

Accessible transport: Together Trust response to the Transport Select Committee's inquiry

Who we are

The Together Trust is a charity based in the North West which has been championing and caring for people with disabilities, autism and complex health needs for over 150 years. Every year, we deliver individual care, support, and education to almost 3000 children and adults.

To outline some of our services (for context about our response):

- We maintain three schools which provide specialist support to children with SEND and are all rated Good by Ofsted.
- We provide therapy and specialist support to children and have a team of sleep practitioners, speech and language therapists, positive behavioural practitioners, and educational and clinical psychologists.
- We operate a short break (respite) service for parents and families.
- We run an inclusive day centre for adults aged 18 to 30 with autism, learning disabilities and/or complex health needs.
- We care for children through our residential children's homes and fostering services.

We believe that we have a responsibility to raise awareness of the issues faced by the people we support.

Why we are responding the inquiry

Many of the stations near our services remain completely inaccessible to disabled people, meaning that public transportation is often not an option for them.

For example, Ashburys station is the nearest station to our Bridge College, only 0.3 miles away. However, it is yet to be granted funding via the Department for Transport's Access for All funding scheme. In fact, it is 32 places from the top – meaning that it could take years to get funding.

In the meantime, our students have no real option travel by public transport and have told us that they feel this is unfair. In a class full of young people, only a handful had been on a train before.

Last year we arranged for a public speaker with a physical disability to attend the college to speak to students. When he arrived at Ashburys station there were no staff present to help him get off the train onto the platform – meaning he missed his stop several times. This should not have happened.

Although operators have a duty to arrange alternative transportation when rail infrastructure is not accessible, research shows that this does not always happen, and negative experiences travelling by rail can be enough to stop disabled people from doing so in future.

In the UK, even before the COVID-19 pandemic, nearly one in three disabled people said they simply didn't make some journeys due to problems with transport (Motability, 2022).

There is strong economic and social rationale for improving the accessibility of rail transportation. Research by Motability suggests that more than £70 billion per annum can be recuperated through savings to health and wellbeing, access to employment and moving people off benefits and into work, and access to education (Motability, 2022). For our society to be genuinely inclusive, it must remove barriers for disabled people to live their lives. We hope that the Transport Committee shares this view.

How effective is the current legislation aimed at ensuring accessible transport for all?

According to the Equality Act 2010, public authorities must make reasonable adjustments to ensure that a disabled person is not put at a substantial disadvantage in comparison with persons who are not disabled.

Around 14 million people are affected by disability in the UK. Despite progress to improving accessibility of the rail network in recent years, evidence continues to suggest that the network remains inaccessible for many disabled people.

Only 40% of train stations in Greater Manchester are currently compliant with the Equality Act 2010 according to Councillor George Hulme. In the remainder, major Many stations are not staffed all the time, which means there is often nobody there to assist disabled passengers with booking tickets or accessing help.

The gaps in step-free access or level access between the platform and the train show that the Equality Act 2010 is not providing equal access for disabled people when travelling by train ([Leonard Cheshire](#)).

How can existing legislation be better enforced to make accessible transport a reality?

Focusing on specific issues such as step-free access at stations is a necessary but insufficient approach. Accessibility needs to be embedded into the core of what the railway does in the same way that safety is currently ([DPTAC, 2022](#)).

Funding

The current funding framework of Access for All does not address disabled people's needs in a sufficient way. We need significant funding to plug the gap.

There is an urgent need for a consistent funding package, instead of a piecemeal AfA funding mechanism, as currently exists. The next Comprehensive Spending Review must include a sufficient funding package as well as a commitment for future spending until 2030.

In 2021, the DfT appointed Atkins to conduct an audit of mainline railway stations in Great Britain, as a means of quantifying the investment needed to make stations accessible. Since then, over 1,600 stations have been audited but the remaining are due to be audited by summer 2023. However, the next five-year funding period will begin in 2024.

According to the DPTAC around £6 billion would be required to upgrade all stations that currently fall short of the step-free access standard ([2022](#)). This just amounts to 1-3% of the total transport capital investment ([Get on Board, 2020](#)).

