



Department  
for Transport

# Accessibility Action Plan

Summary of responses to the consultation on  
the draft plan

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# 1. Introduction

- 1.1 The Department for Transport (the Department) ran a public consultation on the draft Accessibility Action Plan (AAP) between 24th August and 22nd November 2017. The consultation invited respondents to submit their views on 15 questions and 48 proposed actions.
- 1.2 Responses to the consultation were received via letter, email and easy read answer booklet. In addition, views were sought on a face to face basis at five consultation events held across England. In total, over 1000 responses were received and more than 100 people expressed their views at the consultation events.
- 1.3 This document summarises the points raised by respondents to the consultation and provides the Department's response, including an update on progress against each of the 48 proposed actions and 15 consultation questions, where an update is available.
- 1.4 The Department has considered all of the points raised and has set out more detailed policy commitments within the Inclusive Transport Strategy, which has been published alongside this document.

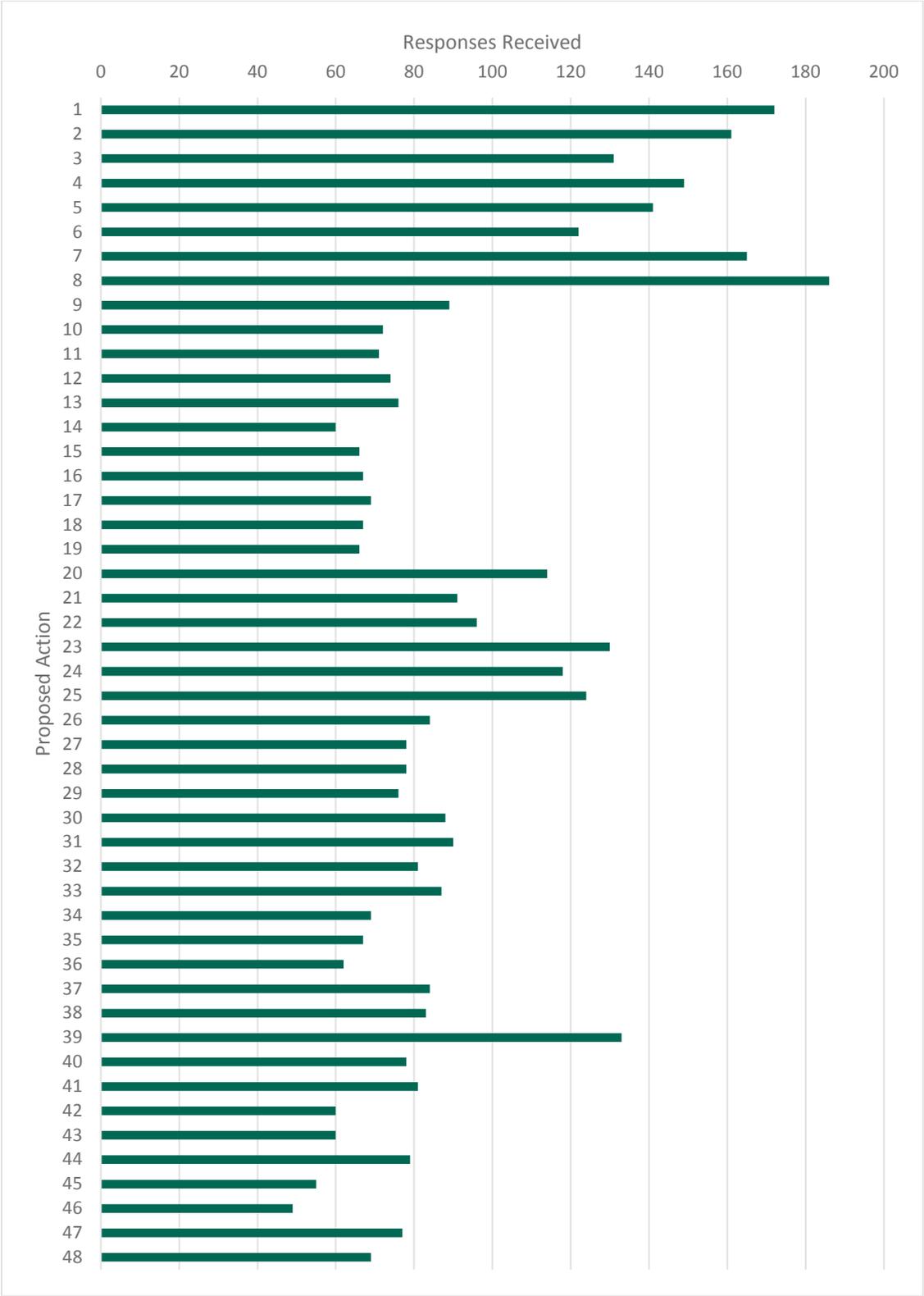
## Overview of respondents

- 1.5 Responses to the consultation were submitted by a mixture of individuals and organisations, including national and local disability groups, local authorities and transport operators.
- 1.6 Overall, we received more responses from individuals than organisations (59% of the responses were from individuals with responses from organisations accounting for 41% of the total). However, organisations frequently commented on a greater number of the consultation questions and proposed actions in their responses, reflecting their ability to draw upon the wide-ranging experiences of their members.

## Distribution of responses

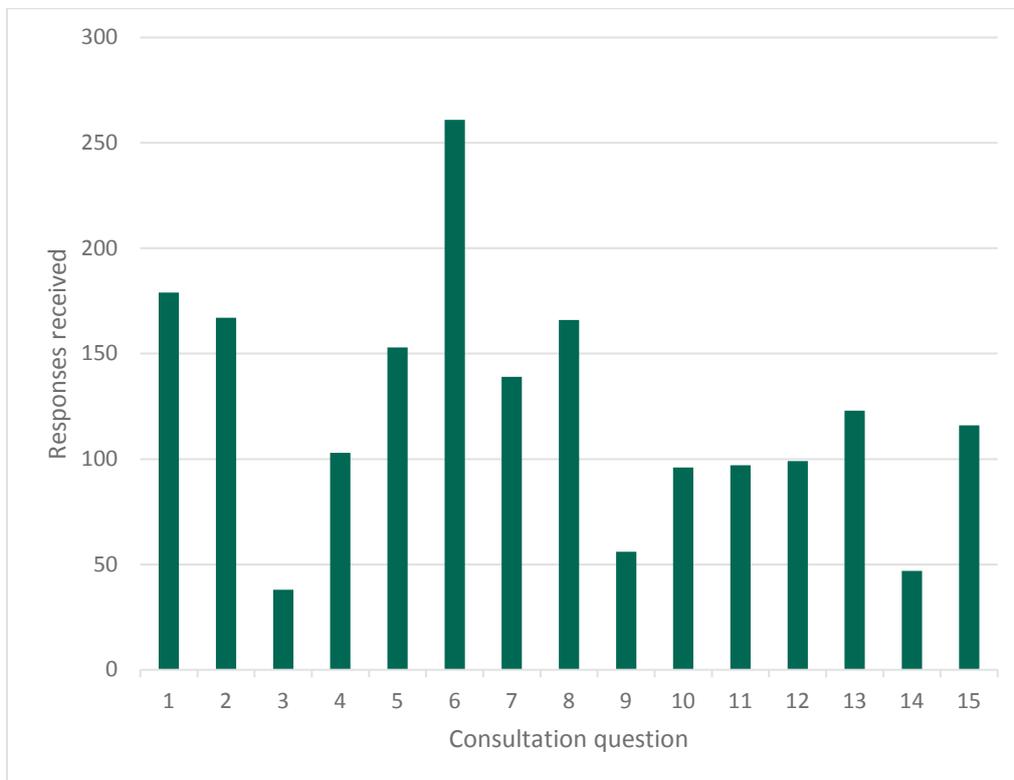
- 1.7 The 48 proposed actions received between 49 and 186 responses each, with over a quarter attracting more than 100 responses (see Figure 1 for a breakdown by action).

Figure 1: Number of responses by proposed action



- 1.8 The actions that received the greatest number of comments were (in order):
- Action 8 on rolling out railway station improvements and delivering the Access for All programme (186 responses);
  - Action 1 on updating the Inclusive Mobility guidance and examining whether to update guidance on tactile paving (172 responses);
  - Action 7 on reviewing Blue Badge eligibility for people with non-visible disabilities (165 responses);
  - Action 2 on considering how to take forward work by the Chartered Institution of Highways and Transportation on shared space (161 responses); and
  - Action 4 on implementing the Accessible Information Requirement for audible and visible announcements on buses (149 responses).
- 1.9 Varying numbers of responses were received on each of the 15 consultation questions - between 38 responses at the lower end and 261 responses at the higher end (see Figure 2 for a full breakdown).

**Figure 2: Number of responses to consultation questions**



- 1.10 The consultation questions that received the greatest number of comments were (in order):
- Question 6 on consultees' experiences of using transport services, in particular the level of understanding shown by providers and staff of the needs of disabled people (261 responses);
  - Question 1 on how well the national bus concession in England supports the local transport needs of disabled people and how it might be improved (179 responses);
  - Question 2 on information and guidance setting out the rights of disabled people when travelling by air (167 responses);
  - Question 8 which asked consultees for their experiences of trying to travel spontaneously (166 responses); and
  - Question 5 on experiences of using accessibility equipment when travelling by train (153 responses).
- 1.11 In addition to comments focused on the consultation questions and proposed actions, the Department received over 400 submissions as part of three single-issue campaigns. These campaigns raised concerns about staffing levels on the railways, called for step free access to Canons Park and Stanmore underground stations and asked for Blue Badge eligibility to be extended to the carers of children with Autistic Spectrum Disorder (ASD).
- 1.12 The Department has noted the campaign to extend Blue Badge eligibility to carers of children with ASD and will be announcing actions in response to this campaign through our response to the recent Blue Badge consultation.
- 1.13 We also note the campaign for step free access to Canons Park and Stanmore underground stations. Transport in London is the responsibility of the Mayor of London and is delivered by Transport for London. It is a matter for the Mayor to determine transport policy, including step free access at stations. We have passed these responses on to Transport for London.
- 1.14 The Department notes the views expressed on staffing levels on railways, where many respondents stated that a second member of staff, either on the train or at the station, was an important function for disabled people travelling by rail. The Government fully recognises the importance of providing assistance to those who need support to travel and as we modernise the network and new trains arrive this can be delivered through a combination of staffing and infrastructure. The newest trains on our network no longer require crew to operate the doors, this frees them up to allow more time to help passengers, including those with accessibility requirements.

## 2. Summary of responses to proposed actions

- 2.1 The draft AAP outlined 48 proposed actions and asked consultees for their feedback on each proposal. Respondents were asked to say whether they agreed or disagreed with the action and whether there were any other areas that required further attention.
- 2.2 This chapter summarises the responses received to the 48 proposed actions and sets out progress and planned next steps on those actions where it is possible to do so.

### Action 1

We will commission a research project to scope the updating of the “Inclusive Mobility” guidance by the end of summer 2017. As part of this project we will also examine updating our guidance on the use of tactile paving surfaces. We will then consider the recommendation and determine a way forward.

### Summary of Responses

- 2.3 This question received 172 responses, with 50 submitted by individuals and 122 submitted by organisations.
- 2.4 A large number of responses highlighted technical or practical issues that may fall within the scope of the Inclusive Mobility or Tactile Paving Surfaces guidance documents. These included dropped kerbs being blocked by cars or cars being parked across road crossings; dropped kerbs on one side of the road not being complemented with a dropped kerb on the other side which could leave wheelchair users in a dangerous situation; the need for clear colour contrasts in paving; the requirement for a minimum pavement width as walkways can be too narrow; and the importance of functioning audible signals at crossings and zebra crossings.
- 2.5 Several respondents highlighted a conflict between the needs of people with visual impairments and those with other mobility needs. For example people with visual impairments found tactile paving helpful, whilst people using wheelchairs, prams, bicycles or pushchairs found the ridges uncomfortable when travelling over them. In addition, it was suggested that those with poor balance can find tactile surfaces slippery.

- 2.6 A number of respondents highlighted inconsistencies with the delivery of tactile paving, poor maintenance and the view that, in some cases, aesthetic design was being favoured over safety. Many respondents also referred to wider issues such as inconsistent gradients of paving.
- 2.7 Several respondents highlighted the importance of updating and harmonising other relevant guidance such as the Government's Manual for Streets and Local Transport Note 1/11 (Shared Space).
- 2.8 Some respondents highlighted the importance of the enforcement of rules and called for a move away from "guidance" to statutory requirements. A small number of respondents raised concerns about local authorities not adhering to, or properly following, previous guidance.

### **Update on Proposed Action**

The contract for the proposed research has been let and we expect work to conclude during the summer. By autumn 2018, we will publish the conclusions of the research project currently underway to review the existing Departmental guidance on both Tactile Paving and Inclusive Mobility, with the view to expanding or updating them and exploring whether the two sets of documents should be combined.

### **Action 2**

We will continue our involvement with the Chartered Institution of Highways and Transportation (CIHT) on their work on shared space. After we receive their report by the end of 2017, we will consider the recommendations and announce how we will take them forward.

### **Summary of Responses**

- 2.9 There were 161 responses to this proposed action, 68 from individuals and 93 from organisations. There was strong opposition to shared space schemes on the grounds that they are dangerous. Respondents gave many examples of poorly designed schemes, and many features were cited as being dangerous and unsuitable for people with visual impairments, hearing loss or other disabilities. For example, it was stated that courtesy crossings, which rely on pedestrians making eye contact with drivers, cannot work for visually impaired people; guide dogs are trained to stop at kerbs and cannot do this where kerbs are removed; low "invisible" kerbs create a trip hazard; and shared space schemes can be confusing for people with hidden disabilities such as autism or other mental impairments.
- 2.10 There was broad agreement with the proposal to consider CIHT recommendations on shared space. However, there was a strong view that the Department should fully

implement the recommendations of the report by the Women and Equalities Select Committee<sup>1</sup>, including:

- Replacing Local Transport Note 1/11 (Shared Space) with new guidance;
- A moratorium on new shared space schemes until new guidance is issued; and
- Retrofitting kerbs and crossings to existing shared space schemes where they have been removed.

- 2.11 There was a strong view that Government guidance on shared space schemes should be urgently rewritten as respondents considered it not fit for purpose. Many respondents also called for the current version to be immediately revoked/withdrawn while new advice is prepared.
- 2.12 Respondents also expressed the view that the Department should co-produce new guidance with disabled groups and organisations such as the Disabled Persons Transport Advisory Committee (DPTAC) and the Equality and Human Rights Commission (EHRC), taking account of the findings in the CIHT report, and should consult on it.
- 2.13 Some respondents stated that the Department should either put the guidance onto a statutory footing, or should produce clear standards/minimum requirements for shared space schemes, not just guidance.
- 2.14 There was also a strong view that local authorities must undertake proper consultation with local communities, including with groups representing disabled people, before shared space schemes are introduced. It was also stated that those consultations need to be meaningful and inclusive.

### **Update on Proposed Action**

- 2.15 The Department is aware of, and understands, the concerns of visually impaired people about navigation around shared space. Our current guidance stresses the importance of involving a wide cross-section of the community, and in particular groups representing disabled people, during development of shared space schemes.
- 2.16 Earlier in the year, the CIHT published its review of shared space schemes, which included recommendations to Government for further work<sup>2</sup>. The Department is considering these recommendations and how best to take these forward.
- 2.17 The review considered many of the issues raised by the Women and Equalities Select Committee's inquiry into Disability and the Built Environment, published in April 2017. The Government published its response to this report earlier this year<sup>3</sup>.
- 2.18 The Department notes the concerns raised about shared space and has temporarily withdrawn the Local Transport Note 1/11 to allow for research to be completed and for the guidance to be updated. In addition, we have requested that local authorities

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<sup>1</sup> <https://www.parliament.uk/business/committees/committees-a-z/commons-select/women-and-equalities-committee/inquiries/parliament-2015/disability-and-the-built-environment-16-17/>

<sup>2</sup> CIHT review: 'Creating better streets: inclusive and accessible places': <http://www.ciht.org.uk/en/document-summary/index.cfm/docid/BF28B40D-9855-46D6-B8C19E22B64AA066>

<sup>3</sup> <https://www.gov.uk/government/publications/disability-and-the-built-environment-government-response-to-select-committee-report>

pause any shared space schemes they are considering that incorporate a level surface, and which are at the design stage.

