

RNIB

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See differently

RNIB Cymru

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Senedd Cymru
Equality, Local Government and
Communities Committee
Cardiff Bay,
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Many thanks for the opportunity to contribute to the Equality, Local Government and Communities Committee's inquiry into the COVID-19 outbreak in Wales.

About RNIB Cymru

RNIB Cymru is Wales' largest sight loss charity. We provide support, advice and information to the 121,000 people living with sight loss across Wales. We also campaign for improvements to services and raise awareness of the issues facing blind and partially sighted people. We support, empower and involve thousands of people affected by sight loss to improve lives and challenge inequalities.

We want to lead the creation of **a Wales where there are no barriers for people with sight loss.**

1. Introduction

From difficulty accessing basic essentials and accessible information, a lack of emotional and practical support, blind and partially sighted people each face their own set of challenges every day.

The outbreak of the global coronavirus pandemic has exacerbated many pre-existing issues, but it has also created new challenges for people with sight loss. Long waiting times for deliveries means blind and partially sighted people are forced to adapt to new and unfamiliar shop layouts whilst trying to maintain a safe distance from others they may be unable to see, increasing their risk of infection. Reduced public transport services for essential journeys and loss of support from family and friends means people with sight loss are more vulnerable than ever.

More recently, as lockdown measures begin to ease, we are starting to see changes being made to our public spaces to enable social distancing and encourage greater active travel. Whilst this is a positive step, the speed of implementation, absent careful equality considerations risks making our streets inaccessible to people with sight loss. The steps taken to 'unlock our society' must not exclude disabled people and widen the gap of disadvantage even further.

2. Safe social distancing near-impossible for people with sight loss (RNIB research)

Our latest research into the impact of the coronavirus lockdown on blind and partially sighted people shows:

- 66% of blind and partially sighted respondents feel less independent now compared to before lockdown.
- 80% of all respondents reported that the way they shop for their essential shopping has changed since lockdown, with half as many blind and partially sighted people now shopping alone
- 74% of respondents were either very or quite concerned about getting access to food while 21% of people reported that they had had to ration food.
- A quarter (26%) of respondents said that they had struggled to get written information in a format that they could read and 17% said that they had struggled to access online information.

Keeping two metres away from other people is difficult if not impossible for blind and partially sighted people. Guide dogs aren't trained to do this. We have heard of instances of passers-by aggressively challenging people with sight loss who have been unable to keep their distance owing to their sight loss, and many visual markers to enforce social distancing are inaccessible for people with sight loss:

“It is very hard to know how to keep 2 metres away from people when you can't judge distance... I can't see the markings on the floor, so have been shouted at... I ended up in tears. It's not my fault that I can't see the floor markings.”

This is having a major effect on the independence of many blind and partially sighted people, in many cases leading to isolation and depression:

“I live alone and feel isolated and alone for the first time in my life. I am also very acutely aware of my sight impairment in ways I am not usually.”

“I am very concerned about social distancing when we do return to going out again. Visually Impaired people like myself who were independent before will be more disabled after this pandemic.”

People with sight loss who would usually navigate with another person acting as a guide have also been impacted. A study by RNIB in 2015 found that people who are blind or partially sighted are more likely to live alone than the general public, with more than half relaying on others from outside their household for support. Social distancing measures have meant that if their guide is not a member of their household, then contact should not be maintained. This has in effect taken away some people's primary means of being able to leave the house.

Many people who are blind or partially sighted are also likely to use touch to navigate – for example, using their hands to identify surfaces, walls or railings. Many blind and partially sighted people who rely more heavily on touch to get about fear that they are at greater risk of contracting the virus from surfaces. As such, many are concerned about the health risks, not only to themselves, but also the general public, from leaving their house.

“Will it become a choice of starvation or corona as we can't leave our homes? I live on my own and cannot ask others to jeopardise their safety by getting my shopping’.

All of this makes it incredibly difficult for blind and partially sighted people to get out and about for essential trips like exercise and to the shops.

Conclusions and recommendations

RNIB, along with other sight loss charities have produced some advice and FAQs on safe social distancing and guiding for people with sight loss. We shared these with Welsh Government and Public Health Wales on 25 March, asking them to review our messages and provide specific advice for people with sight loss. We have yet to receive a response.

Recommendations:

- Welsh Government to provide guidance to blind and partially sighted people on how to practice safe social distancing:
 - How can I be guided safely?
<https://www.sightadvicefaq.org.uk/independent-living/Covid-19/guiding-CV>
 - How do I practice safe social distancing?
<https://www.sightadvicefaq.org.uk/independent-living/Covid-19/social-dist-CV>

3. Access to groceries and priority delivery slots

As noted in the previous section, social distancing measures are particularly difficult for people with sight loss. As a result, shopping for essentials has become significantly more challenging. Added to this, online delivery slots are hard, if not impossible, to book. With no suitable alternatives in place, we have found that people who are blind or partially sighted are finding it difficult to obtain the very basics needed to survive.