More funding needs to be invested locally. Simon Elliott, Head of Rail Transport for Transport for Greater Manchester said that around £250 million is needed to make all GM stations fully accessible. With the current funding from the central government 45% of our station will need some further intervention to become accessible by 2025, meaning the 2025 target will not be met. ([GM Transport Committee, 2022](#))

There is a clear economic case for closing the transport accessibility gap for disabled people in the UK. Doing so would deliver benefits in the region of £72.4 billion per annum. ([Motability, 2022](#))

Staff assistance

The government's desire to restart the roll out of Driver Only Operation (DOO) would lead to an extensive de-staffing of the rail network, impacting on the accessibility of the railway for disabled people ([NFBUK](#)).

Data from the Association of British Commuters shows that DOO has created 'no go areas' for accessible rail travel in over 11% of Britain's stations ([Association of British Commuters, 2022](#)).

The Equalities and Human Rights Commission has said that the move towards DOO, and the need for many disabled rail passengers to book assistance before their journeys could be breaching the Equality Act ([DNS, 2022](#)). There must always be enough staff available in train stations and on board to assist passengers.

We want transport providers to provide a consistent service so that disabled people know what to expect from transport staff. This includes a more consistent approach to training staff ([Scope](#)).

Are operators and local licensing authorities fulfilling their legal obligations to disabled travellers and travellers with other accessibility needs? If not, why not?

Evidence shows that in many situations operators and licensing authorities are not fulfilling their legal obligations to disabled travelers and others with accessibility needs. Research by the Association of British Commuters shows that train operators and the rail regulator have failed to establish any consistent or lawful mitigations for discriminatory staffing policies ([2022](#)).

All operators are required to provide passenger assistance. However, at a national level, between 9-12% of people who booked Passenger Assist reported receiving no assistance in 2017-18 and 2020-21. Furthermore, disabled passengers have reported not being met by staff, either at the station they departed or arrived at, and said that they had been left on trains at the station ([Research briefing, 2022](#)).

If disabled passengers are unable to book a ticket in advance, they have the right to be able to do so at the station without penalty on the train or at the station. However, almost 1/3 of disabled people stated that they would have difficulty buying tickets using existing methods. This ties into a wider trend around poor staff interactions and infrastructure ([Research briefing, 2022](#)). People using mobility aids face additional barriers including the height of ticket machines at public transport stops ([Atkins](#)). Operators must provide up to date information about accessibility of facilities and services, timetables, fares, connections and delays, disruptions, diversions, and emergencies. In a recent meeting at the GM Transport Committee, Councillor Angie Clark said trains often do not take passengers at the destination they booked ([Councillor Angie Clark](#)).

Contractual agreements impose accessibility-related obligations on operators, with limited flexibility to change once agreed. This is exacerbated by the constraints on purely commercial investment by train operators because franchise lengths are too short to allow them to earn a return on their investment ([DPTAC, 2022](#)).

Investments by Network Rail, including the DfT-specified Access for All programme, are subject to a range of sometimes conflicting pressures, and it is not always clear that the resulting accessibility outcomes are optimal ([DPTAC, 2022](#)).

How well do complaints and compensation processes work when things go wrong?

Research by Scope (1018 respondents) showed that 1 in 5 disabled people had complained in the past and nothing had been resolved. Of those who submitted complaints (805 respondents), 46% submitted these to the transport operator, but almost half of those were unhappy with the response they received (2019).

The sheer number of organisations involved dissipates and blurs responsibilities, meaning that it is difficult for disabled people and their representative bodies to hold the industry to account ([DPTAC, 2022](#)). This means that problems often go unresolved and disabled people face the same issues time and time again, regardless of whether they complain (Travel Fair Report, 2019).

The recent introduction of the Rail Ombudsman has gone some way in addressing this problem ([2019](#)). However, not everyone may know about or be able to get in touch with them. Another positive change is the government's decision to collaborate with Scope in developing a Passenger Charter. This will provide an online one-stop shop on passenger rights and complaints procedures for disabled people.

