

Guidelines for Accessible Maritime Passenger Transport



Department of Transport
An Roinn Iompair



nDA

Foreword

We are very happy to present these **Guidelines for Accessible Maritime Passenger Transport**, which we believe, will make a valuable contribution towards the provision of better maritime passenger transport services for passengers with reduced mobility. The commitment of the Government to making Ireland a better place to live for people with disabilities or mobility impairments is given a statutory basis in the Disability Act 2005.

Transport for All is the Department of Transport's plan for improving access to transport services in Ireland. The Maritime Passenger Transport Forum is made up of representatives from government departments, from the National Disability Authority, from organisations representing people with disabilities, and from port authorities and vessel operators. The Forum is charged with monitoring, advising on and contributing to proposals for access improvements in the maritime passenger transport sector. The **Guidelines** presented here have been drawn up in response to a recommendation of the Forum and are built on the Transport for All principle that focuses on a whole journey approach.

These **Guidelines** represent a significant step forward towards ensuring that maritime passenger transport services are accessible to all. They contain a range of practical advice and information and are designed as a key support to all those involved in providing maritime passenger transport services, including passenger vessel owners and operators, port operators and local authorities, as well as government departments with a statutory remit in relation to maritime passenger transport services.

Guidelines for Accessible Maritime Passenger Transport

The advice given covers all aspects of a journey, including advice on providing accessible information for planning the journey, on improving access on board vessels, on making shore side facilities accessible, on disability awareness training for staff and on improving communications with passengers.

Maritime passenger transport services link Ireland to neighbouring countries and provide regular services to the offshore islands, both for local people and visitors. They play an important role in the promotion of tourism and appreciation of our cultural life through maritime excursions and trips. These guidelines are intended to enhance the sustainability of this key sector and assist in opening it up for many more people to enjoy.



Noel Dempsey, T.D.
Minister for Transport



Siobhan Barron
Director, NDA

Preface

Who are these Guidelines for?

The purpose of these **Guidelines** is to assist and support maritime passenger transport operators in Ireland to make their services more accessible to passengers with reduced mobility. The primary intended audience for this document consists of the owners, operators, management, crew and staff of:

- International passenger vessels operating to and from Ireland
- Domestic passenger vessels operating in Ireland
- Port and terminal facilities handling passenger services
- Harbours, piers and other places for getting on or off passenger vessels

People who need accessible maritime passenger transport services, especially passengers with reduced mobility, may also find the **Guidelines** helpful when planning maritime journeys. Other stakeholders, such as local authorities, tourism development agencies and relevant government departments may also find these **Guidelines** of use.

What do the Guidelines cover?

The **Guidelines** in this document provide advice and information on best practice. They are intended to help maritime passenger transport operators provide comprehensive and readily usable services to passengers with reduced mobility. A person with reduced mobility is someone whose access to traditionally constructed transport vehicles is limited because

of physical, sensory, learning or cognitive difficulties (whether permanent or temporary). Other people who come into this category are those whose access is limited because they are elderly or because they are travelling with small children, or have a lot of luggage or shopping bags. The terms 'passenger with reduced mobility' and 'person with reduced mobility' are used throughout this document to refer to all such people.

How to use this document?

This document is structured in two parts.

Part One, Background Information (chapters 1-3) explains why we need to improve accessibility, describes the current barriers to accessibility and sets out the legal context of the supporting framework.

Everybody interested in accessibility of maritime passenger transport should read Part One.

Part Two, Guidelines (chapters 4-9), has individual chapters that present guidelines for different parts of the maritime passenger transport business, as follows:

Chapter 4 – Information Provision

Chapter 5 – Ports, Harbours and Piers

Chapter 6 – Vessels

Chapter 7 – Customer Relations

Chapter 8 – Disability Equality Training

Chapter 9 – Disruption and Emergency

Readers may choose to focus on the relevant sections of Part Two, depending on their role and responsibilities. The main recommendations are summarised at the end of each chapter. Each of the chapters also contains a 'Where to go next' section that provides information and sources of more specific and detailed guidance that can be used.

The document also contains a number of appendices, one of which is a List of Useful Contacts (see Appendix I) that includes contact details for most of the national disability representative organisations.

Contents

| | |
|--|-----------|
| Foreword | 2 |
| Preface | 4 |
| Who are these Guidelines for? | 4 |
| What do the Guidelines cover? | 4 |
| How to use this document? | 5 |
| | |
| Part 1 Background Information | 11 |
| Chapter 1 Improving Accessibility | 12 |
| 1.1 Why improve access to maritime passenger transport? | 13 |
| 1.2 How can the necessary change be managed? | 15 |
| | |
| Chapter 2 Barriers to Travel | 16 |
| 2.1 Introduction | 17 |
| 2.2 How does the physical environment create barriers? | 20 |
| 2.3 How do policies, procedures and systems create barriers? | 21 |
| 2.4 Barriers in accessing information | 21 |
| 2.5 How do people's attitudes create barriers? | 22 |
| | |
| Chapter 3 The Supporting Framework | 23 |
| 3.1 What legislation applies to accessibility of maritime passenger transport? | 24 |
| 3.2 Legislation relating to passenger vessels | 26 |
| 3.3 The Maritime Passenger Transport Forum | 28 |

| | |
|---|-----------|
| Part 2 Guidelines | 29 |
| Chapter 4 Information Provision | 30 |
| 4.1 Introduction | 31 |
| 4.2 Why does information matter? | 32 |
| 4.3 How should information be provided? | 32 |
| 4.4 Who should provide the information? | 34 |
| 4.5 What information should be provided and when? | 35 |
| 4.6 Where should information be provided? | 37 |
| 4.7 In what formats should information be provided? | 38 |
| 4.8 Websites | 40 |
| 4.9 How can accessibility of information be checked? | 41 |
| 4.10 Summary of Recommended Guidelines – Information | 43 |
| 4.11 Where to go next? | 44 |
| Chapter 5 Ports, Harbours and Piers | 47 |
| 5.1 Introduction | 48 |
| 5.2 How to improve access to ferry ports, harbours and piers? | 49 |
| 5.3 How to audit buildings, ports, harbours and piers for accessibility? | 55 |
| 5.4 Summary of Recommended Guidelines – Buildings, ports, harbours and piers | 57 |
| 5.5 Where to go next? | 58 |
| Chapter 6 Vessels | 60 |
| 6.1 Introduction | 61 |
| 6.2 What makes for good access on a vessel? | 61 |
| 6.3 How operators can review the accessibility of their vessels? | 62 |
| 6.4 How to improve the accessibility of vessels? | 63 |
| 6.5 What is best practice guidance for accessible vessels? | 69 |
| 6.6 How to make sure operating practices are not a barrier? | 69 |

Guidelines for Accessible Maritime Passenger Transport

| | |
|---|-----------|
| 6.7 Summary of Recommended Guidelines – Vessels | 71 |
| 6.8 Where to go next? | 72 |
| Chapter 7 Customer Relations | 75 |
| 7.1 Introduction | 76 |
| 7.2 What approach should be taken? | 76 |
| 7.3 Priorities for communication | 77 |
| 7.4 What about training? | 79 |
| 7.5 How to make sure standards are maintained? | 79 |
| 7.6 How to check maritime passenger transport service provision? | 80 |
| 7.7 Summary of Recommended Guidelines – Customer Relations | 82 |
| 7.8 Where to go next? | 83 |
| Chapter 8 Training | 84 |
| 8.1 Introduction | 85 |
| 8.2 Who should be trained? | 86 |
| 8.3 What training should be provided? | 86 |
| 8.4 How should the training be provided? | 87 |
| 8.5 When do people need training? | 90 |
| 8.6 Summary of Recommended Guidelines – Disability Equality Training | 91 |
| 8.7 Where to go next? | 92 |
| Chapter 9 Disruption and Emergency | 93 |
| 9.1 Introduction | 94 |
| 9.2 Development of plans and procedures for emergencies and disruptions | 95 |
| 9.3 Needs of passengers with reduced mobility during evacuation | 97 |
| 9.4 Assessing, auditing and testing | 98 |
| 9.5 Summary of Recommended Guidelines – Disruption and Emergency | 99 |
| 9.6 Where to go next? | 100 |

| | |
|--|-------------|
| Appendices | I 01 |
| Appendix 1: List of Useful Contacts | I 02 |
| Appendix 2: Main references | I 08 |
| Appendix 3: Legislation | I 11 |
| Appendix 4: Summary Guidelines | I 12 |

Part 1

Background Information

Chapter 1

Improving Accessibility



Improving Accessibility

1.1 Why improve access to maritime passenger transport?

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

All citizens should have equal access to maritime passenger transport services.

Maritime passenger transport can enable access to work, to education and to leisure activities. It is important that persons with reduced mobility can access these facilities in the same way as everybody else.

Improving accessibility is good for business.

Just under 10 per cent of the population has some form of disability (Census 2006). Because of that, services and facilities that are appropriately designed and managed to accommodate everybody, regardless of their ability or disability, can potentially attract an additional 10 per cent of customers.

The profile of passengers (and potential passengers) of maritime transport is changing. The number of passengers with reduced mobility is growing and the proportion of older people in the population is also increasing. These demographic changes will

require improvement in the accessibility of maritime passenger transport services. Such improvements have the potential to attract passengers who would not previously have considered using maritime transport. Existing passengers, who may or may not have disabilities, will be encouraged to make more trips by maritime transport as it becomes easier to use.

Transport operators must not discriminate against anybody on grounds of their disability (under the **Equal Status Acts 2000 – 2004**).

In its **Sectoral Plan** drawn up under the **Disability Act 2005** (last reviewed in 2008), the Department of Transport has stated that obligations to do with accessibility provision ‘will apply to all operators of public transport services, both public and private’. **The Sectoral Plan** highlights the benefits available to many travellers (not just passengers with reduced mobility) from appropriately designed accessible services. The Department’s objective is ‘that all passenger transport operators must provide the highest possible degree of accessibility, taking into account the availability of resources, the constraints created by competing priorities and the rules of practicality’. **The Sectoral Plan** explains the ‘Transport for All’ concept as follows:

‘The benefits of improved transport accessibility extend to all transport users, even to the most able-bodied, and issues relating to transport accessibility go far beyond the needs of passengers with reduced mobility. They impact on the transport needs of the entire population because most people, at some point in their lives, are likely to acquire a physical or other impairment or be impeded in some manner, that will make travelling difficult, if not impossible, on what one might call ‘traditional’ type transport vehicles. This is particularly the case as people advance through the ageing process. It is also the case that there is a high correlation between age and disability.’

1.2 How can the necessary change be managed?

Improving access to maritime passenger transport for persons with reduced mobility requires change, and this presents challenges that need to be managed. These challenges can be addressed by:

- Having a clear and shared vision across all staff
- Having visible and effective leadership
- Developing relationships with and consulting persons with reduced mobility and their representative organisations
- Providing relevant training for staff and management
- Carrying out formal access audits of vessels and onshore facilities
- Communicating with staff and passengers about the programme of changes
- Preparing detailed plans for improving accessibility
- Implementing accessibility improvements and monitoring progress

Chapter 2

Barriers to Travel



Barriers to Travel

2.1 Introduction

When persons with reduced mobility make a journey they have the same expectations as other people. They expect to be able to leave their house, get to the terminal or embarkation point, board the vessel, travel in safety and comfort, disembark from the vessel and get to their destination without any difficulties. Passengers with reduced mobility, 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 some passengers will choose an alternative method of travel (where available) or might not travel at all.