### **Action 3**

We will refresh our guidance in Local Transport Note (LTN) 2/08: Cycle Infrastructure Design to ensure that Local Authorities can continue to design good, safe and inclusive schemes that work for everyone in accordance with legislation.

### **Summary of Responses**

- 2.19 There were 131 responses received for this action, with 45 from individuals and 86 from a wide range of organisations (including local authorities and disability groups).
- 2.20 A recurring theme in responses was a call for the forthcoming update to LTN 2/08 to provide a greater focus on the needs of disabled people, those with reduced mobility and visually impaired people both as pedestrians and/or cyclists.
- 2.21 A large number of responses commented on shared pathways between pedestrians and cyclists. A mixture of individuals and organisations highlighted a safety risk between people with visual impairments or other disabilities using shared cycleways.
- 2.22 Some responses also highlighted the need for more tactile paving or delineation/segregation between cyclist and pedestrian areas. A small number of responses called for research to be undertaken into the behaviour and perceptions of blind and partially sighted people when using shared routes with cyclists.
- 2.23 The Royal National Institute for the Blind (RNIB) noted that a high percentage (73%) of its members had stated that they were not confident using a path or pavement shared with cyclists. In addition, ten per cent of its members stated they had had a collision with a cyclist and sixteen per cent mentioned the speed of cyclists being a problem. Members also highlighted concern with the lack of use of bells by cyclists.
- 2.24 Several respondents highlighted the need for cross referral in LTN 2/08 to other relevant guidance. Respondents noted that there were a number of different design guidance documents and initiatives for cycling facilities and infrastructure (ranging from the Highways England Standard Interim Advice Note (IAN) 195/16 'Cycle Traffic and the Strategic Road Network' guidance, the London Cycling Design Standards and guides produced by Cycle Cities Ambition Grant areas) and that the forthcoming refreshed LTN 2/08 guidance should incorporate some of this information and provide worked examples of specific layouts.
- 2.25 A number of respondents focused on specific aspects of cycle infrastructure which were problematic for people with disabilities. Concerns included "cyclist dismount" signs (where it was noted that disabled cyclists may find it hard or impossible to mount and dismount) and the width of shared lanes (which need to be wider to

accommodate cycles, tricycles and mobility scooters). Some respondents sought clarification on whether mobility scooters and wheelchairs should be using cycling lanes or the pedestrian area.

- 2.26 We received a number of responses calling for greater enforcement of “no cycling” signs and illegal pavement cycling. Similarly, some respondents called for the removal of parked cycles causing obstructions in the pedestrian environment whilst others called for enforcement action to be taken against vehicles parked on cycle paths/ways.

#### **Update on Proposed Action**

- 2.27 The Department recently ran a competition to secure a contract to update LTN 2/08. Bids have been received and a contract was awarded at the end of February. The Department will publish a revised version of LTN 2/08 by spring 2019.

#### **Action 4**

We will work with disabled people, the bus industry and the devolved administrations, on the Regulations and guidance which will implement the Accessible Information Requirement on local bus services throughout Great Britain, helping disabled passengers to travel by bus with confidence.

- 2.28 We received 149 responses to this proposal, 43 from individuals and 106 from organisations such as bus operators, local authorities and disability groups.
- 2.29 Both individuals and organisations expressed widespread support for the proposed action. Several respondents stated that audible and visible information (AVI) on buses would make their own journeys easier whilst others pointed out that AVI would also benefit non-disabled passengers, particularly those unfamiliar with a route (e.g. tourists). A number of responses called for a clear timetable to be established for implementing the Accessible Information Requirement.
- 2.30 Several responses identified specific aspects of AVI that guidance supporting the Regulations might usefully address. For example, some wheelchair users highlighted the importance of ensuring visual displays are visible to passengers travelling in a rearward-facing position.
- 2.31 Other suggestions included providing guidance on the types of display that are easiest for visually impaired passengers to read and on the most suitable timing, speed and volume of audible announcements. A few respondents suggested that opportunities should be taken to supply interchange information at relevant stops and to provide real-time diversion and emergency announcements.
- 2.32 By contrast, a small number of responses cautioned against being too prescriptive in the Regulations and guidance and suggested focusing on outcomes, giving operators the flexibility to develop solutions as well as allowing for future technological developments.

- 2.33 A recurring theme in the responses was the need to monitor and enforce the Regulations. Several respondents proposed specific mechanisms, including auditing accessibility on an area by area basis and designating a body to carry out inspections and deal with complaints.
- 2.34 Some responses from local authorities and bus operators flagged the costs of AVI as a potential barrier to successful delivery. Suggestions for managing these costs centred upon adopting a phased approach to implementation (avoiding the additional cost of retrofitting vehicles) and the possibility of a government grant programme to support delivery.

### **Update on Proposed Action**

- 2.35 Government is committed to using powers in the Bus Services Act 2017 to require the provision of audible and visible information on board local bus services throughout Great Britain. We are currently engaging with a range of stakeholders in order to shape the policy.
- 2.36 In developing the detailed proposal it is important to consider both the views of passengers who will benefit from the information provided, and bus operators who will be integral to making the new requirement work in practice. Responses to the AAP consultation are helping to inform our thinking, including with regard to the standards that information will need to meet, and creation of a proportionate approach for challenging non-compliance.
- 2.37 Consultees currently have the opportunity to comment in the public consultation which began on 5 July 2018. The consultation document can be found at [add link to consultation webpage].

### **Action 5**

We will review and consult on best practice guidance for taxi and Private Hire Vehicle (PHV) licensing authorities, which will include strengthening recommendations on supporting accessible services, including on the action that licensing authorities should take in response to reports of assistance dog refusal. This guidance is expected to be published in 2017.

### **Summary of Responses**

- 2.38 There were 141 responses to this action, 39 from individuals and 102 from organisations. A large number of responses agreed with the proposal to review and consult on best practice guidance although some respondents felt that statutory requirements, rather than guidance, were needed – in particular, to require licensing authorities to maintain lists of taxis and PHVs designated as wheelchair accessible.
- 2.39 A recurrent theme in the responses was that drivers, dispatchers and those working in licensing authorities should have mandatory disability awareness training. Individuals and disability organisations pointed specifically to the need for training on

the carriage of assistance dogs and wheelchair users and how to assist visually and hearing impaired users.

- 2.40 The issue of wheelchair accessible vehicles (WAVs) featured in a number of responses. Several respondents felt that not enough WAVs were available, particularly in rural areas and at peak times. To help address this, some thought that guidance should provide advice on the appropriate percentage of WAVs in a local fleet.
- 2.41 Others suggested that there was a case for introducing financial incentives (such as a reduced licence fee) to encourage a greater supply of WAVs. A recurrent theme was that new standards were required to ensure that WAV taxis can accommodate larger wheelchairs. There was also a call for greater clarity over which types of wheelchair can be carried by particular vehicles.
- 2.42 On the issue of refusal to carry assistance dogs, several respondents suggested that a clear definition of an assistance dog was needed in order to help people assert their rights. A number of visually impaired individuals and representative organisations also called for taxi identification information to be more consistent and available in accessible formats and for exemption certificates to be similarly accessible to the visually impaired.
- 2.43 A number of suggestions were made for strengthening the monitoring and enforcement of accessibility requirements. Several respondents pointed to the need for a quick and easy way to report incidents (for example, via an app). Others proposed "mystery shopping" by authorities, the restoration of local licensing to enable better local authority policing of licence holders and the collection and publication of data on refusals, complaints and investigations. In the event of non-compliance with obligations, a number of respondents felt that harsher penalties were required for drivers, firms and licensing authorities as well as better compensation for users who have been unlawfully refused carriage.

#### **Update on Proposed Action**

- 2.44 We understand how important taxis and private hire vehicles are to many people, and expect local licensing authorities to use the powers already available to them to ensure that the service provided is accessible to everyone wishing to use it.
- 2.45 We agree that disability awareness training could help drivers to better understand their legal duties towards disabled passengers, and the ways in which they can help them to have a safe and comfortable journey. We are clear too that unlawful discrimination against assistance dog owners and wheelchair users is unacceptable, and that effective action must be taken to prevent it.
- 2.46 By end of 2018, we will publish for consultation revised best practice guidance to support local licensing authorities (LLAs) to use their existing powers more effectively. In particular we will recommend that authorities require taxi and PHV drivers to complete disability awareness training, make it simple to report discrimination and take robust action against drivers alleged to have discriminated against disabled passengers.

2.47 We also intend to recommend that authorities use their licensing controls to counter the lack of wheelchair accessible vehicles in some areas of the country, ensuring that the overall service meets the needs of all passengers. By autumn 2018, we will write to local licensing authorities stressing the importance of supporting an inclusive taxi and PHV fleet. We will ask those authorities who have not already done so to publish lists of vehicles designated as wheelchair accessible under Section 167 of the Equality Act 2010. We also intend to request that authorities publish on an annual basis the number of wheelchair accessible vehicles in their area.

### **Action 6**

We will seek to increase the number of accessible vehicles through appropriate recommendations to taxi and PHV licensing authorities in our draft revised best practice guidance.

### **Summary of Responses**

- 2.48 We received 122 responses to this proposal, with 25 from individuals and 97 from organisations. There was broad agreement on the need to take action, with many respondents commenting on the lack of accessible vehicles outside of major cities and some referring to instances of being refused carriage due to their disability and (in the case of wheelchair users) being charged more.
- 2.49 A number of responses commented on the use of guidance as a mechanism for bringing about change and suggested that placing statutory obligations on licensing authorities would be more effective.
- 2.50 In particular, some respondents felt strongly that authorities should be required to publish lists of wheelchair accessible taxis and PHVs. Other respondents suggested that the revised best practice guidance should include specific advice to authorities on the appropriate proportion of wheelchair accessible vehicles whilst one respondent proposed that authorities should have to review provision in their area on a periodic basis. By extension, several responses advocated encouraging licensing authorities to set targets for increasing the number of accessible vehicles in their area.
- 2.51 A frequently expressed view was that all taxi and PHV drivers should be required to undertake disability awareness training as a condition of licensing and that this training should be underpinned by consistent national standards. This was felt important to both encourage greater provision of accessible vehicles and to reduce the instances in which drivers refusing to carry disabled passengers despite their vehicles being capable of doing so.

- 2.52 On barriers to increasing the number of accessible vehicles, some respondents felt that the efforts of licensing authorities were being hindered by cross-border hiring<sup>4</sup> and that this practice should be prevented or a more consistent national set of licensing conditions introduced.
- 2.53 The cost of accessible vehicles was also cited in some responses as a factor underpinning low levels of provision. Various incentives were proposed to help overcome this, including reduced licence fees for accessible vehicles, relaxed picking up rules and priority access to busy and profitable locations such as airports and railway stations.

### **Update on Proposed Action**

- 2.54 We understand the frustration of passengers reliant upon wheelchair accessible vehicles at the lack of taxis and PHVs meeting their needs in some areas of the country.
- 2.55 Whilst we remain of the view that a mixed fleet should provide for the needs of a range of passengers we agree that the proportion of wheelchair accessible vehicles may be insufficient in some areas. We already intend to provide clearer advice in the revised best practice guidance on authorities' role in shaping the accessibility of vehicle fleets, and some of the options available to them to incentivise the operation of wheelchair accessible vehicles.
- 2.56 We also intend to write to local licensing authorities stressing the importance of supporting an inclusive taxi and PHV fleet as outlined in our response to Action 5.

### **Action 7**

We will review, in co-operation with DPTAC and others, Blue Badge eligibility for people with non-physical disabilities. This will include considering the link to disability benefits.

### **Summary of Responses**

- 2.57 Overall this action generated 165 responses, with 79 responses from individuals and 86 from organisations. A common concern emerged around the eligibility criteria and application process for Blue Badges. Respondents wanted to see existing eligibility criteria reviewed and also extended to cover hidden disabilities and medical conditions, and people with reduced mobility due to age. Blue Badges were seen by some respondents as essential to being able to travel when public transport was unavailable or inaccessible.

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<sup>4</sup> In England and Wales, a licensed PHV driver can fulfil pre-booked journeys starting or ending anywhere in England and Wales. Operators are allowed to accept booking requests where the pick-up and drop off are both outside the operator's licensing area. The operator, driver and vehicle used to fulfil a booking must all be licensed by the same authority. Taxi drivers are allowed to fulfil pre-booked journeys via any operator, regardless of licensing authority.

- 2.58 There was some concern around the misuse of Blue Badges and the need to ensure this issue was addressed. Suggestions were made to implement reviews of applications to ensure Blue Badges are still needed by the recipient; issue temporary time restricted Blue Badges where conditions are not permanent; imposing penalties and issuing photocards with the badges to prevent misuse.
- 2.59 A frequently raised issue from individuals was how autism was considered within existing eligibility criteria. There were a number of responses from parents and carers to someone with autism as well as individuals who had been diagnosed with autism, setting out their need for Blue Badges to enable safe and convenient parking. There was a strong call for further consideration to be given to this issue.
- 2.60 Respondents called for a simplified process to be implemented for Blue Badge applications. The general view was the current process is often complex, lacks consistency in assessing applications and is perceived to lack impartiality. Some respondents wanted standardised criteria and application processes amongst local authorities.
- 2.61 A recurring theme was around the lack of, or misuse of, disabled parking spaces. Respondents noted that disabled people often used cars more than any other mode of transport due to accessibility issues and therefore this should be reflected in the number of disabled parking spaces allocated at car parks and on streets. In addition, some respondents called for the design of disabled parking spaces to take into consideration wider space needs (for example, to enter and exit cars with mobility aids and wheelchairs) and for disabled parking spaces to be made available near building entrances due to drivers' or passengers' reduced mobility.

### **Update on Proposed Action**

- 2.62 The Department undertook a consultation on Blue Badge eligibility between 21 January 2018 and 18 March 2018<sup>5</sup>. An announcement will be made on the Department's actions in response to this consultation by the end of this year.

### **Action 8**

We will continue to roll-out station access improvements for which funding has been allocated, and deliver the Access for All programme in full, building on the significant progress that the programme has already made. We will continue to seek to extend the Access for All programme further in the future.

### **Summary of Responses**

- 2.63 There were 186 responses received for this action, with 58 from individuals and 128 from organisations.

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<sup>5</sup> <https://www.gov.uk/government/consultations/blue-badge-disabled-parking-scheme-eligibility-review/blue-badge-scheme-consultation-on-eligibility>

2.64 The majority of respondents agreed with this action and there was general support for the Access for All programme. However, a frequently mentioned concern was that funding for the Access for All programme needed to be extended and that improvement works under the current funding programme needed to be delivered sooner.

2.65 Some respondents called for funding to be allocated for smaller improvement works such as tactile paving and improved signage at stations. A number of suggestions were made by respondents to improve funding for the Access for All programme, and these included encouraging joint bids between private and public sectors to boost third party funding to undertake accessibility improvements; to make station improvements a planning condition as part of housing developments; and to provide central government grant funding for community rail partnerships aimed at improving accessibility at interchange train stations.

2.66 Respondents commented that a number of areas required further attention:

- improving the information available about accessible stations;
- ensuring accessibility equipment such as lifts and ramps were fully functioning;
- addressing the need for Changing Places facilities<sup>6</sup> and improving the availability of accessible toilets;
- identifying and addressing accessibility issues during the design stage of Access for All projects by consulting with passengers and disability organisations;
- there was a call for more barrow crossings<sup>7</sup> from some respondents;
- there was a call to see improvements to the platform train interface at stations;
- there was a call for improved lift design and access for wheelchair users and passengers travelling with cycles;
- improving provision of help points on station platforms;
- developing a more integrated transport system to ensure all modes of transport are accessible by all passengers;
- some concerns were raised around individual stations being closed and citing the costs of accessibility works as a reason for closure.

2.67 A recurring theme was the concern around the lack of staff at stations and the need for staff training on how to assist passengers with a wide range of visible and less visible disabilities. This was consistently raised across all the questions and actions relating to rail travel.

