

Transport Committee

Access denied: rights versus reality in disabled people's access to transport

First Report of Session 2024–25 HC 770

Transport Committee

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Summary

Our predecessor Committee heard that accessibility failings in transport are systematically ingrained across modes, have got worse since the Covid-19 pandemic and have a significant negative impact on people's lives. This is despite the adoption of clear policy aspirations to provide equal access to transport for disabled people, and a framework of equality legislation.

The evidence from disabled people shows that there is still a very substantial gap between the rights and obligations that exist in theory, and the daily experience of people who rely on pavements, buses, taxis, trains and planes to get to work, to access services or for leisure. We have sought to understand the reasons why this is the case, and what could be done to bridge that gap. We have focused on three principal factors:

Firstly, there is currently far too great a burden placed on individual disabled people to take action to hold transport operators and authorities to account for fulfilling their duties. This includes both costly, stressful and uncertain legal action, and opaque and ineffective complaints processes.

Secondly, the landscape of legislative and regulatory requirements, and of the bodies responsible for providing and enforcing these, is overly complicated

and fragmented. This prevents both users and providers understanding the applicable rights and obligations, and reduces access to redress.

Thirdly, at present, the level of formal enforcement action by regulators completely fails to reflect the regularity and severity of access failures experienced by disabled travellers on a daily basis. A way must be found to bring this into balance.

We therefore recommend that the Government undertake:

- design of a unified complaints service, with a focus on ensuring that complaints reach the relevant body, that cases are followed up, and that systemic issues are identified and addressed, regardless of mode or provider;
- a review of transport accessibility legislation to assess how it could be streamlined, clarified and updated, and underpinned by greater specification of the standards providers must work to, including in matters currently subject only to the Public Sector Equality Duty and duty to make reasonable adjustments;
- a review of enforcement bodies to ensure that all have consistent and sufficient resources and powers at their disposal, to ensure that no transport mode (including the street environment) is left uncovered, and to assess whether a single body with responsibility for enforcing transport accessibility across modes would be more effective at asserting the rights

of travellers. This review should also consider whether bodies with responsibilities for transport accessibility should be given power and resources to act on breaches of the Equality Act general duties and Public Sector Equality Duty within their remit.

The Secretary of State must also immediately give regulators an explicit mandate, backed by the necessary resources, to be far more proactive within the scope of their current powers in identifying and enforcing against breaches of accessibility law and regulations.

Throughout transport systems and among policymakers, accessibility urgently needs to be recognised as an issue of human rights and protection from discrimination, not as an optional customer service matter. It is also frequently a health and safety issue. Failures should be vanishingly rare, not commonplace.

A change of mindset at all levels of the system is urgently needed to embed this. We look to the Government to set out practical steps to ensure that operators and service providers know that every instance of not meeting accessibility obligations constitutes a serious failure, for which they will be held accountable.

This work must be done in parallel with, not at the expense of, further steps to address practical factors including physical barriers, staff training and processes. Myriad specific issues need to be addressed, across all transport modes and relating

to all kinds of disability, to continue to improve compliance and good practice on a daily basis. The meaningful involvement of disabled people is central to this, and this involvement must be adequately funded and planned.

These practical steps need to be set within the context of an overall strategy. Government policy has hitherto set out welcome and necessary ambitions, but the plans for achieving these and the resources committed to doing so (especially in relation to infrastructure) have not been equal to the task. The demands of accessibility have too often been set aside when deemed to be in conflict with other policy goals, technical requirements or cost pressures. The Department for Transport must within 12 months set out a new inclusive transport strategy, backed by a costed, practical plan that will close the gap between rights and reality.

This plan must include setting concrete timescales for achieving independent accessibility across the rail network, steps to make policy and decision-making processes more responsive to accessibility, including when decisions are made about staffing levels, and proactive quality assurance of disability awareness training.

The Government's transport and equality agendas have changed since the 2019–24 Transport Committee considered the matters set out in this report. We ask that this report's recommendations be taken into account as legislation on buses, rail and equalities is

developed and taken through Parliament. We intend to hold ministers accountable for progress throughout the 2024 Parliament.

1 Introduction

1. This report is based on evidence collected during an inquiry launched by our predecessor Committee towards the end of the 2019 Parliament. They were not able to publish a report before Parliament was dissolved in May 2024 ahead of the General Election. The Committee had, however, put the evidence received into the public domain, alongside observations on key themes.¹
2. It happens too often that disabled people are made to tell and re-tell their stories without meaningful action resulting, and we did not want to ask stakeholders and individuals to repeat themselves by submitting new evidence. News reports about accessibility failures have continued to emphasise the urgency of the problems, and there is evidence that by some metrics performance has declined further.²
3. We hope that a new Government provides an opportunity to revise priorities and strategic planning with inclusion at its heart, and that our conclusions and recommendations, based on the existing body of evidence collected by our predecessor Committee, will assist the new ministerial team in the Department for Transport. We intend to hold ministers accountable for progress throughout the 2024 Parliament.

1 Transport Committee, First Report of Session 2023–24, Work of the Transport Committee in the 2019 Parliament, HC 828, paras 5–6

2 See paragraph 62

4. The Government's transport and equality agendas have changed since the 2019–24 Transport Committee considered the matters set out in this report. The Department for Transport is bringing forward new legislation on rail reform and bus services. The Government has also committed to publishing a draft Equality (Race and Disability) Bill. We ask that this report's recommendations be taken into account as the relevant legislation is drafted and taken through Parliament by their sponsor Departments.

The inquiry

5. Before launching an inquiry, our predecessor Committee held roundtable discussions with accessibility campaigners and advocates. Hearing about the appalling experiences disabled people have every day in using transport, one overarching question emerged: why do such widespread problems persist when the UK has a legal and regulatory framework that should, in theory, guarantee minimum standards of equality and accessibility? It was this question that they set out to address, along with the related one of whether it is the framework, its implementation by operators or its enforcement by regulators that is primarily at fault.
6. The inquiry, 'Accessible transport: legal obligations', was launched in February 2023. It received more than 70 pieces of written evidence. This was complemented by a survey about people's experiences of using transport and the street environment, to which over 800 responses were received. In oral evidence the

Committee heard from disabled people with lived experience of travelling, experts on transport and accessibility law, transport operators, regulators, the Equality and Human Rights Commission and the Department for Transport.

- 7.** We are very grateful to all those who gave their time, energy and expertise to give evidence or respond to the survey. The Committee also received help in other ways: Guide Dogs UK in Milton Keynes and Disability Positive in Northwich hosted members of the Committee to help them understand lived experiences. We particularly want to pay tribute to the late Alan Benson MBE, who contributed oral evidence and who, along with fellow advocate Claire Lindsey, invited our current Chair (then a member of the Committee) to accompany him on a journey in London to provide a practical perspective on the issues. Alan's insight was of great value to the inquiry and to this report.
- 8.** In July 2023 plans to close the majority of ticket offices across the rail network were published for consultation by the Rail Delivery Group and train operating companies. It was immediately clear that these proposals carried significant implications for accessibility. The Committee therefore decided to invite further submissions specifically on this matter, and thanks are due also to those who responded and who gave oral evidence on the issue in September 2023. The plans were dropped in October 2023.

9. The inquiry and this report adopt the social model of disability. This sets out that people are disabled by barriers in society, not by their condition or difference, and recognises that steps can be taken to remove those barriers.

The legal and regulatory framework for transport accessibility

10. The Equality Act 2010 provides legal protections from discrimination in the workplace and in wider society.³ Disability is one of nine ‘protected characteristics’ set out in the Act. Part 3 of the Act covers the broad equality duty for the provision of goods, services and facilities. The Act also puts providers of services and public functions under an “anticipatory reasonable adjustments duty” which requires them to continually review their operations for any disability-related disadvantage, and to take reasonable steps to remove it.
11. The Public Sector Equality Duty set out in section 149 of the Equality Act 2010 requires bodies that provide public functions to “have due regard” to the need to take steps to “advance equality of opportunity” between those who have a protected characteristic and those who do not. It applies to the Department for Transport itself, to regulators, to Network Rail and the Operator of Last Resort (but not to privately-owned

3 Equality Act 2010

train operating companies), and to local authorities, which are responsible for licensing taxis, administering Blue Badge schemes, and for the street environment. An Equality Impact Assessment is an analysis of a proposed policy or change to an existing policy which assesses whether it would have a disproportionate impact on people with protected characteristics. These assessments are primarily carried out by public authorities to show compliance with the Public Sector Equality Duty, but in England they are not obligatory and other means of demonstrating compliance are possible.

- 12.** The principal UK legislation specific to the rights of public transport users who are disabled or who have reduced mobility is contained in Part 12 of the Equality Act 2010, which makes provisions for the physical accessibility of taxis, buses, coaches and trains, for audible and visible information on board buses, and for the service provided to disabled users of taxis and private hire vehicles.
- 13.** A raft of mode-specific legislation and retained EU law underpin disabled passengers' rights, especially for rail, air and maritime travel. Regulation (EC) No. 1107/2006, now assimilated into UK law, deals with the rights of disabled passengers in aviation. Public Service Vehicles Accessibility Regulations set out requirements for buses and coaches carrying more than 22 passengers; separate conduct regulations place relevant duties on on-board staff, and Regulation (EU) No 181/2011 requires certain bus and coach staff to complete disability-related training.

New requirements—such as regulations on accessible information introduced in 2023⁴—continue to be brought in, and this is far from an exhaustive list.

- 14.** Requirements are also set by a range of other mechanisms: rail operators are obliged by the conditions of their licences to have Accessible Travel Policies, and privately-operated train operating companies are subject to contractual requirements to assist the Secretary of State in discharging their Public Sector Equality Duty.⁵ Licensing policies for taxis and private hire vehicles are set by each responsible local authority.⁶
- 15.** Sector-specific regulators have oversight of whether operators are fulfilling their obligations: these include the Office of Rail and Road, the Civil Aviation Authority, the Driver and Vehicle Standards Agency, the Office of the Traffic Commissioner, local licensing authorities and the Maritime and Coastguard Agency. Operators and service providers have their own complaints processes for when journeys go wrong, with a variety of escalation routes depending on mode should complaints remain unresolved.
- 16.** Responsibility for many aspects of equality-related policy on bus, coach, taxi and private hire vehicle accessibility in England, Scotland and Wales rests with the UK Government, despite responsibility for most

4 The Public Service Vehicles (Accessible Information) Regulations 2023

5 Department for Transport (ATL0061)

6 Department for Transport (ATL0061)

other aspects of policy across these modes being devolved. Policy on aviation and maritime accessibility is reserved to Westminster for the whole of the UK.⁷

- 17.** The efficacy of this complex patchwork of duties, regulations and regulators is considered later in our report. First, however, we wish to set out some of the evidence our predecessor Committee received about what it is like for disabled people using transport networks and services.

⁷ Department for Transport (ATL0061)

2 The experiences of disabled people using transport

18. Around 16 million people in the UK are disabled, representing almost one in four of the population.⁸ This includes physical and sensory conditions such as mobility difficulties, hearing or sight loss, non-visible disabilities such as autism, dementia and anxiety, learning disabilities, and physical and mental health conditions.
19. Some 29 per cent of disabled adults live in households without access to a car, compared with 16 per cent of non-disabled adults. People with specific access needs tend to travel less, find travel more stressful and feel less confident in travelling. In 2023, disabled adults in England made 25 per cent fewer trips across all modes than non-disabled adults. This gap widens further among over-60s.⁹ Decreased confidence when

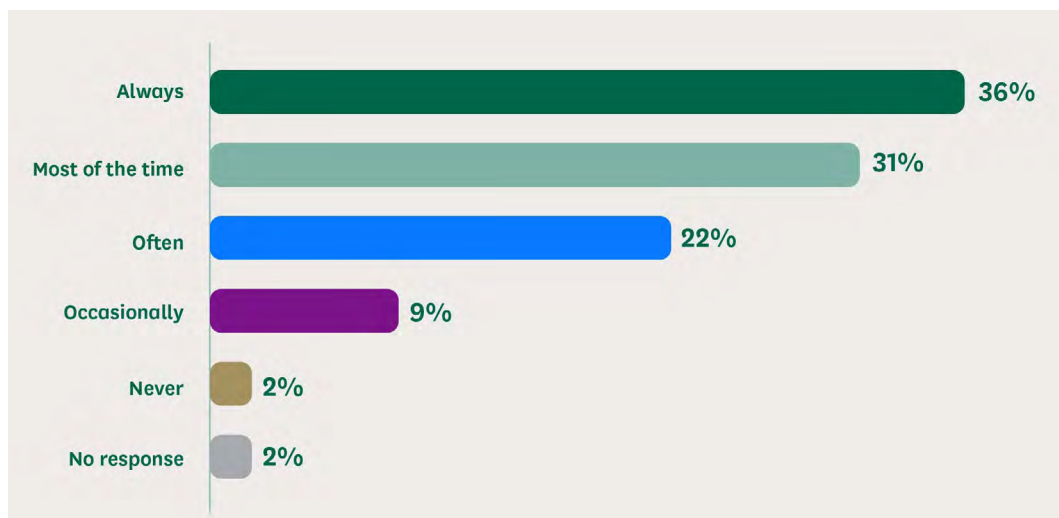
8 Department for Work and Pensions, Family Resources Survey: financial year 2022 to 2023, March 2024

9 Department for Transport, Disability, accessibility and blue badge statistics: 2023 to 2024, January 2025

making complex, multi-modal journeys is evident, and is particularly pronounced for people with cognitive differences and mental health conditions.¹⁰

- 20.** When the Committee opened this inquiry, it launched a survey to enable members of the public to tell us directly about their experiences of travelling as, or with, a disabled person on modes of transport other than private cars.¹¹ The survey asked people how often they experienced access challenges or barriers that make it difficult to travel. Just under 90 per cent of respondents said that this happened either often, most of the time, or always.

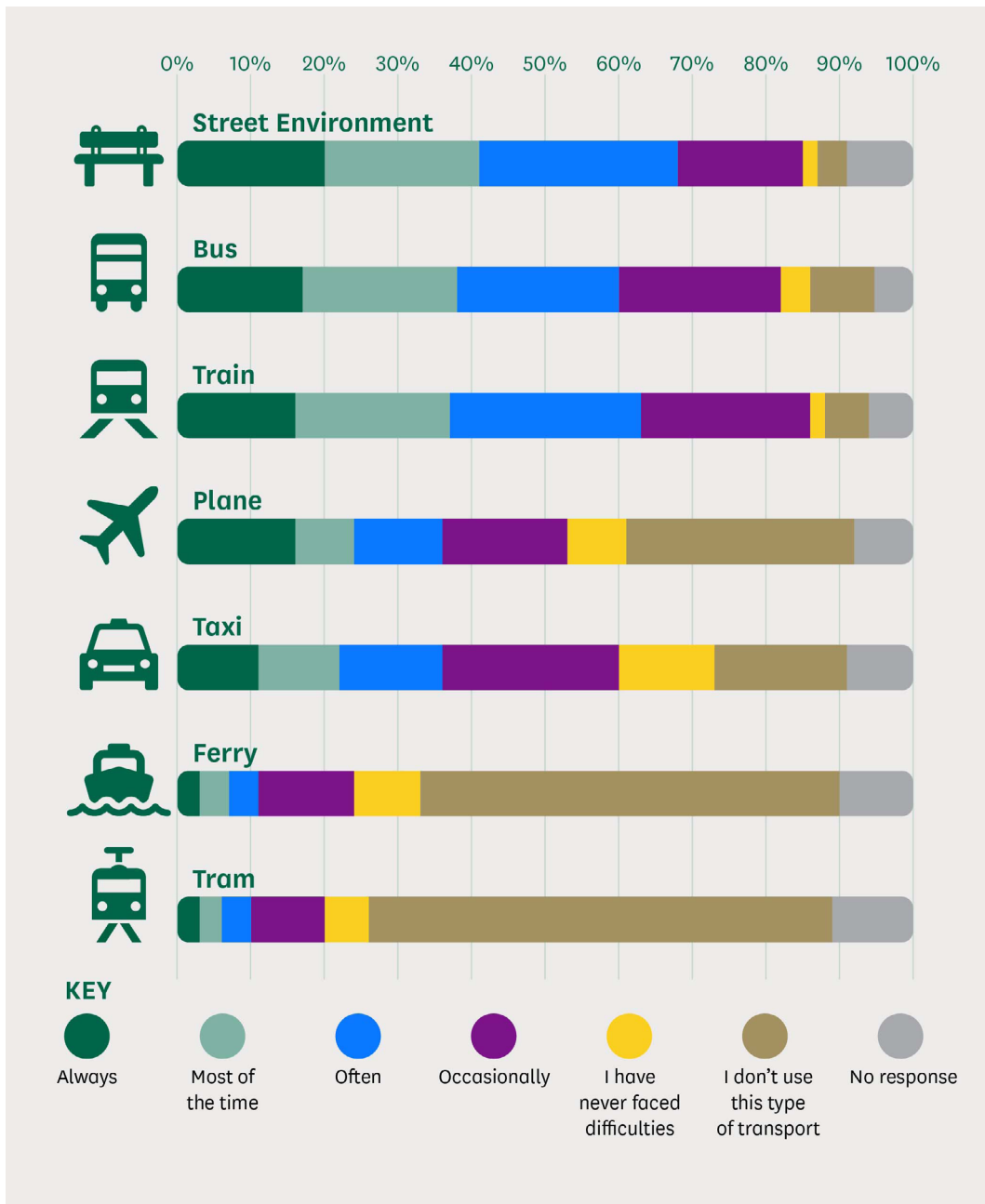
When using public transport, do you or any people you travel with experience access challenges or barriers that make it difficult to travel? (825 total respondents)



¹⁰ Department for Transport, Inclusive Transport Strategy: evaluation baseline report, NatCen, November 2021

¹¹ Transport Committee, First Report of Session 2023–24, Work of the Transport Committee in the 2019 Parliament, HC 828, Annex

How often have you or the person you travel with who is disabled or who has accessibility needs faced difficulty on the following modes of transport? (825 total respondents)



21. The support that people need to make journeys successfully and confidently varies greatly: from deployment of ramps to provision of quiet areas, from clear straightforward speech by staff to readily

accessible toilets.¹² Barriers to using transport include physically inaccessible stations or vehicles, lack of information, processes not being followed as they should be, limited Blue Badge parking, and a cluttered or poorly maintained street environment. They also include the risk of being subject to harassment, hate crime or assault.¹³ The most frequently-raised issues in the Committee's survey were—by some distance—availability and attitudes of public transport staff, and the accessibility and standard of toilets. Accessibility of bus stops and rail stations, access to wheelchair spaces and the availability and service provided by accessible taxis were all mentioned by significant numbers of respondents.¹⁴

- 22.** The comprehensive nature of the barriers and failings was made clear in the survey responses: difficulties are encountered across all transport modes and compound each other. We heard about refusals to carry disabled passengers (for example because of the need to carry a wheelchair or service animal) on taxis and on cruise lines; we heard that the most alarming or unsafe failures might occur in air travel and on the railway, while the most frequent failures might happen in the street environment or on buses. No mode of transport is free from problems.¹⁵

12 Disabled Persons Transport Advisory Committee, DPTAC position statement on non-visible disabilities, August 2020

13 Qq4, 48 (14 June 2023)

14 Transport Committee, First Report of Session 2023–24, Work of the Transport Committee in the 2019 Parliament, HC 828, Annex

15 Qq4, 9 (14 June 2023)

Box 1: The all-pervasive nature of transport inaccessibility

“Complete lack of trust that procedures will be followed. Lifts or accessible toilets broken down. Expense and lack of availability of wheelchair accessible taxis. Loss of pressure relief cushion by airline. Inaccessible toilets on planes. Undignified boarding and disembarking procedures on planes. No room on accessible buses. Bus replacement services for rail journeys not accessible.”