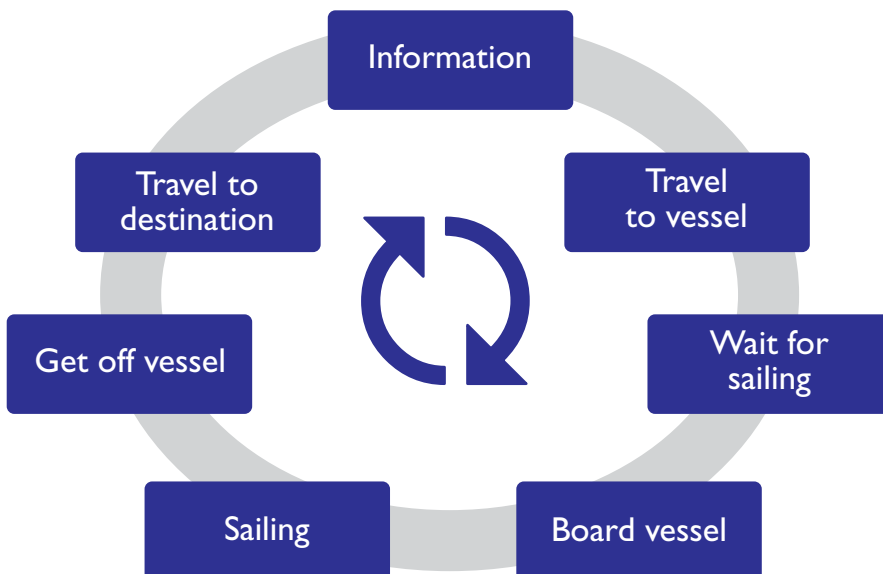


Figure 2.1: travel chain diagram showing various stages of a journey by vessel.

If a person using or attempting to use maritime transport has a bad experience, it may undermine their confidence in maritime transport. The person may assume that they cannot rely on maritime transport to meet their travel needs, and the absence of a reliable transport service could lead to restrictions in their quality of life.

Barriers in the maritime transport system can prevent passengers with reduced mobility from using maritime passenger transport services. Different barriers affect passengers with particular disabilities in different ways – some examples are outlined here:

- A flight of stairs or steps are a barrier to a wheelchair user. They may also present a difficulty to someone with a vision impairment, but this difficulty can be reduced if the staircase has well designed handrails, appropriate tactile warnings and colour or tonal contrasts
- Visual information such as a safety information card or emergency exit sign with no audible alternative might present a person with a vision impairment with serious difficulty
- Boarding calls or other announcements made over a public address system may be a problem for passengers who are Deaf or hard of hearing and for 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 some passengers with a vision impairment because it can make their residual vision less effective
- Poor signage, especially signage without appropriate pictograms, can be a barrier for people with an intellectual disability

Guidelines for Accessible Maritime Passenger Transport

- If a terminal building has a confusing layout, passengers may end up walking farther than they need to, and this could be a problem for those with walking difficulties. A confusing layout might also pose problems for those with an intellectual disability, who might lose their way; and for those with vision impairments who might not be able to follow visual clues or signage

For persons with reduced mobility, barriers to travel fall into the following four categories:

| | |
|----------|--|
| 1 | Physical barriers |
| 2 | Barriers created by policies, procedures and systems |
| 3 | Barriers in accessing information |
| 4 | Barriers caused by management, staff or customer attitudes |

2.2 How does the physical environment create barriers?

Physical barriers include:

- Steps and stairs
- Narrow doors
- Heavy doors
- High customer service desks
- Steep or narrow gangways

There are also less obvious barriers, such as:

- Confusing terminal layout
- Inadequate lighting
- Lack of seating
- Poor colour or tonal contrast
- Inadequate signage

The needs of passengers with reduced mobility should be considered by those who are responsible for acquiring new vessels or for building port facilities. This will ensure that new facilities are accessible for all customers, including older people, parents with young children and passengers with heavy luggage. When sourcing a new vessel, or designing a new terminal building, there is an ideal opportunity to address accessibility at reasonable cost. Accessibility features can often be integrated into the original design in a way that improves the travelling experience for all passengers. Failure to take this opportunity during the design stage can result in substantial costs to retrofit accessibility features at a later stage.

2.3 How do policies, procedures and systems create barriers?

Policies, procedures and systems can create barriers to passengers with reduced mobility in the maritime transport environment.

For example, in order to minimise boarding times and reduce staffing levels, an operator might require passengers to buy their tickets at a ticket office before they board a vessel. If the ticket office is up or down a few steps or if the ticket counter is too high for a wheelchair user to be seen, then the requirement to buy a ticket before boarding will create a difficulty for wheelchair users. The effect of this barrier can be lessened if staff are flexible and understand that certain passengers might not be able to buy tickets in advance. An online booking facility may also be helpful as an alternative sales channel for customers who have Internet access. Quality customer service policies, procedures and systems can help to compensate for poor access in the physical environment (as interim measures), until changes can be made in the physical environment.

2.4 Barriers in accessing information

Information for customers (including advertising, timetables, ticketing details, safety information and so on) needs to be accurate, consistent and accessible to all. Issues relating to the adequacy, availability and formatting of information, text size and colour, and the type of paper used should be addressed to ensure that the needs of all passengers are met. Websites can be imaginatively designed so that they can be used successfully

by people who are blind or have impaired vision and who use screen-reading technology.

2.5 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 some people who believe that passengers with reduced mobility should not be using mainstream transport by themselves – or that they should be using some other form of specialised transport. There are also people who assume incorrectly that a person with an obvious disability is not responsible for his or her own affairs and will deal with the disabled person's helper or partner instead.

Staff can be educated to understand more about the barriers faced by passengers with reduced mobility. Strong leadership and staff training should help to overcome these barriers.

Chapter 3

The Supporting Framework



The Supporting Framework

3.1 What legislation applies to accessibility of maritime passenger transport?

Following the launch of the Government's National Disability Strategy in September 2004, the Minister for Transport issued the **Sectoral Plan of the Department of Transport**, as required by the **Disability Act 2005**. In this plan, which was updated in 2008, 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 stresses that the benefits of improved transport accessibility extend to all transport passengers. The **Sectoral Plan** also notes that it is inevitable that some people, because of the severity or nature of their disabilities, will not be able to be accommodated on all transport services. In such cases, every effort must be made to pre-inform intending passengers of the limitations of accessibility and to provide a service to as many passengers with reduced mobility as possible.

The **Disability Act 2005** also places certain obligations on public bodies to ensure accessibility of buildings, services and information:

- Section 25 of the Act requires public bodies to ensure that public buildings comply with the Part M building regulations by 2015
- Section 26 of the Act requires public bodies to appoint an Access Officer, and to 'ensure that the provision of access to the service by persons with and persons without disabilities is integrated'
- Section 27 of the Act requires public bodies to ensure that goods or services supplied to those bodies are accessible to people with disabilities
- Section 28 of the Act requires public bodies to ensure that information provided to people with sensory or cognitive disabilities is made available in alternative formats on request

The **Equal Status Acts 2000 – 2004** make it illegal to discriminate on the grounds of gender, marital status, family status, sexual orientation, religion, age, disability, race or membership of the traveller community when providing goods or services to the public. Guidance from the Equality Authority states that:

'... a person selling goods or providing services must do all that is reasonable to accommodate the needs of a person with a disability. This involves providing special treatment or facilities in circumstances where without these, it would be impossible or unduly difficult to avail of the services.'

3.2 Legislation relating to passenger vessels

There are a number of existing legislative and non-legislative measures relating to the accessibility of passenger vessels.

Existing legislation for passenger vessels engaged on international voyages

Irrespective of whether they are registered in Ireland or elsewhere, vessels engaged in international voyages are governed by international agreements. These include recommendations on the design and operation of passenger vessels in response to the needs of elderly and disabled persons as set out in the International Maritime Organisation's (IMO) Circular MSC/735 of 24/06/1996.

Existing legislation for domestic passenger vessels

Safety rules and standards for domestic passenger vessels are governed by EU Directive 98/18/EC as amended by 2003/24/EC. This Directive has been transposed into Irish law by Statutory Instrument No. 716 of 2004. The Directive, which is aimed at certain categories of domestic passenger vessels not engaged on international voyages, establishes standards of a general nature to assist passengers with reduced mobility. For categories of domestic passenger vessels not covered by the Directive, the Marine Survey Office seeks voluntary compliance with the Directive during the construction of such vessels.

Proposed new legislation

1. EU proposals on the rights of maritime passengers

Arising from an examination of the rights of international maritime passengers, including passengers with reduced mobility,

the European Commission has acknowledged the limitations in the existing directive (EU Directive 2003/24/EC) on safety rules and standards for passenger vessels. A proposed Regulation to strengthen passenger rights in the area of maritime transport, including the rights of persons with reduced mobility, is under discussion at EU level.

The proposed Regulation proposes to give maritime passengers similar rights to those that air and rail passengers already have under EU law. The aim of this is to improve the attractiveness of maritime transport and public confidence in it, as well as to achieve a level playing field for maritime transport carriers from different member states and between maritime transport and other modes of transport. The proposal covers maritime and inland waterway commercial passenger services, both domestic and international, and makes provision for the following:

- Accessibility, non-discrimination and assistance to disabled persons and persons with reduced mobility
- Obligations on carriers in the event of cancellation or delay
- Obligations on carriers to inform passengers of their rights
- Handling of complaints
- Enforcement

2. National legislation proposals in relation to accessibility of passenger vessels

As previously mentioned, compliance with accessibility requirements is voluntary in relation to certain domestic passenger vessels. However, if the voluntary approach is not seen to be working, proposed new legislation published in May 2009 will give the Minister for Transport power to introduce regulations to cover standards or requirements designed to improve the accessibility of pre-journey information, the provision of lifts, steps and stairs, safety announcements, signage and so on.

3.3 The Maritime Passenger Transport Forum

The Maritime Passenger Transport Forum was established in 2006 to oversee the implementation and review of the Maritime section of the **Sectoral Plan** of the Department of Transport. The Forum comprises representatives from disability organisations, passenger ship companies, port services providers, relevant government departments and the National Disability Authority. The Forum's report (published in 2008, available on the Department of Transport website <http://www.transport.ie>) gives an overview of the work of the Maritime Passenger Transport Forum since its establishment. The report includes:

- Information on work undertaken on behalf of the Forum relating to the current levels of access to a sample number of domestic passenger vessels that underwent access audits
- Information on work planned and undertaken by the four international ports on accessibility improvement projects
- Recommendations on ways of improving accessibility in the maritime passenger transport sector

The Department of Transport, acting on a recommendation of the Forum, has provided a number of disability awareness training courses for ship operators and crews around the country and is progressing work on the other recommendations of the Forum, including these Guidelines and access audits for passenger vessels.

Part 2

Guidelines

Chapter 4

Information Provision



Information Provision



4.1 Introduction

Clear, concise, accurate and timely information is crucial to people making journeys on all transport modes including maritime passenger transport. For passengers with reduced mobility, quality information can be the difference between being able to make a journey or not.

Information on the transport environment can be divided into three levels:

- Level 1 information, such as urgent safety information or immediate boat or vessel departures
- Level 2 information, such as general timetable information, information about how to make a complaint and general safety information
- Level 3 information, such as advertising

It is important that these three levels of information are clearly distinguished. Essential information, particularly safety instructions, should be easy to find, and should not be obscured by advertising.