2.68 Respondents also made a number of suggestions for the Department to consider, such as providing information on the estimated distances or average walking times to

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<sup>6</sup> Changing Places facilities are toilets which feature a large space for people to move around - as needed by people using powered or specialist positioning wheelchairs or who require assistants to assist them. See <http://www.changing-places.org/>

<sup>7</sup> Barrow crossings tend to be used by railway staff to walk from platform to platform, usually with wheeled equipment. The public, if escorted by railway staff, can also legitimately use barrow crossings.

[http://www.nationalrail.co.uk/stations\\_destinations/HotspotDetails.aspx?StdCode=SME\\_ACT&HotspotId=45558](http://www.nationalrail.co.uk/stations_destinations/HotspotDetails.aspx?StdCode=SME_ACT&HotspotId=45558)

platforms from the station concourse; provision of pre-booked parking spaces for disabled passengers; use of local data to help inform investment decisions; greater use of the Harrington Hump<sup>8</sup>; and greater transparency of the decision making process for allocating Access for All programme funding.

### **Update on Proposed Action**

- 2.69 The Government is committed to delivering the Access for All rail accessibility programme, including the stations deferred by the Hendy report, with work to start as soon as possible after 1 April 2019. We will seek industry nominations for additional Access for All projects in 2018 and announce the next tranche of stations in April 2019.
- 2.70 Since 2016, more than 200 stations have received step free access through Access for All funding. The Statement of Funds Available for Control Period 6 (2019-2024)<sup>9</sup>, published on 12 October 2017, included funding for continued investment in the accessibility of the railway. We will be announcing details of how this funding will be allocated in due course and will launch the nomination round as soon as possible. We are aiming to have the next list of selected stations available for announcement by April 2019. We will also consult with disability groups at the design stage of Access for All projects.
- 2.71 With respect to the points raised regarding levels of station staffing, while we believe that train operators themselves are best placed to determine how to meet the needs of their passengers, each operator is required to participate in the Passenger Assist Reservation system which allows disabled passengers to book staff assistance when they require it, even at normally unstaffed stations.

### **Action 9**

Subject to the finalisation of the Statement of Funds Available (in October 2017), Government will allocate funding to provide additional accessible toilet facilities at stations as part of the next rail funding period (from 2019 onwards).

### **Summary of Responses**

- 2.72 There were 89 responses received regarding this action, with 19 responses from individuals and 70 from organisations. There was strong support from respondents for additional funding for accessible toilets. Many respondents commented that lack of accessible toilets was a barrier to travelling by train and more needed to be done to address this issue. There was a call for more toilets in general including Changing Places facilities, standard and fully accessible toilets at stations.

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<sup>8</sup> Harrington Humps are an easy access system which raises the platform edge at a train station to reduce the platform-train gap. They are particularly useful for passengers who face difficulties in taking large steps, particularly older people, parents with children and people with luggage.

<sup>9</sup> <https://www.gov.uk/government/publications/railways-statement-of-funds-available-2017>

2.73 Some respondents highlighted the need for better information about accessible toilet availability on trains and at stations to help passengers plan and be confident in taking a train journey. There were comments around ensuring toilets were open from first to last train at stations and ensuring toilets are well maintained to minimise closures on trains. Some respondents suggested that more needed to be done to prevent and address vandalism of accessible toilets.

#### **Update on Proposed Action**

2.74 We have made an additional up to £300m available to extend the Access for All programme until at least 2024. This includes £50m to restore the funding deferred by the 2015 Hendy report and £200m of new funding, a 25% increase on the £160m that was made available in the last Rail Control Period. We are currently considering how this funding can help improve accessible toilet provision on the rail network.

#### **Action 10**

From October 2017, the Department for Transport (DfT) will fund a pilot to explore opportunities to improve train tanking facilities and increase the availability of train toilets. Building on the learning from this and industry-led research in this area, we will consider how best to allocate further investment, beginning with upcoming franchising opportunities.

#### **Summary of Responses**

2.75 There were 72 responses received, with 14 from individuals and 58 from organisations. The majority of respondents highlighted the importance of knowing whether an accessible toilet would be available and in service on their journey (either at the station or on board the train). Questions were raised by some respondents about whether improving train tanking facilities would lead to reductions in the occurrence of out of service accessible toilets. Some respondents suggested more needed to be done by Government to influence change within the rail industry on this issue.

2.76 Some respondents highlighted the need for accessible toilets on trains to be designed to accommodate two people to ensure carers could provide help and to be made accessible for visually impaired passengers by improving the door access and having alternatives to the engaged light.

#### **Update on Proposed Action**

2.77 The Department will be announcing details of how it intends to fund the pilot to explore opportunities to improve train tanking facilities as part of the funding allocation for Control Period 6 (2019-2024).

## Action 11

The Office of Rail and Road (ORR) will publish the results of its large programme of research, looking in depth at accessibility and assistance, in 2017. It is expected that the results will provide a snapshot of industry performance and include industry level recommendations to take forward.

### Summary of Responses

- 2.78 There were 71 responses to this action, of which 18 were from individuals and 53 from organisations. Respondents specifically asked for a review of driver only operated trains citing the combination of fewer staff to provide assistance alongside unstaffed stations hindering spontaneous travel by train for disabled people. Some respondents commented that there were inconsistent levels of staff assistance and this needed to be addressed and improved.
- 2.79 Some respondents agreed that ORR's research could be useful in developing future policies and providing insight into industry performance, however, concerns were raised that disabled organisations had not been involved in the research.

### Update on Proposed Action

- 2.80 The Department has studied the findings of the three pieces of research<sup>10</sup> around assisted travel services published by the ORR and has responded to the consultation on improving assisted travel launched by ORR.
- 2.81 The findings of the research have provided an insight into industry performance with regards to the level of assistance given to passengers who require it. We are making it a requirement as part of the franchise competition process that train operators should promote the awareness of the Passenger Assist system and introduce enhanced disability awareness training covering both visible and less visible disabilities.
- 2.82 In all the three pieces of research, disabled people were actively involved by taking part in surveys, interviews and suggesting ideas on how the provision of assisted travel services can be improved.

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<sup>10</sup> [http://orr.gov.uk/\\_data/assets/pdf\\_file/0008/25982/research-into-passenger-awareness-of-assisted-travel-services-april-2017.pdf](http://orr.gov.uk/_data/assets/pdf_file/0008/25982/research-into-passenger-awareness-of-assisted-travel-services-april-2017.pdf)  
[http://orr.gov.uk/\\_data/assets/pdf\\_file/0009/25983/research-into-passenger-experiences-of-passenger-assist-november-2017.pdf](http://orr.gov.uk/_data/assets/pdf_file/0009/25983/research-into-passenger-experiences-of-passenger-assist-november-2017.pdf)  
[http://orr.gov.uk/\\_data/assets/pdf\\_file/0006/25980/a-mystery-shop-of-turn-up-and-go-services-report-november-2017.pdf](http://orr.gov.uk/_data/assets/pdf_file/0006/25980/a-mystery-shop-of-turn-up-and-go-services-report-november-2017.pdf)

## Action 12

DfT is exploring with the Rail Delivery Group (RDG) the ability for train operators to provide “alternative journey options” if the journey becomes unsuitable, for example, if the only accessible toilet on a train goes out of use unexpectedly.

### Summary of Responses

- 2.83 There were 74 responses received, with 15 from individuals and 59 from organisations. The majority of respondents want to see more information made available on whether accessible toilets on trains are working and the alternative travel options if they are not. This information should be made available in a variety of easily accessible formats.
- 2.84 Some respondents raised concerns about the suitability of alternative journey options currently provided, such as taxis and buses, and the need to ensure that they are accessible vehicles, incur no extra cost to the passenger and are arranged with minimal delay.
- 2.85 Some respondents highlighted that trains needed to have more than one accessible toilet.

### Update on Proposed Action

- 2.86 Train operators are required as part of their Disabled People’s Protection Policies (DPPPs) to provide alternative transport, at no extra cost, where a journey cannot be undertaken by rail.
- 2.87 The RDG in conjunction with a number of Train Operating Companies is trialling a new assistance system, which will provide alternative journey options (where required) to passengers who use it. The trial will be evaluated by autumn 2018. We will also support RDG in the introduction of a new Passenger Assistance application which has been designed to enable customers to book rail assistance.

## Action 13

We are exploring with RDG the possibility of placing dynamic notifications on the Stations Made Easy web pages of the availability of accessible features on trains.

### Summary of Responses

- 2.88 There were 76 responses to this action, with 18 responses from individuals and 58 from organisations. A common theme emerged highlighting a general lack of public awareness about where to find information about the accessibility features available on trains. The majority of respondents were not aware of the Stations Made Easy webpage. Some respondents wanted the information on the webpages to be

regularly updated and easier to find. The information should also be made available in a variety of formats to ensure easy accessibility.

#### **Update on Proposed Action**

- 2.89 The Department will support the work being led by the RDG to produce a digital map by August 2018 which shows accessibility information for all stations on the rail network

#### **Action 14**

We are also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.

#### **Summary of Responses**

- 2.90 There were 60 responses received, with 12 responses from individuals and 48 from organisations.
- 2.91 Overall there was general support for this action. However, concerns were raised about how this would be monitored and implemented. A number of respondents felt the information would need to be supplemented by staff assistance and alternative travel options.
- 2.92 Some respondents felt that notifications would need to be made available in a variety of formats and not just in digital format. Other respondents suggested using websites such as Trainline, using apps and text messages to provide notifications. One respondent commented that seat reservations and bookings should be carried over to the next train service if their original train was cancelled.

#### **Update on Proposed Action**

- 2.93 The Department will explore with RDG the ability for train operators to provide 'alternative journey options' if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.

#### **Action 15**

We are working with the Rail Safety and Standards Board (RSSB) to launch an innovation competition in September 2017, which will find solutions to reducing the cost of accessibility improvements at stations, including the availability of accessible toilets. This competition will also focus on making improvements aimed at those with hidden disabilities.

#### **Summary of Responses**

- 2.94 There were 66 responses received, with 12 responses from individuals and 54 from organisations.
- 2.95 The majority of responses supported this action. However, concerns were raised about the lack of publicly available information about this innovation competition such as the criteria and selection process as well as the lack of involvement of disabled people and organisations.
- 2.96 Some respondents felt there was a lack of clarity about how it would lead to improvements for passengers with less visible disabilities. Others felt strongly that this funding should have been used to make improvements that have already been identified, whilst others called for clear, quantifiable targets for delivery and implementation of any accessibility improvements funded.

### **Update on Proposed Action**

- 2.97 The Department, in conjunction with RSSB, launched two innovation competitions, valued at £600,000 and run by the RSSB, to find solutions to reducing the cost of accessibility improvements at stations. Most of the applications received were on innovations aimed at making improvements for passengers with less visible disabilities.
- 2.98 The winning entries<sup>11</sup> include innovations which identified lower cost means of improving physical access to stations (e.g. lifts and toilets), and use information technology to support people with less visible disabilities. These innovations covered impairments affecting learning, memory and mental health as well as developmental conditions such as autism. A brief summary of the winning entries is provided below:
- Nodality (Navigating transport interchange): This project looks to build a website that provides disabled passengers and carers with all the information they need to understand if they can use a specific station.
  - LVIS (Less Visible Impairments): Feasibility study into how a synthetic digital environment could be used to increase frontline staff understanding about difficulties experienced by rail users with less visible impairments.
  - ACCESS (Accessibility Evaluation Survey for Stations): Provide an easy-to-use assessment tool to enable those with responsibility for station accessibility to identify the shortfalls, prioritise improvement measures and monitor their effectiveness.
  - Welcome Aboard: A smartphone app for both people living with dementia and rail staff that provides two-way communication and a 'check-in' feature that alerts staff to a passenger's arrival at the station
  - Rail4All: This app provides a two-way communication method to provide Station Facilities Owners (SFOs) with requests for immediate journeys from vulnerable passengers.

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<sup>11</sup> <https://www.gov.uk/government/news/government-puts-disabled-passengers-first-by-backing-innovative-projects-to-improve-train-journeys>

- Aubin (The Journey Planner for Autistic People): Makes travel on the railways easier for people on the autism spectrum by planning the least stressful routes and / or modes of travel.
- Signly: A toolkit that uses the latest augmented reality software to improve the passenger experience for people who use sign language..
- Accessible Journey Pocket Assistant: A personalised, accessible journey planner and personalised wayfinding services, the portable device will provide accurate and personalised guidance at each step of the journey.

2.99 These innovations will need to be developed and tested with disabled people before they are rolled out more widely.

### Action 16

We are also investing in a new rail innovation accelerator which will look at how the availability of facilities can be improved.

### Summary of Responses

- 2.100 There were 67 responses received to this action, with 15 responses from individuals and 52 from organisations.
- 2.101 Overall respondents were supportive of this action. However, respondents wanted to see more investment across a range of issues:
- staffing levels and training;
  - information provision and signage particularly at interchange stations;
  - accessibility equipment on rolling stock which takes into consideration the range of disabilities and conditions;
  - accessible toilets at stations and on board trains; and
  - alternative service provision, for example, when trains are cancelled or accessibility equipment is not available.
- 2.102 Some respondents highlighted the need to develop a much more coordinated approach to innovation funding across the industry.

### Update on Proposed Action

- 2.103 The Accelerating Innovation in Rail 5 (AiR5) competition was launched in September 2017 by Innovate UK and the winners were announced in February 2018<sup>12</sup>. The innovations emerging from the accessibility competition will need to be developed, evaluated in service (pilots) and then implemented based on the

<sup>12</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/680443/Accelerating\\_Innovation\\_in\\_Rail\\_5\\_-\\_Competition\\_Results.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/680443/Accelerating_Innovation_in_Rail_5_-_Competition_Results.pdf)

outcomes from these trials. Ten of the winning projects have started and the projects will take up to 12-24 months to complete

### **Action 17**

We will commission research, which will be published by 2018, to measure the impact for passengers of work to improve rail vehicle accessibility since the introduction of Rail Vehicle Accessibility Regulations (RVAR) and the Persons of Reduced Mobility Technical Specification for Interoperability (PRM-TSI).

### **Summary of Responses**

- 2.104 There were 69 responses received to this action, with 10 responses from individuals and 59 from organisations.
- 2.105 There was a mixed response with some support for the research. However, some respondents disagreed on the basis that this was repeating existing research and not improving the daily passenger experience.
- 2.106 Respondents raised a number of issues for consideration. These included ensuring disability organisations, disabled passengers, train operators and regulators were involved in research projects to develop future improvements. There was a call for information about the research to be provided in a variety of accessible formats with clear timelines for delivery and publication.
- 2.107 Respondents felt there was a need to carry out research to measure the value of refurbishing older rolling stock. There was also a call for broader research to be undertaken across all modes to facilitate cross-modal improvement.
- 2.108 Respondents highlighted that there was a need for clear quantifiable targets for measuring progress and ensuring that Train Operating Companies were complying with the Rail Vehicle Accessibility Regulations (RVAR) and the Persons of Reduced Mobility Technical Specification for Interoperability.
- 2.109 Some respondents raised concerns about the levels of accessibility provided by older vehicles which have been upgraded to meet modern accessibility standards and felt that accessibility standards should be reviewed to reflect changing needs. This review should include consideration of electric wheelchairs, mobility scooters and other mobility aids, as well as generally reflecting technological progress.
- 2.110 Many respondents highlighted the challenge that the gap between the train and the platform continues to present for passengers with disabilities and reduced mobility.

### **Update on Proposed Action**

- 2.111 By the end of 2019, we will publish research which measures the impact for passengers of work to improve rail vehicle accessibility since the introduction of Rail

Vehicle Accessibility Regulations (RVAR) and the Persons of Reduced Mobility Technical Specification for Interoperability (PRM-TSI). Following feedback received from the AAP consultation, this research will review the impact of existing accessible design standards on the experience of those with visual impairments and assistance dogs.

### **Action 18**

By the end of 2017, we will publish performance data on accessible features on trains, and details of any remedial action necessary to improve both the quality of the data reported and any areas of poor performance.