—Respondent to our survey, describing factors that make travelling difficult

“Journeys for me are journeys that will go wrong. I expect something to go wrong. It is just how badly it goes wrong. Does it mean I am delayed 10 minutes? Does it mean I am delayed three hours?”

—Alan Benson¹⁶

“It baffles me that the government won’t commit to achieving level boarding across the rail network. It baffles me that disabled people face ritual humiliation when travelling by plane. As somebody who wasn’t born disabled, the thing I have found most difficult about adjusting to life as a disabled person is getting from A to B. I have lost count of the bad experiences I have had on public transport. I’m perfectly capable of functioning as an active member of society but the constant access barriers and ignorance of public transport policy

makers makes every day a struggle. The current state of public transport in this country firmly places disabled people as second class citizens. It's beyond shameful.”

—Respondent to our survey

- 23.** Other research and surveys bear this out.¹⁷ Research published by Scope in 2019 found that two thirds of disabled people had experienced problems in using public transport within the previous year.¹⁸ The gap between disabled and non-disabled passengers in both their likelihood to have taken a flight from a UK airport within the last 12 months, and their satisfaction with the experience, is growing. Of those respondents to the Civil Aviation Authority’s 2023 Consumer Survey who said they had a disability, 59 per cent reported having difficulty in accessing or using airports or flying. For passengers with a combination of hidden and non-hidden disabilities, the figure was 73 per cent.¹⁹ It is important also to note that many metrics do not capture the experiences of disabled people who face insurmountable barriers to using these services in the first place.²⁰
- 24.** The Committee received evidence from operators across rail, bus and aviation, setting out measures and innovations they had put in place to make their services work better for disabled people.²¹ These

17 Dr Sunil Rodger (ATL0069)

18 Scope, Travel fair, September 2019, p.6

19 Civil Aviation Authority, Flying in 2023: Research findings from Wave 12 of the CAA’s UK Aviation Consumer Survey, January 2024

20 Wheels for Wellbeing (ATL0041), Scope (ATL0062)

21 FirstGroup plc (ATL0050), Southeastern (ATL0026)

ranged from use of technology for facilities such as virtual station tours and BSL train information, to engagement with disabled people's organisations. We also heard some positive feedback from users about individual operators and good experiences with staff.²² Nonetheless, these examples serve to highlight the lack of consistent expectations, standards and delivery across transport networks.

Understanding the full range of needs

- 25.** Accessibility needs were in the past often understood primarily in terms of mobility and sensory needs, and only a limited range of provisions considered as a result. A much broader range of interventions in vehicle and station design, and in the provision of information, is needed to make transport fully accessible. Poor lighting design, excessive noise or visual clutter, ambiguous signage or navigation, a high level of crowding, late changes to services and inadequate communication may all particularly affect autistic people, for example. Research by the National Autistic Society found that 52 per cent of autistic people said that a fear of experiencing unexpected changes, like delays, diversions and cancellations, has stopped them from going on a bus or train.²³ Sensory overwhelm can also make travel inaccessible for people with dementia.²⁴ The Department for

22 Adam Sergent (ATL0007), Mr Mark Jukes (ATL0002)

23 National Autistic Society (ATL0036)

24 Mental Health Foundation (ATL0009)

Transport’s own research found that buses presented particular difficulties for people with cognitive, learning, behavioural and mental health conditions including because of inconsistent timetable and fare information online and a lack of—or inaccurate—real-time information which heightened anxiety related to travelling.²⁵

- 26.** The Department’s 2018 Inclusive Transport Strategy (see Chapter 3) acknowledged that accessibility needs may arise from conditions that can affect learning, memory and quality of mental health or result in differences in the way that people process information (sometimes known as neurodivergence).²⁶ The Committee heard evidence, however, of a lack of confidence among transport users that the full range of specific needs is consistently understood by providers,²⁷ and concern that patchy coverage in out-of-date regulations means autism travel policies being decided by the goodwill of individual operators.²⁸ Examples of effective provisions included the provision of ‘sensory nooks’ in passenger assistance lounges at Manchester Piccadilly, and a guide for Lumo passengers which gives them advance warning of

25 Department for Transport, People with non-visible impairments’ attitudes and experiences of transport qualitative research, September 2024

26 Department for Transport, The Inclusive Transport Strategy: achieving equal access for disabled people, July 2018

27 Alex E. (ATL0004), Mrs Sophie Grand (ATL0005)

28 Adam Sergent (ATL0007)

how many tunnels the train will pass through and for how long—but this was isolated good practice, not a standard applied by all.

- 27.** Blue Badges and concessionary passes are not universally made available to the full range of users who might benefit from them, especially those with ‘hidden’ disabilities, and neurodivergent people or people with mental health conditions may not be aware when travel assistance services are available.²⁹ General disability awareness training for staff is unlikely to be sufficient for ensuring that travellers with less well-understood disabilities receive the support they need or are entitled to.³⁰
- 28.** Management of chronic health conditions also has implications for access to transport. Easy and reliable access to adequate toilet facilities—not just wheelchair accessible or Changing Places toilets—and information about them can be a determining factor in whether some people feel able to travel at all. Crohn’s and Colitis UK told us that 87 per cent of people with these conditions plan journeys based on access to toilets.³¹

A worsening picture?

- 29.** It seems reasonable to expect that the story of transport accessibility would be one of steady, if slow, improvement, underpinned by the legislative

29 Mental Health Foundation (ATL0009)

30 National Autistic Society (ATL0036)

31 Crohn’s and Colitis UK (ATL0037)

framework. The Committee heard, however, that the situation has in fact deteriorated since the Covid-19 pandemic. Consultant and campaigner Christiane Link drew a contrast with the period around the London 2012 Paralympic Games:

There were routines; people were used to seeing wheelchair users, other disabled people, cane users, guide dogs and so on. That has totally dropped and it has a massive impact on disabled people at the moment. [...] 2012 was the best time of my life [...] because we got it right. Everyone was well-trained, the processes were clear and disabled people were welcome in society. That has totally changed since Covid. There is a different feeling.³²

Guide dog user Stephen Anderson reported that the number of refusals of service he had personally had from taxi and private hire vehicles had doubled since the end of the last lockdown, and statistics from Guide Dogs UK bear out a generally worsening experience.³³ Baroness Tanni Grey-Thompson told us that, during the pandemic, train companies regularly refused to allow wheelchair spaces to be booked.³⁴ The opening up of more pavement seating for restaurants and cafés also made the street environment more difficult to navigate.³⁵

32 Qq16, 21 (14 June 2023)

33 Q11 (14 June 2023)

34 Q13 (14 June 2023)

35 Q33 (14 June 2023)

- 30.** The ending of pandemic travel restrictions in 2022 created particular problems in the aviation sector; numerous reports of disabled people having lengthy waits for airport assistance and being stranded on aircraft prompted the Civil Aviation Authority (CAA) to write to airports in June 2022, demanding action plans to tackle assistance waiting times.³⁶ Increased demand may have taken operators by surprise; airports reported a much higher proportion of travellers than pre-pandemic requesting mobility assistance.³⁷ The CAA’s 2023 consumer survey reported that, since 2019, the gap in satisfaction ratings between disabled and non-disabled passengers flying from UK airports had widened on most metrics, including the airport experience and handling of complaints.³⁸
- 31.** A lack of training and exposure to dealing with disabled travellers through the pandemic years may be partly to blame for these problems across modes.³⁹ Alan Benson, an activist and wheelchair user, added that, as a result of Covid-19, many disabled people have energy impairments and other invisible conditions; for them it can be “a much harder

36 Letter from CAA Group Director of Consumers & Markets to airports, 9 June 2022

37 Airport Operators Association (ATL0013)

38 Civil Aviation Authority, Flying in 2023: Research findings from Wave 12 of the CAA’s UK Aviation Consumer Survey, January 2024

39 Q45 (14 June 2023)

environment because they are faced with lack of belief; they are faced with personal animosity in some cases.”⁴⁰

Impact on daily life

- 32.** The effect of unreliable or inaccessible transport on disabled people’s lives is profound. The extra inconvenience of travel as a disabled person is a considerable barrier to going about daily life in the way that the wider population expect to be able to. Some factors simply exclude disabled people from certain kinds of journey, such as when assistance desks at rail stations do not open until after the first trains of the day have departed, and when vehicles have only one wheelchair-accessible space, meaning that two wheelchair users cannot travel together.⁴¹ Drivers who use wheelchairs will not be able to switch to using EVs if there are no accessible charging points near their homes, and if the cost of wheelchair-accessible EVs is prohibitive.⁴² Even when vehicles are accessible, the design or location of bus stops can make bus journeys difficult or impossible.⁴³ Alan Benson calculated that, over a period of six months, an out-of-service lift on his normal route to work had necessitated a workaround that cost him a total of

40 Q26 (14 June 2023)

41 Q23 (14 June 2023), *Wheels for Wellbeing* (ATL0041)

42 Q14 (14 June 2023)

43 Confederation of Passenger Transport (ATL0012), National Centre for Accessible Transport (ATL0014)

three extra weeks travelling time,⁴⁴ and compensation is not usually available for delays to journeys because of broken lifts or ramps, or lack of space on a vehicle.⁴⁵

- 33.** It is not just the travelling itself but the preparation time that is required for journeys: Baroness Tanni Grey-Thompson estimated that she spends a couple of hours a week longer than a non-disabled person planning her travel around the UK.⁴⁶ Accessibility campaigner Stephen Anderson described constantly “having to think seven steps ahead”.⁴⁷ The complexity of planning journeys and the unreliability of information about stations and facilities is a huge disincentive to travel.⁴⁸ Baroness Grey-Thompson noted that, to travel successfully, “you have to be an expert in the system and you have to be an expert in every single mode. You also have to be an expert in which train stations or bus stops are accessible”.⁴⁹

44 Q7 (14 June 2023)

45 Rita Egan (ATL0001)

46 Q24 (14 June 2023)

47 Q11 (14 June 2023)

48 Q27 (14 June 2023)

49 Q28 (14 June 2023)

Box 2: The impact on daily life of transport inaccessibility

“Our record for not being able to board any buses consecutively is five, only one being because of a wheelchair being already on board—over an hour extra. We already have to leave an hour earlier than if I could walk as it is.”

—Respondent to our survey

“My partner suffers from colitis and every journey has to be planned and toilet availability sought in advance. They will avoid eating that day just in case they can’t get access to a toilet and gets unwell. This is debilitating physically and mentally.”

—Respondent to our survey

“There’s an assumption that disabled people’s time is less valuable—that it’s ok to make us wait for a rail worker to turn up with a ramp. I’ve been late to important meetings because of this, and it makes me feel like a second class citizen. Far too often I’ll go to an accessible tube station but the lift is broken and I have to turn around. (The tube is so bad I mostly use buses, which have their own problems—double or triple journey times in many cases, which means I rarely go far from where I live, and miss out on social events.) I barely go to see my mum or friends at home because the transport is so bad for wheelchair users I don’t know how I’d do it. It’s affected my friendships, relationships and working life, and it’s embarrassing. I just want to be able to use public transport like everyone else.”

—Respondent to our survey

“Many of us can’t go where we want, when we want to or need to. We spend a lot of time worrying about journeys beforehand and arranging them. We have to allow extra time for the journeys themselves, and they are stressful.”

—WinVisible⁵⁰

- 34.** We heard a great deal of frustration about the assumptions made about why disabled people need to travel.⁵¹ Wheels for Wellbeing summed this up:

Transport provision is not designed to accommodate disabled people travelling as commuters, as carers for children or other Disabled people, or travelling to important meetings and events. Disabled people’s journeys are assumed to be for non-essential, leisure purposes and therefore without requirement for it to be reliable, predictable or efficient.⁵²

Baroness Grey-Thompson reflected that having to plan travel and being told to book assistance in advance is “a constant negation of the fact that we have lives, we have work, we have families. We are constantly treated differently.”⁵³

50 WinVisible (ATL0070), Wheels for Wellbeing (ATL0041)

51 Q28 (14 June 2023)

52 Wheels for Wellbeing (ATL0041)

53 Q5 (14 June 2023)

Making the decision not to travel

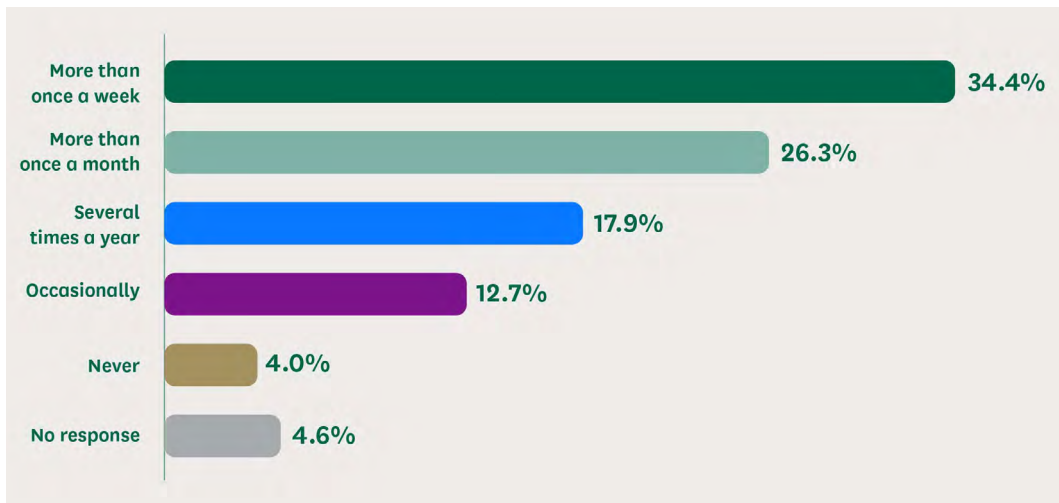
- 35.** We also heard that lack of confidence in services to function correctly and staff to assist appropriately causes wearying anxiety, stress and frustration. This stops many disabled people travelling at all.⁵⁴ Research shows that disabled people are less likely to undertake an unfamiliar journey, and that lack of information about facilities like ramps, lifts or toilets can lead people to decide against travelling.⁵⁵ Some of our witnesses expressed caution about speaking frankly about the problems they had encountered, acknowledging the risk that they would further contribute to disabled people's reluctance to travel.⁵⁶
- 36.** The Committee's own survey bore out the extraordinary regularity with which this affects the lives of disabled people. More than a third of respondents told us that more than once a week they decided not to make a particular journey because they knew it would be too complicated, too unsafe or things would be too likely to go wrong. Only four per cent of respondents said this was never the case.

54 Leonard Cheshire (ATL0045)

55 Department for Transport, Inclusive Transport Strategy: evaluation baseline report, November 2021, Transport Focus (ATL0027)

56 Qq25, 28 (14 June 2023)

**How often do you decide not to make a journey because you know it will be too complicated, too unsafe for you, or things are too likely to go wrong?
(825 total respondents)**



Box 3: Why some disabled people decide not to travel

“I don’t use public transport at all anymore. I can’t cope with buses refusing me space, trains leaving me stranded in the sidings, airside crew destroying my wheelchair, taxis refusing wheelchairs.”