4.2 Why does information matter?

Accessible information that enables passengers, including those with reduced mobility, to make journeys safely and successfully can build confidence in the maritime passenger transport system. Accurate and detailed information enables independent travel and reduces reliance on staff and on other passengers. It also increases passengers' safety by reducing the risk of incidents occurring, such as passengers straying into hazardous work areas on ship or ashore. Where a transport service is not fully accessible, it is important that passengers understand the limitations of accessibility before making the journey. Operators should let passengers know the extent of the accessibility of the service they provide.

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. However, a person with a vision impairment may not benefit from these visual clues and will need to depend solely on the announcement. People who are Deaf or hard of hearing will need visual clues instead of the audible announcement. If the announcement is unclear or not given, this can cause confusion or disruption such as a missed boarding or missed connection.

4.3 How should information be provided?

The design of new information sources (such as a new timetable leaflet or website) provides a great opportunity to ensure information is accessible to all at minimal cost. The design brief should specify requirements around the style, content and formatting of information to maximise accessibility.

Clear information

Clear information is information that is legible and easily understood. Information for passengers should be written in plain English. The National Adult Literacy Agency (NALA) provides guidelines on its website on plain English writing. These guidelines include using short sentences and everyday language and avoiding the use of jargon.



Although commercial advertising can be an important source of revenue, advertising that is too prominent or intrusive can distract passengers who are relying on clear visual information when making their journey. If background information is given equal weight to immediate information, the latter (including timetable changes or disruption notices) may not be sufficiently clear and understandable. All passengers will enjoy the benefits of clearly presented information.

Concise information

Information should be complete but concise and to the point. Too much information is difficult for people to retain. The use of standard symbols can help passengers to quickly find key facilities such as bathrooms and emergency exits.

Accurate and consistent information

All information provided should be accurate and consistent. Information that is not accurate can cause confusion and even distress. Conflicting information can add to passenger stress, particularly if journeys are delayed. Consistent use of terminology or pictograms will help to communicate effectively with all passengers.

Timely and accurate

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 passengers with reduced mobility would like to have information about their intended journey well in advance. Where, for example, a lift or a toilet is out of service, passengers with reduced mobility need to be informed promptly about alternative options.

4.4 Who should provide the information?

It is not practical to expect that 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 reduced mobility where to get the information they need, or find another staff member who can help. In addition, all relevant staff should know how to provide information to passengers with reduced mobility. Training can greatly help to ensure that staff understand the needs of passengers with reduced mobility and can provide whatever information those passengers need.

An operator should have policies and procedures in place to ensure that essential information is available on demand in the most popular formats and media, and that all other information is available on request in alternative formats. Some formats of information (such as large print) can easily be produced on demand. Other formats, such as Braille or 'easy-to-read' formats require considerable preparation and lead time.

There is a legal requirement to ensure that all passengers are informed about safety provisions and procedures. Operators must ensure that safety information is communicated to all passengers, including those with vision or hearing impairments.

4.5 What information should be provided and when?



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

- Before the journey
- At the ferry terminal, port, harbour or pier
- On the vessel
- On arrival at the destination

The information that should be provided at each of these stages is as follows:

Before the journey

- Advertising
- Easy to use journey planner
- Timetable information – routes, times and so on
- Information on connections with other modes of transport (including rail, light rail, bus, taxi and hackneys)
- Information on requirements such as ticket purchase, fares, making reservations, booking seats, and so on
- Information about any limitation for concession travel users
- Details of the assistance available and how to get that assistance
- Information on accessibility of facilities, services and alternative options
- Facilities available: lifts, seating, services, toilets, shops – both on board the vessel and at the harbour, port or pier
- Information on how to make a complaint

At the ferry terminal, port, harbour or pier

- 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 / kiosks
- Information on safe boarding, disembarkation and waiting
- Information on the accessibility of the facilities and services available
- Visual and audible information on delays, including how long the delay will be
- Visual and audible instructions on what to do in the event of disruption
- Useful telephone numbers and help line
- Information on how to make a complaint

On the vessel

- Clear external signage showing vessel destination(s)
- Instructions on how to get assistance
- Visual and audible information in advance of arrival at the destination
- Location and details of the facilities on board
- Visual and audible information on delays, including how long the delay will be
- Visual and audible instructions on what to do in the event of an emergency
- Information on how to make a complaint

On arrival at the destination

- Details of connecting services (including rail, light rail, bus, taxi and hackneys)
- Information on how to make a complaint



4.6 Where should information be provided?

Information should be easy to find. Information may be delivered through different mechanisms (such as websites, leaflets, signage and so on) and at different locations such as public counters (with induction loop systems to accommodate hearing aid users), public address systems, queuing systems, telephones and public access terminals. For each mechanism, different accessibility issues may arise. For example, a maritime passenger transport operator needs to ensure that information provided via electronic screens or display boards is also available in other formats to people who have a vision impairment.

Specific information on how to get assistance needs to be available. For example, passengers who have problems standing need to know what seats will be available. It can sometimes be hard for passengers to find detailed information on what facilities will be available.

Making it easy for people to find the required information will encourage more passengers with reduced mobility to use maritime transport services. In providing this information, operators should consider creating clearly identifiable sections on their websites, timetables, brochures and signage dedicated to passengers with reduced mobility. Accessible design and appropriate naming of such sections will ensure that those who most need assistance will be able to find it and receive it. If it is

called ‘assistance for people with disabilities’, some passengers who need it, for example, frail older people, may not think it is for them. On the other hand, some passengers with reduced mobility may not relate to a heading such as ‘special needs’. The best approach may be to give the section a title such as ‘for passengers who need extra assistance’, with an explanation of what that means.

4.7 In what formats should information be provided?

The format in which information is provided is as critical as the information itself. Information should be available in formats that are accessible to all passengers. In many cases this will involve providing the information in an alternative format, such as large print, audio/video (on tape, disk or in electronic format), Braille or ‘easy-to-read’.

It is good practice to ensure that the information provided is in clear print and plain language. For example, producing standard printed documents in a 14 point sans serif font makes them readable to a wide range of people with vision impairments and to people with intellectual disabilities. Many people over 40 years of age need to use reading glasses for smaller font sizes, so this will make documents more convenient for them, too. Text on signs in block capitals (for example, ‘TOILETS’) is difficult to read for many including those with dyslexia. Title case text such as ‘Upper Floor’ or ‘Toilets’ will be more easily understood.

Where operators wish to provide information in more than one language, separate information leaflets in each language are better than a single multi-language leaflet. Clear audible announcements may also be made in each language. The use of pictorial signage is particularly useful as it reduces the need for multiple signs (in different languages) and it can be more

easily understood by passengers including those with learning disabilities.

Operators should consider the need for alternative formats when new leaflets or timetables or other information is being designed:



- For printed documents, people with vision impairments may need large print, Braille or audio alternatives. For large print formats, 18-point font size is often sufficient
- Audio information can be provided on cassette, audio CD, MP3 or podcast formats
- People with intellectual disabilities may find an audio version or an 'easy-to-read' version useful. 'Easy-to-read' versions make the words simpler and use pictures alongside the words. Simple pictures or symbols should be added to information wherever possible as these can help to make information more accessible
- Signage should also include internationally approved pictograms to assist people who find the written word a barrier. This would include people for whom English (or Irish) is not their first language and people with literacy problems
- People who are Deaf or hard of hearing will use visual formats and may also find plain language information and 'easy-to-read' versions helpful

It is reasonably easy to produce information in large print, simply by increasing the font size in a word processing package. It may be necessary to get Braille, audio / video and 'easy-to-read' versions produced by professionals who have experience working in the relevant area. Organisations such as the Citizens Information Board and NCBI (National Council for the Blind in Ireland) provide guidance to operators on producing accessible information. Disability groups and organisations can be

consulted by operators seeking feedback on the accessibility of their information.

It is particularly important that clear and accurate information is provided to alert passengers when they are approaching their destination and at prominent locations at the terminals. This will be achieved by clear audio and visual announcements. Alternative methods of information provision such as videos/ DVDs (with subtitling), clear visual displays, and SMS or Bluetooth services on mobile phones may also need to be considered by transport operators. Where large screens or monitors are used, it is important to ensure that their location and the size of text they use do not prevent effective communication.

Public bodies should also be conscious of their obligations under the Official Languages Act 2003. More information on these obligations can be found at <http://www.coimisineir.ie> – the website of An Coimisinéir Teanga.

4.8 Websites

Some passengers with reduced mobility may experience difficulties with traditional 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 the text from a website in a synthesised voice. However, some websites are not designed with accessibility in mind and for that reason screen reader users will find it difficult or impossible to access content on these sites. Websites that have sound clips or that require the use of the mouse for navigation, for example, also present problems for some passengers with reduced mobility. It is better to design and build a website to be accessible from the outset. This can save time and the costs involved in rework and maintenance.

Operators should consider the use of journey planners on websites and maps. These offer the potential for detailed and precise journey details to be worked out before or during the trip. Information that is presented visually (such as on a map) should also be available in text format for people with vision impairments.



4.9 How can accessibility of information be checked?

In order to check the accessibility of information, you will need to take the following actions:

- Make a list of the types of information that are provided and the current formats: 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 develop the alternative formats on request
- Develop a plan for putting all information into accessible formats in priority order
- Ensure that all designers, printers and web designers have the skills and experience to produce accessible information
- Consult passengers with reduced mobility about their information needs and on what they find easy to use. It may also be useful to 'pilot' information with a group of passengers with a range of disabilities, as the experience of using the information in a 'live' situation is a very different test to a more controlled audit situation
- Review the quality of the information on a regular basis (by checking it against this guidance) to determine how much

is accessible. Do this in consultation with organisations for and of people with disabilities, as this will help 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 Initiative's Web Content Accessibility Guidelines (WCAG 2.0). Such an audit will identify improvements that can be made to the site.



4.10 Summary of Recommended Guidelines – Information

- 1** Maritime passenger transport operators should ensure that information is provided in a variety of accessible formats at the different points at which the passenger needs it – before setting out, at the port or harbour, on the vessel and after leaving the vessel.
- 2** At a minimum, maritime passenger transport operators should ensure that urgent safety and emergency information, timetables, and websites are accessible to all.
- 3** Maritime passenger transport operators should ensure that specific information on how to get assistance is provided to passengers with reduced mobility.
- 4** Relevant staff members who are employed by maritime passenger transport operators need to be able to provide accurate and clear information to passengers with reduced mobility.
- 5** Maritime passenger transport operators should regularly check the accessibility of the information they provide to their customers.

4.11 Where to go next?

General information

- For guidance on making signage accessible for people with impaired vision: <http://www.ncbi.ie> (Information for architects and engineers)
- UK Department for Transport (updated 2005), **Inclusive Mobility – A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure**. Chapter 10 deals with signage and information. <http://www.dft.gov.uk>
- NDA, **Code of Practice on Accessibility of Public Services and Information Provided by Public Bodies**. <http://www.nda.ie>
- UK Association of Transport Coordinating Officers (ATCO) (2004), **Printed Information at Bus Stops – Interim Good Practice Guidelines**. <http://www.atco.org.uk>
- UK Association of Transport Coordinating Officers (ATCO) (updated 2003), **Printed Public Transport Information, a Code of Good Practice**. <http://www.atco.org.uk>
- European Conference of Ministers of Transport (ECMT) and the (2006), **Improving Transport Accessibility for All, a Good Practice Guide** <http://www.internationaltransportforum.org>
- European Conference of Ministers of Transport (ECMT) and the International Association of Public Transport (UITP) (2004), **Improving Access to Public Transport**, Geneva, OECD Publishing/IUPT. <http://www.uitp.org>

Easy-to-read and plain English

The National Adult Literacy Agency 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>



Websites

- For guidance on website accessibility and how to test a website for accessibility visit <http://universaldesign.ie> **useandapply/ict**
- The **W3C Web Accessibility Initiative** (WAI) homepage. <http://w3.org/wai>
- The **Web Content Accessibility Guidelines** (WCAG 2.0) <http://www.w3.org/>

Interactive information

- The **National Disability Authority IT Accessibility Guidelines** include guidelines for the web, telecoms, software applications and public access terminals. <http://universaldesign.ie>

Passengers with vision impairments

- National Council for the Blind of Ireland provides guidance for making printed documents accessible and media conversion services, <http://www.ncbi.ie>
- 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>

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>

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. It seeks to identify, investigate and disseminate best practice in making public transport facilities more accessible, see <http://www.maple-eu.com>

Chapter 5

Ports, Harbours and Piers



Ports, Harbours and Piers

5.1 Introduction

Accessible buildings and infrastructure are essential if passengers with reduced mobility are to access and use maritime passenger transport services in a safe, secure and confident manner.