It is important to raise awareness about the Charter to ensure that disabled people are aware of its existence. Also, it is crucial to ensure that physical copies are available for people who cannot access it online.

Do current legal obligations or guidance need to be strengthened?

In the UK disabled people take 38% fewer trips than those without disabilities. For a decade this figure has remained the same. One of the factors contributing to the 'transport accessibility gap' is that the current provision of transport, both public and private does not adequately cater for the needs of disabled people. ([Motability, 2022](#)) There needs to be legislative change to deliver proper scrutiny on progress of delivering at sufficient pace and scope. The government must put in place a legally binding duty for all train journeys to be fully accessible by 2030 ([Leonard Cheshire](#)). This must include an implementation plan with sufficient funding to ensure genuine progress is made.

The DfT must ensure that existing regulations are properly enforced, like the Public Service Vehicle Accessibility Requirements and the Rail Vehicle Accessibility Requirements. We also want the Government to make it clear what the consequences will be if transport providers fail to comply.

The UN Committee on the Rights of Persons with Disabilities has called on the UK to incorporate the Convention into legislation and allow domestic remedies for breaches. Although it was ratified in 2009, the UNCRPD is not directly enforceable in the UK courts. Because of this, disabled passengers facing discrimination cannot rely on their UNCRPD rights.

What best practices should transport operators be following to improve their performance on access and inclusion for users?

Improving accessibility has the potential to generate higher revenues for operators and potential cost savings from retrofitting infrastructure and service offerings in the future.

Collaborative work

Improvements tend to be piecemeal rather than systemic, synergies are not identified or realised, effort is sometimes wastefully duplicated and opportunities to improve are missed ([DPTAC, 2022](#)). There is a need for a framework within which relevant stakeholders can work collaboratively to develop and implement an overall industry accessibility strategy.

Rail infrastructure and inclusive design

Accessibility is still seen as desirable, instead as a necessary feature of rail travel. We want to see the access needs of disabled people treated as a priority. Whenever the rail industry installs, replaces, or renews station infrastructure this needs to meet current accessibility standards. Sufficient funding must be in place to make this a reality. Accessible methods of booking tickets, live information on route, audio-visual provision, sufficient staffing at stations, and better staff training are clearly all-important elements that must also be put in place.

Transparency and consistency

Public transport companies must be clear and open with disabled customers about the service they can expect. Transport providers must offer consistent services, so that disabled people know what to expect from transport staff (including more consistent approach to training staff).

How effective is the Government's Inclusive Transport Strategy, and how well does it influence decision-making across transport policy? How could it be improved?

The Inclusive Transport Strategy aims to make transport fully accessible for all passengers by 2030. However, it does not seem to influence decision-making across transport policy, especially in relation to funding and accountability.

DPTAC has said that at current annual rates of investment spent on station accessibility, it will take around 100 years to make the entirety of the station estate step-free to new-build standards ([2022](#)).

One of the main themes of the strategy is: *“Improving physical infrastructure – ensuring that vehicles, stations and streetscapes are designed, built and operated so that they are easy to use for all.”*

Nonetheless, Network Rail is installing inaccessible structures across the country ([DNS, 2023](#)), which do not comply with the Inclusive Transport Strategy and potentially breach the Equality Act.

The [Inclusive Transport Strategy, 2020](#) merely ‘encourages’ the Office of Rail and Road to take enforcement action whenever accessibility standards are not met. The language needs to be strengthened by making it mandatory to take enforcement action in such cases.

Further investment in research, development, and innovation is needed to solve accessibility issues across our existing transport network. It is crucial to raise awareness of the adversity disabled individuals face when using rail transportation to enable more meaningful dialogue between disabled people and key decision makers. ([Motability, 2022](#))

We want to see the Government improve accountability across all public transport by creating a single transport regulator. Building on the Inclusive Transport Strategy, which recognises that most journeys use more than one mode of transport.