—Respondent to our survey

“I don’t fly because it is inaccessible to me (I can’t transfer out of my wheelchair, can’t risk injury by being manhandled by airport staff without appropriate equipment). I choose not to use trains because I have no guarantee that I will be able to disembark at my destination, I can’t risk getting stranded. Longer distance buses/coaches are generally not wheelchair accessible, so I restrict my journeys to local only.”

—Respondent to our survey

- 37.** In the remainder of this report, we will examine why negative experiences are so widespread, despite the existence of a policy, legal and regulatory framework which ought to prevent them.

38. CONCLUSION

Aside from the structural legal issues, it is clear from the evidence that myriad specific practical issues need to be addressed, across all transport modes and relating to all kinds of disability, to improve compliance and practice on a daily basis. We will seek to hold the Department for Transport, local authorities and providers to account for addressing these issues. The meaningful involvement of disabled people must be central to the work of operators and government at all levels in solving these problems, and such involvement must be adequately funded, planned and supported.

3 From policy aspiration to implementation: where do things go wrong?

The 2018 Inclusive Transport Strategy

39. Governments have adopted clear policy aspirations to provide equal access to transport for disabled people. In 2018 the Department for Transport published an Inclusive Transport Strategy, which set out ambitions to “make sure that disabled people [...] are able to travel easily, confidently and without extra cost” and to achieve “equal access for disabled people using the transport system, with assistance if physical infrastructure remains a barrier, by 2030.”⁵⁷ The previous Government also published a National

57 Department for Transport, The Inclusive Transport Strategy: achieving equal access for disabled people, July 2018

Disability Strategy in 2021, which acknowledged the remaining challenges and reiterated its determination “to achieve an accessible transport system for all”.⁵⁸

40. The Inclusive Transport Strategy set out 95 actions, ranging from very broad to very specific. Actions related to the railway focused on introduction of the Rail Ombudsman and incentivising better performance on Passenger Assist. The ambition or scope of some actions did not seem well matched to the overall ambition of the Strategy: an online tool for reporting issues experienced by disabled people travelling by bus was promised, but it would only relate at first to use of ramps and lifts for boarding. In respect of taxis and private hire vehicles, the principal action was to “do everything in our power to ensure that local licensing authorities make full use of their existing powers”. Despite stating that “there is a clear role for Government in actively monitoring and ensuring compliance with legislation”, there was heavy reliance in the language of the actions on “considering”, “incentivising”, “exploring”, “raising awareness” and undertaking or responding to consultations rather than ensuring compliance.⁵⁹

41. A number of commitments were paused or delayed due to the impact of the Covid-19 pandemic.⁶⁰ In December 2023, the Committee asked Guy Opperman, then Parliamentary Under Secretary of

58 HM Government, National Disability Strategy, July 2021, CP 512

59 Chartered Institute of Logistics and Transport (ATL0010)

60 Department for Transport, The Inclusive Transport Strategy: summary of progress, November 2020

State for Transport and the Minister with overarching responsibility for transport accessibility, whether he thought the Strategy’s aspirations for 2030 were still achievable: he said yes. He told the Committee that “there may be isolated elements where there is difficulty [...] but fundamentally things are changing” and “come 2024 we still have six years to fix it”.⁶¹ A final evaluation report had been due to be published in 2024.⁶²

42. While the Committee heard support for the principles and vision of the Strategy, and some cautious optimism about its potential to influence decision-making, there was scepticism about what it had achieved in practice, with performance on some metrics regressing and its influence across transport policy unclear.⁶³ The Chartered Institute of Logistics and Transport argued for “a complete overhaul [...] with better specification of each commitment in terms of what will be achieved, who will be responsible for delivering it, when it will be achieved and how it will contribute to achieving the vision”.⁶⁴ There were calls for greater ambition in relation to physical infrastructure, and for revenue funding to help achieve its aims in practice.⁶⁵ The Rail Delivery Group reported

61 Q147

62 Department for Transport (ATL0061)

63 Q316 [Caroline Stickland] (25 October 2023); Chartered Institute of Logistics and Transport (ATL0010), Transport for All (ATL0017), National Pensioners Convention (ATL0025), Disability Rights UK (ATL0060), Liverpool City Region (ATL0066),

64 Chartered Institute of Logistics and Transport (ATL0010)

65 Christiane Link (ATL0020), Liverpool City Region (ATL0066)

that some train operating companies suggested that the “easier to accomplish” commitments within the Strategy had been achieved, but it was necessary to recognise that costly infrastructure investments would ultimately be required to create a fully inclusive rail network.⁶⁶

- 43.** The present Government has reiterated the ambition for disabled people to have equal access to transport, and set out several fronts on which it is taking action. Minister Simon Lightwood MP has told the House in January 2025 that

The new aviation accessibility task and finish group [...] brings together industry and consumer advocates with first-hand experience to improve accessibility in air travel. The Government will take advantage of the benefits of a unified rail network to deliver a more reliable and consistent customer experience for everyone with accessibility needs, and our buses Bill will make bus travel more accessible and inclusive, including by extending the requirements for relevant bus staff to undertake disability training.⁶⁷

- 44.** These commitments are welcome, but underscore the need for transport accessibility to be considered in the round and across modes. The promised Integrated Transport Strategy, on which the Department is

66 Rail Delivery Group (ATL0016)

67 HC Deb, 9 January 2025, col 982

consulting, could be one vehicle for doing so.⁶⁸ The then Secretary of State, Rt Hon Louise Haigh MP, told us in November 2024 that:

The key principle of the integrated transport strategy is that we start from people’s needs and work back. We had an internal conversation just last week about the need to think about accessibility first and foremost because if you have an accessible transport system it is inclusive for everyone. It is on that principle that we are building out the integrated transport strategy.⁶⁹

45. CONCLUSION

The 2018 Inclusive Transport Strategy set a goal of “creating a transport system offering equal access for disabled people by 2030”. Regardless of the status of individual actions set out in that Strategy, it is evident that the overall goal will not be achieved on that timescale. A positive direction of travel is not enough—and, indeed, we have seen progress go backwards in some respects since the Covid-19 pandemic. There needs to be more emphasis on a concrete delivery plan to achieve the overall outcome of closing the accessibility gap, rather than administrative actions which, while positive in themselves, risk adding up to no more than the sum of their parts.

68 Department for Transport, Integrated National Transport Strategy: a call for ideas, November 2024

69 Oral evidence taken on 13 November 2024, on Work of the Secretary of State for Transport, Q46

46. RECOMMENDATION

The Government should publish within 12 months a new Inclusive Transport Strategy. This strategy must have a stretching ambition, but one underpinned by metrics, actions, costings and milestones which clearly map out a practical pathway to deliver on that ambition. It must be cross-modal and closely linked to the Government's promised Integrated Transport Strategy, but a specific focus on accessibility is needed.

- 47.** The evidence the Committee received sheds some light on why the policy aspirations of a strategy might fail to be translated into progress on the ground. Witnesses talked about a lack of priority given to accessibility compared to other factors in decision-making, gave examples of a culture of accepting failure and of policies being developed that work against inclusion, and described the importance of sufficient trained staff for putting theory into practice.

Deprioritisation of accessibility in practice

- 48.** Several witnesses drew comparisons between accessibility and other factors and obligations which are seemingly more deeply embedded in decision-making in the transport industry, such as health and safety or sustainability.⁷⁰ Barrister Catherine Casserley argued that rights to accessible transport

70 Q289 (25 October 2023)

should be enforced in the same way as any health and safety requirement. As part of any operation, any business has to comply with a range of obligations. These should be no different.⁷¹

- 49.** Professor Anna Lawson, a specialist in disability and law, argued that the demands of accessibility were frequently disregarded when they appeared to be in conflict with other policy goals—such as increasing cycling when it comes to the street environment—or operational factors, like the comfort of other passengers in respect of the volume of audio information on bus services.⁷² Alan Benson observed that what is considered by disabled people to be a good service is often argued by operators to be in conflict with health and safety (as in the case of policies on carrying mobility scooters, which vary across train operating companies),⁷³ finance or engineering factors. He said, “It always seems to be that accessibility loses the arguments. Until it wins those arguments—[...] like health and safety does—we are not going to deliver a properly accessible transport network.”⁷⁴

71 Q315 (25 October 2023)

72 Q291 (25 October 2023)

73 Anthony Jennings (ATL0092)

74 Q30 (14 June 2023)

Trumped by other factors? The case of rail infrastructure

- 50.** Progress has undoubtedly been made on making the rail network more physically accessible. The Access for All programme for funding accessibility improvements at stations, initially launched in 2006, has provided step-free access at more than 250 stations,⁷⁵ with smaller-scale accessibility improvements at more than 1,500 locations. The then Minister for Rail, Huw Merriman, told the Committee in December 2023: “75 per cent of journeys are from step-free stations. Even though most stations are not step-free, the busy stations are.”⁷⁶ Further funding for accessibility improvements is included in Network Rail’s Control Period 7, running from 2024 to 2029. Rolling stock itself now largely conforms to accessibility standards, even if several companies required exemptions to give them more time to comply after the regulatory deadline of January 2020. The Department consulted in late 2023 on improving the standards in the Code of Practice for accessible design of railway stations, to which operators must adhere when installing, renewing or replacing infrastructure.⁷⁷
- 51.** There is a question, however, of whether these measures are equal to the scale of the remaining challenge. In a February 2022 report, the Disabled

75 Railway stations: disability PQ 11849, 6 November 2024

76 Q162 (13 December 2023)

77 Department for Transport, Consultation: Design standards for accessible railway stations: a code of practice, August 2023

Persons Transport Advisory Committee (DPTAC) drew attention to the endemic nature of physical accessibility barriers on the rail network.⁷⁸ Fewer than two per cent of stations had level access between train and platform. Analysis by charity Leonard Cheshire in 2020 found that, at the then rate of progress, it would be 2070 before the rail network had full step-free access.⁷⁹ Baroness Tanni Grey-Thompson noted: “In my lifetime, I will not be able to get on a train without the permission or support of a non-disabled person.”⁸⁰

52. Funding is clearly a substantial barrier: DPTAC acknowledged that “the quantum of investment required to achieve something approaching full accessibility [at stations] is very significant”, and the then Minister in 2023 emphasised the need to stay within budgets.⁸¹ On the other hand, witnesses pointed out that the entire Access for All budget for 2024–29 (£350 million) is substantially less than the reported overspend on the Elizabeth Line station at Bond Street alone (£570 million).⁸²

78 Disabled Persons Transport Advisory Committee, DPTAC reference frame: working towards a fully accessible railway, February 2022

79 Leonard Cheshire (ATL0045)

80 Q5 (14 June 2023)

81 Disabled Persons Transport Advisory Committee, DPTAC reference frame: working towards a fully accessible railway, February 2022; Q176 (13 December 2023); see also Rail Delivery Group (ATL0016), Liverpool City Region (ATL0066)

82 Q22 (14 June 2023); Anthony Jennings (ATL0092)

53. Funding is not the only issue, however. There are exemptions in force across the rail network that mean operators are not obliged in specific respects to provide accessibility: these include level boarding between platform and train, toilets on certain trains, and side displays on certain trains.⁸³ Baroness Grey-Thompson said: “We have to stop allowing derogations. [...] There needs to be a step-by-step plan to take action, not just to keep kicking it into the long grass.”⁸⁴ Consultant Christiane Link criticised the watering down of DfT’s “brilliant accessibility standard” when individual projects are being planned, sometimes resulting in permission being given to set standards aside. She argued that this practice resulted from a mindset “that accessibility is a gold-plated something that is optional”.⁸⁵ The Committee challenged Alison Smith, Accessibility and Inclusion Lead at Network Rail, about why in some cases it was still building footbridges over the railway without step-free access. She explained that there were often competing needs to balance: if a lift could not be powered, a ramp would be needed, but these were not always supported by the community. Ultimately, she said, “we make a decision that is in the best interests of the taxpayer”.⁸⁶

83 Q290 (25 October 2023); Anthony Jennings (ATL0092)

84 Q51 (14 June 2023)

85 Q52 (14 June 2023)

86 Q25 (22 November 2023)

54. A consistent long-term plan for deploying resources is required. In 2022 DPTAC cited a “lack of any kind of strategic plan for station upgrading”.⁸⁷ There is at present no Government commitment to or strategy for introducing level boarding across the network; the 2018 Inclusive Transport Strategy committed only to the very modest action of working with an operator which had introduced platform gap fillers to share its experience across the industry.⁸⁸ Successive rounds of Access for All funding have been subject to competitive bidding, a piecemeal approach arguably at odds with a culture of accessibility for all.⁸⁹ Progress on individual projects under that programme has often been either very slow or uncertain.⁹⁰ Alan Benson commented that:

we are dealing with networks that are 100 or more years old. We are dealing with deeply embedded barriers, but our solutions are looking at three and five-year timescales [...]. Our

87 Disabled Persons Transport Advisory Committee, DPTAC reference frame: working towards a fully accessible railway, February 2022

88 Department for Transport, The Inclusive Transport Strategy: achieving equal access for disabled people, July 2018

89 Q289 (25 October 2023); Together Trust (ATL0018), Southeastern (ATL0026); Liverpool City Region (ATL0066)

90 HC Deb, 9 January 2025, col 982; “Passengers waiting five years for lift at Hackney Downs Overground station”, Hackney Citizen, 22 August 2024; “Network Rail criticised for late opening of Theale station Access for All footbridge”, New Civil Engineer, 11 December 2024; “TfL: Seven Sisters Overground station upgrade paused”, Hackney Gazette, 3 January 2025; “Colchester Station: Ex-MP slams Greater Anglia over disabled access”, Daily Gazette, 8 January 2025;

investment [...] gets cut the minute there are budget squeezes. We need to start setting an aspiration and sticking to it.⁹¹

55. Christiane Link said:

We know how difficult it is. We know it needs time, but it needs a road map. If you do not have a plan, you will never end up anywhere. We do not even have a plan at the moment. If you do not have a plan for how to make this country's railway stations accessible, you will never achieve that. You need a ring-fenced budget and a cross-party commitment for the next 30 years that no one touches [...].⁹²

She issued a challenge for the Department to set a date after which no more rolling stock would be procured that did not support level boarding,⁹³ and offered an example from Vienna's U-Bahn of how a long-term plan, begun in the 1990s, supported by ringfenced budgets, could achieve accessibility across a network that includes much historical infrastructure.⁹⁴ We also heard about New York City's plan to make 95 per cent of subway stations accessible by 2055, and plans to make the entire railway network in the Netherlands independently accessible to everyone by 2030.⁹⁵

91 Q30 (14 June 2023)

92 Q62 (14 June 2023)

93 Q27 (14 June 2023)

94 Christiane Link (ATL0020)

95 Qq62, 64 (14 June 2023)

- 56.** In 2023, the Great British Railways Transition Team completed an audit of station accessibility at all 2,575 mainline rail stations.⁹⁶ This was intended to inform the development of a National Rail Accessibility Strategy, first recommended by the Williams Plan for Rail in 2021 along with a “long-term investment programme”.⁹⁷ The previous Government committed to publication of all the data collected by the audit in a way that would permit it to be scrutinised.⁹⁸ The current Government has said that it will publish a “rail accessibility road map”, which among other things will address investment in infrastructure, and that it is “carefully considering” its approach to identifying new Access for All projects.⁹⁹
- 57.** The Rail Minister, Lord Hendy of Richmond Hill, told us in December 2024 that a list of 50 Access for All schemes that had been published late in the previous Parliament “was not really a list of 50 that were going to happen. It was a list of things that might be done if they proved to be feasible. We have to work our way through that.” He also suggested that delivery of schemes by Network Rail “has not been quite as good

96 Railway stations: Greater London PQ567, 15 November 2023

97 Department for Transport, Great British Railways: the Williams-Shapps Plan for Rail, CP 423, May 2021

98 Q178 (13 December 2023)

99 Oral evidence taken on 13 November 2024, on Work of the Secretary of State for Transport, Q46; Railway stations: access PQ 12546, 12 November 2024

[...] as you might have expected” and that there was scope in some cases for “small and cheaper” interventions to improve accessibility.¹⁰⁰

58. CONCLUSION

Decision-makers too often deem accessibility to be in conflict with, and less important than, other policy goals, technical requirements or cost pressures. The Government’s starting point must be that accessibility has to be delivered, not that it will only be delivered if other factors do not get in the way.

59. RECOMMENDATION

As part of a new Inclusive Transport Strategy, the Government must set out concrete timescales for achieving independent accessibility across the rail network, and commit to setting out within 12 months a road map for how to meet those timescales. This road map must inform the rolling stock, station and network enhancements strategies of the Department and, when it is operational, Great British Railways.

100 Oral evidence taken on 11 December 2024, on Rail services and infrastructure, Q46

60. RECOMMENDATION

Progress in implementing agreed accessibility upgrades at stations has been too halting, and delivery too slow and costly. The Department for Transport and its agencies and partners should consider adopting a different commissioning approach based on a rolling programme of rapid interventions, as opposed to individual station projects commissioned separately. By creating certainty and consistency for contractors, this should speed up delivery and lower costs.

61. RECOMMENDATION

Station accessibility audit information must be published in full within two months of this report to permit independent scrutiny of progress, the resources required and any decisions made to rule out works at particular locations. In its Inclusive Transport Strategy, the Department should commit to compiling and publishing in open data format a register of key accessibility assets on the rail and bus network which can be drawn upon by journey planning tools.