### **Summary of Responses**

- 2.112 There were 67 responses received, with 13 responses from individuals and 54 from organisations. Respondents raised a number of issues for consideration including expanding the criteria used to measure performance to also capture data on improving accessibility of station facilities and car parks and making information on accessible services easier to find and in a variety of formats.
- 2.113 Some respondents also suggested that performance data should be captured in comparable formats for all Train Operating Companies and that this data should be publicly available. Respondents also wished to receive more information on how the data will be used to monitor and improve accessibility and the customer experience.
- 2.114 Some respondents highlighted the need for clearer communication on how to report faulty accessibility equipment and suggested implementing an automated system to report faults to ensure accessibility equipment is properly maintained.

### **Update on Proposed Action**

- 2.115 We are considering the findings of scoping work which was carried out to look at the value of collecting retrospective performance data of accessibility features on trains (in particular accessible toilets). Initial research has identified that defining a useful metric for data capture and effective operator comparison is challenging given differences in fleet and route types. Research has also highlighted that the benefits of data that can be captured are limited in providing passengers with information about the journey they plan to (or are about to) make as it can only provide information on past performance.
- 2.116 We are now exploring possibilities with RDG for better in journey fault reporting channels, both for passengers and train crew. Furthermore, proposed changes to rail franchise agreements include specific provision for operators to use technology to improve and ensure the reliability of accessible toilets.

## **Action 19**

We will also share the performance data reported to us with ORR to inform any action they take to ensure operators are meeting their legal requirements to comply with accessible rail vehicle standards.

### **Summary of Responses**

- 2.117 There were 66 responses received, with 12 responses from individuals and 54 from organisations. A recurring view from respondents was the need for transparency on the methodology and format of the data captured, how it is being used and for the information to be made publicly available in a variety of accessible formats.
- 2.118 A common theme emerged around the need for improved monitoring and enforcement to ensure Train Operating Companies are complying with existing legal requirements. Some respondents called for clarity on ORR's role in enforcing compliance and ensuring comparable data is captured from all Train Operating Companies on how they are implementing accessibility standards. Some respondents suggested using mystery shoppers in addition to performance data reporting.
- 2.119 Some respondents commented that a number of accessibility issues remained despite existing legislation such as the need to improve audio and visual facilities, access to priority seating, wheelchair access, accessible toilets, catering facilities, the availability of staff to provide assistance on board trains and improving the complaints procedures.
- 2.120 Some respondents suggested developing and implementing a penalty regime to drive up compliance and penalise operators who fail to meet the January 2020 RVAR and PRM-TSI deadlines for trains built before 1999. Concerns were also raised about the impact on disabled passengers of dispensations granted to Train Operating Companies for older rolling stock and a call to review the existing dispensation policy.

### **Update on Proposed Action**

- 2.121 The Department is considering the issues raised and will continue to work with ORR to understand how we can share data and work collaboratively to ensure train operators deliver consistent service levels for disabled passengers and persons of reduced mobility.
- 2.122 The requirement to comply with accessibility standards set out in RVAR and the PRM-TSI has a mandatory end date of 1 January 2020 for vehicles first brought in to service prior to 1999. For vehicles built after that date, the standards are already in force. Statistics are publicly available on the number of accessible rail vehicles in service<sup>13</sup>.
- 2.123 The Department's policy of 'targeted compliance' for operators of older vehicles which undergo upgrade work to meet modern accessibility standards can include

<sup>13</sup> <https://www.gov.uk/government/publications/list-of-rail-vehicles-built-or-refurbished-to-modern-accessibility-standards>

granting dispensations, on a class by class basis, where there is evidence that meeting the standards would be technically unfeasible or would require significant structural or internal re-engineering. Dispensation requests are subject to stakeholder consultation with ORR, DPTAC and Transport Focus. Dispensations granted are available publicly<sup>14</sup>.

- 2.124 ORR is the enforcement body for RVAR and the Railways Interoperability Regulations 2011 (which mandate compliance with the PRM-TSI). ORR's enforcement policy statement is informed by the regulatory principles as set out in the Legislative and Regulatory Reform Act 2006<sup>15</sup>. The statement sets out a range of approaches ORR uses to secure compliance which includes information, advice, persuasion, co-operation, inspection, audit, permissioning, verification and compulsion through to deterrence activities of formal enforcement.
- 2.125 With regard to broader accessibility issues, ORR ensures that train operators systematically consider the needs of travellers that require assistance to use the rail network through approval and review of the disabled people's protection policies (DPPPs) that each has to produce under its licence conditions, and monitor compliance with those policies. As part of this, ORR collects, monitors and publishes information that it requires those operators to provide.

## Action 20

We will support the Driver and Vehicle Standards Agency (DVSA) in its activities to communicate with operators on, and incentivise prompt compliance with, the Public Service Vehicles Accessibility Regulations<sup>16</sup> (PSVAR), and to take decisive action where this does not happen. We will expect the DVSA to report annually on the action taken.

## Summary of Responses

- 2.126 None of the 114 responses to this action, 33 from individuals and 81 from organisations, disagreed with the proposal. However, several responses emphasised the need to take clear action against operators that fail to comply with their obligations, with a small number suggesting that operators were actively seeking to avoid these obligations (for example, by removing seats).
- 2.127 A recurrent theme in responses was the design of wheelchair spaces on buses. Several aspects of existing designs received criticism, including the use of a reference wheelchair which is smaller than most existing wheelchairs; failure to design in sufficient space to manoeuvre into the wheelchair area; a lack of stability when buses turn corners; and the inaccessibility of bells from the wheelchair space.

<sup>14</sup> <https://www.gov.uk/government/collections/heavy-rail-fleets-2020-targeted-compliance>

<sup>15</sup> [http://orr.gov.uk/\\_data/assets/pdf\\_file/0016/5650/health-and-safety-compliance-and-enforcement-policy-statement-2016.pdf](http://orr.gov.uk/_data/assets/pdf_file/0016/5650/health-and-safety-compliance-and-enforcement-policy-statement-2016.pdf)

<sup>16</sup> <http://www.legislation.gov.uk/ukksi/2000/1970/contents/made>

- 2.128 The applicability of the PSVAR to coaches and rail replacement services featured in several responses but there was no consensus view. Some responses favoured applying standards to all vehicles whilst others suggested exceptions should be made, for instance when a non-accessible coach is the only one available in a rural area.
- 2.129 A number of responses focused less on the accessibility of vehicles themselves and more on improving the accessibility of bus stops (calling for raised kerbs, better seating and audio-visual information) and on aspects of driver behaviour that could improve journey quality for disabled passengers (such as waiting for passengers to take their seats before moving off).

### **Update on Proposed Action**

- 2.130 The PSVAR prompted a revolution in the accessibility of buses and coaches, but they will only continue to remain relevant if their requirements are enforced effectively.
- 2.131 We will support the DVSA in its activities to incentivise prompt compliance by bus operators with the PSVAR and to take decisive action where this does not happen. We will also regularly report on DVSA's enforcement activities.
- 2.132 In addition, as set out in the Inclusive Transport Strategy, we also plan to commission, during 2019, research to identify a standard to assist local authorities in improving roadside infrastructure supporting bus services.

### **Action 21**

We will review, with Government partners and stakeholders, the reasons why some taxi and PHV drivers refuse to transport assistance dogs, and identify key actions for local or central government to improve compliance with drivers' legal duties.

### **Summary of Responses**

- 2.133 There were 91 responses to this proposed action, 20 from individuals and 71 from organisations, with all expressing their support for the proposal. A number of individuals described the impact refusals have had on their daily life (missed appointments, trains etc.) and some said that they now avoid travel by taxi or PHV unless they know the company and its drivers.
- 2.134 Several responses listed drivers' common concerns with carrying assistance dogs. Reference was also made to a survey on the reasons for refusals undertaken by the Guide Dogs for the Blind Association<sup>17</sup>. A small number of respondents concluded that the reasons for refusal are already well known and that the focus of the review should be on identifying specific, time-bound actions for addressing the problem.

<sup>17</sup> <https://www.guidedogs.org.uk/media/3859/hail-storm.pdf>

- 2.135 A number of respondents felt that mandatory disability awareness training for taxi and PHV drivers would improve compliance. Several responses also proposed a communications campaign, aimed at both drivers and passengers, to increase awareness of legal requirements and to ensure that passengers understand the powers licensing authorities have to enforce the requirement to transport assistance dogs.
- 2.136 For many respondents, a greater level of enforcement activity was felt to be key to improving compliance. To support activity by the licensing authority, several responses called for an improved system for users to report refusals or concerns about drivers/operators. Some visually impaired respondents pointed to the need to make it easier to obtain the details of drivers who refuse to transport them and called for drivers who have been granted a medical exemption to display it in accessible formats. A small number of responses identified barriers to effective enforcement, including a lack of resources in authorities to follow up complaints and the practice of cross-border hiring<sup>18</sup>.
- 2.137 A recurrent theme in the responses was that existing sanctions had not proved sufficient to discourage the refusal to transport assistance dogs. Respondents proposed a variety of penalties, including larger fines and the suspension or revocation of drivers' licences.

### **Update on Proposed Action**

- 2.138 For over a decade it has been illegal for non-exempt drivers of taxis and PHVs to refuse the carriage of assistance dogs or to charge their owners extra, and it is unacceptable for a minority of drivers to continue discriminating in this way.
- 2.139 As set out in the Inclusive Transport Strategy, by the end of 2019, we will undertake research to better understand the refusal of assistance dog owners by taxi and PHV drivers and confirm what steps we will take in response, potentially including the amendment of legislation or guidance.
- 2.140 In the meantime however, we urge local licensing authorities to consider what they can do to eliminate discriminatory behaviour by licensed taxi and PHV drivers, including the provision of mandatory training, and the taking of effective action against those alleged to have acted inappropriately.
- 2.141 Authorities must take allegations of discrimination seriously, understanding the impact they have on the ability of disabled people to live and travel independently and with confidence. Allegations should always be investigated thoroughly and, where sufficient evidence exists that a crime has been committed, drivers should be prosecuted. Authorities should also consider how licensing sanctions, including the suspension or revocation of licences can support criminal penalties and so send a strong message that discrimination will not be tolerated.
- 2.142 Whilst current legislative requirements do not allow for the adaptation of medical exemption notices, we understand the challenge experienced by visually impaired

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<sup>18</sup> Explained in footnote 4 above

people seeking to confirm whether a notice is genuine, and will continue to support authorities to identify alternative approaches for achieving this.

### **Action 22**

We have begun publishing enforcement newsletters aimed at local authorities (i.e. all Blue Badge teams and parking teams) to promote enforcement success stories and good practice, in order to help encourage better enforcement of disabled parking spaces. We will also continue our regional engagement workshops with local authorities and will work with DPTAC on both initiatives.

### **Summary of Responses**

2.143 There were 96 responses received, with 28 responses from individuals and 68 from organisations. Overall there was strong support for this action. Respondents raised a number of issues to be addressed such as:

- a need for more disabled parking spaces and improving enforcement measures to monitor and prevent misuse;
- an awareness raising campaign to publicise Blue Badge scheme rules and prevent misuse; and
- reviewing and updating Inclusive Mobility guidance regarding disabled parking.

### **Update on Proposed Action**

2.144 The Department has been publishing enforcement newsletters and has undertaken some regional workshops to encourage more enforcement and the sharing of best practice between authorities.

2.145 We will consider what further steps can be taken to tackle abuse and educate the public about the impact that misuse of disabled parking spaces by those not entitled to use them can have on vulnerable people. For an update on Inclusive Mobility guidance, please see Action 1.

### **Action 23**

We will work with the bus industry, DPTAC, Driver Certificate of Professional Competence (Driver CPC) training accreditors and the DVSA to seek to ensure that the training of bus drivers in disability awareness and equality reflects the Department's recently developed best practice guidance, and that appropriate arrangements are in place before such training becomes mandatory in March 2018.

## **Summary of Responses**

- 2.146 There were 130 responses to this action, 49 from individuals and 81 from organisations. Most responses expressed support for the proposal. A number of respondents called for the best practice guidance to be published as soon as possible and some suggested that government should mandate disability awareness and equality training for staff on all forms of public transport.
- 2.147 Several responses made suggestions about the content and coverage of disability awareness and equality training. A number of respondents cited particular conditions (often hidden impairments) that they felt drivers needed to better understand and specific behaviours drivers should avoid (such as leaving large gaps between bus and kerb) or which it would be helpful for them to adopt in future.
- 2.148 A number of responses suggested training should include advice on handling difficult situations such as when the wheelchair space is occupied by a pushchair. Some responses, particularly from disability organisations, expressed a desire for greater consistency in training between companies or at least a set of minimum standards.
- 2.149 Several responses focused on how to maximise the effectiveness of training. A recurrent view was that disability groups should be involved in designing and delivering training to give drivers access to real, lived experiences. Other responses cautioned against allowing training to be delivered online or undertaken in a driver's own time. Some respondents pointed out that it would be important for drivers to undertake regular refresher training.
- 2.150 Monitoring and enforcement of the training requirement featured in a number of responses. Several disability organisations and local authorities felt that a monitoring regime was necessary to check not just whether training was taking place but whether it was having the intended effect of improving driver behaviour. Other respondents thought that decisive action should be taken against operators that fail to provide training or drivers that fail to act in accordance with their training. A further suggestion was to replicate for bus operators the need to produce a Disabled People's Protection Policy which is a licensing condition for Train Operating Companies.

## **Update on Proposed Action**

- 2.151 The interaction between bus and coach drivers and their passengers can be integral to providing an inclusive service accessible to all. This is why by the end of 2019, we will publish best practice guidance for delivering training across the bus sector. This guidance will assist operators in complying with the new mandatory disability awareness training requirement which came into force across the sector in March 2018.
- 2.152 By spring 2019, we will develop a monitoring and enforcement framework for mandatory bus driver disability awareness training, which will include identifying a body to ensure compliance by bus operators with legal requirements.

## Action 24

We will support the Office of Rail and Road (ORR) in its monitoring of disability equality and awareness training undertaken by train and station operators.

### Summary of Responses

- 2.153 There were 118 responses received regarding this action, with 37 responses from individuals and 81 from organisations. Overall, respondents wanted to see improvements to staff training around disability awareness which should include steps staff can take to help passengers with a range of visible and less visible disabilities.
- 2.154 A number of specific issues were raised such as ensuring disability awareness training is developed and delivered in collaboration with disability organisations, and ensuring there is consistency in the training provided across the rail network by individual train operating companies. Some respondents called for disability awareness training to be written into franchise agreements and improved monitoring to ensure compliance. Respondents suggested raising awareness of the Disabled People's Protection Policies (DPPP) approval process and establishing a disability committee to ensure DPPPs are being met.

### Update on Proposed Action

- 2.155 The Department supports the Office of Rail and Road (ORR) in its role in the monitoring of disability equality and awareness training by train and station operators. We are currently working closely with ORR in their review of the Disabled People's Protection Policies (DPPP) guidance.
- 2.156 In addition, as part of the Inclusive Transport Strategy, the Department has committed that, by the end of 2018, it will include a section focused entirely on accessibility in rail franchise competitions which will require bidders to commit to providing enhanced disability awareness training for staff covering a range of impairments, including less visible disabilities, as part of the franchise tendering process.

## Action 25

We will encourage taxi and private hire licensing authorities to promote disability awareness and equality training for licensed taxi and private hire drivers, and recommend, in our draft best practice guidance, that such training be mandated in their licensing policies.

### Summary of Responses

- 2.157 This proposal attracted 124 responses, 32 from individuals and 92 from organisations.
- 2.158 Whilst many of the responses expressed support for the proposal, a recurrent view was that the government should go further by mandating disability awareness and equality training for taxi and PHV drivers and ensuring that this requirement is monitored and enforced. A small number of responses suggested that government funding was needed to ensure that training was high quality and had the desired effect.
- 2.159 The responses contained a number of suggestions about the design and content of disability awareness and equality training. Several individuals and disability organisations recommended that disability groups be included in developing the content of the training and in delivering courses to drivers.
- 2.160 A number of authorities that already require training argued for consistent standards to be introduced across all areas, especially given the level of cross-border hiring<sup>19</sup>. Some responses advocated the introduction of a Certificate of Professional Competence for taxi/PHV drivers similar to that for bus drivers in order to drive up standards of customer service. A small number of respondents suggested that drivers who take disabled children to school should also have child protection and safeguarding training.
- 2.161 Although not specific to the proposed action, some responses pointed to the underlying need to increase the proportion of accessible taxis and PHVs (especially outside of London), whilst others suggested that licensing authorities and operators should do more to ensure that booking systems and information about services are accessible to people with a range of disabilities.

