

POSITION STATEMENT

TITLE: COMMUNICATION ACCESS – COMMUNICATION ACCESS IN AIRPORT FACILITIES

ISSUE

The Disability Discrimination Act makes it clear that all people who are Deaf or have a hearing impairment have the same right to access information as do people with hearing. Therefore, if a facility provides arrangements to amplify speech (such as enquiry counters or the like, and/or meeting rooms) and those arrangements use sounds to alert users to anything, then the facility should provide parallel arrangements that enable Deaf and hearing impaired people to receive the sounds and information. Failure to provide equitable access to such facilities means the person who is Deaf or has a hearing impairment is discriminated against. It is illegal to discriminate against people on the basis of their deafness disability.

If there are legislative provisions to provide particular information or sounds, such as fire alarms or emergency warnings/instructions, then that information/sounds must be accessible to all. The Building Code of Australia and various Australian Standards indicate the specific obligations in respect of various types of buildings and transport systems. Where there are no specific other legislative provisions, the DDA still applies and makes it illegal to discriminate against people with deafness on the basis of that disability.

The Department of Transport and Regional Services advises the Government on the policy and regulatory framework for Australian airports and the aviation industry. The Division, Aviation and Airports Policy, manages the continuing relationship between the Government and the Civil Aviation Safety Authority (CASA), Airservices Australia (Airservices) and Australia's airlines. It also manages Australia's participation in the work of the International Civil Aviation Organization (ICAO) and provides the secretariat for the International Air Services Commission (IASC).

The Division also provides aviation security policy advice, as well as developing, monitoring and auditing aviation security standards including any additional security measures required during heightened threat situations.

Building and construction activities at leased Federal airports must be approved by the Airport Building Controller (ABC). The ABC is appointed under Commonwealth law to administer the airport building control regime. The Airport-Lessee Company (ALC) must also approve the activity from a planning and airport operational perspective.

All construction and building activities must be notified to the Airport Building Controller (ABC). These activities cover, for example, new buildings, terminals, hangars, shop fit-outs and civil works including runways, taxiways, roads and drains. Activities require a formal application to the ABC and payment of the associated fee. The Regulations also allow building works to continue under an existing building approval issued by the Federal Airports Corporation (FAC).

Under the Regulations minor building and construction activities, including repairs and alterations, do not require a formal application but must be brought to the attention of the ABC. The specific process for the approval of building and construction activities is set out in the Airports (Building Control) Regulations.

For the majority of work involving buildings, the relevant standards can be found in the Building Code of Australia (BCA), as applied in the State/Territory in which the building activity is taking place. Where the BCA does not apply (eg in relation to civil engineering works such as roads and bridges, or specific aeronautical structures such as aerobridges, hangars, etc) the relevant standards will be specified by the ABC in the Airport Building Controller Operations Manual. Generally these will be approved Australian standards, or where no such standard is available, a recognised international standard.

Generally State and Territory laws in respect of building approvals and planning have no effect at leased federal airports. State and Territory law with respect to the registration of builders and other construction professionals, builder insurance, occupational health and safety, and fire safety apply.

The health and safety of both staff and passengers must always be considered in all activities.

It is essential that architects and designers have been trained in the design issues that affect people who are Deaf or hearing impaired or that there are appropriate skills in the design team, and that they are appropriately briefed.

This should include not only the physical access and ease of use of facilities but also access to operational manuals, emergency procedures, evacuation arrangements, safety information and other documents.

As a general principle the costs of providing assistance to passengers who are Deaf or hearing impaired at airports should not be passed directly to passengers. This is the agreed principle in Europe and the UK.

Companies should review their policies, procedures and practices to ensure that they meet the needs of passengers who are Deaf or hearing impaired.

It is most cost effective to ensure that access for people who are Deaf or hearing impaired is included from the outset as part of the initial design of an aircraft and airport terminal and this directly benefits all customers.

Out of scope

This position statement does not cover airline travel.

STATISTICS

Currently, one in six Australians suffers from some form of hearing impairment, and this is projected to increase to one in four by 2050 (Access Economics 2006).

CONCLUSIONS

From the start to the end, the journey must be accessible. The lack of accessibility at an airport can seriously hamper the safety, comfort and enjoyment of a person who is Deaf or hearing impaired who is using air services.

Meeting the needs of these passengers is both a personal and corporate responsibility.

General Announcements and Individual Communications

The anxiety created by not being able to easily communicate with personnel at counters, not hearing the announcements, or not understanding where a service is located, is a source of concern to travellers who are Deaf or hearing impaired. Air carriers also need to increase the accessibility of announcements and communication with passengers in airports.