Acceptance of failure? The case of Passenger Assist services

- 62.** Passenger Assist services enable passengers to book in advance to receive assistance to enable them to make a rail journey, such as assistance in getting on or off trains, or provision of taxis to otherwise

inaccessible stations. There is currently no fully comprehensive data about how often failed assists occur, in contrast to aviation, where missed flights or connections due to assistance not turning up have to be reported by the airport to the regulator.¹⁰¹ The Office of Rail and Road (ORR), however, conducts an annual survey about performance of and satisfaction with Passenger Assist. The most recent report, covering 2023–24, shows overall satisfaction with the system at 87 per cent, down from 91 per cent the year before. The proportion of users reporting that they received all the assistance they booked was 76 per cent, a fall from 81 per cent in 2022–23. This figure was lowest for users with a non-visible disability. The success rate of the best performing station facility operators for all elements of booked assistance was only 82 per cent, and the worst performers were at 73 per cent. All but one operator’s performance was worse than in the previous year, in some cases significantly so. Ten per cent of users who were supposed to be met by staff to provide assistance reported that staff did not turn up.¹⁰²

- 63.** This patchy performance was reflected in the experiences shared with the Committee, with individuals saying that the industry was habituated to regular failed assists.¹⁰³ Christiane Link said: “There is no awareness anymore that this is not okay because it virtually happens—not virtually—it happens

101 Q39 (14 June 2023)

102 Office of Rail and Road, Experiences of Passenger Assist, July 2024

103 Q6 (14 June 2023)

every single day”.¹⁰⁴ Baroness Tanni Grey-Thompson commented: “We are constantly told, ‘It will never happen again,’ ‘It’s just you,’ or ‘We’re really sorry,’ and we are expected to go away.”¹⁰⁵ Alan Benson told the Committee that he had personally had to pull the passenger alarm three times on three separate trains in the preceding three months, when assistance for him to get off the train did not turn up.¹⁰⁶

104 Q6 (14 June 2023)

105 Q5 (14 June 2023)

106 Q7 (14 June 2023)

Box 4: Experiences with passenger assistance

“I need ramp access to get on and off the train. The staff at the first station are supposed to ring ahead to the second station to tell them I am coming and to be there with a ramp. About 50 per cent of the time, there is no one with a ramp there, and another passenger has to flag down staff to assist. This is embarrassing, delays the train, relies on good will of passengers who may not be there if it’s a quiet train, and shows that the current system isn’t working. This happens regardless of whether I book ahead using the Passenger Assistance app or just turn up and request a ramp.”

—Respondent to our survey

“Even after booking assistance, there is a constant fear that assistance will not turn up. Have had to crawl off trains. If not physically able to stop doors closing would have missed other destinations due to failed assistance.”

—Respondent to our survey

“[...] the so-called Passenger Assistance app, it’s superb, however the application of it by staff is absolutely appalling. Very rarely can you book seats that are useful to yourself for the guide dog, and staff are very poorly trained and often have no idea how to help or to make a safe journey for you.”

—Respondent to our survey

- 64.** Operators’ representatives and sector bodies universally acknowledged that “there is more to be done” and that there are too many unacceptable

failures.¹⁰⁷ They also tended to be positive about the trajectory of their sector’s accessibility performance and confident for the future, noting the work they have undertaken to improve their performance and corporate understanding, and saying that “in the vast majority of cases things go right” and “on the whole [...] when it goes well, it goes extremely well”.¹⁰⁸

- 65.** Nonetheless, disabled people felt that there was a lack of cultural leadership from the top and a lack of understanding in the industry, as Christiane Link said, “that disabled people have a right to travel”. Ms Link told us that “the Department for Transport must give a clear message that this is not acceptable any more and that there will be severe issues if it does not stop.”¹⁰⁹

66. CONCLUSION

The seemingly routine, everyday nature of assistance failures on the rail network is unacceptable. Accessibility must not be viewed through the same lens as customer service, where less than 100 per cent performance is considered normal. Accessibility failures should be vanishingly rare, not commonplace, but too few actors in the system currently behave as if that is the case. A change of mindset throughout the transport system is urgently needed, recognising that accessibility is both a non-negotiable matter of human rights and discrimination, and a health and safety issue.

107 Q51 (22 November 2023)

108 Qq2, 3, 7 (22 November 2023)

109 Q6 (14 June 2023)

67. RECOMMENDATION

The Government's new strategy for inclusive transport should set out what practical measures it will take to embed the principle that every instance of not meeting accessibility obligations constitutes a serious failure for which operators and service providers will be held accountable. This must include measures to collect comprehensive data on such failures.

Flawed policy development? The case of proposals to close rail ticket offices

- 68.** In July 2023, proposals to close the majority of ticket offices across the rail network were published for consultation by the Rail Delivery Group and train operating companies. After taking written and oral evidence about the implications for accessibility, our predecessor Committee wrote to the Rail Minister setting out serious concerns. On 31 October 2023, following objections by Transport Focus and London TravelWatch, drawing on their analysis of more than 750,000 consultation responses, the Government announced that the plans would be withdrawn.
- 69.** Our predecessor Committee's letter set out a number of concerns about the proposals and the way the consultation had been handled. It noted that the rationale had been based on significant changes in the behaviour of the majority of passengers, but argued that this was not a sufficient approach for

safeguarding the needs of a minority. It outlined the many questions disabled people had raised about how they would be able to access support, and the fact that the proposals were not sufficiently detailed to answer these questions. The Committee questioned the apparent lack of data about the kinds of passengers who currently use ticket offices and how many would be able to switch to using machines without detriment. The letter also raised serious concerns about the accessibility of the consultation process itself and the lack of transparency in the proposals which made it very difficult for respondents to assess the overall impact on the network. The initial consultation period proved woefully inadequate and had to be extended. In conclusion, our predecessor Committee argued that the proposals went “too far, too fast, towards a situation that risks excluding some passengers from the railway”.¹¹⁰

- 70.** The then Rail Minister himself concluded in the end that the ticket office closures proposals “did not meet the high thresholds set by Ministers”.¹¹¹ We are led to ask how the proposals got as far as they did. The Department had an Inclusive Transport Strategy in place, and was advised on policy by the Disabled Persons Transport Advisory Committee (DPTAC), an internal source of expert advice and review which Huw Merriman, at that time the Minister, described as “heavily involved” in work responding to the

110 Letter from the Chair of the Transport Committee to the Rail Minister, 20 October 2023

111 Letter from the Rail Minister to the Transport Committee, 14 November 2023

closure proposals. The Equality and Human Rights Commission engaged with the Department and the Office of Rail and Road as early as February 2023 “in an attempt to head off such proposals, or at least to make sure that they were properly considered”.¹¹² The operators have Accessible Travel Policies (ATPs) in place. The ORR, having not been involved by the Department or operators in the earlier stages, wrote to the operators to remind them about their responsibilities in respect of ticket offices and ATPs in July 2023.¹¹³ Equality Impact Assessments were published, albeit belatedly. And still, the proposals made it to consultation.

- 71.** Instead, many aspects of the proposals should have been addressed ‘upstream’ by multiple different actors. In terms of the railways, the forthcoming establishment of Great British Railways may offer an opportunity to streamline the number of organisations involved—Professor Matthew Campbell-Hill, Chair of DPTAC, went so far as to tell the Committee he thought this situation would not have arisen under a GBR structure¹¹⁴—but will not in itself solve the problem if meaningful consideration and understanding of disabled people’s needs is not embedded from the start. The then Secretary of State, Rt Hon Louise Haigh MP, emphasised to us in November 2024 the role that she wanted Great British Railways to play in respect of

112 Q126 (13 December 2023)

113 Q146 (13 September 2023); Letter from ORR Head of Consumer Team to train operating companies, 5 July 2023

114 Oral evidence taken on 8 May 2024, on Scrutiny of the draft Rail Reform Bill, Q110

improving disabled rail passengers’ experiences and making working practices reliable and consistent.¹¹⁵ Ms Haigh has said that the Government planned for accessibility to be “one of the key measures against which we would eventually hold Great British Railways to account”.¹¹⁶

72. The early involvement of disabled people in transport policy-making will only become more important as transport modes develop in relation to new technology. The widespread adoption of Mobility as a Service, journey-planning apps, self-driving vehicles, demand-responsive transport and advanced air mobility, among other things, require careful consideration so that they enable inclusion rather than further entrenching inaccessibility. Demand-responsive transport vehicles, for example, may be smaller than the threshold of 22 seats which triggers the requirement to have a wheelchair priority space.¹¹⁷ Then Minister Anthony Browne assured the Committee that the Department had been working with DPTAC on the implications for disabled people of greater use of automated vehicles.¹¹⁸

73. Minister Guy Opperman told the Committee that DPTAC was “an integral part of the Department” but that “we can do more to include them. It is not a question of being consulted. It is being part of the

115 Oral evidence taken on 13 November 2024, on Work of the Secretary of State for Transport, Q45

116 HC Deb, 29 July 2024, col 1072

117 Q301 (25 October 2023), Q102 (22 November 2023)

118 Q180 (13 December 2023)

decision-making process when decisions are made.”¹¹⁹ Liz Wilson, the Department’s Deputy Director for Accessibility and Inclusive Travel, said there was an aspiration to move beyond DPTAC being involved in “accessibility-specific areas of work” to involvement in all areas of policy-making. To achieve this, an 18-month work plan was being developed jointly with DPTAC, to map out their involvement in upcoming policy decisions.¹²⁰

74. CONCLUSION

Despite all the mechanisms in place to safeguard accessibility, proposals which risked significantly damaging disabled people’s access to the rail network by closing hundreds of ticket offices were published in 2023 and only withdrawn after a huge response to public consultation. This was a waste of time and resources and it resulted in a burden being placed once again on disabled people themselves to advocate for their needs.

75. RECOMMENDATION

The Department must set out in response to this report how it will change its processes in order to build accessibility into decision-making processes both internally and at agencies overseen by the Department, and how it will ensure that internal checks and balances for accessibility are effective. Relying on consultations to highlight problems after policies and interventions have already been designed is not acceptable.

119 Q170 (13 December 2023)

120 Q170 (13 December 2023)

76. CONCLUSION

We welcome the aspiration expressed by the Department in the last Parliament to involve the Disabled Persons Transport Advisory Committee more thoroughly in the policy-making process beyond policy specific to accessibility. This was long overdue, considering that DPTAC was established in 1985.

77. RECOMMENDATION

The Department should share with this Committee a work plan mapping out DPTAC’s involvement in upcoming policy decisions, and publish quarterly reports detailing the impact that DPTAC has had on the Department’s decision-making.

78. In February 2025 the Department for Transport published a consultation paper on its plans for legislation to establish Great British Railways.¹²¹ The paper states that Great British Railways will “maximise the benefits of a unified network in tackling the barriers that prevent disabled passengers using rail”, citing its responsibility for various functions which “will enable better visibility of end-to-end journeys and ensure GBR can offer the best possible service to disabled passengers”. We note that the requirement set out in the February 2024 draft Rail Reform Bill for GBR’s licence to include a specific condition requiring it to have regard to accessibility—a refinement of the 2021 Plan for Rail’s commitment to give GBR a statutory duty to improve accessibility—does not

121 Department for Transport, A railway fit for Britain’s future, CP 1269, February 2025

form part of the Government’s current proposals.¹²² The consultation states instead the Government’s view that the licence should be “focused on the minimum viable set of conditions that are required for safety, performance [...], efficiency and passenger experience”. We note too that references in the February 2024 draft Rail Reform Bill to extending the remit of DPTAC to be a statutory advisor to GBR have not been repeated in the consultation, and that none of the consultation questions invite specific commentary on the effect of the proposals on accessibility.

79. CONCLUSION

The establishment of Great British Railways presents a once-in-a-generation opportunity to fix accessibility as a core goal and responsibility of the railway and as a guiding principle for its decision-making. The opportunity must not be squandered, and we urge the Government in bringing forward its legislation to consider the full range of mechanisms that could be used to achieve this.

122 Department for Transport, Draft Rail Reform Bill, February 2024

Putting it into practice: complexity and the role of staff

- 80.** Transport operators acknowledge that complex journeys with transitions between operators and modes are often an especial weak point in the delivery of assistance.¹²³ Stephanie Tobyn, ORR’s Director of Strategy, noted that where one step in a process fails “then the whole system collapses for that passenger”¹²⁴ and that “the more touch points you have in a journey, the higher the risk that something could go wrong”.¹²⁵ A system like Passenger Assist may depend on many different people playing their part in a long chain of individual actions, and there can be a failure to carry over pre-booked assistance when services are subject to disruption or cancellation.¹²⁶
- 81.** Aviation is sometimes described as a particularly complex environment with multiple actors. Insufficient notification of needs to the airport, lack of staff training or unexpected equipment might all result in a problem.¹²⁷ There has also been significantly increased demand for assistance at airports over recent

123 Q4 (22 November 2023), Mobility and Access Committee for Scotland (ATL0057)

124 Qq3, 50 (22 November 2023)

125 Qq4–5 (22 November 2023)

126 ASLEF (ATL0033)

127 Q50 (22 November 2023)

years.¹²⁸ Rob Griggs, Policy and Public Affairs Director of Airlines UK, highlighted gaps in pre-notification for flights arriving from abroad, which might cause an unexpected spike in demand for assistance at an airport. Karen Dee of the Airport Operators Association (AOA) noted that at some points at Heathrow Airport in 2023, pre-notification levels were as low as 60 per cent: “that means that, on average, there were about 1,500 passengers per day requiring assistance that had not been pre-notified”.¹²⁹ The AOA called for public reporting on the performance of airlines in enabling pre-notification.¹³⁰

128 Qq51, 59 (22 November 2023); Civil Aviation Authority, Airport accessibility performance report 2023/24, August 2024

129 Q59 (22 November 2023)

130 Airport Operators Association (ATL0013)

Box 5: Staff attitudes can make all the difference

“On top of the stress of very nearly missing events and wasted energy [...] I have felt belittled. All staff members seem to enjoy telling me that whatever I did was wrong and that the better way is some other way. I get the impression all the parties know the system is broken but instead of sorting it out they take their frustration out on the customer.”

—Member of the public who submitted evidence¹³¹

“The way I have been treated by train staff and the errors that have been made whilst assisting me, that have put my life and wellbeing in danger, now mean that train travel is something I’m too distressed to contemplate.”

—Respondent to our survey

“Some of the staff who try to help are amazing and wonderful. Others just don’t have the knowledge, training or time needed.”

—Respondent to our survey

“The biggest problem, with so many of the root causes of problem, is people not taking ownership and responsibility to fix it. Bus drivers not requesting that other passengers move, railway employees treating it as someone else’s problem”

—Respondent to our survey

131 Beth Manship (ATL0042)

“I can never rely on staff to uphold the Equality Act. Sometimes they do but I also often experience them using their power to deny me access. I find this particularly happens if I am not ‘grateful’.”

—Respondent to our survey

82. In these complex environments, the performance and attitudes of staff are a crucial determinant of travellers’ experiences.¹³² Jacqueline Starr of the Rail Delivery Group emphasised the importance of staff training to improve the “human intervention” in systems.¹³³ A number of actions in the 2018 Integrated Transport Strategy related to development of new training packages for disability awareness and measures aimed at more widespread training across rail, buses, taxi and private hire vehicles and the maritime sector. On the railway, as part of their Accessible Travel Policies, operators must ensure that all frontline staff undertake disability awareness training, and that staff receive refresher training within two years. The Department for Transport also mandates this training for all managers through contracts with train operators.¹³⁴ Transport Focus noted that a court judgment on wheelchair spaces on buses put a lot of emphasis on the role of the driver to determine whether a request to vacate the space was reasonable—a role they should not be expected to carry out without training and support.¹³⁵

132 Q13 (14 June 2023)

133 Q28 (22 November 2023)

134 Railways: disability PQ 192692, 11 July 2023

135 Transport Focus (ATL0027)

83. CONCLUSION

Operators are at pains to emphasise the complexity of the systems they work within, especially when it comes to journeys involving multiple organisations or modes. But people are entitled to expect to be able to make complicated journeys to get where they need to go; disabled people are no different. Systems and staffing must be able to cope with complexity. Similarly, resilience to external shocks—such as the sudden increase in air travel after the ending of pandemic restrictions—must be sufficient to cope with accessibility requirements.

84. RECOMMENDATION

It is not sufficient for training to be delivered on disability awareness, accessibility and preventing discrimination: the training must be of a guaranteed minimum standard and proven to be effective in improving outcomes. The Department for Transport should, with the active participation of disabled people, establish an expert unit to review within 12 months the training packages currently available across modes to identify, benchmark and standardise best practice, and conduct ongoing quality assurance.

Box 6: The importance of staff being present

“Lack of staff at rail or bus terminals to help with access needs resulting in either late travel or not being able to travel at all making me feel embarrassed and helpless.”

—Respondent to our survey

“Particularly on trains, Passenger Assistance staff are usually lovely and helpful but so chronically and systematically understaffed that they’re running platform to platform and delayed (upwards of 30 minutes plus) supporting people as they can’t be everywhere at once.”

—Respondent to our survey

“Our local station has no step-free access to main platform and requires the station staff to escort wheelchair user across the line via a locked gate and a ramp. The station is only staffed part-time!”

—Respondent to our survey

“Lack of staff and support at airports which makes the experience awful and adds a lot of stress and unpleasantness on top of the chronic illness and disability one might be experiencing.”

—Respondent to our survey

“We cannot read the information to know which bus or train to catch, we get lost easily and there is not always a member of staff to ask.”