### **Update on Proposed Action**

- 2.162 We believe that effective disability awareness training has the potential to enable taxi and PHV drivers to provide every passenger with the assistance they require. Around a third of licensing authorities already require drivers to complete disability awareness training before their licence is issued or renewed. We want every driver to complete such training, and urge authorities to prioritise action to achieve this.
- 2.163 The powers to do this are already in place, and our revised best practice guidance for local licensing authorities will recommend authorities use them.

### **Action 26**

ORR will publish the results of its large programme of research looking in depth at accessibility and assistance in 2017.

## **Summary of Responses**

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<sup>19</sup> Explained in footnote 4

2.164 This action received 84 responses, with 24 responses from individuals and 60 from organisations. This action was also referred to as Action 11 in the Accessibility Action Plan consultation. The responses to this action were similar to the responses to Action 11.

#### **Update on Proposed Action**

2.165 Please refer to Action 11 above for an update on this action.

### **Action 27**

We will report on the progress of joint research with Transport Focus, to identify the challenges inhibiting passengers from travelling, by the end of 2017.

#### **Summary of Responses**

- 2.166 This action received 78 responses, with 16 responses from individuals and 62 from organisations. Generally respondents were supportive of this research. However, respondents highlighted that they felt there was a need for clear, quantifiable targets for this research and clarity on how issues identified will be addressed. Other areas of concern from respondents tended to be around the research methodology such as ensuring passengers with a range of visible and less visible disabilities were involved, capturing the views of people who do not currently travel by rail to understand what barriers exist, ensuring the research captures the end to end journey experience whether pre-booked or spontaneous travel and that similar research should be carried out across all modes of transport.
- 2.167 Respondents made a number of specific suggestions such as reviewing peak travel restrictions, implementing automatic journey break rights on tickets and use of Harrington Humps<sup>20</sup> where possible on platforms.

#### **Update on Proposed Action**

- 2.168 The research into the travelling experiences of disabled passengers, identifying the challenges inhibiting disabled passengers from using the rail network that was commissioned by the Department and Transport Focus has been completed. The research findings will be published by the end of 2018.
- 2.169 The research included people with a range of visible and less visible disabilities and those who do not currently travel by rail.
- 2.170 The Department notes the views received on the use of Harrington Humps on platforms and confirms its continued support of its use, where possible.

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<sup>20</sup> Please see footnote 8 above

### **Action 28**

DfT is exploring with RDG the ability for train operators to provide ‘alternative journey options’ if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.

#### **Summary of Responses**

2.171 This action received 78 responses, with 23 responses from individuals and 55 from organisations. This action was also referred to as Action 12 in the Accessibility Action Plan consultation. The responses to this action were similar to the responses to Action 12.

#### **Update on Proposed Action**

2.172 Please refer to Action 12 above for an update on this action.

### **Action 29**

DfT is also exploring with RDG how notifications of such incidents [where accessible facilities become unavailable] can be provided to passengers as early as possible.

#### **Summary of Responses**

2.173 This action received 76 responses, with 20 responses from individuals and 56 from organisations. This action was also referred to as Action 14 in the Accessibility Action Plan consultation. The responses to this action were similar to the responses to Action 14.

#### **Update on Proposed Action**

2.174 Please refer to Action 14 above for an update on this action.

### **Action 30**

We will work with representative bodies (e.g. the Confederation of Passenger Transport (CPT) and the Rail Delivery Group (RDG)), and will support the work of regulators (such as the Office of Rail and Road), to encourage greater promotion of information about the rights of disabled travellers and what they are entitled to expect in terms of service and facilities, as well as developing easier ways to register complaints when things go wrong.

## Summary of Responses

- 2.175 There were 88 responses to this action, with 21 from individuals and 67 from organisations, with the majority of respondents supporting the proposed actions.
- 2.176 Some respondents felt that the promotion of disabled peoples' rights cannot in itself improve the reliability of transport services unless compliance is further enforced. It was suggested that enforcement of service providers to meet their obligations should come first, so that when a complaint is submitted to these providers it is taken more seriously.
- 2.177 Some respondents highlighted that Government needed to ensure that the new ways of promoting this information are provided in a variety of formats both online and at stations (for example, audio and large font versions).
- 2.178 It was suggested that Government involve disabled passenger groups at all levels of this promotion to ensure that the new complaints procedures are genuinely easier for all users as a whole.

## Update on Proposed Action

- 2.179 We note the responses received to this proposed action, in particular the call for stronger enforcement of disabled people's rights. The Department has set out its commitment to promote greater awareness of disabled people's rights and strengthen the monitoring and enforcement processes in place across all modes of transport in Chapter 6 of the Inclusive Transport Strategy.
- 2.180 Key commitments include:
- launching a major new awareness raising campaign, developed jointly with DPTAC and disabled people's organisations aimed raising awareness of disabled travellers' rights and needs, and
  - working with industry and consumer groups to support the establishment of a Rail Ombudsman to investigate unresolved customer complaints and issue decisions that are binding on the industry and ensure that disabled travellers are fully aware of the obligations on transport operators and know how to raise complaints, if needed.

### Action 31

We will work with transport authorities and representative bodies (e.g. CPT and RDG) to encourage the provision of better information about levels of accessibility on vehicles and services, so that disabled people can make informed choices about their journeys. This will include issuing guidance concerning the provision of information about the accessibility of bus services.

## Summary of Responses

- 2.181 This action received 90 responses, with 24 responses from individuals and 66 from organisations. The majority of respondents were supportive of the potential actions described.
- 2.182 A common theme among responses was the need for clarity and accuracy in the information provided. Many respondents felt that the best journey planning would be possible when information was consistently kept up-to-date, and was designed to be clear for all users.
- 2.183 Specific suggestions on how to do this included companies listing accessibility features of stations on transport apps, maintaining up-to-date station plans online, clearly stating where concessions do and do not apply, providing real-time data on the occupation status of wheelchair spaces and designing standardised symbols to indicate accessible features across the entire transport network. In a large number of cases these respondents also called for a method of ensuring that the provided information was accurate to the actual service provision.
- 2.184 Respondents highlighted that passengers would also benefit from a greater integration of information. Combining train and bus services' accessibility information into a single search; combining information on the ability to board a vehicle with a mobility scooter and then park at the destination, and obtaining information on the journey to and from the starting and ending stations (for example, road works en route to a bus stop) were received as examples of where information could be integrated for ease of use.
- 2.185 The accessibility of the information was raised in some responses, where ensuring that information is available in different formats to fit the needs of different users, and ensuring that new systems are tested with disabled users and groups to validate the design, were suggestions received on how to provide the information inclusively.

## Update on Proposed Action

- 2.186 As set out in the Inclusive Transport Strategy, we will support the RDG to develop an online model of stations which will enable passengers to familiarise themselves with the layout and environment before they travel.
- 2.187 In addition, the Department will explore with the RDG the ability for train operators to provide 'alternative journey options' if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.

### Action 32

We will support the work of the RDG and ORR to encourage further promotion of the benefits of Disabled Persons Railcard (DPRC) in order to further increase its take up and use.

## Summary of Responses

- 2.188 There were 81 responses received, with 28 responses from individuals and 53 from organisations. Several issues were highlighted by respondents about the DPRC. A common theme that emerged was a lack of public awareness of the DPRC. Respondents felt the scheme needed to be publicised much more widely and in a variety of formats to raise awareness. In addition, many respondents made the link to a lack of awareness of Passenger Assist as well. There were a number of suggestions made of practical steps that could be taken to increase its publicity. Several respondents also made the point that there needs to be more publicity of the Disabled People's Protection Policy which is implemented by ORR.
- 2.189 A recurring theme amongst responses from individuals and organisations such as DPTAC, RDG and Transport Focus was that the current eligibility criteria were too narrow and needed to be reviewed and updated.
- 2.190 Respondents highlighted the need to harmonise criteria and streamline processes for applying for different concessionary schemes. The current system needed to be standardised to ensure fairness and consistency around eligibility criteria, the evidence required to apply, the application process and the benefits of such schemes.
- 2.191 Some respondents cited problems caused by poor co-ordination between health and social providers as well as between local and regional authorities as part of the application process. The lack of consistency and clarity with the different concessionary schemes also acted as a barrier. Some respondents called for the introduction of a universal disabled persons travel card.
- 2.192 Respondents also highlighted that it still costs a disabled person more to travel than a non-disabled person where a companion is needed. Some respondents suggested that carers or companions of DPRC holders should be entitled to free travel when accompanying them on journeys.
- 2.193 Some respondents also suggested that disabled passengers should be automatically offered seats in the first class section on crowded trains to ensure they have a seat if they want one.

### Update on Proposed Action

- 2.194 As set out in the Inclusive Transport Strategy, from summer 2018, the Department will work with the Rail Delivery Group (RDG) to review the eligibility criteria for the Disabled Persons Rail Card. We expect this review to be completed in 2019.

### Action 33

We will continue to identify and support initiatives for promoting and supporting travel training, mentoring and buddy schemes.

### **Summary of Responses**

- 2.195 This action received 87 responses, 14 from individuals and 73 from organisations, with the majority of respondents supporting the potential actions described.
- 2.196 A recurring view was that funding would be required in order to halt the closure of existing schemes. Respondents highlighted that funding for such schemes has not been consistent, which affects local authorities' ability to support schemes.
- 2.197 Some respondents suggested that the promotion of existing schemes was an area which required further attention. It was felt that scheme managers could better communicate how the scheme works and who is eligible. Suggestions for how to improve communication included providing Government guidance to local authorities and scheme managers, and that a single online portal should be used for all schemes nationally.
- 2.198 Respondents tended to feel that travel training developed a life-long skill, and was of particular benefit to young people as a method of developing confidence and understanding.

### **Update on Proposed Action**

- 2.199 The Department notes the views received on travel training and recognises the benefits of travel training. Unfortunately, we are unable to make funding commitments with respect to this proposal at this time but will continue to look for opportunities to do so.

### **Action 34**

We will highlight and promote the work of Mobility Centres, and identify ways to support the ambition of the Driving Mobility Network to increase the services it provides in response to the growing ageing population and become community style "hubs" for older and disabled people.

### **Summary of Responses**

- 2.200 There were 69 responses to this action, with 15 from individuals and 54 from organisations. Many responses expressed support for doing more to publicise the work of Mobility Centres, commenting on their own positive experiences and the opportunity to support a greater number of clients.
- 2.201 A number of suggestions were made about ways to improve the Mobility Centres as part of any future development. Suggestions included:
- Ensuring that centres are located in areas that can be easily accessed by both public transport and private vehicle;
  - Involving disability groups in the design and operation of centres;

- Expanding the range of facilities and information on offer to meet a broader spectrum of needs;
- Providing emotional as well as practical support for users who may be coming to terms with potentially traumatic changes in their abilities; and
- Placing greater emphasis on the promotion of non-car based modes of travel, including cycling.

### **Update on Proposed Action**

2.202 The Department intends to proceed with this action by 2020, and will work with the Mobility Centres to trial the development of community style “hubs”, alongside the provision of their existing services.

### **Action 35**

Over the course of the next two years, Mobility Centre ‘hubs’ will promote the public and private transport options available in each region to those considering giving up driving or those who have been advised to cease driving.

### **Summary of Responses**

- 2.203 There were 67 responses to this proposed action with 21 from individuals and 46 from organisations. The proposal received widespread support, with some respondents focusing on the benefits to continued personal mobility from this action and others citing the potential safety benefits to other road users.
- 2.204 A number of responses commented on the availability of alternatives to driving in their local area. Some respondents considered that alternatives to driving, particularly in rural areas, were insufficient or overpriced. Others emphasised the need for enhancements to the accessibility of public transport (for example, through the provision of audible and visible information on buses) in order to convince some people that it offers a genuine alternative to driving. One respondent suggested that Mobility Centre hubs should use the experience gained from interactions with people considering giving up driving to feed into decisions about the provision of local and community transport services.
- 2.205 Several responses highlighted the challenge of making alternatives to the car widely understood to people accustomed to driving. In their responses, some local authority respondents and transport operators offered to work with Mobility Centres to ensure that customers are given information about the full range of options available to them. A number of responses pointed out the importance of explaining any constraints on travel (such as any size and weight restrictions on the carriage of wheelchairs and mobility scooters). Some responses proposed greater promotion of cycling (including electric bikes) and walking as genuine alternatives to driving.

2.206 One disability organisation questioned whether Mobility Centres were the right environment for advising on alternatives to driving given their focus on driving and cars. One local authority pointed to existing initiatives established by community transport operators which provide advice on alternatives to driving and highlighted the risk that the proposed hubs might impact upon their work.

### **Update on Proposed Action**

2.207 The Department will work with the Mobility Centres to ensure that, when the “hubs” are established, they will be able to provide detailed information on alternatives to driving, covering the full range of local transport options.

### **Action 36**

By the end of 2018, Driving Mobility will produce guidance to support families concerned about an older person’s driving ability, along with information on alternatives to self-driving.

### **Summary of Responses**

- 2.208 There were 62 responses to this action, 13 from individuals and 49 from organisations. Respondents expressed clear support for the proposal with a number welcoming the opportunity this work would present for public/community transport operators and local authorities to engage directly with users to provide information about alternatives to driving.
- 2.209 Some respondents felt that the emphasis should be on supporting older people to continue driving safely for as long as possible. Suggestions for doing so included widening the availability of driver refresher training and assessments and the introduction of restricted driving licences to permit driving in specific scenarios.
- 2.210 A number of responses included proposals to increase the likelihood of this action being successful. A common theme was that offering personalised travel planning advice would be the most effective form of guidance to support a transition from self-driving.
- 2.211 Another suggestion was to raise public awareness of Mobility Centres by working with General Practitioners (GPs) and other healthcare providers to signpost potential customers towards their services. A small number of responses felt the proposed guidance should not just be directed at older people but should be available to anyone with a condition that changes over time and affects their driving ability or at anybody (whether they are disabled or not) who simply wishes to reduce their level of car use.
- 2.212 On potential barriers to success, several respondents felt that the proposal would only be successful in areas where transport provision was good enough to convince

drivers that genuine alternatives existed. A small number of respondents also raised questions about the long-term funding of Mobility Centres and whether they would be able to cope with the additional demand that might result from this action.

### **Update on Proposed Action**

- 2.213 The Mobility Centres will work with the Research Institute for Consumer Affairs (RICA) and organisations representing older people to develop this guidance by the end of 2018.

### **Action 37**

We will work with Mobility Centres and the British Healthcare Trades Association (BHTA) on promoting the need for training of scooter users and providing facilities for such training.

### **Summary of Responses**

- 2.214 There were 84 responses to this action, with 14 responses from individuals and 70 from organisations. The majority of respondents supported this action. Whilst there was general agreement with the principle of training for mobility scooter users, a number of issues were highlighted around their use.
- 2.215 Some respondents felt there was a need to ensure public transport services implemented a consistent policy towards the carriage of mobility scooters. One issue raised by respondents was different Train Operating Companies having inconsistent policies around access at stations for mobility scooters and the availability of storage on board trains. There was also concern expressed about the barring of mobility scooters by some transport operators and a call for scooters to be seen as similar to wheelchairs.
- 2.216 Other concerns related to the need to ensure the promotion of safe practices on the use of shared space within the pedestrian environment and making policies clearer about mobility scooters being driven on pavements. A small number of respondents called for mobility scooters to be allowed on cycle pathways.
- 2.217 Respondents also called for the possibility of free hire for mobility scooters in large shopping centres; local authorities to monitor and replace tactile paving that has been worn down; and that training for mobility scooters should not just be limited to Mobility Centres and should be rolled out across shop mobility schemes which are more widely available.

### **Update on Proposed Action**

- 2.218 Several issues raised in the responses to this proposed action concern the wider use of scooters within the transport network and built environment. These issues will be considered as part of work to update the Inclusive Mobility guidance (see Action 1).

