



EDF Recommendations on exit measure for transport services in light of covid-19

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Who we are

We, the European Disability Forum (EDF), are an umbrella organisation of persons with disabilities that defends the interests of over 100 million persons with disabilities in the EU. We are a unique platform run by persons with disabilities and their families, and a strong, united voice of persons with disabilities advocating for the implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD) in the EU.

Introduction

These are EDF's recommendations to European and national policy-makers, public authorities, representatives of transport operators, infrastructure managers, and related services, and other stakeholders responsible for the development and implementation of covid-19 exit strategies in relation to air, rail, bus and coach, and waterborne transport at urban, suburban, regional, national and transnational level.

The United Nations Convention on the Rights of Persons with Disabilities (CRPD) recognises the importance of accessible transport in enabling persons with disabilities to fully enjoy all human rights and fundamental freedoms. As States Party to the CRPD, the European Union and all Member States have a legal obligation to ensure that the rights of persons with disabilities are fully respected. Among other crucial accessibility issues, article 9 of the CRPD obliges countries to ensure that persons with disabilities access transport services on an equal basis with others. Accessible transport is a vital precondition for persons with disabilities to exercise of one of the four freedoms granted by the EU Treaties - free movement of citizens within the EU. The right to equal travel is further underpinned by EU passenger rights Regulations.

To ensure the right of equal travel by persons with disabilities considering confinement and exit strategies, several safeguards and measures should be put in place.

Right to assistance and other support services

- **Assistance to passengers with disabilities** by transport companies should always be provided as it is the right of passengers with disabilities under EU law (Regulations 1107/2006, Regulation 1177/2010, Regulation 181/2011, and Regulation 1371/2007). Assistance to passengers includes handling, transferring, and storing of passengers' mobility equipment during travel in addition to supporting passengers themselves.



Social distancing rules must not compromise this right. To do this safely see our recommendations below.

- Persons with disabilities should be able to access transport services with their **personal assistants or other accompanying persons**. This means that social distancing measures must not hinder persons with disabilities to be in close contact with their assistants or accompanying persons, and staff of transport services should be aware of this.
- Persons with disabilities should be able to access transport services with their **certified guide dogs and other certified assistance animals**.

Accessibility of travel information, facilities and services

- **Clear, easy to understand, and accessible behavioural instructions** must be provided to passengers at airports, stations, ports and on transport vehicles and carriers. Alternative communication means must be provided for persons with sensory disabilities. Specifically, for blind and partially-sighted persons, information must be made available in audio or large character formats. For deaf and hard of hearing travellers who lip read, non-transparent masks will create a barrier to communication. Measure must be taken to ensure that these passengers can access information through easily findable, clear and easy to understand instructions at the airports, stations, ports and on transport vehicles and carriers. Information must also be accessible to persons with intellectual disabilities.
- **Information must be easy to find**. This means focused efforts must be made to ensure that persons with disabilities are aware of where they can find information on travel restrictions and requirements, their rights and obligations as passengers, as well as how to protect their and others' health while travelling. Therefore, such information must be provided through mainstream information sources such as websites and social media channels of public authorities and transport companies. When this information is provided on websites, it must be on front pages so it is visible without having to search or click through multiple pages.
- Apart from providing the above information on their websites, transport services must make sure that the **passenger is informed** about travel restrictions, requirements, their rights, including right to assistance, and measures to protect their health, right **before purchasing a ticket. Once the purchase is made**, a confirmation email with the noted information should be sent to the passenger. If tickets are purchased at a



travel agency or ticketing office, the noted information must be provided to the passenger before and after booking as well.

- Passengers must be informed **who is responsible for what type of safety requirement**. Accessible, easy to understand videos with closed captions, sign interpretation, and audio description would ensure that all passengers are adequately informed about their rights and obligations when travelling.
- **Accessible contact points** must be available to passengers, reachable via more than one communication channel and in person.
- Purchase of online tickets for **persons with disabilities** is not always possible due to inaccessible websites, mobile applications and devices, or simply because the transport company does not provide such possibility, so **the alternative of purchasing tickets in person** at ticketing offices, travel agencies, at stations must be allowed. Alternative ways of purchasing a ticket or booking assistance must always be **without any additional cost** for persons with disabilities.
- **Accessible entrances and step-free routes must not be blocked** due to changes in the directions of circulation of passengers. In case of any such changes in routes, this should be communicated to passengers in advance, on the transport company's website, and with email, SMS or other notifications accessible to the passenger.
- **Social distancing measures must not reduce or block assessable spaces on vehicles for persons with disabilities**. Passengers using wheelchairs or other mobility equipment must have enough space to embark, disembark and manoeuvre within the vehicle. Space next to the passenger for assistance dogs or other certified assistance animals should be ensured as well.
- **Financial investment in advancing accessibility of transport infrastructure**, including stations, airports, ports, vehicles and carriers must continue at least at the current level, to ensure that progress is maintained and built upon. This funding must also foresee the cost of hiring accessibility experts. Accessibility of transport infrastructure such as automatic doors and electronic gates will contribute to maintaining better hygiene by reducing the number of passengers touching door handles, and other services.

