
Equality Act 2010 — Sections 20 & 29

UK PRIMARY LEGISLATION

AnnounceAgain as a reasonable adjustment for audio-only public information

1. What this is

The Equality Act 2010 is the primary UK statute covering discrimination law in England, Scotland and Wales. Section 20 sets out the legal test for the “duty to make reasonable adjustments”, and Section 29 applies that duty to organisations providing a service to the public. Together, these are the main legal basis in Great Britain requiring venues, transport operators and other public-facing organisations to make reasonable changes so disabled people are not put at a substantial disadvantage.

2. Who it applies to

Any “service-provider” under section 29 — defined broadly as a person concerned with the provision of a service to the public or a section of the public, whether paid for or not (s.29(1)). This includes people exercising a public function (s.29(6)). In practice: venues, transport operators, retailers, leisure and entertainment operators, healthcare providers, and public bodies — effectively any organisation whose visitors include members of the public.

3. What kind of instrument this is

Primary legislation (an Act of Parliament), legally binding in England, Scotland and Wales. It is not voluntary guidance — failure to comply can give rise to a civil discrimination claim. Northern Ireland has separate, broadly equivalent disability discrimination law.

4. Specific requirements relevant to announcements and accessible communication

- s.20(3) — the “first requirement”: where a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with non-disabled people, the organisation must take reasonable steps to avoid that disadvantage. Relying solely on a spoken, audio-only PA system is a practice that can put d/Deaf people, people with hearing loss, and some neurodivergent visitors at a substantial disadvantage. (Note: this duty is owed to disabled people as defined by s.6 of the Act — a visitor who simply does not speak the announcement’s language fluently is not, by virtue of that alone, within scope of this duty, even though translation may still be good customer service.)
- s.20(5) — the “third requirement”: where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage, the organisation must take reasonable steps to provide that auxiliary aid. Making spoken information available in text form is a direct example of this requirement being engaged; s.20(11) confirms “auxiliary aid” includes an auxiliary service.
- Schedule 2, paragraph 2(2) — for service-providers, the duty is anticipatory: it is owed to disabled people generally, and must be planned and in place in advance, not arranged reactively once a specific disabled visitor asks for help.
- s.29(1)-(2) — failing to provide a reasonable adjustment, or providing a materially worse service as a result, can amount to unlawful discrimination against the person requiring the service.

5. What organisations are expected to do

- Identify where existing practices — such as audio-only PA — could put disabled visitors at a substantial disadvantage.
- Put reasonable steps in place in advance (anticipatorily), not only when a specific visitor asks.
- Ensure the adjustment is genuinely usable and effective for the people who need it, not just present on paper.

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- Bear the cost of the adjustment themselves — it cannot be passed on to the disabled person (s.20(7)).

6. Which requirements AnnounceAgain can help address

The auxiliary-aid limb of the reasonable adjustments duty (s.20(5)) as it relates specifically to audio-only PA announcements, and the anticipatory nature of that duty (Schedule 2, para 2(2)), since AnnounceAgain runs continuously rather than being arranged on request.

7. How AnnounceAgain addresses them

- Captures existing PA announcements automatically via the Recorder Box, without replacing the venue's PA system.
- Transcribes speech to text and publishes it as a readable transcript for visitors to check.
- Automatically translates announcements into up to 10 languages — a general accessibility and customer-service benefit, in addition to (not as part of) the disability-specific duty described above.
- Lets visitors read and replay recent announcements on their own device, in their own time — addressing the fact that a live PA broadcast is a single, fleeting moment for anyone who cannot process it as it happens.
- Is installed and operating ahead of any specific visitor's visit, so the aid is anticipatory by design (in place in advance) rather than something staff must remember to arrange on request.

8. Requirements AnnounceAgain does not satisfy by itself

- “Reasonableness” under s.20 is judged against the specific organisation, its resources, and the specific disadvantage — a single measure is rarely the whole answer, and AnnounceAgain does not determine or certify what is reasonable for any given organisation.
- It does not address non-communication barriers, such as physical/step-free access, which fall under the separate “physical features” requirement (s.20(4)).
- It does not by itself ensure visitors know the service exists or how to use it — signage and staff awareness remain the organisation's responsibility.

9. Requirements needing certified hardware or other measures

- A specific individual's personal auxiliary aid — e.g. their own hearing aid working with a compatible induction loop, or a British Sign Language interpreter for a particular event — is a separate provision that AnnounceAgain does not replace.
- Physical/built-environment adjustments (ramps, tactile paving, lift access) sit under the physical-features requirement and are unrelated to AnnounceAgain.
- Certified emergency evacuation systems have their own requirements (see the separate BS 5839-8 / BS EN 50849 datasheets) — AnnounceAgain can supplement but does not replace them.

10. Suggested wording for an organisation's accessibility statement

“As part of our approach to the Equality Act 2010 reasonable adjustments duty, we provide visitors with text transcripts of PA announcements via AnnounceAgain, alongside [other measures], to help address the substantial disadvantage that audio-only announcements can cause for d/Deaf and hard-of-hearing visitors. AnnounceAgain also translates announcements into other languages as a wider accessibility and customer-service benefit.”

Important: This datasheet explains how AnnounceAgain can form part of an organisation's response to the Equality Act 2010 reasonable adjustments duty. It does not constitute legal advice, and installing AnnounceAgain does not by itself guarantee compliance — what counts as “reasonable” depends on each organisation's own circumstances. Organisations should take their own legal advice.

Sources & further reading

- [Equality Act 2010, Section 20 \(Duty to make adjustments\) — legislation.gov.uk](https://www.legislation.gov.uk/ukpga/2010/154/part/2A/chapter/1/section/20)
- [Equality Act 2010, Section 29 \(Provision of services, etc.\) — legislation.gov.uk](https://www.legislation.gov.uk/ukpga/2010/154/part/2A/chapter/1/section/29)
- [Equality Act 2010, Schedule 2, paragraph 2 \(Reasonable adjustments: supplementary\) — legislation.gov.uk](https://www.legislation.gov.uk/ukpga/2010/154/schedule/2/paragraph/2)