### **Action 38**

We will identify and promote pushchairs, prams and scooters most appropriate for public transport, working closely with the British Healthcare Trades Association and transport providers, by 2018.

#### **Summary of Responses**

2.219 A total of 83 responses were received, with 22 responses from individuals and 61 from organisations. The majority of respondents supported the action to identify and promote pushchairs, prams and scooters most appropriate for public transport. Some respondents highlighted the need to address the dimensions of current accessible spaces across the different modes of transport due to the competing demands of different users and that current space allocation was inadequate to meet demand.

#### **Update on Proposed Action**

2.220 After considering this action further in the light of the other work we have committed to in the Inclusive Transport Strategy, the Department has concluded that it will not be taking this action forward.

### **Action 39**

We will begin a survey to gather evidence and identify examples of improvements that could be made to the wider process for making Traffic Regulation Orders, by autumn 2017. This evidence will help inform our approach to tackling pavement parking.

#### **Summary of Responses**

2.221 Overall 133 responses were received for this action, with 46 from individuals and 87 responses from organisations.

2.222 The majority of comments tended to highlight the difficulties posed by pavement parking and did not respond to the detail of the proposed action. However, respondents felt that pavement parking was a significant issue that needed to be resolved. Some respondents supported the survey to gather evidence and identify improvements that could be made to the Traffic Regulation Orders to tackle pavement parking. Whilst some respondents called for a national ban on pavement parking as it was perceived that Traffic Regulation Orders (TROs) would not be able to resolve this issue.

- 2.223 A recurring theme amongst respondents with visual impairments, wheelchair users and people with young children was that pavement parking obstructs and endangers lives if they are forced to use the road to continue their journey around parked cars.
- 2.224 A frequently raised concern was that local authorities and police do not currently do enough to tackle pavement parking. There was also a feeling among some local authorities that TROs are expensive and bureaucratic to administer and are limited in effect.
- 2.225 Some respondents highlighted that there was a need for a national policy on pavement parking to ensure consistency in approach alongside a behaviour change campaign and that it cannot be addressed through a patchwork of TRO restrictions alone. It was suggested that a uniform system of reporting of vehicles parked on pavements causing obstructions needed to be developed and implemented.

#### **Update on Proposed Action**

- 2.226 The Department will continue its work to gather evidence on pavement parking, the effectiveness, or not, of current regulatory frameworks, and potential alternatives, noting the recent consultation by the Scottish Government on new measures to tackle the issues in Scotland. We intend to complete this work by the end of 2018.

#### **Action 40**

In 2017, we will commission research to further understand the barriers to travel for individuals with cognitive, behavioural and mental health impairments, to help us develop potential measures to improve accessibility.

#### **Summary of Responses**

- 2.227 There were a total of 78 responses, 15 from individuals and 63 from organisations.
- 2.228 There was general support from most respondents for this action. Respondents felt that the research was long overdue, and that the Department should publish the results openly and widely and share them with other government departments, local authorities and transport providers. The results should also be acted upon as quickly as possible, with timescales, resources and mechanisms for monitoring impacts. Respondents stated that the research should also take account of autism and autism spectrum conditions.
- 2.229 A few respondents submitted negative comments. These respondents were of the view that that the research was pointless unless there was direct involvement from disabled people and disability groups from inception. Others were of the view that the proposed action would delay the implementation of necessary accessibility improvements and ample research already existed to guide and support the development of an accessible transport network.

- 2.230 A consistent view expressed was the need to change behaviours of transport staff and other passengers as these acted as a barrier to using public transport for those with mental health conditions.
- 2.231 Respondents also called for the eligibility for concessionary bus and rail passes and supported travel schemes to be reviewed to ensure they were available to those most in need.

#### **Update on Proposed Action**

- 2.232 We confirm our commitment to taking forward this action. We intend to undertake this research by 2022 and will draw upon the findings of University College London's research on the same subject, which is expected to be published by the end of 2018.

#### **Action 41**

By 2018, we will commission research quantifying the economic, social and commercial benefits of making passenger transport more accessible.

#### **Summary of Responses**

- 2.233 A total of 81 responses were received, 18 from individuals and 63 from organisations. Support for this action was mixed amongst individuals and various organisations with a small number of respondents specifically citing the value this research would make for the case for additional investment.
- 2.234 Several participants presented what they considered to be the potential benefits and dis-benefits that the research could capture. These included: the additional time costs to disabled individuals (in having to plan travel and make journeys in advance); potential health care savings i.e. benefits to the NHS and social care services when accessible public transport helps people obtain regular preventative healthcare; the impact on employment levels; environmental benefits and the commercial revenue benefits for operators.
- 2.235 Another recurring theme raised by respondents was that of existing evidence that the research might draw upon. Responses specifically mentioned the Papworth Trust 2016 research report on transport and access to employment; Cycle BOOM project data on benefits of cycling and electric bicycles (e-bikes) for older people, First research focused on people with cognitive disabilities; Living Streets research into the benefits to local businesses of accessible streets and pavements; Whitehall & Industry Group data on age profiles of the population by 2035; Devon County Council's impact assessment (including on accessibility) of proposed service reductions.
- 2.236 A few respondents proposed alternative research suggestions. These included monitoring staff assistance hours at railways stations; the potential of cycling and electric bikes (e-bikes) to improve mobility and access for older people; and forecasting the likely scale and nature of assistance needs in the future.

2.237 Respondents tended to feel that disabled people and disability groups should be called upon to work collaboratively on research projects at their outset. Similarly there was a request that the Department share the results and findings publicly and proactively, including with other departments and operators. Some suggested the research should develop tools to estimate the economic impact of specific interventions to improve accessibility such as a raised kerb bus stop.

2.238 Conversely a limited number of respondents cautioned against relying too heavily on the economic case for improved accessibility, by for example using research to influence operators. Rather it should be a social imperative that drives Government to help disabled people live the life they choose to and help to remove the barriers that stand in their way.

#### **Update on Proposed Action**

2.239 We have considered the consultation responses and can confirm that research will be commissioned by the end of 2018.

#### **Action 42**

DfT is working with the RSSB to launch an innovation competition in September 2017, which will find solutions to reducing the cost of accessibility improvements at stations, including the availability of accessible toilets. This competition will also focus on making improvements for those with hidden disabilities.

#### **Summary of Responses**

This action received 60 responses, with 15 responses from individuals and 45 from organisations. This action was also referred to as Action 15 in the Accessibility Action Plan consultation. The responses to this action were similar to the responses to Action 15.

#### **Update on Proposed Action**

2.240 Please refer to Action 15 above for an update on this action.

#### **Action 43**

We are also investing in a new rail innovation accelerator which will look at how the availability of accessible facilities can be improved.

#### **Summary of Responses**

2.241 This action received 60 responses, with 13 responses from individuals and 47 from organisations. This action was also referred to as Action 16 in the Accessibility Action Plan consultation.

#### **Update on Proposed Action**

2.242 Please refer to Action 16 above for an update on this action.

#### **Action 44**

We will ensure that DfT innovation competitions highlight the need for prospective funding recipients to consider accessibility within their project proposals, where projects impact on transport users.

#### **Summary of Responses**

2.243 This action received 79 responses, with 18 responses from individuals and 61 from organisations. The majority of respondents supported the proposed action.

2.244 A large proportion of respondents suggested that bid assessors should have an understanding of the issues affecting disabled people in the transport sector as this would help the Department better identify the risk or opportunities presented by different project proposals. In addition, it was suggested that improving assessor knowledge of disability issues could lead to accessibility considerations forming a stronger part of future competitions' assessment criteria.

2.245 A number of responses called for more involvement of disability groups in the Department's assessment of bids. It was also suggested that the Department should require Equality Impact Assessments to be included with every bid, as this requirement would ensure accessibility issues were considered as part of a project's design before being submitted.

#### **Update on Proposed Action**

2.246 The Department confirms its commitment to support accessibility innovation as part of its funding of technology and will continue to highlight that prospective bidders should consider accessibility as part of their project proposals.

#### **Action 45**

We will develop and deliver (with input from DPTAC) training for civil servants in the Department to include the law and good practice with respect to disability awareness and equality issues.

#### **Summary of Responses**

- 2.247 This action received 55 responses, with 12 responses from individuals and 43 from organisations. The majority of respondents supported the potential actions described.
- 2.248 A recurring theme from respondents was that the training should be made widely available, as opposed to only being for those involved in the policy process. It was argued that this would better ingrain good practices for disability awareness into wider Departmental thinking. Some respondents went further to suggest that the training should be shared with local government and the wider transport sector.
- 2.249 There was a call to involve disabled people directly in the development and delivery of the training. In addition, respondents considered that any future training should not replace the Government's duty to consult with key disability groups and disabled individuals when developing and implementing policies.
- 2.250 Many respondents called for a focus on the social model of disability; consideration of a variety of disabilities; and civil servants actively taking journeys with disabled people as part of the training content. There were also recommendations on operational tools which policy-makers could utilise in their work, for example specific formats of impact assessments.
- 2.251 Other issues mentioned included whether the training should be made mandatory and whether the training should be kept up-to-date through ongoing monitoring and reviews.

### **Update on Proposed Action**

- 2.252 As set out in the Inclusive Transport Strategy, the Department remains committed to providing disability equality and awareness training for DfT staff as part of our staff development programmes. We also intend to raise staff awareness on how the Public Sector Equality Duty, and the needs of people with protected characteristics, should be considered as part of transport policy development and delivery. In addition, we will develop a disability and awareness training package that can be made available across modes to all transport operators.

### **Action 46**

We will work with the Welsh Government and the Minister for Equalities to understand the impact of the introduction of these new powers in Wales, and their potential applicability to the English jurisdiction.

### **Summary of Responses**

- 2.253 We received a total of 49 responses to this question, 11 responses from individuals and 38 from organisations. The majority of respondents supported this action, with most simply stating that they 'agreed'.

### **Update on Proposed Action**

2.254 The Department confirms its intention to work with the Welsh Government to understand the impact of its decision to make statutory duties designed to deliver the Public Sector Equality Duty, as well as its decision to impose duties on public authorities in Wales.

#### **Action 47**

We will support work with local authorities to raise their awareness of the Public Sector Equality Duty under the Equality Act 2010 in relation to local transport and transport facilities.

#### **Summary of Responses**

2.255 There were 77 responses received, with 15 responses from individuals and 62 from organisations. The majority of respondents supported the potential actions described.

2.256 Many respondents raised suggestions for specific guidance which would benefit local authorities. These included calls for transport guidance (as opposed to general guidance) on the application of the Public Sector Equality Duty; guidance on completing equality impact assessments in relation to transport projects and policies; and clarity on local authorities' obligation to take reasonable measures on the design and management of streets and other public spaces.

2.257 A recurring theme was the involvement of disabled people in local authorities' planning, policies and projects in order to help them comply with their Equality Duty obligations. Some respondents called for guidance on how to improve the accessibility of transport project consultations, by for example providing audio descriptions of proposed schemes.

2.258 Individuals and disability organisations frequently raised concerns with regards to ensuring an effective enforcement regime for local authority compliance. Respondents suggested that authorities should receive more consistent enforcement in order to increase levels of compliance.

2.259 Funding for local authorities was another issue raised. Respondents questioned whether local authorities would have sufficient funding to undertake improvements to existing infrastructure and services, ensure sufficient engagement of disabled people and conduct awareness raising activities, given wider financial pressures.

#### **Update on Proposed Action**

2.260 As set out in the Inclusive Transport Strategy, we will continue our work to ensure that all public transport bodies and professionals understand their obligations under the Public Sector Equality Duty in relation to planning and delivering transport and designing transport infrastructure.

### **Action 48**

We will develop, in consultation with DPTAC, effective ways of measuring travel patterns and trends among disabled and older people over time as a basis for targeted policy initiatives.

### **Summary of Responses**

- 2.261 This action received 69 responses, with 13 responses from individuals and 56 from organisations. The majority of respondents supported the proposed action.
- 2.262 Respondents submitted a number of suggestions for future research including research into travel accessibility based on rurality, availability of accessible travel to hospital appointments, how transport's accessibility affects older people's ability to stay in work for longer and the topography of streetscapes. Suggestions were also received for updating certain assumptions used when planning infrastructure placement, for example the average walking distance which disabled and elderly people are capable of.
- 2.263 Respondents also called for increased involvement of people who are housebound, do not use public transport, or who do not define themselves as disabled but have a hidden impairment or restricted mobility, in the research undertaken by the Department.

### **Update on Proposed Action**

- 2.264 The Department will be developing its monitoring and evaluation framework for the delivery of the Inclusive Transport Strategy over the next six months and will consider this as part of this process.

## 3. Summary of responses to policy development questions

- 3.1 The draft AAP included 15 consultation questions covering a range of accessibility issues, either cross-cutting in nature or specific to a particular mode of travel. Respondents were invited to share their views and experiences to help inform future policy development.
- 3.2 This chapter summarises the responses to each consultation question and provides an initial Government response where this is available. The Department has considered all of the issues raised in which have been fed into the development of the Inclusive Transport Strategy.

### Question 1

How well do you feel the national bus concession in England succeeds in supporting the local transport needs of disabled people, and how might it be improved? Please be as specific as possible in your response.

### Summary of Responses

- 3.3 There were 179 responses to this question, 77 from individuals and 102 from organisations. Many respondents agreed that the national bus concession had positively supported disabled travel. One individual described it as a “great asset”, another commented that it “allows me significant savings on my travel costs” and a third (referring to their disabled partner) said that “they have been able to travel a lot more often and effectively and it has improved their ability to work”.
- 3.4 A large number of responses also contained suggestions for improvements to the scheme. Commonly held views were that:
  - The scheme’s hours of operation should be extended, particularly during the morning, so as to cover journeys to school and work;
  - Schemes should be more consistent between areas as this would improve equity, reduce confusion and support more cross-boundary travel;
  - Eligibility criteria should be widened to cover people with less visible disabilities;

- A carer should be allowed to accompany a disabled traveller for free; and
  - The application and renewal process for a concessionary pass should be made easier to complete.
- 3.5 Several responses identified barriers that prevented them from taking full advantage of their concessionary pass. A number of people pointed to a lack of bus services, particularly in rural areas. Others cited inaccessible vehicles, competition from other users for priority seating and wheelchair spaces and a lack of understanding from drivers as further barriers to making full use of the concession.

### **Government Response**

- 3.6 We encourage local authorities to take note of the suggestions made as a result of this consultation. At the same time, the Department will keep the views expressed by respondents in mind in any future development or review of national policy.

## **Question 2**

As a passenger or an organisation representing disabled people, what is your experience of information and guidance setting out the rights of disabled persons or those with reduced mobility when travelling by air?

### **Summary of Responses**

- 3.7 There were 167 responses in total, with 95 responses from individuals and 72 from organisations. A common theme that emerged from the responses received was that existing information and guidance should be updated and simplified as it was too technical. The guidance should include 'good practice' and identify 'absolute rights', rather than being open to interpretation.
- 3.8 Additionally there should be detailed information on the type of mobility aids permitted in the cabin as well as clarity over the carriage of medicines over 100ml, their refrigeration and storage, the rules governing medical exemptions, the carriage of special dietary food and what disabled people should do during an emergency.
- 3.9 Any information and guidance should be accessible and widely available in a variety of alternative formats (e.g. large print, BSL, audio, via a specialist dedicated phone number, pictorial, easy read, Braille as well as printed, online and digital via the use of apps. The Guide Dogs for the Blind Association and similar groups also called for clearer information on travelling with guide dogs.
- 3.10 Several respondents identified additional issues relating to the provision of information on passengers' rights. These included identification of the type of help passengers could reasonably expect from airline staff (particularly those passengers with less visible disabilities), a lack of audible as well as visual announcements, little or no consistency in booking assistance and long waiting times at airports, a lack of

accessibility equipment such as air bridges<sup>21</sup>, the need for improvements to the surface access from public transport to airports as well as reducing walking times to gates to board aircraft.