It can be challenging to improve the accessibility of many buildings and infrastructure, particularly older facilities or heritage buildings. Operators of ports, harbours and piers may not always have control over all parts of a particular site, and may need to liaise with local authorities or other stakeholders. The size and extent of the facility and the nature of services provided at that location will all impact on the practicality of making accessibility improvements. 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. It is particularly important that new buildings or refurbishments are designed, built and managed according to best practices in accessibility.

The requirements of the International Ship and Port Facility Security (ISPS) Code are mandatory under both domestic and international law. It is important that the security requirements of the Code are not seen as conflicting with provision of an appropriate level of accessibility. Similar security requirements exist in other modes of transport, particularly air transport. By integrating disability access into security planning and implementation and by training all personnel in disability equality (as well as security), successful outcomes can be achieved.

Operators, working with other stakeholder agencies, can do a great deal to improve access to buildings, terminals and embarkation points. The aim of this chapter is to provide guidelines on making these improvements.

These guidelines do not address the strategic issue of route and network design. It is recognised that many people have problems using maritime passenger transport because the journey from their home to the ferry port, harbour or pier is too difficult. Although this problem applies to many people, it applies to a much greater extent to those with disabilities who have mobility problems. Operators 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. Operators should liaise with all who have a role in improving access to maritime transport services – including taxis/hackneys and other public, private, community, voluntary and specialised transport providers.

5.2 How to improve access to ferry ports, harbours and piers?

Maritime passenger transport does not provide ‘door-to-door’ services. To access a terminal or embarkation point, most passengers need to walk, cycle, use a wheelchair or travel by car, bus or train. Integrated access arrangements are consequently an important factor in determining whether passengers with reduced mobility can actually use a ferry or boat service.

Features that need to be considered include:

- Smooth, level footpaths to and from terminals and vessel embarkation points with dished pavements at road crossing points



- Safe, accessible, road crossing facilities
- Well-marked walkways with level surfaces
- Accessible parking bays with adequate space to allow wheelchair users to get in or out of their vehicles
- Good lighting
- Safe, convenient drop-off and pick-up facilities for passengers with reduced mobility at ferry ports, harbours, piers and landings

Locating terminal entrances as close as possible to the vessels they serve improves access, because walking distances are minimised. Access routes and the location of public transport stops, car parking, ticket facilities and other facilities should be audited by operators in consultation with local stakeholders to ensure that they meet the needs of all customers.

Improving access to terminals, by providing footpaths, crossings and lighting are primarily functions of the local authorities, sometimes with the involvement of An Garda Síochána, as operators very rarely own the surrounding infrastructure. Therefore, improving access to ferry ports, harbours, piers and landing places will normally require multi-agency involvement.

Transport operators have an important role to play in such multi-agency initiatives, which may also involve the Department of Transport, the Department of the Environment, Heritage & Local Government, local authorities and An Garda Síochána.

Ferry ports, harbours and piers – outdoor facilities

During the design and maintenance of ferry ports, harbours, piers and landing places, operators should consider the following points, which are critical to the development of high quality accessible transport infrastructure:

- Location, including transport connections and travel distances
- Road and pavement surface quality
- Footpaths and crossing facilities
- Dished kerbs (where the edge of the kerb is sloped to provide easy access for wheelchair users and wheeled luggage)
- Traffic management, including parking and loading/unloading restrictions
- Shelters
- Lighting
- Security
- Markings and signage
- Seating
- Information provision, through a variety of formats (visual, audible, tactile)
- Maintenance and cleaning



Maritime passenger transport buildings and terminals – indoor facilities

Maritime passenger transport buildings are accessed by a variety of methods including on foot or wheelchair, by car (drop-off or parked), or by other public transport modes including buses, rail, taxis and hackneys and other specialised transport services. The general principle is that no matter how the passenger arrives at the terminal building, the approach should be accessible.

Operators should ensure that the approaches to and the environment around the terminal or embarkation point are clearly signed and well-lit so that passengers know where they are going.

Access to and approach to and circulation within maritime passenger transport buildings and terminals require careful consideration in the design and construction of new or existing buildings and infrastructure. The ‘Where to go next’ section at the end of this chapter highlights publications that provide more detailed guidance on how to make these environments more accessible.

Operators can introduce initiatives such as phone and web-based ticket sales and information services to reduce the need for all customers to visit their buildings in person. Such initiatives, however, should complement but not replace other methods of communication.

Improving accessibility for all users 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 on lifts or escalators, footbridges, steps, and so on
- Getting on and off the vessels
- Facilities, including ticketing offices and machines, information points, telephones, waiting and refreshment areas, seating, luggage lockers and toilets
- Facilities for guide dogs and assistance dogs, including water bowls and a designated spending area (for the dog to defecate)
- Signage and information
- Car parking facilities, including a drop-off zone and ticket or payment machines
- Lighting and security

Where existing infrastructure and buildings present physical challenges, the easily achievable elements of accessibility should be addressed first. Operators may need to place more emphasis on customer care to get around the barriers caused by poor physical access.

Day-to-day management of buildings and terminals has a major impact on the accessibility of the environment. For example, a generously-sized accessible bathroom may be unusable for a wheelchair user if it is also used for storage of spare chairs or cleaning equipment. An accessible route or pathway can become inaccessible if blocked by ropes or other equipment. It is important that managing accessibility becomes part of everyone's job, and is included in job descriptions, checklists, safety procedures and so on.

Interventions such as modifications to heritage or listed buildings, even relatively small modifications such as installing new shelters, require planning permission. This should be factored into improvement programmes. Operators should work in partnership with planning authorities in order to reach balanced solutions. When designing new facilities, the Part M building regulations set out the minimum requirements. However, it is good practice in designing new facilities to look beyond the basic minimum requirements, to build in a high standard of accessibility from the outset, and to facilitate users irrespective of age, size, ability or disability. The NDA publication **Building for Everyone** offers practical guidance to designers in this respect. Not all architects or engineers are expert in accessibility issues and operators may need to engage expert professional advisors to ensure that the design of new or upgraded facilities will be accessible to all.

The consultation and decision-making process for improvements or refurbishment projects should be similar to that for new buildings (see NDA's publication **Building for Everyone**). The



option of making a significant improvement in accessibility over a short period of time and the alternative of making a series of less significant improvements over a longer period of time should be examined – the more significant improvement may represent better value for money.

Getting on or off the vessel

The interface between ship and shore is critical to the provision of good disability access and is the area most often found wanting. There are some unique challenges to accessibility in this area, including wet surfaces, slippery surfaces (from seaweed and algae), exposed locations (strong winds and rain), wide tidal variations and movement caused by waves and swells. Typically a gangway is used for foot passenger access on and off the vessel. The design of the passenger gangway is particularly important with respect to:

- Width – sufficient to permit wheelchair usage
- Length and maximum permitted slope
- Provision of appropriate handrails on both sides – ensuring safety and ease of use for all
- Provision of ramp flaps at the ends of the gangway – for wheelchairs and people with reduced mobility
- Surface finish – level surface, non-slip material with tactile finish at both ends
- Marking of surfaces and lighting of gangway and landing areas

On car ferries (Ro-Ro vessels), foot passengers and wheelchair users may board via the bow or stern car ramps. At port facilities and on vessels clear signage and clear marking of walkways is essential to ensure safe segregation of foot passengers from vehicles. When implementing such access systems, operators must address the particular issues of

passengers with reduced mobility – for example, passengers with failing sight may be at increased risk due to vehicle movements in shared passenger and vehicle areas.

5.3 How to audit buildings, ports, harbours and piers 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 vessels, infrastructure and buildings are, how effective accessibility improvements have been and what opportunities exist for further improvements in accessibility. Professional accessibility auditors should be employed to do this type of work.

The access audit should:

- Examine the access features and requirements for all passengers
- Identify existing physical and communication barriers to access
- Make prioritised recommendations as to how these barriers can be addressed

In order to ensure that the built environment has the highest standard of accessibility, 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 vessel and building, location, set down areas



- External environment – car parking, approach routes, ramps, gangways, steps and doors
- Vertical and horizontal circulation – steps and stairs, ramps, lifts, escalators, corridors and internal doors
- Facilities – reception, information desks, toilets, seating areas, changing rooms, restaurants and refreshments
- Interior design – lighting, colour and contrast, fixtures
- Evacuation – emergency equipment, alarms, signage, evacuation equipment, evacuation plans
- Communication facilities – signage, telephones, tactile features, acoustics
- Ship/Shore interface – where people get on and off the ship



5.4 Summary of Recommended Guidelines – Buildings, ports, harbours and piers

- 1** Operators of ports, harbours and piers should put in place plans to improve the accessibility of their infrastructure and buildings and share the details of these plans with passengers with reduced mobility.
- 2** Operators of ports, harbours and piers should consult with and, where relevant, work in partnership with other agencies, such as local authorities, in improving the overall accessibility of the maritime transport infrastructure and built environment.
- 3** When developing or refurbishing buildings, terminals, harbours or piers, operators should ensure that they are fully accessible to all passengers with reduced mobility, in line with the guidance given by the NDA in Building for Everyone.
- 4** Operators of ports, harbours and piers should ensure that periodic accessibility audits of the infrastructure and built environment are conducted by trained and experienced auditors. Feedback from passengers with reduced mobility will be an essential input for the auditor.