1. Deafness Forum **recommends** that every point of contact between the airport terminal employees and the public be equipped with dedicated pen and paper to ensure that communication is facilitated with travellers who are deaf or hearing impaired.
2. Deafness Forum **recommends** that public address announcements be improved by speaking more clearly, more slowly and where required, repeating the message.
3. Deafness Forum **recommends** that any announcement about airport services also include a description of the service location.
4. Deafness Forum **recommends** that air carriers ensure that dedicated pen and paper are available at every check-in counter to facilitate communication with travellers who are Deaf or hearing impaired; that they ensure public address announcements are clearly enunciated, made more slowly and repeated; and that they include a description of the service location.
5. Deafness Forum **recommends** that, if passengers request it, air carriers use well-contrasted markers to write down the boarding gate number in large characters for those who have difficulties reading the information on boarding passes, to facilitate their identification.
6. Deafness Forum **recommends** a pager system to assist passengers, visitors and staff who are deaf or hearing impaired to access fire alarm and public address information in the same way as hearing passengers.
7. Deafness Forum recommends an Induction Loop system be installed in terminals to amplify announcements for passengers wearing hearing aids.

TTYs and other telephones

Deafness Forum believes that access to TTYs and volume-controlled phones is essential for travellers who are Deaf or hearing impaired.

8. Deafness Forum **recommends** that airport operators ensure that an adequate number of public TTYs and volume-controlled phones are available, in both the public area (landside and airside) and the arrival and departure area, 24-hours a day.
9. Deafness Forum **recommends** that personnel be fully aware of the location of such

TTYs and volume-controlled phones, and that these phones be properly indicated by appropriate signage.

10. Deafness Forum **recommends** that telephones including TTYs should be indicated by clear signage.

Self-Identification (of deafness)

Deafness Forum believes that the benefits to the traveller of clearly expressing prior to travel the services that will be required, are not yet known to many travellers who are Deaf or hearing impaired.

11. Deafness Forum **recommends** that air carriers actively promote understanding of the benefits of self-identification among travellers who are Deaf or hearing impaired.

Itineraries in Alternative Formats

The need for a plain language travel itinerary, available upon request in alternative formats can be a benefit to travellers who are Deaf or hearing impaired.

12. Deafness Forum **recommends** that air carriers provide itineraries and individual travel information in plain language with minimal use of codes and acronyms.

13. Deafness Forum **recommends** that itineraries and individual travel information be made available in the appropriate alternative format.

Air carriers are encouraged to work in concert with travel agents to facilitate these changes.

Associated services

All services associated with the airport should provide accessibility. This can include kiosks, car parks and bus services.

14. Deafness Forum **recommends** that all transport provided in conjunction with the airport ensure that appropriate accessibility is provided, For example, buses to and from car parks provide information in text format.

15. Deafness Forum **recommends** that car park booths and machines are accessible. Where information is provided in audible format (eg a beep), an equivalent visual format must also be provided (eg a flashing light).

Security

While travellers understand the need for heightened security in the light of possible terrorist activity, the information needs to be accessible. Persons who are Deaf or hearing impaired have related that they cannot hear when the security alarm beeps, and are often unsure of whether or not they can proceed to their gate.

16. Deafness Forum **recommends** that security personnel use both audio and visual means to indicate whether or not travellers can proceed to their boarding area after passing through the magnetometer.

17. Deafness Forum **recommends** that security personnel undergo deafness awareness training to ensure understanding of the issues. For example, something as

simple as saying “Whose bag is this?” Or, “Is this your bag?” at the security screening point can become complicated if the security guard is facing away from the Deaf or hearing impaired traveller.

18. Deafness Forum **recommends** that all airports provide training and support to their security officers, to support the following communication from travellers who are Deaf or hearing impaired:

“If you need help from one of our Security Officers, tell him or her that you have a hearing disability and explain the best way to communicate with you. If the screening process is unclear to you, ask our Security Officer to write the information down.

If you can read lips, ask our Security Officer to look directly at you and repeat the information slowly. It is best if you wear your hearing device (hearing aid, cochlear implant or middle ear implant) while going through the metal detector. Otolaryngologist and Otolaryngology surgeons say that none of our screening processes affect these devices.

If you are concerned or uncomfortable with going through the walk-through metal detector, or are uneasy with having your external component of your cochlear implant x-rayed, you can ask for a full body pat-down and a visual and physical inspection of the exterior component while you wear it.