Since the outbreak the RNIB's Sight Loss Advice Service has received an average of over 100 calls a day from people who are struggling to access essential groceries.

Ordinarily, online shopping would be an effective alternative to shopping at supermarkets for those who are digitally enabled, as it allows people who are blind or partially sighted to shop safely and independently.

However, with the demand for online delivery slots having increased, blind and partially sighted people – some of whom will have relied on this service in the past to maintain their independence – and who now need it more than ever are less able to access home delivery.

On 3 April 2020, we wrote to the Minister for Environment, Energy and Rural Affairs, Lesley Griffiths MS expressing our concerns and calling for Welsh Government to urgently work with supermarkets to ensure that people with sight loss are considered a priority group able to access online shopping.

On 23 April, we received a response which stated that disabled people, and people with serious health conditions, who are not at the highest risk of Covid-19 and therefore outside the shielding group, should seek support from family, friends or other support groups. Where this support is not available, they should contact their local authority for volunteer support.

We recognise the urgent need to safeguard those most vulnerable to immediate risk of severe illness and commend the Welsh Government for taking action to protect the most vulnerable. However, we do not believe it is acceptable that a vital service which enabled disabled people to live free and independent lives prior to the outbreak is no longer available to them. Forcing previously independent people to rely on volunteers diverges from the social model of disability and cannot be considered a viable solution.

This issue was raised again in the Equality, Local Government and Communities Committee meeting on 14 May 2020. Deputy Minister Jane Hutt MS stated that she would take up this issue. We wrote a follow-up to Jane Hutt on 19 May 2020 and we await a response.

The UK Department of Environment, Food and Rural Affairs recognised that some people outside the shielded group may need help getting food because of a disability or medical condition and lack of local support. On 26 April, George Eustice MP, Secretary of State for Environment, Food and Rural Affairs announced that some supermarkets will be working with UK Government on a referral system so that when someone is not shielded but vulnerable for another reason, their Local Authority can refer them directly to a supermarket to make sure that they get a priority delivery slot. Link to the announcement here:

<https://www.gov.uk/government/speeches/environment-secretarys-statement-on-coronavirus-covid-19-26-april-2020>

To refuse to offer the a similar solution in Wales is unfair and places people with sight loss in Wales at a further disadvantage and at increased, needless risk.

Conclusions and recommendations

The current circumstances present innumerable challenges which are unique to people with sight loss which have been being highlighted by the press and charities for weeks. While understandable, the decision to ask supermarkets to prioritise the shielded group took existing services away from those who relied on them, and - with social distancing rules and the resulting changes in-store to supermarkets - created a perfect storm for blind and partially sighted people trying to access groceries.

We are into the third month lockdown and a proper solution to securing home delivery of food for individuals who are not on the shielded list, but who nonetheless have been made vulnerable by the crisis is yet to be implemented.

Recommendations:

- Welsh Government must rapidly establish a system whereby Local Authorities in Wales can refer people with sight loss made vulnerable by the pandemic directly to a supermarket to ensure a priority delivery slot.
- Welsh Government must work urgently with supermarkets to establish that people with sight loss are considered a priority group and mitigate any safety issues that would impact unfairly.
- We would like the Welsh Government to work with RNIB to create an additional referral route to priority delivery slots accessible to the blind and partially sighted people that need them, potentially through the well-established RNIB helpline.

4. Temporary transport measures, the built environment and remaking streets

Coronavirus response measures are beginning to be eased across the world. With this easing, we are seeing temporary changes being made to the layouts of streets and public spaces. The Welsh Government recently signalled intentions to begin introducing temporary transport measures to enable safe social distancing and to encourage a shift towards more sustainable transport. Link to the announcement here:

<https://gov.wales/written-statement-funding-local-sustainable-transport-measures-response-covid-19>

Expressions of interest are currently being accepted from local authorities for how this might be done. Alterations include widening pavements, setting up 'pop-up' cycle ways and temporary speed restrictions.

Whilst we support the intention to encourage more active travel, street layouts can cause difficulties at the best of times for people with sight loss. We want to ensure that any temporary changes to our public spaces allow people with sight loss and other disabled people to continue to get around safely and independently.

We are already beginning to see new street layouts being introduced. One example is Castle Street in Cardiff, where the pavement has been widened into the road using cones. We are concerned that these measures are being put in place without Equality Impact Assessments being undertaken.