5.5 Where to go next?

General information

- For information on retro-fitting and refurbishment of buildings, general guidance on transport terminals and a guide on inclusive buildings and environments – National Disability Authority, **Building for Everyone** NDA Publications <http://www.nda.ie>
- Department of Transport, Department of the Environment, Heritage & Local Government and Dublin Transportation Office (2006) **Traffic Management Guidelines** <http://www.dto.ie>
- Department of the Environment Heritage and Local Government, Building Regulations, **Part M – Access for People with Disabilities Technical Guidance Document** <http://www.environ.ie>
- NDA **Draft Code of Practice on Accessible Heritage Sites** – contact standards@nda.ie
- The annual **Irish Access Directory** provides information on assistive technology and equipment for people with disabilities and is published by Mobility Communications, <http://www.accessdirectory.ie>
- **UK BS 8300:2009** – Design of buildings and their approaches to meet the needs of disabled people, Code of practice, British Standards Institution, **UK** <http://www.bsigroup.com>
- UK Department for Transport (2002, updated 2004), Inclusive Mobility – **A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure**, <http://www.dft.gov.uk>
- Canadian Transport Agency, 2007 – **Code of Practice for Passenger Terminal Accessibility**. Ontario: Minister of Public Works and Public Services (Canada) <http://www.cta-otc.gc.ca>

- Canadian Transport Agency, 2007 – **Guide for Passenger Terminal Accessibility**. Ontario: Minister of Public Works and Public Services (Canada) <http://www.cta-otc.gc.ca>
- European Conference of Ministers of Transport (ECMT) and the (2006), **Improving Transport Accessibility for All, A Good Practice Guide** <http://www.internationaltransportforum.org>
- European Conference of Ministers of Transport (ECMT) and the International Association of Public Transport (UITP) (2004), **Improving Access to Public Transport**, Geneva, OECD Publishing/IUPT <http://www.uitp.org>



Access audits

- National Disability Authority (2004), Guidelines for the **Access Auditing of the Built Environment**. NDA Publications <http://www.nda.ie>
- Centre for Accessible Environments (2004) **Access Audits: A guide and checklists for appraising the accessibility of public buildings**. Centre for Accessible Environments, United Kingdom. <http://www.cae.org.uk>

Signage

- National Council for the Blind of Ireland – **Recommendations for signage for Architects and Engineers** <http://www.ncbi.ie>

Security

- **International Ship and Port Facility Security**, International Maritime Organisation <http://www.imo.org>

Chapter 6

Vessels



Vessels



6.1 Introduction

The Department of Transport's current policy is to encourage owners and operators to build in as much accessibility for all passengers as possible when building or acquiring new vessels. However, there are some vessels that are not accessible now and which will be challenging to make accessible because of cost and operational difficulties. The size and age of the vessel and the nature of services provided will impact the operator's ability to improve accessibility for passengers with reduced mobility.

Where there is less than full accessibility in such vessels, it is the policy of the Department of Transport to encourage and support a phased approach to better access. Operators should work towards phased implementation of improvements in accessibility over the short, medium and long term, including non-structural improvements, such as, the use of colour contrast, signage and so on.

There are many opportunities available to vessel operators to improve accessibility for passengers with reduced mobility. Many of these improvements will also help other users of these vessels, including older people, parents with children in buggies and people who are temporarily disabled due to injury or illness.

6.2 What makes for good access on a vessel?

An accessible vessel must have as a minimum:

- Access for wheelchair users, including accessible toilet facilities

- Features to aid people with difficulties in walking, gripping, reaching or balancing (including non-slip surfaces, handrails and hand-holds)
- Facilities to assist people with vision impairments (including consistent use of colour contrast and tonal contrast, clear and (where appropriate, tactile) signage, good lighting, non-reflective surfaces, audible as well as visual announcements and tactile and audible guidance and warning surfaces and systems (where appropriate)
- Facilities for people who are Deaf or hard of hearing (including visual information, clear audible announcements and clear signs)

6.3 How operators can review the accessibility of their vessels?

A formal access audit should be conducted by an accessibility expert with a track record of auditing in the transport area. The auditor should be briefed appropriately to ensure that he or she understands the particular conditions that exist in each maritime transport environment. The operator should work with the auditor during the audit to ensure the audit report and recommendations present an accurate picture of the current situation and a realistic path towards best possible accessibility. Operators should ensure that their operational personnel fully participate in the auditing process.

As a result of the auditing process operators should draw up plans with defined timescales for upgrading their service and to provide an improved level of accessibility. They should regularly review access for passengers with reduced mobility (perhaps using the experiences of people with a range of impairments)

and invite passengers with reduced mobility to try out the service. Initially, this might best be done during off-peak periods to find out what problems they experienced.

The ideal opportunity to ensure accessibility for all customers at minimal incremental cost is when the operator is building or buying a new vessel. When operators are planning to upgrade services by commissioning a new vessel or upgrading existing vessels, they can seek advice on how best to build in accessibility from the Marine Survey Office, from accessibility experts, and from passengers with reduced mobility. This will help ensure that the requirements or design specification gives appropriate priority to accessibility issues, and that any limitations or accessibility issues encountered on existing vessels are addressed, where practicable.



6.4 How to improve the accessibility of vessels?

It may not be possible or practical to address barriers such as narrow passageways or door sills at reasonable costs or because of particular requirements in the vessel's construction. Where it is not possible to remove these barriers, details should be included in the pre-journey information for the customer. This will allow the customer to make an informed decision about proceeding with their journey.

Vessel operators should review the accessibility of the following aspects of their vessels with accessibility experts and passengers with reduced mobility, and implement appropriate improvements.

Getting on or off the vessel

The interface between ship and shore is critical to provision of good disability access and is the area most often found wanting.

There are some unique challenges to accessibility in this area, including wet surfaces, slippery surfaces (from seaweed and algae), exposed locations (strong winds and rain), wide tidal variations and movement caused by waves and swells. Typically a gangway is used for foot passenger access on and off the vessel. The design of the passenger gangway is particularly important with respect to:

- Width – sufficient to permit wheelchair usage
- Length and maximum permitted slope
- Provision of appropriate handrails on both sides – ensuring safety and ease of use for all
- Provision of ramp flaps at ends of the gangway – for wheelchairs and people with reduced mobility
- Surface finish – level surface, non-slip material with tactile finish at both ends
- Marking of surfaces and lighting of gangway and landing areas

On car ferries (Ro-Ro vessels), foot passengers and wheelchair users may board via the bow or stern car ramps. Clear signage and clear marking of walkways is essential to ensure safe segregation of foot passengers from vehicles. When implementing such access systems, operators must address the particular issues of passengers with reduced mobility – for example, passengers with failing sight may be at increased risk due to vehicle movements in shared passenger and vehicle areas.

Moving around the vessel

Many passengers with reduced mobility choose to travel independently but may have difficulties in getting around a vessel due to barriers such as:

- Narrow passageways and corridors
- Lack of grabrails or handrails along both sides of passageways and ramps and fitted at heights suitable for both walking passengers and wheelchair users
- Slippery surfaces, particularly in wet conditions
- Cramped conditions, with seats or equipment blocking access and escape routes
- Heavy doors, doorframes with high sills
- No ramps
- Poor colour or tonal contrast



Vessel operators should aim to ensure that all passengers can move around the vessel independently. As far as possible, the provision and construction of ramps, stairs and lifts should be configured to give access to all passengers. In practice, it may be very difficult to achieve all these aims on existing vessels or on smaller vessels. However, there are still many practical approaches that can be taken to improve accessibility at reasonable cost. These include fitting handrails or grabrails, repainting existing handrails to improve visibility, and reorganising seats and other fittings to create more space.

Having well-designed handrails available along steps and ramps will greatly improve the accessibility of these for many people, including passengers with reduced mobility. The shape and material of the handrail should be comfortable to grip, even in cold weather. The handrail should contrast against the colour of the background, and should be turned in at either end so it doesn't catch on clothing or baggage. Handrails should also extend beyond the top and bottom of stairs to improve usability. Appropriate handrails will greatly improve the accessibility of passageways and corridors too. A practical example of this would be the fitting of highly visible hand-holds, similar to those fitted on modern trains, at the back and outer edge of seating situated along walkways.

It may also be possible to change floor surfaces to improve slip-resistance. Clear signage with non-glare surfaces, strongly contrasting colours, and with tactile lettering (ideally also in Braille) will help everyone to find their way around the vessel, and will give easier access to facilities such as bathrooms and the coffee shop. Operators should be aware that home made signs, such as laminated sheets printed from a computer, can be problematic, and for a variety of reasons:

- They might not be as clear as possible because of errors in language, terminology, spelling or grammar
- They might be physically difficult to read because they are badly designed (poor colour contrast or too small) or because they are badly positioned and are affected by reflected glare

See Chapter 4 of these Guidelines for further details in relation to information provision.

Where there is a risk that a passenger might bump his or her head off any structural fixtures or fittings, these hazards should be clearly marked, and ideally padded to prevent injury.

Cleanliness and good housekeeping are of particular importance to passengers with reduced mobility because they may have to touch more things than other people do, in order to get extra support or directional guidance. Keeping walkways clear and tidy is particularly important in relation to those with a vision impairment.

Enjoying the journey

Operators should aim to ensure that passengers with reduced mobility can enjoy their journey to the same extent as other passengers. There should be a mix of types of seating available. Seating should contrast in tone and colour to the background,

to ensure that it is visible to those with impaired vision. Some customers will need seats with arm-rests, to help them to get into and out of the seat. For other customers, arm-rests will present a barrier. Some wheelchair users may want to transfer out of the wheelchair into a standard chair for the duration of the journey. For other wheelchair users, availability of suitable restraints to ensure that their chair is clamped or strapped down securely, adjacent to other seats, will be important (particularly on high-speed vessels) to allow them to enjoy the journey with their companions.

It is recommended that at least 4 per cent of the vessel's passenger seats should be suitable for passengers with reduced mobility. Such passengers may be more vulnerable to the effects of bad weather than other customers, so the location of dedicated seating for passengers with reduced mobility should be chosen carefully and close to the entrances/exits and within easy reach of evacuation routes.

For vessels with passenger cabins, a number of cabins should be available to meet the needs of wheelchair users. The International Maritime Organisation (IMO) circular **MSC/Circ 735** of 24/06/1996 provides further details on the design of such cabins.

The importance of accessible toilet facilities will depend on the duration of the journey, and the availability of accessible toilet facilities at the port or terminal facilities at the start and end of the journey. While toilet facilities on board smaller vessels would not traditionally have sufficient space to be usable by wheelchair users, there are still many opportunities for vessel operators to improve the accessibility of toilet facilities. Grab rails are very important in a toilet facility, particularly when the vessel is in motion, possibly in rough sea conditions. Fittings such as taps and hand-driers should be designed to be usable by everybody. Taps with lever fittings are best, and hand-driers and



towels should be positioned within easy reach. An emergency alarm should be available to enable passengers to summon help in case of difficulty.

When commissioning a new vessel, availability of accessible toilet facilities should be a priority requirement.

On-board passenger information

It is essential that all customers are kept informed about any safety issues or procedures that might arise during the journey. Safety information should be available in a variety of ways. Safety information cards should use a font size of at least 14 point and should be located to ensure they are available to all passengers. The colour of the text should contrast strongly against the background (for example, black text against a white background). Use of symbols and simple diagrams can help people with poor literacy or people for whom English or Irish is not their first language. For customers with little or no vision, it may be necessary to convey this information by an audible announcement or directly on a one-to-one basis. For passengers who are Deaf or hard of hearing, safety information needs to be communicated in a visual format.

Where announcements are made over a public address system, care should be taken that these announcements are clear and concise. Operators should be conscious that many customers will not have a basic understanding of maritime terminology, so terms such as port or starboard should be avoided.

Car decks

Passengers with reduced mobility (particularly wheelchair users) may need additional space when getting in or out of their cars. They may also need more time to travel to and from the car deck than other drivers or passengers. Operators should take this into account when making on-board announcements for passengers to return to their cars.

6.5 What is best practice guidance for accessible vessels?



The International Maritime Organisation (IMO) published guidelines relating to disability access on vessels. However, these are now over ten years old, are quite general in nature, and apply particularly to larger internationally trading ships. In the UK the Disabled Persons Transport Advisory Committee (DPTAC) has produced very useful guidance documents (available on their website) dealing with the design and operation of both large and small vessels and the supporting shore infrastructure for maritime transport. For more information, see below at **6.8 – Where to go next?**

Because of the diverse nature of maritime transport in Ireland and because there is little standardisation of vessels or their support infrastructure, it is not particularly useful to consider one-size-fits-all advice or guidance to be definitive. It is better to use the available reference material as a basis for conducting access audits and thereby identifying the particular local problems and issues that serve as barriers to access for passengers with reduced mobility.