- 3.11 It was suggested that the industry work together with disabled passenger groups to co-create a standard set of disabled passenger assistance principles and procedures for use across all UK airports and airlines.
- 3.12 A number of responses raised concerns about the need for accessible toilets. These included improving directional signage, and introducing Changing Places facilities at airports to allow carers in to help, training for staff who need to support passengers to access the toilet, and that information detailing the availability of disabled toilets on flights should be made available in accessible formats.
- 3.13 There was general consensus among individual respondents that improvements were needed for wheelchair users. A recurrent theme was the need to ensure prevention of wheelchair damage when carried in the hold. This might be by providing training on the handling of wheelchairs to minimise them being mishandled or damaged during transit. Also research might help to understand how often damage occurred to wheelchairs and why.
- 3.14 Several respondents commented on the need for a standard seating policy for wheelchair users which should include methods and training on physical lifting used for the transfer of passengers from their wheelchairs to sky chairs or airport wheelchairs and flight seats. Manual or foldable wheelchairs should be allowed in the aircraft cabin and wheelchair spaces developed on planes, rather than checked into the hold to simplify embarking and disembarking from flights. Respondents felt that wheelchair users should be able to experience and use all airport facilities without the necessity of being moved to holding areas or boarding gates after check-in. The design of airports should include ramps and other mobility devices rather than stairs.

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<sup>21</sup> An air bridge is an enclosed movable connector which most commonly extends from an airport terminal gate to an aircraft allowing passengers to board and disembark without going outside.

### Question 3

As an industry representative or a service provider in the aviation sector, what is your experience of guidance regarding your obligations when providing services to disabled people or those with reduced mobility when travelling by air?

#### Summary of Responses

- 3.15 There were 38 responses to this question, 8 from individuals and 30 from organisations. A broad range of themes were identified by respondents around accessibility and disabled passengers experiences when travelling by air.
- 3.16 A few responses alluded to the need for clarification on the safe carriage and return of mobility aids such as wheelchairs, including where accountability lay when mobility aids were returned to disabled passengers damaged or in less than perfect condition.
- 3.17 A common theme fostered by respondents was the need for improved guidance for disabled passengers. Several responses suggested that guidance should outline the minimum care standards and services available or that might be reasonably expected, obviating dissimilar provision across airports both in terms of product and service quality.
- 3.18 A number of responses considered that overall guidance on passengers with restricted mobility was clear and that information was easy to find. Some responses proposed that the industry should share data on workable disabled passenger solutions, as well as developing information technology standards which aided access to websites and could be fed into best practice for use across the industry.
- 3.19 It was suggested by some participants that a greater emphasis should be made of pre-notification of travel to ensure the best possible service was available on the day of travel. Airport and service provider guidance should clarify what realistically could be offered to spontaneous passengers i.e. those who had not pre-notified.
- 3.20 A few respondents focussed on the Government's role. The Department's guidance on Access to Air Travel for Disabled Persons and Persons with Reduced Mobility had been a useful tool, however it should be updated. There should be clear recommendations defining accessibility facilities to enable air operators to calculate the investment needed as well as clarification on the level of 'reasonable adjustments' needed in certain cases.
- 3.21 Several respondents raised training as an issue, stating that staff should be focussed and knowledgeable about assistance services. Support for those with less visible disabilities should be included in staff disability awareness training. It was suggested that in order to aid passengers' familiarisation, visits to airports should be introduced at all airports and widely advertised. A number of respondents also recommended the promotion of assistance services to those who had never travelled by air before. However it was noted that training to care for those with less visible disabilities was costly to operators owing to the broad range of disabilities and the variation in the support required.

- 3.22 A few responses proposed the creation of nation and industry-wide standardised support for passengers with less visible disabilities including the development of a symbol, colour, signage, and lanyard scheme making it easier to identify if assistance was required. It was also proposed that Cabin Crew should be informed in advance of those travelling with less visible disabilities by adding this information to the flight manifest.
- 3.23 Some responses stressed that travelling to airports could be a potential barrier to using them and that it was important to ensure interchanges between transport modes i.e. from coach or rail to air worked seamlessly.

### **Government Response to Questions 2 and 3**

- 3.24 The Government is considering the points raised in this consultation as it develops its new Aviation Strategy for the UK aviation sector, due to be published in 2019. However, in anticipation of this publication, the following commitments have been made in the Inclusive Transport Strategy:
- By 2019, the Department will review the powers the Civil Aviation Authority (CAA) have to enforce regulations and strengthen them if evidence suggests this is required;
  - We will also work with the CAA to review performance standards for airports and airlines, such as the length of time taken for a passenger to receive assistance boarding and leaving aircraft;
  - By 2020, we intend to put in place a robust framework for measuring airlines' provision of assistance services, and to have strengthened the current performance standards for airports;
  - By 2019, we will consider how passenger assistance could be improved by providing assistance via a single member of staff throughout the journey (airside and landside).

#### Question 4

As a passenger or an organisation representing disabled people, what are your experiences with maritime passenger services when travelling by sea, in particular are there any issues where you feel more could be done to improve accessibility for passengers with disabilities or with reduced mobility?

#### Summary of responses

- 3.25 There were 103 responses received, with 49 response from individuals and 54 from organisations. There was generally a positive view from individuals about the current level of accessibility within the maritime sector, with particular praise for certain ferry and cruise operators and port terminal staff based on individual experiences.
- 3.26 A common view amongst respondents was whilst there is some awareness of passenger rights when travelling by sea and inland waterways, more should be done to actively publicise information about these rights and make them easily accessible in a variety of alternative formats. This needed to be supplemented with staff training about the range of disabilities in order to ensure a consistent approach is taken towards disabled passengers and those with reduced mobility.
- 3.27 A recurring theme emerged about the accessibility of existing infrastructure with concerns raised about the lack of suitable ramp access; issues with link span bridges connecting terminal buildings to ferries; lack of passenger Changing Places facilities; lack of lifts, adapted cabins and toilet facilities for guide dogs on board ferries and cruise ships. There were also suggestions to improve the parking facilities at port terminal buildings allowing disabled passengers and passengers with reduced mobility to park closer to port terminals and board ferries more easily. It was also noted that there was a need to provide more visual and audible aids at port terminals and on board ships for passengers.
- 3.28 There was a call to encourage operators to consult with disabled passengers and those with reduced mobility to test facilities and identify areas that could be improved in terms of accessibility. It was also suggested that collecting data on the number of disabled passengers and passengers with reduced mobility travelling by sea and inland waterways would help to improve the evidence base.
- 3.29 A common view amongst respondents was the need for increased enforcement of existing legislation. It was highlighted that merely encouraging compliance has its limitations and that more robust enforcement of existing legislation was now required.
- 3.30 Respondents from disability organisations generally suggested that more legislation was needed to improve accessibility. Some respondents highlighted the fact that current legislation does not cover smaller ferries and that the Equality Act 2010 does not apply to services provided on board ships.
- 3.31 Other issues mentioned included a general lack of understanding of the legislation and its remit as well as a lack of clarity on how to make complaints and report accessibility related issues.

## Government Response

- 3.32 Under existing legislation, disabled persons and persons with reduced mobility have the same rights to travel as other passengers. This includes the right to assistance in ports and on board ships and for information about their rights to be made available in accessible formats. Carriers and port terminal operators are also required to pay particular attention to addressing accessibility issues and improving access when carrying out major refurbishment work and during the design of new infrastructure, including ships.
- 3.33 The Department will continue to work with the Maritime and Coastguard Agency (MCA), which is the National Enforcement Body for maritime passenger rights in the UK, to ensure compliance with these rules by carriers and port terminal operators and that appropriate enforcement action is taken when required.
- 3.34 In 2019, in consultation with DPTAC, the Department will publish a toolkit for the maritime industry highlighting key challenges disabled people can face in travelling by sea as well as recommendations on how they can make maritime infrastructure more accessible, for example, by considering including accessible toilets and Changing Places facilities when they upgrade and renovate port infrastructure and providing facilities so that disabled and reduced mobility passengers can park close to port terminal buildings while waiting to board a vessel.
- 3.35 By the end of 2019, the Department will review the MCA's enforcement of regulation, particularly around staff training (which was a concern raised through the Accessibility Action Plan consultation) and work with them to strengthen procedures where areas for improvement are identified.

From autumn 2018, the MCA will begin undertaking dedicated surveys of disabled passengers using ferry and cruise ships in order to effectively measure the services provided.

### Question 5

When you use a train, what has been your experience of accessibility equipment, such as the passenger announcements (either audible or visual), accessible toilets or manual boarding ramps, or other accessibility features)? For example, do you find this equipment reliable, and if not, how could train operators better ensure reliability or assist you?

## Summary of Responses

- 3.36 This question received 153 responses, 63 from individuals and 90 from organisations. Respondents identified a range of issues around improving accessibility and the passenger experience on board trains. Responses to this question have further developed the evidence base on the efficacy of measures to

improve rail accessibility and on the ongoing challenges some disabled people face when travelling by train.

- 3.37 There were a range of issues identified by respondents around improving accessibility and the passenger experience on board trains. A recurring theme was the need to review existing accessibility equipment, such as manual boarding ramps, which from respondents' experiences were often not fit for purpose and poorly maintained. Some respondents suggested trains should have in-built automated ramps. There were concerns raised about the large gaps between trains and station platforms inhibiting passengers from travelling by train. Some respondents commented there should be ramp access to all carriages on a train and it should not be restricted to wheelchair accessible carriages. It was highlighted that there was a discrepancy between availability of accessible rolling stock regionally and some respondents wanted to see consistency in the design and layout of train carriages.
- 3.38 There was a call to review existing accessible design standards to improve the experience of visually impaired passengers and those using guide dogs. There was a common theme around the provision of accessibility features for passengers with visual impairments, with issues identified such as a lack of space for guide dogs on board trains, lack of audio announcements to inform passengers of changes to journeys and travel information and accessible toilets to include design features that take into consideration the needs of visually impaired passengers. Some respondents highlighted RVAR standards needed to be revised to ensure they sufficiently accommodate a colour scheme for visually impaired passengers.
- 3.39 There was a strong view amongst respondents around the need to improve toilet access including their design on board trains. This included specifying accessible toilets be designed near priority seating areas and the design should be inclusive of all disabilities. Some respondents commented that current designs do not support use by all disabled passengers, for example, the door operation panel on toilets are not located for easy access by visually impaired passengers. Some respondents raised concerns that wheelchair spaces were often designed adjacent to accessible toilets which was felt as contributing to an unpleasant journey and would prefer the wheelchair spaces to be located elsewhere in carriages. The maintenance and cleanliness of accessible toilets was also raised and the need to ensure that they are fully functioning on board trains.
- 3.40 There was a common theme around wheelchair accessibility on trains and concerns raised including automated door sensors not detecting wheelchair users; lack of provision to reserve wheelchair spaces or priority seats on trains; blocking of wheelchair spaces by other passengers and that this also required a behaviour change amongst fellow passengers and staff.
- 3.41 One of the main themes that emerged was a requirement to improve the quality of information provision. A wide range of responses from disability organisations, local councils, private individuals and operators felt that the provision of information on rolling stock accessibility equipment needed to be improved.
- 3.42 Suggestions for improving the quality of information provision included improving the quality of audio and visual announcements; using a range of communication methods

to relay information such as apps, easy to navigate train operator websites with information about individual train accessibility features and availability of staff assistance; creating SMS/Twitter feedback options to alert staff of poorly maintained or broken accessibility equipment; installation of induction loops on trains and providing alternative formats of DPPP and timetables such as easy read, braille, audio, pictorial, printed information, amongst other formats and to give DPPP wider prominence on Train Operating Company websites.

- 3.43 There were suggestions around using innovative technology solutions such as station and journey audio guides for use whilst travelling, and virtual reality simulations to help prepare passengers on the end to end journey, including navigating stations.
- 3.44 The quality of customer service was a recurring theme with many respondents commenting that staff needed to be trained in disability awareness and how to provide help. Many respondents cited difficulties finding a member of staff on the train and a fear that if there were fewer staff on board trains in future this, together with unstaffed stations, would create further barriers for passengers with disabilities. Respondents highlighted that there needed to be better customer service to ensure pre-booked assistance is provided and also more assistance in general to allow for spontaneous travel and ensuring priority seating and wheelchair spaces are made available when needed.
- 3.45 There were differing views about seating options for passengers with a wide range of disabilities with priority seating being made available in quiet coaches for passengers with, for example, cognitive impairments or priority seating in first class for disabled passengers if standard coaches are overcrowded.
- 3.46 Some respondents highlighted there was a need to review signage on 'call for aid buttons' and instructions about when they should be used and additional options to contact on board train staff and control centres.
- 3.47 Some respondents commented there was a lack of policies about mobility scooter carriage and disabled cycle storage.

### **Government Response**

- 3.48 Accessibility standards for trains have been mandatory for new trains since 1999 and the deadline for compliance for all trains is 1 January 2020. These standards include provision for the design, layout and colour contrast of rail vehicle interiors, including the provision of priority seating, accessible toilets which can be directly reached from a dedicated wheelchair space and the form and function of boarding ramps used to bridge the gap between the train and the platform.
- 3.49 Some respondents asked about the possibility for installing induction loops in trains. Previous research into this possibility indicated that the noise and vibration experienced on a moving train would negate any benefit for amplifying passenger announcements that could be provided by installing an induction loop.
- 3.50 All operators are required, as a condition of their operating licence, to make available a DPPP. This includes making it available at stations, free of charge. It can also be found on operators' websites. The DPPP also requires that staff undertake disability

awareness training. As part of its role of monitoring compliance with DPPP's, ORR collects and publishes data from licence holders on the numbers of staff undertaking disability awareness training and the kinds of training provided.

- 3.51 Some operators have Priority Card seating schemes which enable passengers to indicate to other passengers that they require the priority seat.

### Question 6

As a transport user, what has been your experience of using transport services? In particular, how would you assess the levels of understanding of transport providers and staff of the needs of disabled people (i.e. those with cognitive, sensory or physical impairments including dementia, autism or mental health conditions)? We would welcome any experiences (positive or negative) that you wish to provide.

- 3.52 There were 261 responses to this question, 155 from individuals and 106 from organisations, with respondents sharing both positive and negative experiences.
- 3.53 Many respondents highlighted specific difficulties that affected their experiences negatively. Lack of the correct assistance; lack of staff availability; poor staff behaviour; lack of accessible infrastructure; no provision of extra time to safely sit down; platforms not being level; no provision of accessible ramps; toilets or lifts not working; lack of consideration for guide dogs' needs; and limited wheelchair space were all mentioned as difficulties which can occur when using transport services.
- 3.54 A recurring theme within the responses was that the provision of information for disabled travellers should be increased and improved. It was felt that in order to achieve accessible journeys, more consistent information on the availability of infrastructure, assistance and relevant parking or seating spaces was needed. It was also identified that the communication of the information, either online or in person at stations, should be more accessible for a range of disabilities.
- 3.55 Related to this question's particular focus on levels of understanding amongst transport providers, many respondents called for improved staff training on all modes of transport. Many of these respondents highlighted that their negative experience with transport services was linked to staff who lacked an understanding of their needs or how to communicate with them and called for refreshed training to address this issue.

## Question 7

What additional action could Government, regulators or transport bodies take to ensure that transport providers and staff have a better understanding and awareness of the access and information needs and requirements of passengers or transport users with less visible disabilities (i.e. those with sensory or cognitive impairments including dementia, autism or mental health conditions)?

### Summary of Responses

- 3.56 This question received 139 responses, with 55 responses from individuals and 84 from organisations. The majority of respondents supported the document's position that the needs of passengers with less visible disabilities should be made more prominent within the industry.
- 3.57 Many respondents called for mandatory training for drivers, operators and station staff. Respondents also called for all staff to be mandated to complete the same training. In particular, senior transport managers in the transport sector were identified as a group who would particularly benefit from disability awareness training as they had the authority (and financial budgets) to ensure that accessibility issues were considered as part of future business decisions. Additionally, there was a call for regular refreshers and assessments to form part of the training and that disabled people be fully involved in its design and delivery.
- 3.58 Many respondents highlighted the lack of opportunities to quickly communicate a less visible disability to staff. Existing systems, such as lanyards in airports and assistance cards on buses, were raised as communication tools which could be introduced more widely across the sector. A recurring comment within responses to this question was that any future system would need to be nationalised for consistency.
- 3.59 Some respondents also called for an increased knowledge of specific disabilities among station staff. It was felt by some that having a team of staff with an understanding of different disabilities (for example, dementia or autism) would increase the overall quality of assistance.
- 3.60 There was a call for improved enforcement against non-compliance of duties. Suggestions included a clear zero tolerance stance to be taken against organisations who do not comply with laws such as the Equality Act. Respondents also called for mystery shopper assessments to ensure those with less visible disabilities received appropriate assistance.