—Respondent to our survey

- 85.** Regardless of training, skills or attitude, the simple fact of whether staff are present is often a crucial determinant of whether safe and independent travel is possible at all.¹³⁶ Travel on a ‘Turn Up And Go’ basis in particular becomes much more difficult to deliver when there are fewer staff either at stations or on board trains, and the availability of essential facilities such as toilets is often dependent on the presence of staff. People with a wide range of disabilities rely on staff for navigating spaces, assisting with information or ticket purchases, and for feeling safe.¹³⁷ The prospect of fewer staffing hours at stations was one of the major concerns expressed by disabled people about the plans of train operating companies in 2023 to close ticket offices, along with fears that, once staff were no longer based in ticket offices, it would be easier in the future for operators to reduce their availability without public consultation.¹³⁸ The abandonment of the wholesale closure programme has not laid these concerns to rest, as changes to staffing hours at individual stations can still be brought forward by operators which, depending on the nature of the proposals, may not always be subject to consultation.¹³⁹
- 86.** The 2018 Inclusive Transport Strategy’s ambition was that, by 2030, there should be equal access for disabled people using the transport system, “with assistance if physical infrastructure remains a

136 London TravelWatch (ATL0051), RMT (ATL0067)

137 East Surrey Transport Committee (ATL0038), WinVisible (ATL0070)

138 RMT (ATL0067)

139 Railways: ticket offices PQ14978, 27 November 2024

barrier”. Such assistance depends on the presence of staff to deliver it. DPTAC, however, has estimated that 10 per cent of all stations on the rail network are affected at some or all times by a combination of no staff at the station and no staff on the services stopping there.¹⁴⁰

87. RECOMMENDATION

The presence of staff is often a crucial determinant of the ability of disabled people to travel. Ahead of the establishment of Great British Railways and nationalisation of operating companies, the Department must be prepared to intervene where necessary to ensure that changes to staffing levels on the rail network do not have the effect of reducing access and inclusion. When legislating for the creation of Great British Railways, it must take steps to ensure that that body gives accessibility appropriate weight in future decision-making about the number, roles and location of staff.

140 Disabled Persons Transport Advisory Committee, DPTAC reference frame: working towards a fully accessible railway, February 2022

4 The burden on individuals

- 88.** A recurring theme of analyses of what goes wrong in transport accessibility is the extent to which the burden of making complaints, seeking redress and pursuing enforcement rests with individual transport users who have been subject to failures.¹⁴¹ This burden is made unnecessarily heavy by opaque and time-consuming processes and, in respect of legal action, by considerable costs and risks. Even if processes are pursued to their conclusions and an individual obtains redress, the outcome may have little bearing on future improvements in service.

Knowing what you are entitled to

- 89.** Knowledge of rights and entitlements can be the first hurdle. Campaigner Alan Benson told us: “So many disabled people put up with appalling service because they do not know that they are entitled to more [...]”.¹⁴² The complexity of the legal and consumer framework is not easy to grasp, and even when attempts are made to bring it all together—as

141 Qq 25, 52 (14 June 2023); Gosport Access Group and Disability Forum (ATL0053), Marion Fellows MP (ATL0063)

142 Q44 (14 June 2023)

the Department has done online—the information is incomplete without reference to other documents such as individual train operators’ Accessible Travel Policies.¹⁴³ Guidance on ATPs does not specify what assistance must be provided, so the policies are not consistent.¹⁴⁴ The Rail Delivery Group acknowledged that, as processes and technology differ between train operators, “we essentially ask the customer to change their expectations depending on which [train operating company] they are travelling with”.¹⁴⁵ The previous Government had announced its intention to consult on a National Rail Accessibility Strategy developed by the Great British Railways Transition Team in 2024, but this was not forthcoming before the General Election. The Government said that the strategy would “introduce new, consistent industry-wide standards to enable passengers to know the level of service to expect wherever and whenever they travel on all parts of their journey”.¹⁴⁶

Difficulty of making a complaint

90. Next, the traveller must know where to direct a complaint. There is no single channel for all transport accessibility complaints, and it can be hard to know

143 Department for Transport, Rights of disabled passengers on transport, gov.uk, accessed 23 January 2025

144 Chartered Institute of Logistics and Transport (ATL0010)

145 Rail Delivery Group (ATL0016); see also Disability Rights UK (ATL0060)

146 Department for Transport (ATL0061)

whose responsibility is engaged.¹⁴⁷ Caroline Stickland, Chief Executive of Transport for All, related a common problem:

How do we know exactly which bit is to blame? If we are standing on that bit of the pavement or that bit of the station, is that the train operator's responsibility? Is it the Underground? Is it the bus operator's or the local authority's? Even just finding out who you are meant to complain to sometimes needs a PhD.¹⁴⁸

She described the experience of “being passed from pillar to post if you do happen to go to the wrong regulator or the wrong place first”.¹⁴⁹ The Disabled Persons Transport Advisory Committee (DPTAC) said in 2022 that “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.”¹⁵⁰

147 Q259 (25 October 2023); National Pensioners Convention (ATL0025), Gosport Access Group and Disability Forum (ATL0053), Scope (ATL0062)

148 Q259 (25 October 2023)

149 Q299 (25 October 2023)

150 Disabled Persons Transport Advisory Committee, DPTAC reference frame: working towards a fully accessible railway, February 2022

Box 7: The difficulty of making complaints

“I have learned the processes. I am able very quickly to get the council on the phone and say, ‘Excuse me. We’ve got a car here [blocking a pavement]. Get it moved, come on.’ But a lot of disabled people are not in a position [...] for whatever reason to do that. It should not be me going down a road, getting my phone out like I am some kind of enforcement officer all the time. I would love the salary to go with it. It really makes life quite miserable. [...] We do not have the finances, let alone the mental wherewithal, to follow up every single incident. If we did, there would be no time to sleep; it is as simple as that.”

—Stephen Anderson¹⁵¹

“How do we complain in sign language?”

—Respondent to the Committee’s survey

“My complaint went through the basic level, right up to the person in charge of accessibility through the assistance of my MP. It was so difficult to do. I was palmed off throughout, and it made me ill.”

—Participant in research conducted by Scope¹⁵²

- 91.** Confusion of responsibilities is especially evident in the case of multi-modal journeys or, even when only one mode is being used, when interchanges and multiple operators are involved.¹⁵³ In the case of air travel,

151 Q24 (14 June 2023)

152 Scope (ATL0062)

153 Q259 (25 October 2023)

carriers and airport management have different sets of responsibilities and duties, and issues can arise when there is no overall owner of an individual traveller’s journey.¹⁵⁴ Airports provide a Special Assistance service from arrival through security to the gate and boarding the aircraft, often through contractors. From the point of boarding, the airline takes over responsibility. The loading of equipment—such as wheelchairs—is the responsibility of ground handlers, typically contracted by airlines.¹⁵⁵ The CAA Consumer Panel said that the separation of roles between airport and airlines can lead to “blame-shifting [...] rather than a common focus on providing a seamless service to passengers centred around doing the right thing”, and argued that for this reason there should be a single ombudsman with a remit over both airlines and airports.¹⁵⁶ Different providers use different definitions of the assistance needed, and passengers can find themselves unprotected in areas of ambiguous responsibilities.¹⁵⁷

- 92.** Complaints handled unsatisfactorily have different escalation routes depending on the mode and operator, creating what London TravelWatch—itsself a statutory appeals body—called “a complex and fragmented landscape that is not easy for people to use”.¹⁵⁸ These bodies are not generally specialists in

154 Lancaster University Management School (ATL0028), The Consumer Council (ATL0065), Consumers Association (ATL0049)

155 Q48 (22 November 2023); Heathrow Airport Ltd (ATL0047)

156 CAA Consumer Panel (ATL0019)

157 CAA Consumer Panel (ATL0019)

158 London TravelWatch (ATL0051)

accessibility. In the rail sector, unresolved complaints can be referred to the Rail Ombudsman, a service introduced under the 2018 Inclusive Transport Strategy which has brought some clarity in that sector.¹⁵⁹ Complaints about local authority responsibilities, including their licensing of taxis and private hire vehicles, can be made to the Local Government and Social Care Ombudsman. Unresolved complaints about buses and coaches can be taken up with Bus Users UK or London TravelWatch. Air passengers may be able to access Alternative Dispute Resolution, although this is not mandatory for airlines, or escalate complaints through the CAA Passenger Advice and Complaints Team or the Consumer Council for Northern Ireland.

- 93.** Complaints processes themselves—particularly when dependent on online forms or apps, or conversely when only available through paper forms—can be inaccessible.¹⁶⁰ The Mental Health Foundation highlighted the importance of enabling communication by different methods because people vary so much in their needs: people with mental health issues, people with dementia, and neurodivergent people find some channels inaccessible and can simply give up.¹⁶¹

159 Transport for All (ATL0017); Together Trust (ATL0018)

160 Q259 (25 October 2023); Chartered Institute of Logistics and Transport (ATL0010)

161 Mental Health Foundation (ATL0009)

- 94.** The then Secretary of State, Rt Hon Louise Haigh MP, told us in November 2024 that the current Government intends to establish a ‘passenger standards authority’ (PSA) as part of the reforms that will bring in Great British Railways as a ‘directing mind’ for the rail system. The Secretary of State said that this body will be “a one-stop shop for complaints. The problem at the moment is that people have too many different routes to complain, and therefore nobody takes responsibility and accountability. Accessibility will be one of the major things that the PSA looks at.”¹⁶²
- 95.** In February 2025 the Government published a consultation on its planned rail reform legislation.¹⁶³ The paper sets out in more detail the plans for “a powerful new passenger watchdog”, and options for its creation and scope. There is a suggestion that the existing passenger-focused regulatory functions of the ORR, watchdog responsibilities of Transport Focus and dispute resolution role of the Rail Ombudsman could be combined into one body. The Department proposes that the new watchdog “will have an explicit role on accessibility by monitoring how services are delivered to disabled passengers and advocating improvements where issues arise”, and it is suggested that it could take on the task of producing guidance on Accessible Travel Policies. There is also a suggestion that

162 Oral evidence taken on 13 November 2024, on Work of the Secretary of State for Transport, Q45

163 Department for Transport, A railway fit for Britain’s future, CP 1269, February 2025

equivalent functions for buses, coaches and trams could be added to the remit of the new body to offer a ‘one-stop shop’ experience to passengers.

96. CONCLUSION

We welcome the focus in the Government’s rail reform consultation paper on streamlining, consolidating and strengthening powers for protecting passenger interests, resolving complaints and monitoring rights and standards. However, the focus on accessibility in the consultation document appears relatively weak in comparison to the severity of the problem. It will be necessary for the passenger watchdog to have substantial expertise in and resources dedicated to accessibility and inclusion if it is to make a significant difference to the everyday experience of disabled travellers. We draw attention to our recommendation later in this report that the Department assess whether a single body with responsibility for enforcing the rights of disabled travellers across transport modes would be a more effective model for bringing about change than mode-specific and general passenger rights bodies.

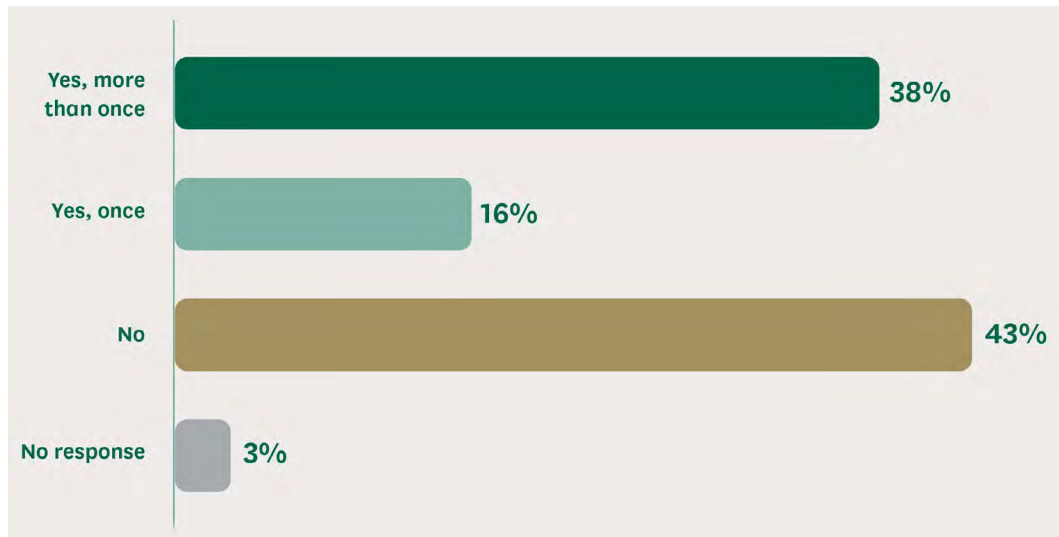
Ineffectiveness of complaints

- 97.** The Committee’s survey showed high levels of dissatisfaction with responses to complaints made about transport accessibility. Among those who had made complaints more than once, only 0.3 per cent said they had been satisfied with the response every time, and 63 per cent said they had never received a satisfactory response. Among those responding to

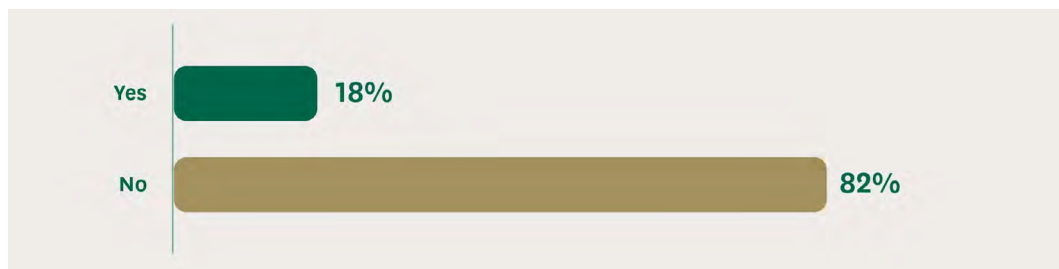
our survey who had complained on only one occasion, 82 per cent reported dissatisfaction—a powerful disincentive to complaining a second time.¹⁶⁴

164 Q5 (14 June 2023)

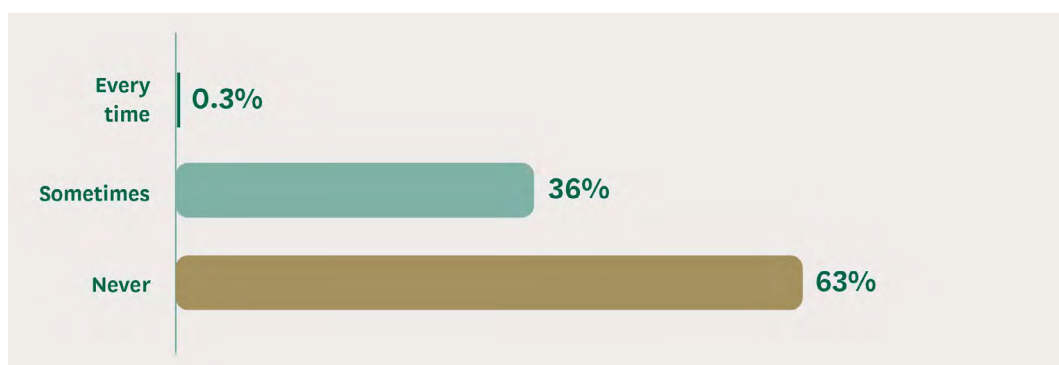
Have you ever made a complaint about accessibility on public transport? (825 total respondents)



For people who said they had complained once, were you satisfied with the response?



For people who said they had complained more than once, were you satisfied with the response?