6.6 How to make sure operating practices are not a barrier?

Vessel operators should review the following areas to start removing barriers for passengers with reduced mobility:

- Train all staff to understand and respond to the needs of passengers with reduced mobility

- Invite passengers with reduced mobility to trial your service and comment
- Review internally what you do, and improve what you can as soon as you can
- Start small – make some small improvements now
- Ensure that new or amended policies and procedures are ‘disability-proofed’ – so that their impact on passengers with reduced mobility is considered and addressed



6.7 Summary of Recommended Guidelines – Vessels

- 1** Many vessels by virtue of their design and area of operation present significant difficulties to achieving full accessibility in the short term. The goal should be for vessel operators to implement improvements in a planned manner and within realistic timescales.
- 2** Vessel operators should consider implementing minor works such as fitting new handrails, repainting to improve colour contrast or fitting new signage, as these can have a substantial positive impact on the journey experience for passengers with reduced mobility.
- 3** Vessel operators should ensure that equipment that is used to enhance the accessibility of the service should be checked regularly and properly maintained.
- 4** Where part of the vessel is not accessible, vessel operators should inform potential and prospective customers before they commence their journey to avoid serious inconvenience to passengers with reduced mobility.
- 5** Vessel operators should conduct regular accessibility audits of their service.
- 6** When acquiring new vessels, operators should ensure that accessibility features are given appropriate priority.

6.8 Where to go next?

General information

- The UK Disabled Persons Transport Advisory Committee (DPTAC) has produced information on the design and operation of both large and smaller vessels and the supporting shore infrastructure for maritime transport.
<http://www.dptac.gov.uk>
- The Canadian Transportation Agency has developed a **Code of Practice for Ferry Accessibility** which provides similar guidelines on accessibility.
<http://www.cta-otc.gc.ca>
- The International Maritime Organisation circular **MSC/Circ. 735 Recommendation on the Design and Operation of Passenger Ships to Respond to Elderly and Disabled Persons' Needs**. **<http://www.transport.ie>**
- For guidance on making signage accessible for people with impaired vision **www.ncbi.ie** (Information for architects and engineers)
- UK Department for Transport (updated 2005), **Inclusive Mobility – A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure**. Chapter 10 deals with signage and information.
<http://www.dft.gov.uk>
- **S.I. No. 163 (2006): Disability Act 2005 – Code of Practice on Accessibility of Public Services and Information provided by Public Bodies**
<http://www.nda.ie>
- UK Association of Transport Co-ordinating Officers (ATCO) (2004), **Printed Information at Bus Stops, Interim Good Practice Guidelines**.
<http://www.atco.org.uk>



- UK Association of Transport Co-ordinating Officers (ATCO) (updated 2003), **Printed Public Transport Information, a Code of Good Practice.**
<http://www.atco.org.uk>
- European Conference of Ministers of Transport (ECMT) and the (2006), **Improving Transport Accessibility for All, a Good Practice Guide**
<http://www.internationaltransportforum.org>
- European Conference of Ministers of Transport (ECMT) and the International Association of Public Transport (UITP) (2004), **Improving Access to Public Transport**, Geneva, OECD Publishing/IUPT <http://www.uitp.org>

Easy to Read and Plain English

- The National Adult Literacy Agency 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>

Websites

- For guidance on website accessibility and how to test a website for accessibility visit <http://universaldesign.ie>
- The **W3C Web Accessibility Initiative** (WAI) homepage <http://w3.org/wai>
- The **Web Content Accessibility Guidelines** (WCAG 2.0) <http://www.w3.org/>

Interactive information

- **The National Disability Authority IT Accessibility Guidelines** include guidelines for the web, telecoms, software applications and public access terminals.
<http://universaldesign.ie>

Passengers with vision impairments

- National Council for the Blind of Ireland provides guidance for making printed documents accessible and media conversion services, at **<http://www.ncbi.ie>**
- 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>**

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>**

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. It seeks to identify, investigate and disseminate best practice in making public transport facilities more accessible see **<http://www.maple-eu.com>**

Chapter 7

Customer Relations



Customer Relations

7.1 Introduction

Good customer service will help to eliminate barriers for passengers with reduced mobility.

Traditionally, passengers with reduced mobility have not been frequent users of maritime passenger transport because of accessibility barriers. Some passengers with reduced mobility have experienced some poor or failed journeys in the past. Operators that can provide a high quality of service to passengers with reduced mobility will encourage those passengers to make more frequent use of maritime transport in future.

The number of staff involved and the nature of services provided will influence the scope of activities to be taken to improve customer relations. Operators should consider providing basic customer services training (including information on dealing with passengers with reduced mobility) to all staff. It could fall to any staff member to deal with a problem that a passenger might have, so it is important that all staff are trained to deal with all passengers appropriately.

7.2 What approach should be taken?

The quality of service provided to passengers with reduced mobility should be an integral part of an operator's service standards. Operators in developing such standards should consult with passengers with reduced mobility or their

representative organisations. Operators should also conduct market research that cover issues such as the accessibility of vessels, accessibility of harbours, ports and piers and the accessibility of information provision. Standards that are developed must be clear, relevant and consistently communicated to all staff, and they should be available to passengers on request, including those with reduced mobility.

Operators should employ people with disabilities, where possible and practicable. Doing so will help to deliver good customer services to passengers with reduced mobility, and will help the operator to gain a better understanding of the preferences and requirements of passengers with reduced mobility. Public sector employers have a statutory target that at least 3 per cent of employees should be people with disabilities.



7.3 Priorities for communication

Maritime passenger transport operators need to ensure that passengers with reduced mobility are informed as to how they can make best use of the maritime transport 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 reduced mobility. For video advertising, operators should consider making subtitles and audio description available. For printed leaflets or timetables, they should ensure that the choice of font size and colours will produce easily readable materials.

Customer feedback mechanisms, such as complaints procedures or customer comments, should be accessible to passengers with reduced mobility and take into account their additional needs. Some passengers with vision impairments will not be able to use a customer comment card, and may need to give their feedback in person or by phone or email.

A wide range of formats should be used in communications with customers – see **chapter 4 Information Provision**. Customers should also be made aware of the accessible services provided and kept informed of new developments.

Contact with passengers with reduced mobility can be formal or informal. Maritime passenger transport operators need to make sure that, where contact is informal, there is a way of capturing feedback on the service from passengers with reduced mobility. Informal contact is generally made by staff who work with customers on a daily basis and who come across passengers with reduced mobility more regularly. Where staff have regular contact with passengers with reduced mobility, their suggestions can be used 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 reduced mobility. Staff should be encouraged to provide feedback, possibly with a rewards system. It is important that feedback provided is followed up, and those who provided feedback get honest responses about how their suggestions will be addressed.

Maritime passenger transport operators may want to consult passengers with reduced mobility 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 these passengers. See the NDA's (2002) **Ask Me: Guidelines for Effective Consultation with People with Disabilities** for advice in this area.

It is essential to be clear about why consultation is being carried out, and how appropriate actions will be taken based on the feedback received from passengers with reduced mobility.

The views of people with disabilities are frequently sought by private and public sector bodies, and this can lead to ‘consultation fatigue’. Operators may want to avoid this by using the Department of Transport’s **Maritime Passenger Transport Forum** as the customer panel for the maritime industry. See **Appendix I: List of Useful Contacts** for more information.



Operators should also be aware that the views of a person with a particular disability are not necessarily shared by other people with the same disability. Everybody is different, and everybody has their own unique needs and requirements. See **Appendix I: List of Useful Contacts** for more information on the different umbrella and representative groups.

7.4 What about training?

Operators should take specific steps to raise awareness of disability and equality issues among all employees. Training should communicate service standards and equip employees to achieve them. Staff will also need training in communication with passengers with reduced mobility – see **chapter 8 Training**.

7.5 How to make sure standards are maintained?

It is important to monitor the delivery of the service to passengers with reduced mobility to ensure that the established standards are being met consistently. Information obtained from monitoring the service to passengers with reduced mobility should be part of the routine performance review of the

business, and should be reported at an appropriately high level.

Operators should avoid intrusive demands for information. For example, instead of asking all customers ‘Do you have a disability?’ when booking, operators could express this as ‘Do you need any special assistance?’

Meeting the needs of passengers with reduced mobility should become part of everyone’s job. This can be detailed in job descriptions and operating procedures, and should become part of any performance management or personnel evaluation system.

In the case of a justified complaint, this should be followed by an improvement action plan, with specified goals, a clear timeframe and agreed responsibilities. Where staff are providing effective customer service they should receive credit for it.

It is important to ensure that those who do use maritime passenger transport services are satisfied with the level of service they receive. Operators should ensure that passengers with reduced mobility are adequately covered by customer service surveys and other customer service monitoring programmes. Specific surveys for passengers with reduced mobility 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 check maritime passenger transport service provision?

In order to ensure that current customer service reflects good practice, it will help to review:

Guidelines for Accessible Maritime Passenger Transport

- The environment in which services are being provided and the barriers to passengers with reduced mobility
- How enhancing the services might help to overcome those barriers – for example, by providing additional passenger assistance or training staff in new skills
- Customer service standards – to ensure that they reflect the needs of passengers with reduced mobility and to draw up proposals for meeting those needs if they are not currently met
- The satisfaction levels of passengers with reduced mobility who are using the services
- Staff training for the new standards and procedures
- Communications from senior management to give out a consistent and clear message to the entire workforce that passengers with reduced mobility are as important as all other passengers



7.7 Summary of Recommended Guidelines – Customer Relations

- 1** Maritime passenger transport operators should, where appropriate, keep customers informed of their accessibility improvement plans.
- 2** Maritime passenger transport operators should provide appropriate customer service aimed at reducing the barriers currently encountered by passengers with reduced mobility.
- 3** Meeting the needs of passengers with reduced mobility should become part of the regular duties for all maritime passenger transport operators' staff members.
- 4** Regular and accessible customer consultation mechanisms should be used by the maritime passenger transport operators in order to establish effective communications with passengers with reduced mobility.
- 5** Maritime passenger transport operators should continue to monitor the quality of their service delivery to passengers with reduced mobility.

7.8 Where to go next?

- For guidelines on effective consultation with people with disabilities, see the NDA (2002), **Ask Me**, NDA Publications <http://www.nda.ie>
- Department of An Taoiseach, **Principles of Quality Customer Service** <http://www.taoiseach.gov.ie>
- For a guide to complaints handling for public bodies, see: Office of the Ombudsman (2001), **Guide to the Provision of Redress**, Dublin, Stationery Office, or <http://www.ombudsman.gov.ie>
- For information on entitlements and benefits for people with disabilities (including the Free Travel Pass) <http://www.citizensinformation.ie>
- In the USA, the Easter Seals Project ACTION have developed a **Transit Operators Pocket Guide** (2007) <http://projectaction.easterseals.com>



Chapter 8

Training



Training

8.1 Introduction

It is important that staff of maritime passenger transport operators understand the needs of passengers with reduced mobility and that they are able to respond to their needs appropriately. One of the most effective ways of ensuring staff develop an understanding of the needs of passengers with reduced mobility is to implement an appropriate training programme.

Disability equality training allows learners to explore disability within the wider context of equality and social inclusion, with full recognition of the rights of people with disabilities to participate fully in the economic, social and cultural life of society. In this way it goes much further than traditional awareness training, which might, however, represent an appropriate first step in staff training. Disability equality training encourages learners to identify the changes in personal and organisational behaviour required to ensure equal access to services for people with disabilities. It takes a holistic view of an organisation, and focuses on the broad range of changes that may be required to ensure that people with disabilities have equal access to the services provided by the organisation. Such changes may include changes to facilities, policies and procedures. The extent of disability equality training to be provided will depend on the size of the organisation, the turnover of staff and the nature of services being provided.