It is vital that the needs of blind and partially sighted people are built into systems created to ease the lockdown to ensure that they are able to play an active part in society.

RNIB Cymru and Guide Dogs Cymru, with the support of a number of third sector organisations, including Disability Wales, Living Streets Cymru, Learning Disability Wales and Ramblers Cymru have written to Lee Waters MS, Deputy Minister for Economy and Transport and local authorities outlining our concerns.

A briefing document was also sent to Welsh Government and all Welsh local authorities which provides a series of recommendations for how the new measures should be implemented in a way which addresses the challenges of social distancing for people with sight loss and promotes an inclusive approach.

We would be happy to share a copy of this briefing, if it is of interest to the committee.

We are also calling for the introduction of a 'coronavirus courtesy code' to raise public awareness of disabilities and promote safe social distancing for all pedestrians, road and public transport users. We would like this to be a key focus of the Welsh Government's communication

campaign as lockdown measures begin to ease and we move into the next phase of recovery.

It is essential that the public are aware that not all conditions are visible and are considerate to other pedestrians and passengers who may have hidden health conditions and mobility requirements.

Conclusions and recommendations

With social distancing likely to remain in place for some time, careful consideration must be given as to how public space and the built environment is made accessible for all. It is vital that disabled people, people with mobility requirements, and those who are vulnerable are able to get out and about safely. Failing to do so is likely to further exacerbate issues of loneliness and isolation among these groups.

All public authorities have a duty under the Equality Act 2010 to ensure they meet the needs of disabled people, and actively involve disabled people in the design and delivery of their services such as the provision or improvement of pedestrian routes and cycle routes.

Similarly, the Active Travel (Wales) Act 2013 requires Welsh Ministers and local authorities, in the performance of functions under the Highways Act 1980, to take reasonable steps to enhance the provision made for walkers and cyclists. The Act explicitly includes disabled people who use aids to mobility (such as guide dogs and canes) under the definition of 'walkers and cyclists'. The active travel design guidance document reiterates the need for routes to be inclusive by design.

Recommendations:

- Welsh Government must provide guidance for local authorities to ensure that people with sight loss and other disabled people are not unfairly disadvantaged by changes to the built environment, or any other measures taken in response to coronavirus.
- Equality Impact Assessments must be undertaken before any changes are made to public spaces.
- Coronavirus Courtesy Code should be developed to raise public awareness and promote safe social distancing for all pedestrians, road and public transport users. This should be backed up by a sustained public awareness campaign from Welsh Government.

5. Accessible information

Early in the crisis, we noticed that some communications from official sources are not always fully accessible, particularly for screen reader users.

One in five people aged 75 and over have sight loss and many blind and partially sighted people have comorbidities. It is therefore essential that information about changes in policy, procedures or advice, is accessible, giving it the best chance of reaching those at high risk from the virus.

In late March we have contacted teams in Government putting out the information and began pulling together a tailored guide to make sure everyone can access what is shared digitally. Members of the Senedd were briefed on making their social media accessible too, and we have offered to help with any queries they receive from blind and partially sighted people.

Overall, we were pleased with the response. Public Health Wales acted immediately and began uploading their coronavirus public health updates with options for audio description and other accessible formats, including easy read and British sign language. NHS Direct Wales added an accessibility toolbar to their website, allowing visitors to change the page settings to suit their needs. This includes playing audio, changing font size and page colour, magnifying images and translating information into multiple languages.

Despite significant progress we continue to see instances where the needs of blind and partially sighted people are not considered in official communications. As mentioned in section 2. despite several requests no official guidance has been published for people with sight loss on how to practice safe social distancing and how to be guided safely.

The shielding letters, which were sent to the 130,000 people in Wales at highest risk of severe illness from coronavirus, were not sent out in accessible formats for people with sight loss, despite containing potentially life-saving information.

Conclusions and recommendations

Ineffective communication with patients with sensory loss is a patient safety issue. In Wales, the NHS should be following the All Wales Standards for Accessible Communication and Information for People with Sensory Loss, providing information in people's preferred format.

The standards were introduced in 2013 and set out the level of service delivery that people with sensory loss should expect to be met with when they need healthcare. Since November 2017, GP surgeries in Wales have had the functionality to identify and record the information and communication needs of their patients with sensory loss. However, to date very little progress has been made and the Standards have not led to demonstrable change for blind and partially sighted people in Wales.

