



NCBI

**Working for People
with Sight Loss**

Response to the 2019 Draft Determination CP3/2019

NCBI Submission

About NCBI

NCBI (National Council for the Blind of Ireland) is Ireland's national charity working for the rising number of people affected by sight loss. At NCBI we are working every day with people of all ages, from young babies to those reaching their 100th birthday. The majority of people we work with actually have some remaining vision, while only a small percentage are completely blind. Census 2016 figures show that there are currently 54,810 people with sight loss in Ireland and this number is rising [1]. Last year, we offered support and services to approximately 8,000 people who are blind and vision impaired. Of this figure, 2,000 were new referrals to NCBI. The demands on our services are increasing as the population ages and the incidence of age-related sight loss escalates.

Replacing People with Signage

Airports are difficult to find your way around, with miles of corridors that look the same. Often this makes it impossible for passengers who are blind and vision impaired to find their way independently through an airport. NCBI research found that most passengers who are blind and vision impaired who chose to travel on their own need the assistance a staff member to find their way to where they need to go. If wayfinding staff are reduced, passengers who are blind and vision impaired will be forced to pay for a sighted friend or family member to travel with them. Signage, even if it is accessible using large clear print and good colour contrast, will not replace wayfinding staff. Accessible signage should instead be considered complimentary to wayfinding staff services.

Signage as well as websites and apps, flight information screens, airport maps and public access terminals need to comply with accessibility standards set out by the National Disability Authority's Centre for Excellence in Universal Design (<http://nda.ie/Resources/Accessibility-toolkit/Make-your-websites-more-accessible/> and <http://universaldesign.ie/technology-ict/it-procurement-toolkit/accessibility-targets/public-access-terminals/public-access-terminals.html>). All of these sources of information are complimentary to essential wayfinding front line staff.

Over the last year, NCBI has been sitting on the Passenger Advisory Group set up by the Commission on Aviation Regulation, so that customer service to passengers with reduced mobility can be improved. We are therefore disappointed to read commitments by the Commission

to replace wayfinding staff with signage in the May 2019 report “Dublin Airport Operating Expenditure: Bottom-up Efficiency Assessment”.

The report says for example on page 6 that “We find that the airport has not achieved some efficiencies that we consider are achievable e.g. through delivering service in other ways (for example improving signage and using fewer wayfinding staff), making the best of outsourcing where that is achievable (e.g. cleaning) and/or negotiating greater employment flexibility as a means to deliver cost efficiency. Similar references are made on pages 11, 58 and 64.

Page 108 also notes that “an ageing population and higher traffic between Dublin and the United States are considered the main drivers behind the increased propensity to use PRM services” and in addition on page 109 the report shows that passengers with reduced mobility numbers have grown by 59% between 2014 and 2018.

With an aging population, sight loss and other disability will increase and yet the Commission concludes in its report that it needs to replace people with signs.

The plan is to deliver €1.8bn of improvements and maintain Dublin Airport’s award-winning customer service with a flat price of about €9.65 over the next five years however, the Commission wants to cut that price by 22%. This surely will reduce the customer service standard available to passengers including passengers with reduced mobility. With an aging population and increased visitor numbers from overseas we need to do more to help passengers not less. The Commission’s plan is not good news for the consumer.

It is vital that winning awards for the quality of customer service continues and that the Commission does not favour less investment in passenger facilities and replace front-line staff with more way-finding signs.

References

[1] Census (2016) Census 2016 Results: Profile 3 – An Age Profile of Ireland. Available at www.cso.ie

More information

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