

## **Access to air travel for people with hearing loss**

### **Policy statement**

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People with hearing loss face numerous information and communication challenges when travelling by air. Accessing information required for travel can be particularly problematic. Visual display systems in both airports and aircraft would ensure that essential, up-to-date information is more accessible to people with hearing loss. Staff training in deaf awareness would help to improve communication and interaction and raise awareness of the barriers that people face.

#### **Introduction**

This policy statement outlines the main issues for people with hearing loss when travelling by air. It sets out our stand on the issues and suggests what actions need to be taken to improve access to air travel for people with hearing loss.<sup>1</sup>

We use the term 'people with hearing loss' to refer to people who are deaf, deafened and hard of hearing throughout.

#### **Background**

People with hearing loss are generally able to travel independently by air, yet airlines display a variety of attitudes towards people who are deaf. There is a need to ensure that people who are deaf can travel unhampered by prejudice and blanket exemptions.<sup>2</sup> There are also physical access issues with regards to communication and information.

#### *UK law*

The Equality Act (2010) covers access to airports, but not aircraft. For example, check-in and airport services and facilities are covered by the Equality Act, but in-flight services and entertainment are not. Assistance dogs have been able to travel in the aeroplane cabin since 2004. However, under the UK Pet Travel Scheme, this is restricted to certain routes and subject to requirements. We are aware of at least one person with hearing loss who was refused boarding with their hearing dog in the past few years. This highlights issues around staff awareness and training. Under health and safety regulations airlines are allowed to move passengers with hearing aids if they are in a seat next to an emergency exit.

#### *European law*

Since July 2007 European law has made it illegal for an airline, travel agent or tour operator to refuse a booking on the grounds of disability, or to refuse to allow a disabled person to board an aircraft when they have a valid ticket and reservation.<sup>3</sup> This applies to any flight leaving an airport in the European Union, and to flights on European airlines arriving in the EU.<sup>4</sup>

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<sup>1</sup> Please note that, like many policy documents, this statement reflects the issues relevant at the time of writing. Over time this may be subject to change, such as new legislation, and we may review and amend the document.

<sup>2</sup> For example, in 2004 a group of deaf teenagers were told by the airline Iberia they were not allowed to fly unaccompanied. In early 2008, staff with Tiger Airways in Australia insisted that deaf passengers must travel with a carer.

<sup>3</sup> Access to Air Travel for Disabled Persons and Persons with Reduced Mobility Regulations 2007.

<sup>4</sup> In very occasional circumstances these rights may not apply – for example, where there are legitimate safety or technical reasons why a disabled person cannot board an aircraft. In such cases, the passenger must be told the reasons and offered a reasonable alternative.

Further European regulations came into force in July 2008, guaranteeing the right to assistance. The regulations cover the whole process, from when flights are booked to arriving at the airport, getting on and off the plane, and leaving the airport. It applies to tour operators and travel agents as well as to airports and airlines. If an individual requires assistance at the airport or onboard the aircraft, it is recommended that this should be made clear at the time of booking and at least 48 hours in advance. Tour operators and travel agents must pass on information about special requirements to the airlines, and airlines must inform the airports about any individual services required.

The law requires that all staff dealing directly with the travelling public receive disability awareness and disability equality training. Whilst on board the aircraft, all essential information should be available in accessible formats, including safety briefings, emergency announcements and information about delays or connections. It expressly mentions that this should include provision for people with hearing loss. Assistance dogs can travel free of charge in the cabin, within the requirements of the Pet Travel Scheme.

The European law is referred to in the aviation industry as the PRM (persons with reduced mobility) regulation. As a result, the air travel industry generally focus on people with reduced mobility, rather than looking at other less obvious disabilities, such as hearing loss. It is important that the mandatory disability awareness training contains information about deaf awareness, so that staff are informed that the regulations apply to all people with disabilities, not just those with reduced mobility.

Where European law overlaps with UK law, European law takes precedence. For example, the Equality Act only covers people who are disabled whereas European law includes people with reduced mobility as well, including temporary mobility problems such as a broken leg.

In 2012, the European Commission published guidelines to improve and facilitate the application of the European Regulation concerning the rights of disabled persons and persons with reduced mobility when travelling by air<sup>5</sup>

The Civil Aviation Authority (CAA) enforces the law and handles customer complaints relating to the regulation. In Northern Ireland this role is undertaken by the Consumer Council.

#### *Code of practice*

To coincide with European law, a code of practice<sup>6</sup> has been published, which comprehensively addresses issues relating to people with hearing loss. The code states that people should not be required to travel with an assistant if they are able to understand information in an accessible format. This means that people with hearing loss should be able to travel unaccompanied.

