transport industry operates and the pressures involved. It may be helpful to arrange for them to speak with drivers and customer service staff while designing the course.

- The training event itself should reflect the principles of good access. Training should be held in accessible venues. Delegates should be asked about their own access needs, and those needs should be met. Failure to do this sends out a message that disability is not really considered to be important. It will be necessary to review all existing training courses to ensure that good access principles are adhered to.

8.5 When do people need training?

The most appropriate times to provide training to staff are:

- at induction;

- on an ongoing basis, for example, three to five yearly refresher courses as part of an integrated programme;

- when there are any significant changes in service practice, and;

- when staff change their role and require different skills (see table above).

If disability awareness training to staff has not previously been provided, or there is uncertainty as to the quality of the training that has been provided, it will be necessary to establish a programme that ensures all staff receive disability awareness training over a specific period.
Summary of Recommended Guidelines – Disability Awareness Training

1. Public transport operators should provide staff members with relevant training to ensure that staff understand the needs of passengers with disabilities and are able to respond to them effectively in relation to their own jobs.

2. Public transport operators should implement disability awareness training at a reasonable pace, as part of an integrated training programme and delivered by experienced trainers who have a good track record in disability awareness training.

3. Public transport operators should regularly monitor the effectiveness of the training.

Where should operators go next?


- FÁS provides a list of registered trainers on a National Register of Trainers Search Engine at: <http://jobbank.fas.ie/ntr/appSearch.jsp>.

- The Irish Wheelchair Association (IWA), in association with the National Association for the Blind of Ireland (NCBI) and the National Association for Deaf People (NAD) provides disability awareness training. For more information contact the IWA, 045 861 346.

- A recent publication by ECMT and UITP entitled Improving Access to Public Transport (in E-book PDF Format) refers to (page 45) a supplementary report on Good Practice for Staff Training which is "currently under preparation" by the ECMT - UITP Task Force (November 2004). This should be available towards the end of 2005 on the ECMT website <http://www1.oecd.org/cem/index.htm>.
Chapter 9 - Disruption and Emergency

9.1 Introduction

Public transport operators need to have plans and procedures in place to prepare for and deal with disruptions and emergencies which may occur in the course of providing transport services.

Disruptions can be defined as events which interrupt the normal course of services, for example: an unplanned disruption could be a service disruption caused by a bus breakdown, or a planned disruption could be the closure of an escalator or lift for maintenance reasons.

Emergencies are more serious as they can be defined as unforeseen circumstances which result in the requirement of immediate action. Examples could include a fire or serious fault on board a vehicle, or a bomb threat.

Transport operators will also have to comply with a number of statutory obligations, such as Fire Regulations and Health and Safety Regulations. For more information see also the "Where should operators go next" section at the end of this Chapter.

9.2 Development of plans and procedures

In order to deal with disruptions and emergencies, it is necessary first to prepare and develop appropriate disruption plans and emergency plans. Existing plans should be reviewed periodically and should be assessed to ensure that the needs of passengers with disabilities are identified and catered for.

The more prepared a business is for these events the better able staff will be to deal with situations as and when they arise. Furthermore, if these plans and procedures are implemented correctly they will also reduce the number of complaints received from passengers. Passenger frustration is often strongly related to not knowing what is going on, rather than to the actual disruption itself.

Dealing with disruptions which are likely to arise on a more frequent basis requires simple and effective procedures to enable staff to communicate with passengers. Public transport operators and service providers need to ensure that this is done in a way that all passengers, including passengers with disabilities, can understand.
There are two essential components when preparing these procedures:

1) **Provide information on the disruption at the earliest opportunity**
   Providing information at the earliest opportunity allows people to make alternative arrangements. Advance warning of planned disruptions is a minimum requirement. For unplanned disruptions, providing people with the information before they purchase tickets, for example, is much better than after they have purchased tickets. Providing information on disruptions before people leave home is best and this can be done in a number of ways (radio, website, text (SMS) messaging).

   Disruptions during the journey, i.e. when passengers are on board the vehicle, should also be communicated to passengers, as this will allow passengers to make alternative arrangements perhaps by informing people waiting for them at the end of the journey. The way in which this information is given should reflect the information needs of different people.