If you use a hearing dog, you and the dog will remain together while you go through the security checkpoint. “

Deafblind

Travellers who are deafblind will generally be accompanied on their travel. However this does not preclude the need for availability of services and information for the deafblind.

19. Deafness Forum **recommends** that an industry focus group should to discuss customer service issues of concern to travellers who are deafblind.

Reserved seating areas

20. Deafness Forum recommends that where there are seating areas (for example in departure lounges) set aside for people who are deaf or hearing impaired, the equipment needs to be compatible with hearing aids, have variable amplification for those who do not use a hearing aid, and some kind of text communication facility.

21. Deafness Forum **recommends** that this seating area must have adequate signage (for example the International Symbol for Deafness).

Access to information

22. Deafness Forum **recommends** that staff at the gate should identify themselves to passengers who have self-identified as Deaf or hearing impaired, and should ensure that they are kept informed when audible announcements are made.

23. Deafness Forum **recommends** that all cabin crew, including the flight crew, should receive deafness awareness training.

24. Deafness Forum **recommends** that where video, or similar systems, are used to communicate safety or emergency information, captions should be included to supplement any audio commentary.

25. Deafness Forum **suggests** the need for captions will be minimised if the video programme is produced without the need for audio commentary, ie. a video relying solely on pictures. It will also assist people with a learning disability and sign language users. A separate audio description would, however, still be required for blind and partially sighted passengers.

26. Deafness Forum **recommends** that all emergency announcements and others relating to changes to the schedule, connections, and on board services should be made visually and orally, in all areas eg monitors in public areas, departure lounges, airline clubs/lounges, etc.

27. Deafness Forum **recommends** that ideally, **all** announcements should be made visually and orally. In this way sensory impaired people are given equal access to the information provided to other passengers.

28. Deafness Forum **recommends** that all advertisements for airports and airlines be closed captioned.

29. Deafness Forum **recommends** a dedicated section of the Airport's web site be provided to help travelers with additional needs to make the most of the range of services available before their journey.

Entertainment

Technology is advancing rapidly enabling access to television and other programs. Over time many passengers will benefit from captions and audio descriptions in airport departure lounges. The sometimes noisy environment can make it difficult for any passenger to hear announcements, whether they have a hearing loss or not.

24. Deafness Forum **recommends** that wherever televisions are switched on, they should display open captions if they are screened as part of the program. For example, all prime time (6pm to 10.30pm) television should be broadcast with captions, as is all news and current affairs. (Audio systems should be compatible with the "T" switch on hearing aids worn by hearing impaired passengers.) This assists all viewers in a noisy environment.

Signage

30. Deafness Forum **recommends** that the International Symbol for Deafness be used appropriately to identify to passengers, both local and visiting, what assistive technology is available. While other signage may be used *in conjunction with* the International Symbol, they should not be used in place of the International Symbol for Deafness.

RECOMMENDED POSITION

Deafness Forum strongly suggests that airports and relevant Australian Government bodies adopt the recommendations outlines above to ensure that travellers who are Deaf or hearing impaired are not discriminated against on the basis of their deafness.



COSTS OF POSITION

The BCA dictates many of these items the cost must be absorbed by the Airport lessee/owner.

RESEARCH BASIS

Consultation with members of Deafness Forum

Consultation with the Australian Government of Transport and Regional Services via phone January 2007. See also www.dotars.gov.au

Consultation with Qantas Consumer Forum and Qantas management

Access Economics 2006 *Listen Hear: The economic cost and impact of hearing loss in Australia*

Access to Air Travel for Disabled People – Code of Practice March 2003 Department for Transport (UK)
<http://www.bhx.co.uk/page.aspx?type=T0NaZj9WNoU=&id=c2tNkouOSoc> accessed 2 January 2007

The Grand Rapids Press, www.mlive.com/grpress published December 26, 2006

Source:

<http://www.battlecreekenquirer.com/apps/pbcs.dll/article?AID=/20061226/NEWS01/61226006/1002>

<http://www.hearinglossweb.com/Issues/Access/Transportation/atp.htm> accessed 2 January 2007

http://www.hawaii.gov/dot/airports/hnl/hnl_ada.htm accessed 2 January 2007

http://www.drlegal.org/downloads/pubs/DRA_annual_Report_06-07.txt accessed 2 January 2007

http://www.tsa.gov/travelers/airtravel/specialneeds/editorial_1380.shtm accessed 2 January 2007

DATE OF PREPARATION

January 2008

STATUS OF RECOMMENDED POSITION

Draft v0.2