- 98.** Users do not trust operators to take their complaints seriously and to act upon them, and do not feel there are effective avenues for structural or recurring

issues to be raised.¹⁶⁵ Carrie Clewes, Head of the Discrimination and Equality Department at Ringrose Law, said “complaints do little to feed into a productive improvement programme [...] anything short of [legal action under the Equality Act] fails to drum up any real change”.¹⁶⁶ Dr Sunil Rodger described the conclusions of his research with disabled people who had attempted to raise access issues with service providers:

Complaints about access issues were generally treated by service providers as one-off situations and responded to in isolation, rather than being symptomatic of a wider pattern of assistance failures that required a systematic response. This was despite the fact that many participants only went to the effort of making a complaint about repeated issues [...]. In one case, a participant raised a repeated access failure with a service provider on tens of occasions, but there was no proactive effort to identify and address the possible root causes [...].¹⁶⁷

- 99.** Witnesses told the Committee that bringing forward a complaint every time something went wrong would be incompatible with living a normal life, given the time and energy demanded by the process.¹⁶⁸ One effect

165 National Autistic Society (ATL0036), Gosport Access Group and Disability Forum (ATL0053), Scope (ATL0062)

166 Ringrose Law (ATL0008)

167 Dr Sunil Rodger (ATL0069)

168 Q5 (14 June 2023), Qq259, 262 (25 October 2023)

of this is a well-founded scepticism that complaints statistics are an accurate reflection of the true scale of problems.¹⁶⁹

Ability to bring legal action

- 100.** When complaints processes do not work or are not adequate, legal action to enforce against discrimination may be an option—at least in theory. The Equality Act 2010 is constructed in such a way as to rely on individuals bringing claims through courts for enforcement of the rights it sets out—usually a daunting and costly prospect, and a recourse that is only available for each individual instance of discrimination.¹⁷⁰ The complexity of the law and the lack of precedents makes the chances of success very difficult to assess, which is a further deterrent, and there are very few solicitors who specialise in this area.¹⁷¹ Some of our witnesses drew attention to changes in costs protection legislation under the Legal Aid, Sentencing and Punishment of Offenders Act 2012 as a barrier: the prohibition on claiming insurance premiums through costs against the defendant if the claimant wins, disapplication of insurance protection for claimants if their case is lost, and the exclusion of disability discrimination cases from qualified one-way cost shifting which otherwise mitigates risks for claimants.¹⁷² Legal action can also take a

169 Q9 (14 June 2023)

170 Transport for All (ATL0017), Leonard Cheshire (ATL0045), Dr Sunil Rodger (ATL0069)

171 Q25 (14 June 2023), Qq259–60 (25 October 2023)

172 Q260 (25 October 2023)

heavy personal toll.¹⁷³ The Mental Health Foundation said that legal action was not an option for many people because of “the emotional and psychological resources required”.¹⁷⁴

- 101.** The difficulty of bringing cases is reflected in the relative lack of impact that case law has had on practice in the area of transport discrimination. Not only have there not been many cases full stop, but some that reached a judgment—such as *Paulley v FirstGroup*, about asserting priority for wheelchair users in accessing the wheelchair space on a bus—have not necessarily driven significant improvement in services.¹⁷⁵ Doug Paulley himself told the Committee how frequently he is still contacted by people recounting how they have been unable to get on buses because of pushchairs and prams that are not moved.¹⁷⁶ Alan Benson described this as “still a fight that we are all having every day.”¹⁷⁷ Carrie Clewes of Ringrose Law told the Committee that, despite having secured £17,000 in compensation for a wheelchair user who had been left stranded on trains and platforms more than 30 times, the same client continued to face the same problems “on a daily basis”.¹⁷⁸
- 102.** A significant number of claims made under the Act are settled before coming to court. While this can be a welcome outcome for the individual concerned, it is

173 Q38 (14 June 2023)

174 Mental Health Foundation (ATL0009)

175 *Paulley v FirstGroup* [2017] UKSC 4

176 Qq292–6 (25 October 2023)

177 Q49 (14 June 2023)

178 Ringrose Law (ATL0008)

less effective as a way of achieving systemic change, and can obscure the volume of claims brought.¹⁷⁹ Many of the cases that are settled come with confidentiality clauses, meaning they cannot be effectively used as a campaigning tool to improve services.¹⁸⁰

103. Fines or awards of damages for breaching equality legislation should theoretically act as an incentive to operators to get things right next time, but it is questionable whether such financial penalties are set at a high enough level to achieve this in practice.¹⁸¹ Transport for All argued that operators seem able to absorb the impact of “continuously paying off fines” in preference to making systemic changes.¹⁸² Barrister Catherine Casserley, speaking of the relatively low level of damages available to successful claimants at court, commented, “it does not cost a lot to pay your way out of difficulty.”¹⁸³ Doug Paulley told us that there is evidence that some operators have a contingency fund to cover legal action, “which may be cheaper or easier than dealing with the fundamental problem that is the subject of legal action”.¹⁸⁴ Ultimately, Alan Benson said, “We want things to get fixed, but actually we are paid off.”¹⁸⁵

179 Transport for All (ATL0017)

180 Q294 (25 October 2023)

181 Q25 (14 June 2023)

182 Transport for All (ATL0017)

183 Q294 (25 October 2023)

184 Q296 (25 October 2023)

185 Q44 (14 June 2023)

104. CONCLUSION

An unreasonable burden is currently placed on disabled people themselves in holding transport operators and authorities to account for fulfilling their duties. Legal action is rarely a practical option for most individuals, so it is especially important that complaints processes are made more accessible and effective. The user should not have to be an expert either in the law or in organisational structures across varied transport modes to know whether they have a valid complaint, to whom it should be addressed, how to contact that body and how to escalate the complaint if necessary. In the long term, there may be a case for rationalising the number of organisations who deal with transport accessibility complaints, but in the meantime, a unified ‘front of house’ service could make a meaningful difference to users. We note plans to establish a passenger standards authority in the rail sector, but this covers just one mode of transport and will not be an accessibility-specific body.

105. RECOMMENDATION

We recommend that the Department for Transport work with disabled people's organisations to design a unified service to receive and triage accessibility complaints or reports of failures, ensure that they reach the relevant operator, authority or regulator, and follow them up if not resolved. Such a service would require an investment in knowledgeable and resourceful staff and in effective and accessible advertising. This should be in place within 12 months. Data about reported problems gathered through this platform should be made available to operators, regulators, campaigners, parliamentarians and the general public.

106. RECOMMENDATION

Users of such a service must receive assurance that information about complaints and failures is being aggregated and used proactively to improve systems and services, not just to effect redress to the individual. In order to achieve this, the Department should:

- analyse information gathered through this mechanism both to hold operators to account for resolving specific problems promptly, and to enable systemic issues and trends to be identified and addressed; and
- report quarterly on what issues have been resolved and services improved as a result.

107. RECOMMENDATION

As one way of reducing the need for complaints in the first place, we recommend that all licensed transport providers be required to appoint an accessible transport champion with the specific responsibility for navigating journeys on a regular basis to assess conditions against a checklist, as a lean and rapid way of assessing the passenger experience. Champions should have an understanding of accessibility needs on a pan-disability basis, and personal experience of navigating transport as a disabled person or carer.

5 The legislative framework

- 108.** Legislation governing transport accessibility is a complicated “patchwork” of laws which have been introduced over time on an ad hoc basis, rather than in a planned way. As set out in Chapter 1, transport accessibility is covered in different respects by the Equality Act 2010, various pieces of law now assimilated into UK law following EU exit, pieces of mode-specific legislation including the Enterprise Act 2002, and sector-specific regulation.¹⁸⁶

The effects of complexity

- 109.** The Department for Transport itself described the framework as “complex and multi-layered”.¹⁸⁷ Doug Paulley, a disabled transport user with substantial experience of bringing legal action on accessibility, went further, describing the legislation as “ridiculously complex and siloed” and “a mess”.¹⁸⁸ Caroline Stickland of Transport for All told us that the fragmentation of the framework means that “at the

186 House of Commons Library, Access to transport for disabled people, Research Briefing SN-00601, July 2022

187 Department for Transport (ATL0061)

188 Qq257, 288 (25 October 2023)

moment the legislation seems to be a compounding barrier rather than removing those [barriers] that exist.”¹⁸⁹

110. Barrister Catherine Casserley explained that, although the Equality Act was intended to simplify the legislative landscape, in fact it introduced some unhelpful complexity in the field of transport:

Transport is dealt with in the Equality Act in three different ways. You have provision for accessibility regulations, which deal with the physical aspects of trains or buses, for example. Then you have anti-discrimination provisions, which are the bits which people bring claims under. Then you have criminal provisions relating to taxis, for example. You add to that schedules which explain how the different bits work, and then you add the exceptions and the European regulations which overlay that. Transport providers themselves do not necessarily know whether they are dealing with the European regulations or the Equality Act. Individuals do not know which bits they should deal with. I think we have a very unclear picture. It is difficult for people to bring claims, to get legal aid or support. All of that, I think, adds to a very difficult enforcement regime.¹⁹⁰

Ms Casserley drew particular attention to the lack of clarity arising from the UK having assimilated former EU regulations governing rail and bus and there not

189 Q258 (25 October 2023)

190 Q258 (25 October 2023)

being a clear domestic statement of how those apply, and whether particular breaches would be dealt with under the regulations or the Equality Act.¹⁹¹ She concluded that “it has been left in a bit of a mess”.¹⁹²

- 111.** The Committee asked witnesses if there were any areas of ambiguity in the law on transport accessibility that they felt could usefully be clarified. They found it difficult to identify specific priorities because there were so many, and suggested a “wholesale revision” was necessary instead.¹⁹³ Professor Anna Lawson argued that technical sections relating to transport “sit uncomfortably with a lot of the rest of the Equality Act”.¹⁹⁴ She noted that it would be vital to retain the provisions of Part 12 of the Equality Act—which cover specific rights of disabled users of taxis, buses and coaches, and trains—but argued that there was merit in reviewing how that part worked, what it extended to, and how it interacted with the reasonable adjustments duty in other parts of the Act.¹⁹⁵
- 112.** Some notable gaps were also highlighted. There is no redress for discriminatory treatment by airlines; this is because of a 2014 Supreme Court ruling that the Montreal Convention (an international agreement regulating the liability of commercial aviation for damage or harm caused to people or property) takes precedence over UK and European legislation—

191 Q266 (25 October 2023)

192 Q267 (25 October 2023)

193 Qq274–275, 282 (25 October 2023)

194 Q282 (25 October 2023)

195 Q283 (25 October 2023)

including equality measures.¹⁹⁶ Ships and hovercraft are exempted from the Equality Act.¹⁹⁷ Cruise liners are not covered by equality legislation on transport.¹⁹⁸ A 2022 specification for electric vehicle charging infrastructure is voluntary, with no requirement on manufacturers to adopt the accessibility measures it outlines.¹⁹⁹ There are no accessibility standards for bus stops or stations—something the Government plans to address through the Bus Services Bill introduced in January 2025.²⁰⁰

113. There is also a question of how adaptable the framework is over time. Technical regulations for transport are in many instances now quite old, and have not kept up with developments in technology or customer expectations.²⁰¹ Some regulations for rail accessibility date back to the late 1990s, since when rolling stock has developed significantly, and some school transport legislation dates back to 1944.²⁰² Dimensions given for occupied wheelchairs on buses, for example, are no longer representative of the typical dimensions of modern wheelchairs.²⁰³ We heard some support from operators themselves for requirements to be reviewed in order to drive up standards.²⁰⁴ Operators’ rules on carriage of

196 Q262 (25 October 2023); *Hook v British Airways Plc* [2014] UKSC 15

197 Q274 (25 October 2023)

198 Q50

199 Electric Vehicles Accessible Charging Specification PAS 1899:2022

200 Explanatory Notes to the Bus Services (No.2) Bill [HL]

201 *FirstGroup plc* (ATL0050)

202 Qq20–21 (14 June 2023), Q95 (22 November 2023)

203 Chartered Institute of Logistics and Transport (ATL0010)

204 *FirstGroup plc* (ATL0050)

mobility scooters—as well as being inconsistent—have not kept pace with their more widespread use.²⁰⁵ Awareness of different kinds of disability, such as neurodiversity, has also changed even since the introduction of the Equality Act 2010, and sensory disabilities and mental health conditions may be overlooked in regulations.²⁰⁶

- 114.** Operators find the legislative patchwork unhelpful in understanding what they have to deliver. The Rail Delivery Group (RDG) argued that “the current volume of obligations and regulations is not easy for transport operators to navigate”.²⁰⁷ Disabled passengers report that each company seems to work to different rules.²⁰⁸ Jacqueline Starr said that rail operators would be greatly helped by a consolidation of regulations and having a “single reference point” against which they could be held to account by regulators, and that this might help inject pace into the process of change.²⁰⁹ The Office of Rail and Road concurred that there may be benefits from “clarifying and streamlining” a framework that had grown “organically” over time.²¹⁰
- 115.** London TravelWatch stated that there was a lack of clarity about what is or is not a reasonable adjustment under the legislation, for example in regard to whether offering taxis to the nearest staffed stations

205 Q277 (25 October 2023), Shopmobility South Gloucestershire (ATL0011)

206 Adam Sargent (ATL0007), Mental Health Foundation (ATL0009)

207 Rail Delivery Group (ATL0016)

208 Lancaster University Management School (ATL0028)

209 Q17 (22 November 2023)

210 Office of Rail and Road (ATL0048)

is an acceptable adjustment.²¹¹ The Department for Transport noted that understanding of what constitutes a reasonable adjustment depends on case law, “and may not always be clear to service providers or users without specialist advice”.²¹²

- 116.** Doug Paulley related how misunderstandings about requirements for accessibility of buses and coaches had led to widespread use of inaccessible vehicles for rail replacement services and home-to-school services, unnoticed by many different responsible bodies, until he himself raised it and the Office of Rail and Road issued advice on the matter.²¹³ Keith McNally of the Confederation of Passenger Transport told us that compliance had been very good where requirements were well understood, but that the way regulations were written and changes in the market since they were made undermined understanding.²¹⁴

Ambiguous obligations: Turn Up And Go services

- 117.** One striking example of where there appears to be a lack of clarity about obligations is in respect of services on a ‘turn up and go’ basis on the railway. Article 19 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD), however, provides for disabled people to realise their right to independent living, and access to transport is a key

211 London TravelWatch (ATL0051)

212 Department for Transport (ATL0061)

213 Doug Paulley (ATL0021)

214 Q89 (22 November 2023)

part of ensuring that disabled people have choice and control over all aspects of their lives.²¹⁵ The ability to travel spontaneously can be regarded as fundamental to that. On that basis, rail passengers should have the right to “turn up and go”, requesting assistance to get on to a train from a member of staff, or via a help point or a Freephone number where stations are unstaffed, without having to book or notify in advance (as is provided for by the Passenger Assist system, discussed in Chapter 3). The UK has ratified but not incorporated the UNCRPD, which means that there is no domestic remedy for breaches.

- 118.** The Department’s own list of the rights of disabled travellers states that, on the railway, “assistance must also be provided when this has not been arranged in advance”, but qualifies this by saying it is “depending on conditions at the time of travel as well as staff availability”.²¹⁶ The Office of Rail and Road’s guidance on Accessible Travel Policies states that operators must set out how they will provide assistance where needed by people who have not arranged it advance, “where reasonably practicable”, and notes the duty of operators under the Equality Act 2010 to make reasonable adjustments.²¹⁷ The ORR told the Committee that “operators need to have clear and effective measures in place to ensure that passengers who have not booked assistance

215 Equality and Human Rights Commission (ATL0015)

216 Department for Transport, Rights of disabled passengers on transport, gov.uk, accessed 23 January 2025

217 Office of Rail and Road, Accessible Travel Policy: guidance for train and station operators, September 2020

in advance can receive it under a variety of staffing models”.²¹⁸ Jacqueline Starr, Chief Executive of the Rail Delivery Group, told us that it was not always possible for operators to provide a turn up and go service, however:

We recognise that a large number of disabled customers are calling for a turn-up-and-go railway [...]. From a moral perspective, of course, why wouldn't disabled customers want the same service that we all enjoy as able-bodied customers? I would be nervous about our ability to deploy that, given some of the challenges that we have currently with scheduled assistance.²¹⁹

- 119.** The Committee asked then Minister Guy Opperman whether the Government accepted that disabled people have the right to be able to travel spontaneously. He responded, “The answer, of course, is yes, we do. [...] [The Inclusive Transport Strategy] set out in copious detail how we are trying to address that”.²²⁰ The only reference in the Strategy to ‘turn up and go’ is in an Annex setting out obligations on rail providers, where it states that “assistance must also be provided when this has not been arranged in advance, depending on conditions at the time of travel as well as staff availability”.²²¹

218 Office of Rail and Road (ATL0048)

219 Qq35–36 (22 November 2023)

220 Q159 (13 December 2023)

221 Department for Transport, The Inclusive Transport Strategy: achieving equal access for disabled people, July 2018

Alternative approaches?

- 120.** The Committee asked witnesses whether there were alternative models for organising transport accessibility law and regulation. Professor Anna Lawson suggested that the UK should seek to follow the example of some other countries where accessibility was underpinned by clear standards, linked to an equivalent of the Equality Act.²²² She cited the work of the Access Board in the United States in developing accessibility standards, and the model of accessibility standards in Norway, under which system it is relatively easy, and cost-free, to bring discrimination cases.²²³ In Canada, an Accessible Canada Act was passed in 2019, creating an accessibility standards body and a commissioner as a focal point for channelling complaints; its purpose is “to make Canada barrier-free by January 1, 2040”.²²⁴ The Mobility and Access Committee for Scotland suggested the introduction of a holistic ‘right to accessible travel’ to build on and bring together separate laws.²²⁵ A dedicated ‘Transport Access Act’ could be one vehicle for such a system.
- 121.** Catherine Casserley agreed that spelling out obligations and exactly what service providers have to do in regulations would be a better approach.²²⁶

222 Q258 (25 October 2023)

223 Q264 (25 October 2023)

224 Government of Canada, Summary of the Accessible Canada Act, accessed 28 January 2025

225 Mobility and Access Committee for Scotland (ATL0057)

226 Q268 (25 October 2023)

She reflected that, having initially been in favour of the concept of ‘reasonableness’ being embedded in the Equality Act, as it made allowances for flexibility and for small operators, she now believed it was not effective in respect of transport: “I think you need standards. Providers need to know what they need to do.”²²⁷ John Kirkpatrick of the Equality and Human Rights Commission sounded a note of caution about attempting to unpick the Equality Act in particular, however, saying that it is a deliberately broad-ranging piece of legislation intended to introduce a valuable coherence across duties and characteristics. He argued that “carving bits out of that would have consequences that would need to be thought about fairly carefully”.²²⁸

- 122.** A mechanism would be needed in a standards-based system to ensure that standards or more prescriptive regulations were responsive to developments such as new technology.²²⁹ It would be of utmost importance, too, to consider how those standards were devised: there would need to be genuine co-production with disabled people to ensure they enshrined a high enough level of accessibility.²³⁰

227 Q270 (25 October 2023)

228 Q141 (13 December 2023)

229 Q181 (13 December 2023)

230 Q276 (25 October 2023); National Centre for Accessible Transport (ATL0014)

123. CONCLUSION

The landscape of legislative and regulatory requirements for transport accessible is overly complicated and fragmented and needs to adapt to changing uses of transport. This prevents both operators and travellers readily understanding rights and obligations, and makes redress harder to access.