### Government Response

The Government notes the calls for mandatory training for transport staff, and agrees that this is important. Chapter 6 of the Inclusive Transport Strategy sets out the steps the Department will take to ensure that transport operators provide their staff with appropriate disability awareness training. It also commits the Department to developing and launching an Inclusive Transport Accreditation scheme to allow the

best transport operators to receive formal recognition for the positive steps they are taking on staff training and other matters, including assistance cards.

### **Question 8**

As a passenger or organisation representing disabled people, what is your experience of trying to travel spontaneously? What steps could transport providers and operators take to promote or reduce restrictions to spontaneous travel? What action could Government, regulators, transport operators or providers take to increase spontaneous travel?

### **Summary of Responses**

- 3.61 This question received 166 responses, with 76 responses from individuals and 90 from organisations. The majority of respondents commented that they had experienced a number of difficulties when trying to travel spontaneously. A pattern emerged demonstrating that negative experiences were generally happening at smaller stations. Some respondents commented they had a positive experience when travelling spontaneously using major train stations. Some respondents felt there was an inconsistent level of service to facilitate spontaneous travel.
- 3.62 A range of issues were cited as restricting disabled passengers from travelling spontaneously, including lack of functioning accessibility equipment such as lifts, ramps, toilets and a lack of staff at stations to provide assistance. There was a call for policy interventions to improve rail accessibility. Respondents made a number of suggestions to increase spontaneous travel such as offering a wheelchair assist area at every station to help identify passengers requiring assistance; training staff so they know how to assist passengers with visible and less visible disabilities; developing technological solutions by working with app developers, for example, to ensure transfer times between platforms at interchange stations are sufficient for passengers that require assistance; and an awareness raising campaign to publicise existing services such as Passenger Assist.

### **Government Response**

- 3.63 The Government has made clear that with growing passenger numbers we want to see more not fewer staff on the railway. The Government fully recognises the importance of providing assistance to those who need support to travel and as we modernise the network and new trains arrive this can be delivered through a combination of staffing and infrastructure. The newest trains on our network no longer require crew to operate the doors, this frees them up to allow more time to help passengers, including those with accessibility requirements.

## Question 9

As a transport operator or provider, what is your experience of enabling spontaneous travel for disabled people? What steps have you taken to enable spontaneous travel for disabled passengers? What action could Government, regulators or other bodies take to help support you to provide spontaneous travel for disabled passengers?

### Summary of Responses

- 3.64 This question received 56 responses, 7 from individuals and 49 from organisations. The majority of respondents supported improving spontaneous travel for disabled passengers. Suggestions for improvement included providing travel training for passengers by local authorities and transport providers; providing more priority seating areas and wheelchair space; taking steps to ensure there was greater provision of accessible facilities such as ramps and lifts; better signage, audio and visual announcements; increased staff presence and improved staff training.
- 3.65 Respondents commented that there should be better information sharing between transport providers particularly at interchange stations and information sharing between all modes of transport to facilitate spontaneous travel and that funding arrangements should reflect this multi-modal way of travelling. The RDG called for the reinstatement of small scheme funding.
- 3.66 Some respondents highlighted the importance of working with disabled passengers and disability organisations to co-design stations and trains to ensure that issues prohibiting spontaneous travel are addressed at the design stage.

### Government Response

- 3.67 Train operators are expected to ensure that wheelchair users have priority access to wheelchair space and signage in the space should inform other passengers that they should give up the space for a wheelchair user.
- 3.68 With regards to the provision of better audio and visual announcements, the legal requirement to provide a passenger information system which delivers audio-visual announcements gives train operators until 31 December 2019 to comply. No new rail vehicles have been placed in service without audio-visual passenger information systems since 1999.

## Question 10

As a passenger or organisation representing disabled people, what is your experience of using Passenger Assist? We would welcome ideas on what further developments could be made to the Passenger Assist system to make it more attractive to users with accessibility needs; particularly those who currently choose not to travel by train.

### Summary of Responses

3.69 This question received 96 responses, 40 from individuals and 56 from organisations. There was a mixed response to this question with a number of respondents stating that they were unaware of the Passenger Assist system and suggesting that more could be done to advertise the scheme. Respondents who had used Passenger Assist reported a number of issues such as:

- inconsistent booking methods amongst different Train Operating Companies, and lack of integration between the Passenger Assist system and ticket booking;
- the booking process does not highlight which stations are unstaffed or whether there is step free access and the current system does not keep a record of requirements for frequent users of the system making it onerous to use;
- not being able to book wheelchair space;
- lack of flexibility in accessing Passenger Assist if there are changes to travel times and delays and often poor communication across different Train Operating Companies on journeys requiring interchanges;
- limited availability of staff or inadequate assistance;
- improving customer service training and training on how to assist disabled passengers;
- concerns about staffing levels on the railway and how to access staff assistance before and during the journey;
- an easy to use complaints process needs to be implemented to report incidents; and
- insufficient provision and monitoring of disabled parking spaces at stations.

3.70 Respondents wanted to see increased advertising of Passenger Assist possibly with Train Operating Companies partnering with a range of organisations to publicise the scheme, and information on how to use the service to be made available in a variety of accessible formats alongside improving the quality of this service.

### Government Response

3.71 All Train Operating Companies are required to participate in the Passenger Assist system, but evidence from the various pieces of research and the responses

received from disabled passengers and disabled groups to the consultation indicates a general lack of awareness of the Passenger Assist system.

- 3.72 From the end of autumn 2018, the Department will require through future rail franchises that Train Operating Companies promote greater passenger awareness of the Passenger Assist service.
- 3.73 We will support RDG to introduce the new Passenger Assistance application which has been designed to enable customers to book assistance through a single click. A trial of this will be evaluated by autumn 2018.
- 3.74 RDG, in conjunction with a number of Train Operating Companies, is trialling a new assistance system which will provide alternative journey options (where required) to passengers who use it. The Department will be monitoring the outcomes of the trial.
- 3.75 By the end of 2018, we will support the establishment by the industry of a Rail Ombudsman to investigate and rule on unresolved customer complaints (including on the provision of assistance and access to advertised accessibility facilities), with the power to issue decisions that are binding on the industry.
- 3.76 On the issue of insufficient provision of disabled parking spaces at stations, when a station is built or renovated it must adhere to the Design Standards for Accessible Rail Stations,<sup>22</sup> which sets national standards for numbers of parking spaces. The underlying principle is that, whenever work is being done, the output of that work must provide improved accessibility.

### Question 11

When you purchase a ticket using a vending machine, what has been your experience of accessibility? For example, do ticket machines provide clear information? Are you able to book the correct ticket? Are there any particular issues that we need to consider when designing or delivering smart ticketing programmes?

### Summary of Responses

- 3.77 There were 97 responses received, with 36 responses from individuals and 61 from organisations. A common theme emerged about the difficulties of using existing ticket vending machines and that design and location modifications were needed to ensure they were accessible for all. Respondents highlighted that wheelchair users were unable to access ticket vending machines as the screens were not height adjustable.
- 3.78 The absence of audio functions on most ticket vending machines was consistently raised as an issue for visually impaired passengers and that without staff assistance they were unable to use them.

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<sup>22</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/425977/design-standards-accessible-stations.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425977/design-standards-accessible-stations.pdf)

- 3.79 Concerns were also raised by respondents about the poor location of ticket vending machines with issues such as sun rays falling on screens which made it harder to navigate and read the information on the screens, and that they should be positioned in areas that make them easier to access for passengers with different disabilities and conditions. Some respondents felt navigation of screens needed to be made simpler with clearer instructions on how to buy tickets, ticket options / deals and use of colour schemes that were visible by people with visual impairments.
- 3.80 Some respondents raised concerns that smart ticketing programmes relying wholly on technology would leave some passengers, who are not computer literate, unable to cope with navigating such systems, therefore preventing them from buying tickets. It was felt that such systems should be supplemented with staff assistance. Some respondents raised concerns about replacing magnetic strip tickets with mobile tickets given some passengers were unlikely to use smart phones and moves towards smart ticketing through mobiles needed to be accompanied with digital training and easy to follow instructions on how to use them to buy tickets.
- 3.81 Suggestions from respondents also included using innovation competitions to explore technological solutions to inclusive design and operation of ticket vending machines and improve accessibility across all ticket purchase channels.

### **Government Response**

- 3.82 In summer 2018, the Department will begin work on a Ticket Vending Machine strategy and will consider the issues raised in the draft AAP consultation as part of this work.

### **Question 12**

We would welcome views, particularly from disabled passengers, on the current systems for resolving transport disputes, and whether processes could be further improved.

### **Summary of Responses**

- 3.83 This question received 99 responses, with 41 responses from individuals and 58 from organisations. The majority of respondents agreed that many disabled people remain unaware of their rights and how best to complain.
- 3.84 There was a common view that transport operators' current systems for complaints were neither clear nor appropriate for disabled peoples' needs. Many respondents felt that it is not always clear who the complaint should be sent to or how a person could get clarity on whether their complaint has been properly received or whether any remedial action would be taken.
- 3.85 Many respondents challenged the inaccessibility of the online portals provided by transport providers for processing complaints (for example, the visual challenges

where users verify that they are ‘human’ not having an audio option for blind or partially sighted users).

### **Government Response**

- 3.86 The Department agrees that current processes for resolving disputes can be too complex and time-consuming. The Department will work with the rail industry and consumer groups to support the establishment of a Rail Ombudsman to investigate unresolved complaints. We will also release an online tool to make it easier for disabled people to resolve issues they encounter when travelling by bus.

### **Question 13**

As a person with a hidden or less visible disability or impairment, or in an organisation representing people with hidden disabilities, we are keen to receive your views on the desirability and feasibility of introducing a national assistance card.

### **Summary of Responses**

- 3.87 123 responses were received for this question, with 57 responses from individuals and 66 from organisations. The majority of respondents supported the introduction of national assistance cards. In particular, respondents identified the cross-modal applicability of a national scheme as a great strength, as this level of consistency had not been seen in any existing schemes.
- 3.88 A recurrent view was that assistance cards would only be of benefit if introduced in conjunction with staff training; a common concern being that staff would not have an understanding of how to effectively communicate with certain disabled people without the correct training.
- 3.89 Some respondents raised concerns related to a person announcing their impairment in public, and how this could make that individual uncomfortable or vulnerable to later hate crime. However, during the AAP consultation events there was a strong opinion from participants that a card was more confidential compared to current methods that disabled people use to communicate their assistance needs.
- 3.90 Other consistent points which participants discussed at the consultation events included that the scheme needed to be simple and have an accessible application process, that a card’s text must be flexible so that a user could design their own instructions, that any future card design needed to be clearly recognisable, that a card should be included with a disabled persons bus pass or rail card and that people who choose not to use assistance cards, but still require assistance, needs to feel confident that they will receive equal treatment.

## Question 14

As a transport operator or provider, we are keen to receive your views on the desirability and feasibility of introducing a national assistance card.

### Summary of Responses

- 3.91 This question received 47 responses, 4 from individuals and 43 from organisations, with many respondents requesting further clarity or submitting concerns on the potential scheme.
- 3.92 Where there was support, multiple respondents suggested that the scheme required staff training to ensure the correct assistance was given. Respondents strongly felt that Government should ensure that there are multiple accessible methods to apply for a card (for example, by phone, post and online) and that the scheme would benefit from further consultation with disabled people and representative groups if it were to be designed.
- 3.93 Some respondents submitted a call for further clarity on exactly how less visible disabilities will be identified within a national assistance card; for example whether there will be a set of colours or symbols for different disabilities, or whether a person's specific impairment would be present on the card at all as opposed to just the instructions for assistance.
- 3.94 Eligibility guidelines and evidence requirements for provision of the card were queried. These respondents called for certainty on who would qualify for a card and if medical certification would be necessary when applying.

### Government Response to Questions 13 and 14

- 3.95 The Government acknowledges the value that many disabled travellers derive from assistance cards. We encourage the greater use of assistance cards, including through our new accreditation scheme for transport providers who are leading the way on disability issues. We will work to develop greater national consistency including by considering a possible Department for Transport endorsed logo for these schemes.

## Question 15

How can the Department for Transport support Community Transport Operators further?

### Summary of Responses

- 3.96 There were 116 responses to this question, with 38 responses from individuals and 78 from organisations (including several local authorities, disability groups and community transport operators).
- 3.97 A recurrent view in responses from both individuals and organisations was that additional funding was key to providing greater support for community transport. In this regard, the Community Minibus Fund was cited as having enabled many charities to obtain new accessible vehicles and expand their services.
- 3.98 However, it was also suggested that any similar future scheme should cover a broader range of eligible vehicles, supporting the purchase of minivans and cars that may be more suitable for some operators and their customer base
- 3.99 A number of respondents commented on a lack of access to community transport services, reflecting different levels of provision between areas. As well as providing more funding, a range of other suggestions were made for addressing this situation as well as for encouraging greater levels of usage. These included:
- Permitting the use of concessionary passes for community transport services where a user is unable to undertake their journey by bus;
  - Local authorities supporting operators in promoting their schemes;
  - Establishing partnerships between community transport operators and other local and longer-distance transport services to bring about accessible end to end journeys for users; and
  - Assembling a clear evidence base about the impact of community transport services, particularly in providing access to healthcare.
- 3.100 Several responses also suggested that the government should ensure that it is as easy as possible for providers to set up and operate schemes. In relation to this, there was a widespread call for greater clarity over future licencing requirements for volunteer drivers. Many of these responses predicted a reduction in volunteer drivers, and a consequent reduction in service provision, were all volunteers required to acquire and renew a Driver Certificate of Professional Competence licence.

### **Government Response**

- 3.101 The Department has always maintained that community transport operators provide vital services that both encourage growth and reduce isolation by linking people and communities to existing transport networks, jobs, education, shops and services.
- 3.102 Community transport operators provide vital services that link people and communities to services including hospital appointments, and we want to see this continue. The Department will be announcing next steps following the outcome of the recent consultation in due course.

# Annex A: Abbreviations and acronyms

<b>Abbreviation / Acronym</b>	<b>Expansion</b>
AAP	Accessibility Action Plan
AIIR5	Accelerating Innovation in Rail 5
ASD	Autistic Spectrum Disorder
AVI	Audible and Visual Information
BHTA	British Healthcare Trade Association
BSL	British Sign Language
CAA	Civil Aviation Authority
CIHT	The Chartered Institution of Highways and Transportation
CPC	Certificate of Professional Competence
CPT	Confederation of Passenger Transport
DfT	Department for Transport
DPPP	Disabled People's Protection Policy
DPRC	Disabled Persons Railcard
DPTAC	Disabled Persons Transport Advisory Committee
Driving Mobility	The Forum of Mobility Centres
DVSA	Driver and Vehicle Standards Agency
e-bike	Electric Bike
EC	European Council
EHRC	Equality and Human Rights Commission
EU	European Union
GP	General Practitioner
IAN	Interim Advice Note
ITS	Inclusive Transport Strategy
LTN	Local Transport Note
MCA	Maritime and Coastguard Agency
MHCLG	The Ministry for Housing, Communities and Local Government
NAC	National Assistance Card
NHS	National Health Service
ORR	Office of Rail and Road
PHV	Private Hire Vehicle

PRM-TSI	Technical Specification for Interoperability for Person with Reduced Mobility
PSVAR	Public Service Vehicles Accessibility Regulation
RDG	Rail Delivery Group
RICA	Research Institute for Consumer Affairs
RNIB	The Royal National Institute for the Blind
RSSB	Rail Safety and Standards Board
RVAR	Rail Vehicle Accessibility Regulation
SMS	Short Message Service
TRO	Traffic Regulation Order
TVM	Ticket Vending Machine
UK	United Kingdom
WAV	Wheelchair Accessible Vehicle