8.2 Who should be trained?

All staff need some level of training in disability issues, including frontline/customer-facing staff, managers, administrative staff and technical staff. It is important that external contractors are trained to the same level as directly employed staff, particularly security officers or cleaning staff who have direct contact with customers.

Operators should also ensure that those engaged to provide professional services (such as architects, graphic designers and web designers) should have a deep understanding of disability and accessibility issues. Everybody in the operator's organisation should understand the needs of passengers with reduced mobility as they relate to their own jobs, so that all members of staff can provide good quality, appropriate and respectful service to passengers with reduced mobility. It could fall to any staff member to deal with a problem that a passenger might have, so it is important that all staff are trained to deal with all passengers appropriately. Staff who have undergone training on disability issues will also be better prepared to work alongside colleagues with disabilities.

8.3 What training should be provided?

Not all staff members require the same level of training on disability issues, and training should be appropriate for each category of staff, consistent with their functions within the organisation. Senior managers, for example, will need to know more about the law. They will also need to know how to develop organisational systems and policies that will enable good employment practice and ensure quality customer service to passengers with reduced mobility.

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 and how it is appropriate to respond to issues that passengers with reduced mobility might experience. Designers (whether internal staff or external consultants) will need to understand the principles of inclusive design in whatever field they are working – this includes, for example, architects, vessel designers, information technology specialists and so on.



The range of issues that may need to be covered in training include the following:

- Context of disability, inclusion and equality
- The business case – including financial and marketing issues
- The law – employment and customer service
- Challenging stereotypes and assumptions
- Dealing with passengers with reduced mobility – language, etiquette, practical skills and use of equipment
- Inclusive working – removing barriers in practices, policies and procedures
- Inclusive design – removing barriers in the physical environment
- Inclusive information – removing barriers in communication and information provision

8.4 How should the training be provided?

Disability equality training should form part of an integrated training programme. However, 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, it can be delivered in a range of ways, including on-the-job training, distance learning, e-learning, videos, briefings, workshops and project based learning. A briefing on the business benefits of accessibility may be the most effective way for senior managers 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 equality training may also be successfully delivered via distance learning courses.

When it comes to who delivers the training, there are also choices that need to be made. In-house staff will have a better understanding of the nature of the operator's business, but they may lack the expertise and the experience to deliver truly effective training. Using people with disabilities as trainers can work well, as they can speak from direct personal experience; and this can help to accelerate the process of changing staff 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 by the percentage of staff trained rather than by absolute numbers.

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

- Training should be equality-orientated, focusing on the fact that the custom of passengers with reduced mobility is as valuable as that of 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, they should be people who have worked extensively alongside people with disabilities, or have been trained to deliver the training by appropriate registered organisations
- The views and experiences of people with disabilities should be part of the training, irrespective of how the 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
- External trainers should have some understanding of how the maritime passenger transport industry operates and the safety issues involved, as well as the constraints particular to maritime passenger transport. It may be helpful to arrange for them to speak with key staff when designing the course
- Trainers should cover how to effectively monitor the impact of training on the delivery of quality services, and should include best practice approaches for effective monitoring
- The training event itself should reflect the principles of good access and should be held in an accessible venue. Those attending should be asked about their own access needs, and those needs should be met. Failure to do this would send out a message that disability is not considered to be that important
- It will be necessary to review all existing training courses to ensure that good training content is accessible
- The effectiveness of training should be monitored by verifying its impact on the delivery of quality customer services



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, annual refresher courses as part of an integrated programme
- When there are any significant changes in service practice
- When staff members change their role and require different skills

If disability equality 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 to ensure that all staff receive disability equality training over a specific period.



8.6 Summary of Recommended Guidelines – Disability Equality Training

- 1** Maritime passenger transport operators should provide staff members with relevant training to ensure that staff understand the needs of passengers with reduced mobility and are able to respond to them effectively in relation to their own jobs.
- 2** Maritime passenger transport operators should consider implementing disability equality training, as part of the training programme for the job. Training should be delivered by experienced trainers who have a good track record in disability equality training.
- 3** Maritime passenger transport operators should regularly monitor the effectiveness of the training.

8.7 Where to go next?

- **Guidelines for Purchasers of Disability Equality Training**, NDA, (2005), <http://www.nda.ie>
- The Equality Authority has published **Guidelines on Equality and Diversity Training in Enterprises**, <http://www.equality.ie>
- FÁS provides a list of registered trainers on a **National Register of Trainers Search Engine** <http://jobbank.fas.ie>

Chapter 9

Disruption and Emergency



Disruption and Emergency

9.1 Introduction

Maritime passenger transport operators are required to have plans and procedures in place to prepare for and deal with disruptions and emergencies that might occur in the course of providing transport services, both on vessels and on shore facilities. Disruptions can be defined as events which interrupt the normal course of services – for example, an unplanned disruption caused by a vessel breakdown, or a planned disruption arising from annual dry-docking and survey. Emergencies are more serious as they require immediate action. Examples could include a fire, or uncontrolled ingress of water, or a serious fault on board a vessel, or a security threat.

Operators of maritime passenger transport buildings must comply with a range of legislation to ensure that buildings are safe for staff and customers; these include the Fire Services Acts (1981 and 2003), the Safety, Health and Welfare at Work Act (2005), and Building Control legislation. Vessel operators will have to comply with the Merchant Shipping Acts and EU law. Typically, most maritime law is implemented by statutory instruments (SIs) that prescribe regulations for construction, fire fighting, life saving appliances, manning of vessels, health and safety and compliance with the International Safety Management (ISM) Code. The International Ship and Port Facility Security (ISPS) Code applies both to internationally trading ships and the larger port facilities in the State.

9.2 Development of plans and procedures for emergencies and disruptions



In order to deal with emergencies and disruptions, it is necessary first to prepare and develop appropriate emergency plans and disruption plans. These plans would normally be implemented under the safety management system for vessels. Similar plans would be implemented for port terminals and shore facilities. Existing plans should be reviewed periodically and should be assessed to ensure that the needs of passengers with reduced mobility are identified and catered for.

Preparation and planning is central to maintaining quality customer service during disruptions and emergencies. Passengers become frustrated when they don't know what is going on, rather than by the actual disruption itself. If plans and procedures are implemented correctly, the number of complaints from passengers will be reduced.

Dealing with disruptions that are likely to arise on a more frequent basis requires simple and effective procedures to enable staff to communicate with passengers. Maritime passenger transport operators need to ensure that this is done in a way that all passengers can understand, including those with reduced mobility.

There are two essential components that maritime passenger transport operators should keep in mind when preparing the procedures for emergencies and disruptions:

1. Provide information on the disruption at the earliest opportunity

Providing information at the earliest opportunity and advance warning of planned disruptions allows passengers to make alternative plans. For unplanned disruptions, providing people with the information before they purchase tickets is preferable. Providing information on disruptions before people leave home is best and this can be done in a number of ways (radio, phone, website, SMS text messaging and email).

Disruptions during the journey (when passengers are on board the vessel) should also be communicated to passengers, as this will allow them 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 vessel has broken down, passengers should be informed whether a replacement vessel can be provided. Plans and procedures for dealing with disruption should be communicated to staff and included in staff training programmes.

Of their nature, emergencies are not likely to occur frequently, but planning how to cope with emergencies is a significant exercise that involves identifying possible emergencies that might occur and designing plans and procedures to deal with them. Emergencies will often require the evacuation or part evacuation of a building or vessel and, as such, will need to consider how all passengers, including those with reduced mobility, can evacuate to an appropriate place of safety. Obviously, the more accessible a building or a vessel is the more easily it can be evacuated during an emergency.

9.3 Needs of passengers with reduced mobility during evacuation



Operators need to consider the particular needs of passengers with reduced mobility in emergency situations. For example, people who are Deaf or hard of hearing will not hear a traditional fire alarm bell. Some people with mobility difficulties who are usually able to move independently may not be able to do so safely in an evacuation situation where large numbers of other people are moving quickly towards the fire exits. Many lifts are not designed for use in an emergency, so alternatives may be required to move wheelchair users and other people with mobility impairments up and down stairs during an evacuation. The options available include manual and powered evacuation chairs to move a wheelchair user up or down stairs, depending on the width and layout of the staircase. There may be some situations where the least risky option is to use standard lifts during evacuations, though this should only be done following a thorough risk assessment by a competent person.

Vessels with a high degree of accessibility will generally have fewer problems evacuating passengers with reduced mobility, but training and regular safety exercises are the most effective preparation for dealing with an emergency and carrying out evacuation procedures. It is the responsibility of all vessel operators to put in place effective plans and procedures for dealing with emergency situations and the safe evacuation of all passengers. In particular, operators should consider preparing a Personal Emergency Egress Plan (PEEP) to ensure that the evacuation needs of particular passengers or staff members are planned and agreed before any emergency occurs. It may be helpful to prepare a standard PEEP for passengers with certain types of disabilities – for example, for wheelchair users

or for those who are blind or have impaired vision. However, it is important that staff understand that every passenger has different abilities and needs, so flexibility will be required in implementing a PEEP.

Operators should consider asking customers at the time of booking if they would be likely to need assistance during an evacuation.

9.4 Assessing, auditing and testing

Plans and procedures for emergencies and disruptions should be subject to assessment and auditing as well as to practical testing of their procedures. It is important that maritime passenger transport operators ensure that they cater for the requirements of all their passengers. There is also a strong argument for involving passengers with reduced mobility in the auditing and testing of the plans and procedures. Operators should consider employing professional accessibility experts to conduct audits, 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.



9.5 Summary of Recommended Guidelines – Disruption and Emergency

- 1** Maritime passenger transport operators must ensure that the specific needs of passengers with reduced mobility are identified and provided for in the event of emergencies and disruptions.
- 2** Maritime passenger transport operators should consider preparing a PEEP to ensure that the evacuation needs of particular passengers or staff members are planned and agreed before any emergency occurs.
- 3** Maritime passenger transport operators must ensure that plans and procedures for dealing with emergencies and disruptions are subject to regular testing by exercises and drills. The results of these drills must be reviewed and used for validation or upgrading of procedures and training provided to staff.