The current crisis has highlighted the reality that accessible information is not standard practice for many public sector organisations. Now more than ever blind and partially sighted people must be able to access information in a format that they are able to read so that they are able to keep themselves safe. Public organisations must meet their legal obligations under the Equality Act 2010, to make reasonable adjustments for those with a disability, so that they are not placed at unnecessary risk and experience the same levels of independence and privacy expected by everyone else.

Recommendations:

- All public information must be provided in a range of accessible formats, as standard practice.
- Systems should be in place to record patients' communication preferences and to support staff to proactively deliver on patients' stated preferences.
- When emergency communications such as the shielding letter are distributed, specific individual communication needs should be considered and information provided in their preferred accessible format by right and without fight.
- Key communications staff should receive training to better understand the communication needs of blind and partially sighted people and how to meet their communication preferences.

For further information, please contact [REDACTED], Policy and Public Affairs Manager.

[Redacted]

RNIB Cymru would also be happy to provide oral evidence to the committee, if required.

Best wishes,

[Redacted]

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Coronavirus and remaking streets – local sustainable transport measures and the impact on people with sight loss

Coronavirus response measures are beginning to be eased across the world. With this easing, we are seeing temporary changes being made to the layouts of streets and public spaces. The Welsh Government recently signalled intentions to begin [introducing temporary transport measures](#) to enable safe social distancing and to encourage a shift towards more sustainable transport.

RNIB Cymru and Guide Dogs Cymru fully support the Welsh Government's aim to encourage more active travel. Many blind and partially sighted people enjoy walking and tandem cycling and a reduction in air pollution is a positive development for the whole community. However, the speed of implementation risks quick changes which could make our streets especially inaccessible to this group.

This document summarises our concerns and provides a series of actionable recommendations to address the challenges of social distancing and promote an inclusive approach.

A number of organisations have pledged their support for our calls, including Disability Wales, Diverse Cymru and Learning Disability Wales.

Summary of concerns

Around 121,000 people live with sight loss in Wales today.

Social distancing is extremely difficult for blind and partially sighted people, which makes getting out and about for essential journeys or exercise particularly challenging.

- Many are unable to tell how far away other people are, making it harder to keep 2m away from others. Guide dogs are also not trained to maintain social distance.
- There have been incidences of passers-by challenging or shouting at blind and partially sighted people who haven't been able to keep their distance. Such unsettling and intimidating experiences have a lasting detrimental impact.
- People with sight loss are more likely to use touch to navigate – this means they are more at risk from contracting the virus from surfaces.
- People with sight loss often use familiar, learned routes. Where these have been altered in response to coronavirus, this can present challenges to independent mobility.
- Many blind and partially sighted people rely on sighted guides, which involves physical contact. In the current circumstances, only household members are able to offer this support.

Key ask: Coronavirus Courtesy Code

Street layouts can cause difficulties at the best of times for blind and partially sighted people. We want to ensure that any temporary changes to our streets allow people with sight loss and other disabled people to continue to get around safely.

It is essential that people are aware that not all conditions are visible and are considerate to other pedestrians and passengers who may have hidden health conditions and mobility requirements.

We therefore recommend that a [Coronavirus Courtesy Code](#) should be developed to raise public awareness and promote safe social distancing for all pedestrians, road and public transport users.

We would be pleased to work with the Welsh Government and other organisations in its development. This would need to be backed up by a sustained public awareness campaign.

Changes to the built environment

1. Widening Pavements

In urban areas, new street layouts are starting to be introduced, using cones and barriers to widen footways along lengths of road to provide more space to allow people socially distance.

We fully support the intention to increase the available pavement space to allow pedestrians to maintain safe distances, but people with sight loss are accustomed to orientating themselves by using familiar landmarks, walkways and a known environment. If new barriers are introduced, visually impaired people may not be aware or able to interpret the intention, leading to disorientation and increased risk.

- Cones, tape and other temporary measures are not suitable for people with sight loss. Guide dogs do not perceive these as solid obstacles and will attempt to navigate between them. These are also difficult to detect using canes.
- Because of this, any temporary barriers should begin at ground level; they should also be colour contrasted, tall enough to prevent them becoming a trip hazard, and securely fixed so as not to be blown over (flimsy barriers and tape must be avoided.)
- Kerbs should be retained as a known delineator between the footway and the road.
- People with sight loss are likely to use the original pavement space, even where additional space is created on the road. It is important that every effort is made to ensure that new

barriers are solid, do not impinge on dropped kerbs, and do not restrict access to controlled crossings. Existing controlled crossings should be maintained.

- Where any changes to street layouts have been made, it is essential that these changes are communicated in an accessible way to the blind and partially sighted people who live locally or might use those streets.
- Transport operators must give consideration as to how blind and partially sighted passengers will be able to find the right bus stop or platform.