2) **Provide relevant information**
   Providing relevant information is important. If a bus has broken down, passengers should be informed whether a replacement bus will be provided. If a station lift is out of service, passengers should be informed which alternative station to use.

Plans and procedures for dealing with disruption should be communicated to staff and included in staff training programmes.

Planning for emergencies, which should be less frequent, is still a significant exercise and will involve identifying possible emergencies that may occur and designing plans and procedures to deal with them. Emergencies will often require the evacuation, or part evacuation of a building or vehicle and, as such, much more consideration is needed on how all passengers, including those with disabilities, can evacuate to an appropriate place of safety. Obviously, the more accessible a building is the more easily it can be evacuated during emergencies.

### 9.3 Assessing, Auditing and Testing

Plans and procedures should be subjected to assessment and auditing as well as actual practical testing of procedures. It is important that public transport operators and service providers ensure that they cater for the requirements of all their passengers and there is a strong argument for involving people with disabilities in the auditing and testing of the
plans and procedures. Additionally, professional accessibility experts should be employed as they will be able to assess against a wide range of accessibility parameters and different types of impairments which non-expert auditors, even people with disabilities, may not be able to do.

Summary of Recommended Guidelines – Disruption and Emergency

1. Public transport operators should ensure that the needs of passengers with disabilities are identified and catered for in the event of disruptions and emergencies.

2. Public transport operators should ensure that plans and procedures for dealing with disruptions and emergencies are subjected to regular testing and review and are included in the training provided to staff.

Where should operators go next?

General information:


Regulations:

- The Department of the Environment, Heritage and Local Government has produced a number of documents on fire safety to assist persons in charge of premises to discharge their duties under the Fire Services Act, 1981. Most of these documents are available from their website: <http://www.environ.ie>, the Fire Services Publications: area of the website.

- The Health and Safety Authority (HSA) is the national body in Ireland with responsibility for securing health and safety at work. The HSA has a wide range of publications available to download on <http://www.hsa.ie/>
List of Useful Contacts

National Disability Authority
25 Clyde Road,
Dublin 4,
Phone: 01 608 0400
Email: standards@nda.ie
Web: http://www.nda.ie

National Disability Authority Library
Phone: (01) 608 0433
Email: library@nda.ie

Department of Transport
Transport House,
Kildare St.,
Dublin 2,
Phone: 01 670 7444
Lo Call: 1890 443 311
Email: info@transport.ie
Web: http://www.transport.ie

Equality Authority
Clonmel St,
Dublin 2,
Phone: 01 417 3333
Lo Call: 1890 245 545
Email: info@equality.ie
Web: http://www.equality.ie

National Council for Ageing and Older People (NCAOP)
22 Clanwilliam Square,
Grand Canal Quay,
Dublin 2.
Phone: 01 676 6484
Email: info@ncaop.ie
Web: http://www.ncaop.ie

European Conference of Ministers of Transport
Web: http://www1.oecd.org/cem

European Local Transport Information Service
Web: http://www.eltis.org

COST - European Cooperation in the field of Scientific and Technical Research
Web: http://www.cordis.lu/cost-transport/home.html

Umbrella and Representative Groups for and of people with disabilities in Ireland:

People with Disabilities in Ireland (PWDI)
People with Disabilities in Ireland
4th Floor Jervis House
Jervis Street
Dublin 1
Phone: 01 872 1744
Email: info@pwdi.ie

Disability Federation of Ireland (DFI)
Fumbally Court,
Fumbally Lane, Dublin 8.
Phone: 01 454 7978
Email: info@disability-federation.ie
Web: http://www.disability-federation.ie