9.6 Where to go next?

General information

- National Disability Authority (2008), **Promoting Safe Egress and Evacuation for People with Disabilities**. Dublin, NDA Publications, <http://www.nda.ie>.
- National Disability Authority, **Building for Everyone**, NDA Publications <http://www.nda.ie>

Regulations

- The Department of the Environment, Heritage & 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>; see 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/>
- Merchant Shipping Legislation available to download from the Department of Transport's website <http://www.transport.ie>

Appendices

Appendix 1: List of Useful Contacts

National Contacts

Department of Transport

Transport House
Kildare Street
Dublin 2
Phone: (01) 670 7444
Lo Call: 1890 443 311
Email: info@transport.ie
Web: <http://www.transport.ie>

Marine Survey Office

Department of Transport
Leeson Lane
Dublin 2
Phone: (01) 678 3400
Fax: (01) 678 3409
Email: mso@transport.ie

Maritime Passenger Transport Forum

c/o Maritime Safety Policy Division
Department of Transport
Leeson Lane
Dublin 2
Phone: (01) 678 3434 / (01) 678 3420
Email: mailto:SP2@transport.ie
Web: <http://www.transport.ie>

Equality Authority

Birchgrove House
Roscrea
Co. Tipperary
Phone: (0505) 24126
Lo Call: 1890 245 545
Email: info@equality.ie
Web: <http://www.equality.ie>

National Disability Authority

25 Clyde Road
Dublin 4
Phone: (01) 608 0400
Email: nda@nda.ie
Web: <http://www.nda.ie>

Centre for Excellence in Universal Design

National Disability Authority
25 Clyde Road
Dublin 4
Phone: (01) 608 0456
Email: info@ceud.ie
Web: <http://universaldesign.ie>

International Contacts

COST European Cooperation in the field of Scientific and Technical Research

COST Office
Avenue Louise 149
1050 Brussels
Belgium
Phone: 00 322 533 3800
Email: office@cost.est.org
Web: <http://www.cost.esf.org>

European Local Transport Information Service

Web: <http://www.eltis.org/>

International Transport Forum

Email: itf.contact@oecd.org

Web: <http://www.internationaltransportforum.org>

National Contacts for umbrella and representative groups for and of people with disabilities and older people

Age Action Ireland Ltd

30-31 Lower Camden Street

Dublin 2

Phone (01) 475 6989

Email: mp@ageaction.ie

Web: <http://www.ageaction.ie>

DeafHear

35 North Frederick Street

Dublin 1

Phone: (01) 872 3800

Email: info@Deafhear.ie

Web: <http://www.Deafhear.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>

Inclusion Ireland

National Association for People with an Intellectual Disability

Unit C2

The Steelworks

Foley Street

Dublin 1

Phone: (01) 855 9891

Email: info@inclusion.ie

Web: <http://www.inclusion.ie>

Irish Deaf Society (IDS)

30 Blessington Street

Dublin 7

Minicom: (01) 860 1910

Phone: (01) 860 1878

Email: info@irishDeafsociety.ie

Web: <http://www.irishDeafsociety.ie>

Irish Guide Dogs for the Blind

National Headquarters and Training Centre

Model Farm Road

Cork

Phone: (021) 4878 200

Lo Call: 1850 506 300

Email: info@guidedogs.ie

Web: <http://www.guidedogs.ie>

Irish Hard of Hearing Association

35 North Frederick Street

Dublin 1

Phone (01) 872 3800

Email: ihha@Deafhear.ie

Web: www.ihha.ie

Irish Wheelchair Association (IWA)

Áras Chúchulainn
Blackheath Drive
Clontarf
Dublin 3
Phone: 01 818 6400
Email: info@iwa.ie
Web: <http://www.iwa.ie>

Mental Health Ireland

6 Adelaide Street
Dun Laoghaire
County Dublin
Phone: (01) 284 1166
Email: info@mentalhealthireland.ie
Web: <http://www.mentalhealthireland.ie>

National Federation of Voluntary Bodies

Oranmore Business Park
Oranmore
Galway
Phone: (091) 792 316
Email: info@fedvol.ie
Web: <http://www.fedvol.ie>

National Parents and Siblings Alliance (NPSA)

31 Magenta Hall
Santry
Dublin 9
Phone: (01) 842 1267
Email: npsa@eircom.net
Web: <http://www.npsa.ie>

NCBI

Head Office
Whitworth Road
Drumcondra
Dublin 9
Phone: (01) 830 7033
Email: info@ncbi.ie
Web: <http://www.ncbi.ie>

People with Disabilities in Ireland (PWDI)

4th Floor Jervis House
Jervis Street
Dublin 1
Phone: 01 872 1744
Email: info@pwdi.ie
Web: <http://www.pwdi.ie>

Appendix 2:

Main references

Association of Transport Co-ordinating Officers (ATCO) (2004), **Printed Information at Bus Stops: Interim Good Practice Guidelines**
<http://www.atco.org.uk>

Association of Transport Co-ordinating Officers (ATCO) (updated 2003), **Printed Public Transport Information: a Code of Good Practice**
<http://www.atco.org.uk>

Canadian Transport Agency, 2007, **Code of Practice for Passenger Terminal Accessibility**. Ontario: Minister of Public Works and Public Services (Canada)
<http://www.cta-otc.gc.ca>

Canadian Transport Agency, 2007, **Guide for Passenger Terminal Accessibility**. Ontario: Minister of Public Works and Public Services (Canada)
<http://www.cta-otc.gc.ca>

Centre for Accessible Environments (UK) (2004), **Access Audits: a Guide and Checklists for Appraising the Accessibility of Public Buildings**
<http://www.cae.org.uk/>

Department for Transport UK (updated 2005), **Inclusive Mobility – A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure**
<http://www.dft.gov.uk>

Department of Transport (2008), **Transport Access for All (2008 Edition), the Sectoral Plan for Accessible Transport under the Disability Act 2005**

<http://www.transport.ie/>

Department of Transport, Department of the Environment, Heritage & Local Government and Dublin Transportation Office (2006), **Traffic Management Guidelines**

<http://www.dto.ie>

Department of the Taoiseach (1997, revised, July 2000), **Quality Customer Service for customers and clients of the Civil Service**

<http://www.bettergov.ie>

Disabled Passengers Transport Advisory Committee (DPTAC) (1996), **Legibility of Bus Timetable Books and Leaflets: Code of Good Practice**

<http://dptac.independent.gov.uk/>

Equality Authority (2004), **The Equal Status Acts 2000 to 2004**

<http://www.equality.ie>

European Conference of Ministers of Transport (ECMT) and the International Association of Public Transport (UITP) (2006), **Improving Transport Accessibility for All, A Good Practice Guide**

<http://www.oecd.org>

European Conference of Ministers of Transport (ECMT) and the International Association of Public Transport (UITP) (2004), **Improving Access to Public Transport**

<http://www.oecd.org>

European Conference of Ministers of Transport (ECMT) (1999), **Charter on Access to Transport Services and Infrastructure**
<http://www.oecd.org>

National Disability Authority (2002), **Ask Me. Guidelines for Effective Consultation with People with Disabilities**
<http://www.nda.ie/>

National Disability Authority (2002), **IT Accessibility Guidelines**
<http://universaldesign.ie/>

National Disability Authority (2002), **Building for Everyone**
<http://www.nda.ie/>

National Disability Authority (2004), **Towards Best Practice in the Provision of Transport Services for People with Disabilities in Ireland**
<http://www.nda.ie/>

National Disability Authority (2005), **Access Handbook Template: A Tool to Help Manage Accessibility of the Built Environment**
<http://www.nda.ie/>

National Disability Authority (2005), **Guidelines for the Access Auditing of the Built Environment**
<http://www.nda.ie/>

National Disability Authority (2008), **Promoting Safe Egress and Evacuation for People with Disabilities**
<http://www.nda.ie/>

WC3 Web Accessibility Initiative (WAI) (2008), **Web Content Accessibility Guidelines (WCAG) 2.0**
<http://www.w3.org>

Appendix 3:

Legislation

- **Building Control Act 1990**, Technical Guidance Documents
<http://www.environ.ie>
- **Disability Act 2005**
<http://www.nda.ie> or <http://www.justice.ie>
- **Employment Equality Acts 1998-2004**
<http://www.equality.ie>
- **Equal Status Acts 2000-2004**
<http://www.equality.ie>
- **Merchant Shipping Legislation**
<http://www.transport.ie>
- **National Disability Authority Act 1999**
<http://www.nda.ie> or <http://www.justice.ie>
- **Official Languages Act 2003**
<http://www.coimisineir.ie/>
- **Safety, Health and Welfare at Work Act 1989** and the subsequent General Application Regulations 1993, as amended
<http://www.hsa.ie>

Appendix 4:

Summary

Guidelines

Summary of Recommended Guidelines – Information

- 1** Maritime passenger transport operators should ensure that information is provided in a variety of accessible formats at the different points at which the passenger needs it – before setting out, at the port or harbour, on the vessel and after leaving the vessel.
- 2** At a minimum, maritime passenger transport operators should ensure that urgent safety and emergency information, timetables, and websites are accessible to all.
- 3** Maritime passenger transport operators should ensure that specific information on how to get assistance is provided to passengers with reduced mobility.
- 4** Relevant staff members who are employed by maritime passenger transport operators need to be able to provide accurate and clear information to passengers with reduced mobility.
- 5** Maritime passenger transport operators should regularly check the accessibility of the information they provide to their customers.

Summary of Recommended Guidelines – Buildings, ports, harbours and piers

- 1** Operators of ports, harbours and piers should put in place plans to improve the accessibility of their infrastructure and buildings and share the details of these plans with passengers with reduced mobility.
- 2** Operators of ports, harbours and piers should consult with and, where relevant, work in partnership with other agencies, such as local authorities, in improving the overall accessibility of the maritime transport infrastructure and built environment.
- 3** When developing or refurbishing buildings, terminals, harbours or piers, operators should ensure that they are fully accessible to all passengers with reduced mobility, in line with the guidance given by the NDA in Building for Everyone.
- 4** Operators of ports, harbours and piers should ensure that periodic accessibility audits of the infrastructure and built environment are conducted by trained and experienced auditors. Feedback from passengers with reduced mobility will be an essential input for the auditor.

Summary of Recommended Guidelines – Vessels

- 1** Many vessels by virtue of their design and area of operation present significant difficulties to achieving full accessibility in the short term. The goal should be for vessel operators to implement improvements in a planned manner and within realistic timescales.
- 2** Vessel operators should consider implementing minor works such as fitting new handrails, repainting to improve colour contrast or fitting new signage, as these can have a substantial positive impact on the journey experience for passengers with reduced mobility.
- 3** Vessel operators should ensure that equipment that is used to enhance the accessibility of the service should be checked regularly and properly maintained.
- 4** Where part of the vessel is not accessible, vessel operators should inform potential and prospective customers before they commence their journey to avoid serious inconvenience to passengers with reduced mobility.
- 5** Vessel operators should conduct regular accessibility audits of their service.
- 6** When acquiring new vessels, operators should ensure that accessibility features are given appropriate priority.

Summary of Recommended Guidelines – Customer Relations

- 1** Maritime passenger transport operators should, where appropriate, keep customers informed of their accessibility improvement plans.
- 2** Maritime passenger transport operators should provide appropriate customer service aimed at reducing the barriers currently encountered by passengers with reduced mobility.
- 3** Meeting the needs of passengers with reduced mobility should become part of the regular duties for all maritime passenger transport operators' staff members.
- 4** Regular and accessible customer consultation mechanisms should be used by the maritime passenger transport operators in order to establish effective communications with passengers with reduced mobility.
- 5** Maritime passenger transport operators should continue to monitor the quality of their service delivery to passengers with reduced mobility.

Summary of Recommended Guidelines – Disability Equality Training

- 1** Maritime passenger transport operators should provide staff members with relevant training to ensure that staff understand the needs of passengers with reduced mobility and are able to respond to them effectively in relation to their own jobs.
- 2** Maritime passenger transport operators should consider implementing disability equality training, as part of the training programme for the job. Training should be delivered by experienced trainers who have a good track record in disability equality training.
- 3** Maritime passenger transport operators should regularly monitor the effectiveness of the training.

Summary of Recommended Guidelines – Disruption and Emergency

- 1** Maritime passenger transport operators must ensure that the specific needs of passengers with reduced mobility are identified and provided for in the event of emergencies and disruptions.
- 2** Maritime passenger transport operators should consider preparing a PEEP to ensure that the evacuation needs of particular passengers or staff members are planned and agreed before any emergency occurs.
- 3** Maritime passenger transport operators must ensure that plans and procedures for dealing with emergencies and disruptions are subject to regular testing by exercises and drills. The results of these drills must be reviewed and used for validation or upgrading of procedures and training provided to staff.