2. Pop-up cycleways

Many cities have also begun to install 'pop-up' cycle facilities using temporary measures such as flexible plastic wands to protect cyclists from other traffic, and widening existing cycle lanes to enable cyclists to maintain social distancing.

These pop-up cycleways can present multiple hazards to blind and visually impaired people.

- Blind and partially sighted pedestrians find it extremely difficult to detect cycles, whilst cyclists may not realise that a pedestrian has sight loss.
- Mobility aids such as white canes can get caught up bicycle wheels, which is a further hazard to both.
- Visual cues to distinguish between pedestrian spaces and cycleways, such as painted lines are not detectable to people with sight loss.
- Many existing bus stops and pedestrian road crossings are inaccessible to people with sight loss if these must be reached across cycle lanes.
- It is vital that detectable kerbs between cycle routes and pavements are maintained. Where new routes are introduced, these must be colour contrasted and physically

separated. Painted white lines to delineate pedestrian spaces from cycleways are not an acceptable solution.

- Shared space between cyclists and pedestrians must be avoided. Where extra space for cycle lanes is required, it should be allocated from the road; it is important to retain adequate space on pavements.
- The creation of bus bypasses, or 'floating bus islands,' (where a pedestrian must cross a cycle lane to get to a bus stop) should be avoided wherever possible. In Cardiff, controlled crossings are being trialled to ensure that pedestrians can cross in safety to bus islands, reducing the risk of collisions.
- Any signage indicating any new pop-up cycle lanes should be placed on the road/cycle lane, not on the pavement, where it could cause a hazard.
- If shared spaces must be introduced, these must be clearly signified by tactile warning paving at the start and end of shared routes, so that blind and partially sighted people are aware of the presence of cyclists.
- New cycle lanes should not cross pavements or affect access to infrastructure like bus stops without accessible crossings.
- Warning markings and signs must also be provided to instruct cyclists to stop when pedestrians are near or on the formal crossing.

3. Additional cycle parking facilities

Additional cycle parking facilities have also been introduced at key locations in many urban areas (outside stations, high streets), to accommodate an increase in cycling.

- Temporary cycling infrastructure and other obstructions on pavements can present tripping hazards and impede mobility for people with sight loss

- Any additional cycle infrastructure which is installed must be done with careful consideration to the needs of disabled people and others who rely on clear pavements to access transport hubs and other key locations.
- We are aware of instances where additional cycle parking will be introduced in repurposed parking spaces. Pavement space should be protected wherever possible.

4. Public transport

Changes to bus and rail infrastructure will have a significant impact on the mobility of people with sight loss. The Welsh Government is currently considering options as to how public transport might be restarted in a way that allows all passengers to travel safely.

Locating a seat can be difficult for people with sight loss. The means by which they locate a place to sit puts them at a particularly high risk in the current circumstances. Transport operators can work to reduce the level of risk.

- If seating is reconfigured to allow passengers to social distance, blind and partially sighted people are likely to have difficulty finding the correct seat.
- Other new measures, such as queues and visual instructions present challenges for people with sight loss.
- As part of the likely reconfiguration of stations and platforms, barriers are likely to be needed. Broadly, the same requirements apply to the types of barriers to be used at transport hubs as elsewhere – i.e. they should begin on ground level, be solid and colour contrasted.
- When reconfiguring seating to allow people to social distance, focus should be on maintaining priority seating areas with sufficient space for disabled and vulnerable people. This should be accompanied by clear signage about who is eligible to use these seats, enforced by the operator.

- Passenger assistance must be available when booking all train journeys. Assistance should aim to keep the passenger safe, and away from others, including avoiding queues, and facilitating access to and exit from the train. Careful consideration must be given to how to manage social distancing on unstaffed stations.

Conclusion

All public authorities have a duty under the Equality Act 2010 to ensure they meet the needs of disabled people, and actively involve disabled people in the design and delivery of their services such as the provision or improvement of pedestrian routes and cycle routes.

Similarly, the Active Travel (Wales) Act 2013 requires Welsh Ministers and local authorities, in the performance of functions under the Highways Act 1980, to take reasonable steps to enhance the provision made for walkers and cyclists. The Act explicitly includes disabled people who use aids to mobility (such as guide dogs and canes) under the definition of 'walkers and cyclists'. The active travel design guidance document reiterates the need for routes to be inclusive by design.

The Welsh Government must provide guidance for local authorities to ensure that people with sight loss and other disabled people are not unfairly disadvantaged by changes to the built environment, or any other measures taken in response to coronavirus.

If you would like any further information on the issues raised in this briefing please contact:

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