Unfortunately the code is voluntary, so tour operators, airports and airlines can choose whether or not to follow it. The government has stated that if the voluntary approach is not effective, the government will consider introducing regulations. The Disabled Persons Transport Advisory Committee (DPTAC) have an aviation working group to advise the UK government on access for disabled people to air travel and they have produced guidance for disabled passengers and less mobile passengers.<sup>7</sup>

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<sup>5</sup> [http://ec.europa.eu/transport/themes/passengers/air/doc/prm/2012-06-11-swd-2012-171\\_en.pdf](http://ec.europa.eu/transport/themes/passengers/air/doc/prm/2012-06-11-swd-2012-171_en.pdf)

<sup>6</sup> Access to Air Travel for Disabled Persons and Persons with Reduced Mobility (July 2008, published by DfT)

<sup>7</sup> Published 2003 [www.dptac.gov.uk/pubs/aviation/access/index.htm](http://www.dptac.gov.uk/pubs/aviation/access/index.htm)

## Evidence

Deafness and hearing loss affect an estimated 81,536,000 adults in Europe.<sup>8</sup>

The number of passengers using UK airports has more than quadrupled between 1980 and 2006, from 50 million to 210 million.<sup>9</sup> In 2006 75% of overseas' residents visits to the UK were by air.

In our 2008 annual survey we asked our members about their experiences of air travel and found that 37% of respondents had travelled on an aeroplane in the past year. Of these:

- 13% said that it was difficult to find out information about their flight before travelling.
- One third said that it was difficult to find out information during their flight.

The kind of problems people with hearing loss face when travelling by air are illustrated in these quotes:

*When flying alone I am always terrified that there will be an announcement and that I won't be able to hear what is being said and I will miss the flight. I have been lucky that there have been fellow travellers who have helped me so far.*

*Public announcements at airport departure lounges just previous to boarding the aircraft are often impossible to hear, and when you apply to a hearing neighbour for enlightenment you frequently discover that they 'didn't hear a word' either! Although I know this applies to most public announcements, in these particular circumstances it can mean missing priority boarding, or boarding according to your seat number.*

*[I boarded my flight to Turkey] ...someone had a ticket to sit on the same seat as mine. It seemed I was on the wrong flight! Why? No text nor visual announcement that the flight gate had been changed and the staff didn't check my ticket properly!!*

## Recommendations

In addition to the issues discussed in the general public transport policy statement, Action on Hearing Loss would like to see the following:

### Airports

- Deaf aware staff, including check-in staff, security staff and staff at information points.
- Real-time visual information displays to notify passengers about departures, arrivals, gates, boarding, delays and emergency information, as well as any other audible announcements.
- Contingency plans should be in place for when visual information screens do not work; for example, the deployment of extra staff, white boards to hand-write information, or pagers to notify people with hearing loss about any information regarding their flight.
- All written information in plain English.
- Induction loops throughout the airport, including check-in, security and information points. The loops should be signposted, regularly checked and maintained, and staff need to be trained in how to operate them. Loops should also be checked to ensure that background noise is not overwhelming.

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<sup>8</sup> Professor Adrian Davis from the Institute of Hearing Research in the UK estimates that 81,536,000 adults had hearing loss in Europe as a whole in 2005. By 2015 the figure is projected to be 90,588,000: this means that more than one in seven adults in Europe will have hearing problems.

<sup>9</sup> *Transport Trends* (2007) Department for Transport

- Visual alarms for emergency evacuations.
- Raise awareness of people with hearing loss of the benefits of pre-notifying and getting assistance.
- Investigate the possibility of using text prompts throughout the airport.

#### *Aeroplanes*

- All audible announcements to be available visually, such as in leaflets and text messages on the TV screens.
- Subtitles for pre-recorded announcements, films and other video material.<sup>10</sup>
- In-vision signing for safety videos and other essential potentially life-saving information.
- Audio information available via an induction loop.
- All cabin crew staff trained in deaf awareness.

#### **References**

*Annual Survey RNID* (2008)

[www.actiononhearingloss.org.uk/membersurvey](http://www.actiononhearingloss.org.uk/membersurvey)

Department for Transport

[www.dft.gov.uk](http://www.dft.gov.uk)

Disabled Persons Transport Advisory Committee (DPTAC)

<https://www.gov.uk/government/organisations/disabled-persons-transport-advisory-committee>

Information is available on the DirectGov website about flying and hearing loss

[www.direct.gov.uk](http://www.direct.gov.uk)

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<sup>10</sup> There are practical considerations regarding subtitles: unless there are individual screens for each seat, users would need to sit at an appropriate distance to the screen so that they could read the subtitles. This would also apply to in-vision signing, which would need to be good quality and large enough to be seen by all users.