124. RECOMMENDATION

The Department for Transport should lead a review of transport accessibility legislation in collaboration with the Office for Equality and Opportunity, and with meaningful involvement and leadership by disabled people, to assess how it could be streamlined, clarified and updated, and whether it should be underpinned by greater specification of the standards providers must work to. Specification of standards should include matters currently subject only to the Public Sector Equality Duty or the duty to make reasonable adjustments. The review should be completed within 12 months of the publication of this report.

6 Regulation and enforcement

- 125.** The complex legislative framework, and the difficulty for individuals of making complaints and bringing cases, place a premium on the role of active, engaged enforcement bodies. A wide range of different bodies have roles, depending on the transport mode, and the allocation of responsibilities between bodies also differs by mode. Unfortunately, despite the number of actors involved, this web of enforcement does not seem to work particularly effectively and is not guaranteeing a satisfactory level of access to reliable travel for disabled people on a day to day basis.
- 126.** The evidence to this inquiry gave the strong message that disabled people feel they were being let down by regulatory and enforcement bodies, and that there had been very little meaningful enforcement action taken in any mode of transport.²³¹ Explanations advanced for a lack of action included that regulators were not aware of what is happening on the ground, that they lacked resources, or that they had little practical power over operators.²³²

231 Q19 (14 June 2023), Q260 (25 October 2023), National Pensioners Convention (ATL0025)

232 Qq16, 19, 21 (14 June 2023), Q260 (25 October 2023)

The Equality and Human Rights Commission

- 127.** The Equality and Human Rights Commission (EHRC) is Britain's equality and human rights regulator. It is not responsible for enforcing the provisions of the Equality Act 2010, but can intervene strategically in litigation to develop equality law, as well as having a range of other enforcement powers at its disposal as set out in the legislation that established the Commission, the Equality Act 2006. These include carrying out investigations where it suspects an organisation has committed an unlawful act, issuing 'unlawful act notices' which require organisations to set out an action plan to remedy the breach and prevent future breaches, and giving organisations the option to enter into an agreement to comply. The EHRC can assess the extent to or the manner in which a public authority has complied with the Public Sector Equality Duty, and issue compliance notices if required. The Commission can provide legal assistance for claims of discrimination, bring its own legal proceedings, or apply for judicial review of the actions of public bodies.
- 128.** The Committee heard some criticism of the EHRC for a lack of enforcement action in the transport sector. Its profile in the sector appears to be very low, despite having adopted transport as one of its strategic priority aims between 2019 and 2022, during which time it supported 26 legal claims relating to transport

accessibility.²³³ One lawyer who received support from the EHRC on cases during this legal support project said it had “brought about positive change but [...] wasn’t a long enough campaign”. When witnesses were asked what they felt the role of the EHRC should be in enforcing transport accessibility, they were uniformly unconvinced that the Commission was equipped to play a significant role.²³⁴ Alan Benson argued that the cases taken personally by one of his fellow panellists, Stephen Anderson, had had greater impact in this sphere than cases brought by the Commission. Opinions were mixed among other witnesses about whether the EHRC ought to have a larger role to play in transport; some felt that an increased role for the EHRC would let the Department for Transport and transport-specific regulators off the hook for things that were properly their responsibility.²³⁵

- 129.** John Kirkpatrick, Deputy Chief Executive of the EHRC, told the Committee that he felt the Commission had a track record in transport “that we are moderately proud of”,²³⁶ citing in particular a section 23 agreement with LNER and action against Network Rail to ensure accessibility during station refurbishments.²³⁷ Mr Kirkpatrick referred to the

233 Q53 (14 June 2023), Equality and Human Rights Commission (ATL0015), Chartered Institute of Logistics and Transport (ATL0010), National Pensioners Convention (ATL0025)

234 Qq53, 55 (14 June 2023), Q287 (25 October 2023)

235 Q286 (25 October 2023), Q53 (14 June 2023)

236 Q113 (13 December 2023)

237 Q114 (13 December 2023)

effect it was hoped that such action would have on other operators who would think “we need to have our house equally in order”.²³⁸ The EHRC had written to the Department for Transport and the Office of Rail and Road to remind them of their duties under the Public Sector Equality Duty in respect of staffing arrangements on trains and at stations, and to the Civil Aviation Authority raising concerns about accessibility at airports.²³⁹

130. Mr Kirkpatrick, however, told us that the Commission’s scope for action in transport was perhaps less than in other spheres because it does not have the power to act under the Equality Act where other regulations governing transport and accessibility properly apply. He argued that the law on transport accessibility would be more effectively enforced by the sector-specific regulators who are “more expert in the detail of the regulations and of the situation than we are”.²⁴⁰ He also drew attention to the decrease in the Commission’s budget over the last decade and, said that the organisation was “neither empowered nor equipped” to bring individual cases “in a serial way”.²⁴¹ The Commission’s role would instead be “to work with [sector regulators] to encourage them to comply with the Public Sector Equality Duty.”²⁴² The then Rail

238 Q121 (13 December 2023)

239 Equality and Human Rights Commission (ATL0015)

240 Q127 (13 December 2023)

241 Qq128, 134 (13 December 2023)

242 Q113 (13 December 2023)

Minister said, for example, that it would fall to the Office of Rail and Road to make sure that the LNER agreement was followed up.²⁴³

Approaches to enforcement by transport bodies

Rail

- 131.** The Office of Rail and Road (ORR) monitors train operating companies' compliance with their Accessible Travel Policy obligations (as a condition of the licences which ORR issues), and is the enforcing body for certain rail, light rail, metro and tram accessibility legislation in Great Britain, including standards for vehicles and stations. It also has enforcement powers for a range of consumer protection laws applicable to rail travel, and is the designated enforcement body for EU-derived rail passenger rights and obligations regulations. The ORR also monitors train and station operators' compliance with their complaints handling procedures.
- 132.** In instances of non-compliance with rail vehicle and station accessibility, the Office of Rail and Road has the power to serve an 'improvement notice', which defines the actions to be taken to achieve compliance. The ORR can prosecute in a criminal court in the event of failure to comply with a notice, or in the case of a major shortcoming with significant aggravating factors. Failure to adhere to an ATP is a breach of an

243 Q154 (13 December 2023)

operator's licence agreement, in respect of which a formal investigation can be launched and the ORR can issue an Enforcement Order and / or levy a financial penalty.

133. Despite this range of formal powers at its disposal, ORR told us that its general approach to enforcement was:

to anticipate and highlight issues as early as possible, and to take informal regulatory action at the early stages of potential non-compliance so that issues are rectified as quickly as possible and formal enforcement action is not required.²⁴⁴

It stated that “in the vast majority of cases”, early intervention was sufficient to achieve compliance and would be best value for taxpayers. Rather than seeking to impose fines for individual instances such as an assistance failures, the organisation focuses on identifying “wider and broader issues that cause failures across the network”.²⁴⁵ The Rail Delivery Group supported this approach, saying that “it is better for all parties to work together to avoid breaches of obligations rather than reaching the stage of enforcement”.²⁴⁶ At the time the previous Committee took its evidence, the ORR had issued only one improvement notice relating to accessibility: a health and safety notice in respect of use of ramps by

244 Office of Rail and Road (ATL0048)

245 Q12 (22 November 2023)

246 Rail Delivery Group (ATL0016)

a specific operator at one station.²⁴⁷ The improvement notice was used as “a last resort” after extensive engagement had failed to produce a resolution.²⁴⁸

134. Since the Committee took evidence, the ORR intervened with Northern Trains in relation to the operator’s consistently poor performance in delivery of Passenger Assist services. The most recent survey showed that 18 per cent of passengers who booked assistance at a Northern-managed station reported not receiving any assistance. After receiving an unsatisfactory response to an initial letter of July 2024, ORR requested and accepted an improvement plan from the operator.²⁴⁹ It is notable, however, that these recent steps followed on from ORR repeatedly raising concerns about the service in 2019, 2022 and 2023, and previous promises of action from Northern that were either not implemented or proved ineffective. In December 2024, ORR announced a consultation on a new annual assessment, to be launched in 2025, that will rate the performance of train companies in providing assistance, and their capability to improve.²⁵⁰

247 Office of Rail and Road (ATL0048). Improvement Notices are issued under s.21 of the Health and Safety at Work Act 1974 and are a request to make specified improvements within a set timescale. Enforcement Notices are issued under s.22 of the Act and are prohibition notices requiring the cessation of activity until remedial actions have been completed.

248 Q15 (22 November 2023)

249 Letter from ORR Director of Strategy, Policy and Reform to Managing Director, Northern Trains, 19 September 2024

250 ORR, Rail regulator unveils new proposals for new passenger assistance ratings for train companies, 11 December 2024

- 135.** Doug Paulley told us that the perception amongst disabled people was that the ORR investigated and took compliance action when it was aware of an issue, but that the organisation’s capacity to pick up on issues proactively was limited. For example, he described use of non-compliant ramps as “a significant and pervasive problem” that the ORR would not have known about it without disabled people raising the issue.²⁵¹ He added that most people do not know to raise issues with the ORR because they are not part of any complaints procedure for accessibility issues.²⁵²
- 136.** Alongside information received from passengers,²⁵³ ORR said it gathers information through more than 100 health and safety inspectors, survey data and “regular engagement with all of the operators, with Network Rail and with our accessible travel advisory panel”. Stephanie Tobyn, ORR’s Director of Strategy, Policy and Reform emphasised the balance of proactive and responsive work undertaken by the organisation,²⁵⁴ with the former including “deep dives” on subjects such as lift reliability and the accessibility of complaint mechanisms, and auditing operators who have performed badly in surveys to investigate the

251 Doug Paulley (ATL0023), Q16 (14 June 2023)

252 Q298 (25 October 2023)

253 Q23 (22 November 2023)

254 Q45 (22 November 2023)

reasons for this.²⁵⁵ She recognised that there was a case for the ORR to better promote the work it does to change operators' behaviour.²⁵⁶

Aviation

- 137.** The Civil Aviation Authority (CAA) enforces UK Regulation (EC) No 1107/2006 which concerns the right of disabled persons and persons with reduced mobility to have the same opportunities for air travel as others. The CAA's role applies to all flights from the UK and flights to the UK on UK and EU-registered carriers.²⁵⁷ It also has powers under the Enterprise Act 2002 to enforce general consumer law in the aviation sector, covering airlines, airports, tour operators and travel agents, where infringements harm the collective interest of consumers. The CAA can seek undertakings from businesses that require them to comply with the law, and if these are not provided, or breached, they can seek an Enforcement Order. The Civil Aviation Authority has used its existing powers to require written undertakings from two airports to improve their assistance service to disabled passengers.²⁵⁸ When concerns about disabled people having excessive waits for airport assistance escalated after pandemic travel restrictions ended in spring 2022, the

255 Qq13–14, 45 (22 November 2023)

256 Qq12, 14, 46 (22 November 2023)

257 Civil Aviation Authority (ATL0064)

258 Civil Aviation Authority (ATL0064)

Civil Aviation Authority wrote to airports demanding that they produce action plans to tackle assistance waiting times or face enforcement action.²⁵⁹

- 138.** It is currently a very time-consuming process for the CAA to impose undertakings or take operators to court.²⁶⁰ The Authority itself recognises the limitations of its enforcement powers, saying that they “fail to act as a sufficiently meaningful deterrent”. In respect of undertakings under the Enterprise Act, in general there is no penalty for past failings, only promises for future compliance.²⁶¹ The Authority has argued for a civil sanctions regime that it can enforce directly without reliance on the courts and the power to impose fines in addition to the range of currently available sanctions, a call supported by many others.²⁶² The previous Government stated that it was in favour of the CAA having additional powers, but that this depended on primary legislation which was not forthcoming before the 2024 General Election.
- 139.** In the absence of the greater powers the previous Government promised, the Civil Aviation Authority instead puts significant emphasis on what it called “reputational enforcement”. It told the Committee that the Airport Accessibility Performance Framework that it introduced in 2017 had been successful in driving

259 Letter from CAA Group Director of Consumers & Markets to airports, 9 June 2022; Civil Aviation Authority (ATL0064)

260 Q69 (22 November 2023), Civil Aviation Authority (ATL0019)

261 Civil Aviation Authority (ATL0064)

262 The Consumers Association (ATL0049), Scope (ATL0062), Marion Fellows MP (ATL0063), Civil Aviation Authority (ATL0064), The Consumer Council (ATL0065)

compliance and improving the overall investment in and quality of assistance at many airports.²⁶³ In 2023, the CAA consulted on introduction of a similar performance framework for airline accessibility, which has not yet been published.²⁶⁴ Anna Bowles, the CAA’s Head of Consumer Policy and Enforcement, said that the Authority engages with airports and airlines “on a regular basis”, sending staff to observe practice in airports and receiving survey responses from consumers.²⁶⁵ The Authority published the outcome of ‘deep dive’ accessibility assessments of certain airports alongside the overall performance report for the first time in 2023–24 (which found that five out of 28 airports needed improvement).²⁶⁶

- 140.** Aviation operators are, generally, not convinced that there is a need for more formal enforcement to hold them to account. The Airport Operators Association told the Committee that it “believes the regulatory arrangements for accessibility issues at airports are sufficient”.²⁶⁷ Both AOA and Airlines UK emphasised the importance of reputation, influenced by the publication of performance assessments, as a driver of improvement in the industry.²⁶⁸ Karen Dee described the CAA’s annual airports report as “a good example

263 Civil Aviation Authority (ATL0064); Qq56, 69 (22 November 2023)

264 Civil Aviation Authority, Performance framework for airline accessibility, consultation opened 25 April 2023 and closed 21 July 2023

265 Q62 (22 November 2023)

266 Civil Aviation Authority, Airport accessibility performance report 2023/24, August 2024

267 Airport Operators Association (ATL0013)

268 Qq70–71 (22 November 2023)

of how the regulatory reporting system drives the behaviours that we want to see. [...] Most of the airports believe they are in a good place.”²⁶⁹

- 141.** The then Aviation Minister, Anthony Browne, reiterated in oral evidence in December 2023 that the Government was persuaded that the CAA needed additional powers, that alternative dispute resolution should be made mandatory and that the cap on compensation (imposed by the Montreal Convention) for damage to mobility aids needed to be removed. He said that while the CAA had the role of enforcer, “it just does not have the tools”.²⁷⁰ The current Aviation Minister said in October 2024, when asked about enforcement and accountability for airport accessibility, that “It is for the CAA as the independent regulator to develop the tools it needs to assess performance and take enforcement action as needed.”²⁷¹

Buses and coaches

- 142.** The Traffic Commissioner is formally the regulator for the bus and coach sectors, with the DVSA responsible for investigating alleged non-compliance and taking enforcement action short of reporting operators to the Traffic Commissioner.²⁷² Enforcement of the Public Service Vehicles Accessibility Regulations 2000 (PSVAR), which applies to buses and coaches,

269 Q58 (22 November 2023)

270 Qq150–153 (13 December 2023)

271 Airports: disability PQ 7311, 11 October 2024

272 Department for Transport (ATL0061); Q100 (22 November 2023)

is the responsibility of the DVSA, supported by the Department, the Traffic Commissioners, and—for rail replacement services—the Office of Rail and Road.²⁷³ DVSA Chief Executive, Loveday Ryder, said that the Agency takes intelligence from roadside inspections and from public complaints, and that monitoring of PSVAR is built into all interactions with operators, including annual vehicle inspections.²⁷⁴ She described the Agency’s enforcement approach:

By and large, operators want to be compliant, so we start with educating, providing additional information, helping them to comply and making sure that they know what they are supposed to be doing. If it becomes a theme or there is evidence that they may be, perhaps, wilfully not doing it, we use our investigative powers, do targeted checks on operators, maybe visit operators’ premises and look for evidence that their systems are right and that it is not a systemic or a wilful failure by an operator. If we think, at that point, that there is an issue, we refer it to the Traffic Commissioners.²⁷⁵

- 143.** Doug Paulley noted that breach by coach and bus operators of either PSVAR or the ‘Conduct Regulations’ is a criminal offence but, he stated, “To the best of my knowledge, no body corporate or individual has ever been prosecuted for breach of either.”²⁷⁶ Loveday

273 Office of Rail and Road (ATL0048)

274 Q98 (22 November 2023)

275 Q94 (22 November 2023)

276 Doug Paulley (ATL0021)

Ryder told us that in 2022–23 only 33 out of 69,000 vehicles failed on PSVAR elements during annual tests, and only 14 accessibility offences were found in 5,100 vehicles pulled over for a roadside check.²⁷⁷ DVSA, however, collects data only on the number of checks that they do and the number of offences found. In relation to the whole public service vehicle fleet, Ms Ryder told us “I cannot tell you, in total, as a percentage of the fleet, how compliant it is.”²⁷⁸ A key enforcement challenge for PSVAR is a lack of robust data on the number of coaches providing local and scheduled services and their level of compliance.

Taxis and private hire vehicles

- 144.** Disabled people on average make significantly more journeys by taxi and private hire vehicle than non-disabled people.²⁷⁹ Taxis and private hire vehicles (PHVs) are regulated at a local level by the more than 300 local licensing authorities, each of which is responsible for setting the standards of service that operators and drivers are obliged to adhere to and taking action for non-compliance.²⁸⁰ Drivers can be fined or stripped of their licence by the licensing authority if they are found to have made an illegal refusal of service to someone who is disabled. Under the Equality Act 2010, local licensing authorities have

277 Q99 (22 November 2023)

278 Qq91–93 (22 November 2023)

279 Scope (ATL0062)

280 Department for Transport (ATL0061)

powers to fine drivers convicted of refusing to carry assistance dogs or of charging more for the fare up to £1,000, and to remove their licence.