Forum of People with Disabilities
21 Hill Street,
Dublin 1.
Phone: 01 878 6177
Email: inforum@indigo.ie
Web: www.inforum.ie
| **National Federation of Voluntary Bodies**  
Oranmore Business Park,  
Oranmore, Galway.  
Phone: 091 792316  
Email: secretariat@fedvol.ie  
Web: http://www.fed-vol.com |
|----------------------------------|
| **namhi (National Association for People with an Intellectual Disability)**  
5 Fitzwilliam Place,  
Dublin 2.  
Phone: 01 676 6035  
Email: info@namhi.ie  
Web: http://www.namhi.ie |
| **National Parents and Siblings Alliance (NPSA)**  
31 Magenta Hall,  
Santry, Dublin 9.  
Phone: 01 842 1267  
Email: npsa@eircom.net |
| **Not for Profit Business Association**  
Unit G9 Calmount Park,  
Ballymount, Dublin 12.  
Phone: 01 429 3614  
Email: clodagh@fumbally.com |
| **Irish Wheelchair Association (IWA)**  
Áras Chúchulainn,  
Blackheath Drive,  
Clontarf, Dublin 3.  
Phone: 01 818 6400  
Email: info@iwa.ie  
Web: http://www.iwa.ie |
| **National Association for Deaf People (NAD)**  
35 North Frederick Street,  
Dublin 1.  
Phone: 01 872 3800  
Email: nad@iol.ie  
Web: http://www.nadp.ie |
| **Irish Deaf Society (IDS)**  
30 Blessington St.,  
Dublin 7.  
Minicom: (01) 860 1910  
Phone: (01) 860 1878  
Email: info@irishdeafsociety.ie  
Web: http://www.irishdeafsociety.ie |
| **National Council for the Blind of Ireland (NCBI)**  
Whitworth Road,  
Drumcondra, Dublin 9.  
Phone: 01 830 7033  
Email: info@ncbi.ie  
Web: http://www.ncbi.ie |
| **Irish Guide Dogs for the Blind**  
National Headquarters and Training Centre,  
Model Farm Road, Cork.  
Phone: 021 4878 200 or  
Lo Call: 1850 506 300  
Email: info@guidedogs.ie  
Web: http://www.guidedogs.ie |
| **Mental Health Ireland**  
6 Adelaide Street,  
Dun Laoghaire,  
Co. Dublin.  
Phone: 01 284 1166  
Email: info@mentalhealthireland.ie  
Web: http://www.mentalhealthireland.ie |
Appendix 1 – Terminology

Reference 1 The term, "people with disabilities", used in this document corresponds to the term, "people with mobility and sensory impairments", as used by the Department of Transport which refers to "people with physical, sensory, learning and cognitive difficulties (whether permanent or temporary) and others whose access to traditional public transport services and infrastructure is constrained on account of age, because of accompanying children, because they are carrying luggage or shopping etc."

(Department of Transport, 2004, Outline Sectoral Plan under the Disability Bill, 2004.).

Reference 2 "The Department’s objective with regard to Transport Accessibility is: That all passenger transport providers should provide the highest possible degree of accessibility, subject to available resources and competing priorities and rules of practicality. The obligations arising from this objective will apply to all providers of public transport services, both public and private." (Department of Transport (2004), Outline Sectoral Plan under the Disability Bill 2004, Dublin: Government Publications).


"19 Each Government Department will ensure that reasonable steps are taken to make its services and those of agencies under its remit accessible to people with disabilities. To facilitate effective action and acceptable standards in this regard, the NDA will issue guidelines in accordance with international norms and will award an accessibility symbol to compliant public offices. Government Departments and agencies will take all reasonable action to qualify within five years."


Reference 5 Cleanliness is of particular importance to people with disabilities because they have to touch more things than other people do, as they need extra support and guidance. People with vision impairments cannot see whether what they are touching for guidance is clean or dirty.

Reference 6 See the "Where should operators go next?" in Chapter 7 for a reference to the Principles of Quality Customer Service for Customers and Clients of the Public
Service, developed as part of the Strategic Management Initiative. The Strategic Management Initiative (SMI) was launched in 1994 with the stated objective of presenting public service management with an opportunity to make a substantial contribution to national development, through the provision of services to the public which were both excellent in quality and effective in delivery. In 1996, Delivering Better Government (DBG) expanded on the framework set out in SMI and presented a vision for the civil service built around six key organisational themes. These included a greater openness and accountability, a mission of quality customer service, and the efficient and fair operation of simplified regulations.
Appendix 2 – Main references


European Conference of Ministers of Transport (ECMT) (1999), *Charter on access to transport services and infrastructure*, <http://www1.oecd.org/cem/topics/handicaps>


Legislation


- Equal Status Act, 2000/2004, see also <http://www.equality.ie>


- Safety, Health and Welfare at Work Act, 1989 and the subsequent General Application Regulations 1993, as amended, see also <http://www.hsa.ie>