Personal protective equipment and hygiene measures

- **All operators**, including security **staff** of transport services, and **especially those providing assistance, must be equipped with personal protective equipment**,




including face-masks and gloves. These should be regularly changed. Protective equipment of staff assisting passengers with disabilities must be changed after each time assistance is provided to a passenger.

- **Provision of personal protection equipment to passengers must be the responsibility of transport services;** the extra burden must not be placed on passengers.
- **Personal protection equipment, sanitary products and other hygiene materials must be equally available for persons with disabilities.** These should be at easily reachable accessible locations, and easy to find with accessible signage indicating their location at transport facilities. In addition, sanitary and protective materials must be provided to passengers on board carriers and vehicles. The mechanism and information to dispose of hygiene and sanitary materials must be accessible.
- **Personal protection equipment, sanitary products and other hygiene materials must also be provided to personal assistants or other accompanying persons, including sign language interpreters and all others that support persons with disabilities.** Given their close contact with persons with disabilities they must be given the same health and safety protection as other health care workers dealing with covid-19.
- **All entry points to transport facilities must be treated with the same hygiene protocols as all other parts of the service.** This includes cleaning handrails of ramps or staircases, accessibility knobs for doors, and other surfaces.
- **Assistive equipment** such as wheelchairs, ambulifts, minivans, as well as mobility equipment of passengers which are handled by assistance or other transport staff, **must be cleaned after each use.**


Training and awareness of service providers and decision-makers

- **All staff of transport services, and especially those providing assistance, must be made aware of the risks persons with pre-existing conditions face,** which leave them vulnerable to respiratory complications.
- **Training programmes must be updated with awareness on health and social impact of covid-19 confinement and social distancing measures on travellers with disabilities.** Special focus in training curricula should be on how to ensure passengers with disabilities are adequately protected from health risks while they exercise their right to travel and assistance.

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- In relation to the above, regular **focused training for assistance staff and general training for all staff in relation to travel of persons with disabilities must be continued, and necessary funding maintained for this purpose**. This is especially true in relation to modes of transport where turnover of assistance staff is quite high.
 - **Public authorities and other policy-makers must consider that mobility and operational business restrictions disproportionately impact persons with disabilities; adaptations and exceptions must be put in place to for them**. For a visually impaired person for example, public transport is the only way to get around independently and a private car is not an option. It is important that continuous and meaningful dialogue is maintained with organisations of persons with disabilities to ensure policies do not negatively affect persons with disabilities, causing further marginalisation.
 - In relation of the above, **Public authorities and transport services must also consider the vast diversity of persons with disabilities**. It is important to understand that persons with disabilities are a very heterogeneous ‘group’ and necessary accessibility and assistance measures can vary greatly from one person to another. That is why it is vital to cooperate closely with organisations of persons with disabilities at EU-level and national-level, ensuring that attention is given to the diversity of accessibility requirements of persons with different disabilities, including blind, deaf, hard of hearing, deafblind persons, persons with intellectual disabilities, persons with autism, persons with different physical disabilities, etc.

Reference documents:

- [EDF resources on covid-19](#)
- [UN Convention on the Rights of Persons with Disabilities](#)
- [Regulation \(EC\) No 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air](#)
- [Regulation \(EC\) No 261/2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights \('General' Reg\)](#)
- [Regulation \(EC\) No 1371/2007 on rail passengers' rights and obligations](#)
- [Regulation \(EU\) No 181/2011 concerning the rights of passengers in bus and coach transport](#)
- [Regulation \(EU\) No 1177/2010 concerning the rights of passengers when travelling by sea and inland waterway](#)

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- [European Union Interpretative Guidelines of Passenger Rights Regulations in the context of Covid19](#)
 - [Passenger rights and covid19](#)
 - [Frequently asked questions on passenger rights in the context of covid19](#)
 - [National Councils of Persons with Disabilities and European Organisations representing persons with disabilities](#)

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