145. Enforcement action varies between authorities, however: some proactively undertake ‘mystery shopping’ exercises to identify non-compliance, whereas others act only in response to specific reports.²⁸¹ The localised enforcement regime results in something of a postcode lottery.²⁸² The Department for Transport has noted that the number of prosecutions made by local authorities remains low in relation to the reported rate of refusals to carry passengers with assistance dogs—a requirement that has been in force for two decades—and that the rate of prosecutions varies “markedly” between authorities.²⁸³ Leonard Cheshire told us that 14 per cent of disabled people have been refused travel on the basis of their disability.²⁸⁴ Stephen Anderson told us that he had counted 43 separate occasions when a driver had failed or refused to transport him because of the presence of his guide dog, Barney; Mr Anderson himself had successfully prosecuted 20 private hire drivers, with more cases waiting to be heard.²⁸⁵

146. Transport for All told the Committee that “there are many barriers to formally complaining, and sadly local authorities do not support disabled people through this process, or do not possess powers to act.”; they

281 Department for Transport (ATL0061)

282 Q298 (25 October 2023)

283 Department for Transport (ATL0061)

284 Leonard Cheshire (ATL0045)

285 Qq4, 55 (14 June 2023)

argued that there was a “lack of accountability for access denials” by local authorities.²⁸⁶ Mr Anderson argued that the level 3 fines imposed under sections 169 and 170 of the Equality Act were inadequate deterrents; he suggested fines at levels 4 or 5, and “automatic revocation” of licences that would not require the complainant “to do all the legwork”.²⁸⁷

- 147.** Taxi and private hire drivers can be licensed by a council other than in the district where they plan to operate, and some may choose to do so because of lower standards in testing or fewer pre-licence checks. The Department set out its view that “in England and Wales a driver can be prosecuted by the local authority with whom they are licensed, or another local authority if the alleged offence occurred elsewhere, provided (in summary) the local authority can show that it is in the interests of the inhabitants of their area to do so.”²⁸⁸ Other evidence the Committee received shows that this is not well understood by authorities in practice as a tool for enforcing against disability discrimination, and clearer communication or a review of processes may be needed. The Local Government Association has called for legislation to give councils powers to enforce against drivers and vehicles operating in their areas.²⁸⁹

286 Transport for All (ATL0017), Gosport Access Group and Disability Forum (ATL0053)

287 Q50 (14 June 2023)

288 Letter from Minister for Roads and Local Transport to the Transport Committee, 12 January 2024

289 Qq103–105 (22 November 2023)

The street environment

- 148.** Almost every journey involves some experience of the street environment. The Committee heard that disabled people and people with accessibility needs can find it challenging to navigate the public realm because of a wide range of obstructions including advertising boards, EV charging points and blockages to crossing points.²⁹⁰ In some cases problems may result from the design of the environment itself. In responses to our survey, the street environment among all transport ‘modes’ was where people most frequently experienced difficulties and barriers: 68 per cent of respondents reported that they always, most of the time or often faced difficulty in getting around on the streets.
- 149.** The National Federation of the Blind of the UK highlighted the difficulties caused in the street environment by certain kinds of bus stops, such as those which are separated from the pavement by cycle lanes—sometimes referred to as ‘floating’ bus stops or ‘bus stop bypasses’.²⁹¹ Many blind and partially-sighted people find it extremely difficult to cross these cycle lanes safely as they cannot see oncoming bikes, and riders very often do not observe the painted pedestrian crossing.
- 150.** Pavement parking is another widespread problem, especially for people with mobility or visual restrictions; when parked cars leave no space on the

290 *Wheels for Wellbeing* (ATL0041), *WinVisible* (ATL0070)

291 *National Federation of the Blind of the UK* (ATL0072)

pavement for use of wheelchairs, walking frames, guide dogs or canes, for example, the user may be forced into the road or not be able to pass by at all. Our predecessor Committee in the 2017 Parliament recommended a nationwide ban on pavement parking.²⁹² The Government subsequently consulted on this in 2019, but despite our predecessors repeatedly pressing for progress,²⁹³ no outcome or legislation has been forthcoming. We note that the present Government has committed to addressing the issue “in due course”.²⁹⁴

292 Transport Committee, Thirteenth Report of Session 2017–19, Pavement parking, HC 1982

293 Oral evidence on the Work of the Secretary of State for Transport, taken on: 3 February 2021, Q61, 27 April 2022, Q250, 19 October 2022, Q268, 7 December 2022, Q492, 19 April 2023, Q583

294 HC Deb, 9 January 2025, col 995; see also Q47 (14 June 2023)

Box 8: Inaccessibility in the street environment

“Walking is the main mode for transport for all of us but I am always left shocked by how little thought is given to making it easier to people to walk around. As a visually impaired person every day I encounter scaffolding, building works on pavements, cars parked on pavements or across tactile crossings, people’s own awareness of my long cane, wheely bins and A boards left on pavements. Lack of pedestrian crossings don’t help. Shared cycle routes where cyclists whizz by.”

—Respondent to our survey

“In cities that have introduced island/floating bus stops I can no longer use most of those stops. Most are too narrow to allow ramp deployment and room to get onto the ramp.”

—Respondent to our survey

“I live less than a mile away from my workplace but as a wheelchair user I need to travel on the road for most of that journey because the pavements are badly damaged, mostly from cars driving across them or parking on them, and there is a lack of dropped kerbs in several places making it impossible to get on/off the sidewalk.”

—Respondent to our survey

- 151.** Sustrans noted that no specific guidance exists in England for inclusive pavement design.²⁹⁵ Gosport Access Group and Disability Forum reported that

295 Sustrans (ATL0044)

good practice documents like Inclusive Mobility “are roundly ignored if deemed inconvenient”.²⁹⁶ Consultant Christiane Link told us that the attitude of local authorities to ensuring accessibility in the streetscape was “a postcode lottery”, and that, as with other transport modes, “enforcement standardisation is the issue”.²⁹⁷ While there is non-statutory guidance on street design and on inclusive mobility,²⁹⁸ the overriding legal requirement that applies to accessibility in the functions local authorities carry out in managing streets is the Public Sector Equality Duty. It is very unclear to what extent the Public Sector Equality Duty produces satisfactory outcomes, however, and how individuals might complain or seek redress or enforcement.

- 152.** It is noticeable that in the Department for Transport’s own compendium of the rights of disabled passengers on transport, the street environment does not feature.²⁹⁹ The Inclusive Transport Strategy stated in 2018 that “Local authorities are responsible for the design of their streets. It is for them to ensure any pedestrian environment scheme, including a shared space, is inclusive and that they meet the requirements of the Equality Act 2010.”³⁰⁰ Nothing

296 Gosport Access Group and Disability Forum (ATL0053)

297 Q32 (14 June 2023)

298 Department for Transport, Inclusive mobility: a guide to best practice on access to pedestrian and transport infrastructure, December 2021

299 Department for Transport, Rights of disabled passengers on transport, gov.uk, accessed 23 January 2025

300 Department for Transport, The Inclusive Transport Strategy: achieving equal access for disabled people, July 2018, para 4.26

was said, however, about how this should be enforced other than, presumably, through the same burdensome and costly legal action that can be taken generally under the Equality Act 2010. Gosport Access Group and Disability Forum said that “achieving any kind of redress or remedial action is very difficult”, and noted with regret that often effective engagement is achieved only through resource-intensive campaigning that may be perceived as confrontational.³⁰¹

- 153.** In theory, therefore, an Equality Impact Assessment (EIA) or similar exercise carried out by the responsible local authority might prevent a design feature being introduced on the street which has a detrimental effect on accessibility (see paragraph 11). This is especially important at the outset of projects because, as Professor Anna Lawson noted, “Once transport and the built environment are in place, they are very expensive and time-consuming to undo.”³⁰² Caroline Stickland, however, described the way EIAs are used as being typically tick-box exercises, something shelved after completion and not returned to, and seen as “a ceiling, rather than a floor” for what should be done. After an assessment has been done, authorities should be considering how to change their plans to mitigate negative impacts, or even abandoning plans that are assessed as likely to have an adverse effect, rather than ploughing ahead regardless. Without that follow-up, their effect may be minimal.³⁰³ The exercises have been described as “‘sorry, you lose’ impact assessments”,

301 Gosport Access Group and Disability Forum (ATL0053)

302 Q311 (25 October 2023)

303 Qq303–309 (25 October 2023)

whereby decision-makers acknowledge the difficulties a particular outcome will cause for disabled people but do it anyway to fulfil other aims, able to claim that by considering the difficulties they have fulfilled their “due regard” duty.³⁰⁴ There is no legal route to challenge an EIA, other than through a judicial review of the decision that was ultimately reached.³⁰⁵

- 154.** Transport for All and Anna Lawson both argued that greater transparency of Equality Impact Assessments would be a good first step towards making sure they are more effective.³⁰⁶ Stephen Anderson suggested that there should be an effective veto: a mechanism whereby a particular intervention could only be put into place when disabled people confirmed that they did not consider it dangerous or an insurmountable obstacle.³⁰⁷

Practicality of enforcement: the case of e-scooters

- 155.** In 2020 our predecessor Committee conducted an inquiry into e-scooters, coinciding with the opening of trials for e-scooter rental schemes. These trial schemes remain at present the only legal way of riding an e-scooter on public roads. While welcoming e-scooters as having the potential to offer a low-cost and environmentally friendly alternative to the private car, the Committee’s report warned that

304 Q317 (25 October 2023)

305 Q309 (25 October 2023); Mr Vincent Stops (ATL0054)

306 Q304 (25 October 2023)

307 Q34 (14 June 2023)

plans for their legalisation should not be to the detriment of pedestrians—in particular, disabled people.³⁰⁸ It recommended that the Department and local authorities monitor the trials for problems emerging with abandoned or inappropriately parked e-scooters causing street clutter, and take robust enforcement measures to eliminate use of e-scooters on pavements, both of which can be especially concerning for blind or partially-sighted pedestrians.³⁰⁹ Similar concerns can arise in respect of inappropriately-parked hired e-bikes. A December 2022 evaluation of the e-scooter trials noted that blind or partially-sighted residents described occasions where they were required to go into the road to avoid parked e-scooters and had to rely on passers-by to assist or find an alternative route.³¹⁰

156. In May 2023 the Committee raised the matter of e-scooter clutter with the then responsible Minister, Jesse Norman. He told us that enforcement of parking was a matter for the local authority, and that he would be “reluctant to substitute a national law for one that was more closely attuned to local needs”.³¹¹ On the matter of pavement riding, the Minister said that this was for the police to enforce. The Committee had, however, previously taken evidence from the

308 Transport Committee, Third Report of Session 2019–21, E-scooters: pavement nuisance or transport innovation?, HC 255

309 See also oral evidence taken on 8 February 2023, on E-scooters: follow-up, Q7

310 Department for Transport, National evaluation of e-scooter trials: findings report, Arup and NatCen, December 2022

311 Oral evidence taken on 17 May 2023, on E-scooters: follow-up, Q180

National Police Chiefs Council lead on this issue, Commander Kyle Gordon, who emphasised that harm caused by e-scooters is “down our list of key priorities”.³¹² Commander Gordon said it was vital for society to set its own norms about acceptable and unacceptable use, and for councils to have their own parking enforcement powers.³¹³ The trials were initially intended to last until 2021, but were repeatedly extended, most recently to May 2026.³¹⁴

157. RECOMMENDATION

The case of e-scooters demonstrates the importance of ensuring that enforcement is not an afterthought when new elements are introduced into transport networks. Should the Government eventually seek to legislate for permanent e-scooter rental schemes or use of privately-owned e-scooters on public roads, it must not rely on saying that it is up to local authorities or police forces to use their powers to manage detrimental impacts on disabled people without proving that this can be effective. It must present evidence from the extensive rental trial schemes demonstrating that it is possible for operators and local authorities to manage such schemes in a way which does not further impair disabled people’s safe and confident access to the street environment. This may require the Government to make additional resources available for enforcement.

312 Oral evidence taken on 8 February 2023, on E-scooters: follow-up, Q33

313 Oral evidence taken on 8 February 2023, on E-scooters: follow-up, Q43

314 Department for Transport, E-scooter trials: guidance for local authorities and rental operators, gov.uk, updated January 2024

Is a different enforcement model needed?

- 158.** There were two main schools of thought in the evidence about whether a different model of enforcement was required: one saying that an accessibility office or commissioner might be more effective, the other, that what is needed is for the existing systems to be strengthened.³¹⁵
- 159.** One advantage of a new body or post which would have general oversight of accessibility across all transport systems could be to smooth over the gaps that exist in the current regulatory landscape: where regulation is fragmented by transport mode, it is ill-equipped to deal with interchanges and multi-modal journeys. This also hinders sharing of learning between different parts of the transport system when cases are brought and complaints are made.³¹⁶ Even in just one sector, rail, the existence of several regulatory bodies responsible for enforcing a range of requirements and obligations was argued to reduce coherence and transparency.³¹⁷ DPTAC argued in 2022 that for regulation of transport accessibility to be effective, “the current fragmented approach should be replaced by a single regulatory code administered by a single enforcement body”.³¹⁸ Scope has argued for a

315 Q301 (25 October 2023)

316 Q316 (25 October 2023)

317 Rail Delivery Group (ATL0016)

318 Disabled Persons Transport Advisory Committee, DPTAC reference frame: working towards a fully accessible railway, February 2022

single regulator for land-based transport, which could harmonise approaches and increase accountability between modes.³¹⁹

- 160.** There was general agreement that the current suite of regulators need to be better resourced to proactively monitor and check compliance. Christiane Link said simply that the regulators “need more staff, they need more money and they need more power.”³²⁰ It was also suggested that they need to embed their Equality Act responsibilities in their training and their strategic plans, to improve their institutional awareness.³²¹
- 161.** We heard some suggestions for ways in which the burden on disabled people to take action to enforce the law could be removed or lessened. Christiane Link spoke of her own experience in Austria, where she found it straightforward and cost-free to bring a complaint about discrimination under a system run through their equivalent of the Department of Work and Pensions, whereby the body alleged to have discriminated has to attend a meeting with the relevant government department to explain their conduct. In Ms Link’s case, the body provided compensation, an acknowledgement of wrongdoing and an undertaking to make changes, with no need to go to court.³²²

319 Scope (ATL0062)

320 Q21 (14 June 2023)

321 Q301 (25 October 2023)

322 Qq40–41 (14 June 2023)

- 162.** Within the UK, Professor Anna Lawson cited website accessibility as an area where a different, more effective approach has been taken: a government body (the Government Digital Service) is tasked with proactively monitoring performance and produces an annual report, and there is a straightforward process for people to raise complaints which will get channelled to appropriate investigators.³²³ She argued that there should be a body with a similar obligation to proactively monitor compliance with transport accessibility standards.³²⁴
- 163.** Both Doug Paulley and Catherine Casserley argued that if the number of legal cases being brought was more reflective of the volume of incidents and breaches, there might be more of an impact on practice.³²⁵ Given the difficulties and risks for individuals of bringing action discussed in the previous chapters, however, Mr Paulley considered this unlikely to happen without substantial numbers of cases being brought by enforcement bodies.³²⁶

323 Q264 (25 October 2023)

324 Q276 (25 October 2023)

325 Q315 (25 October 2023)

326 Q316 (25 October 2023)

164. CONCLUSION

The confidence that regulators evince in informal methods of enforcement and its deterrent effect on other operators is not justified by the experience of travellers. We recognise that reputational incentives such as performance rankings have a part to play, as do informal collaboration and education, but failure to adhere to legal requirements demands more robust and immediate responses. Thresholds for taking formal enforcement action are in general set too high, requiring evidence of repeated and enduring failures. As a result, the number of formal actions that have been taken in each sector is so low that they can generally be recalled individually by enforcement bodies. This cannot be right when disabled travellers themselves typically lose count of the number of times they encounter serious problems. This results in a significant enforcement gap, and operators getting away with repeated poor practice.

165. CONCLUSION

There appears to be no effective or easily available enforcement route for accessibility in the street environment in particular. There is instead a reliance on upstream measures such as local authorities following good practice, consulting effectively and having “due regard” under the Public Sector Equality Duty, but these appear insufficient to ensure good outcomes for accessibility.

166. RECOMMENDATION

The Secretary of State should immediately give regulators an explicit mandate, backed by the necessary resources, to be far more proactive within the scope of their current powers in identifying and enforcing against breaches of accessibility law and regulations by operators. The Department should set annual reporting requirements for regulators to publish updates on the number of breaches of accessibility laws, regulations and guidance that they have a) identified, b) addressed through informal action and c) taken formal enforcement action against. This transparency would enable the public to gauge the success of a new stance of proactive enforcement.

167. RECOMMENDATION

The Department should within 12 months review the roles of enforcement bodies with responsibilities for transport accessibility and prepare to legislate where necessary:

- to ensure that all have consistent and sufficient powers at their disposal, and have both the powers and resources needed to intervene formally at lower thresholds than is currently the case;
- to assess whether such bodies should be given the power and resources to act on breaches of the Equality Act general duties and the Public Sector Equality Duty in matters within their remit, in order to facilitate swifter resolution of breaches and take some of the burden of legal action away from individuals;
- to ensure that no transport mode, including the street environment, is left uncovered by an effective enforcement regime; and
- to assess whether a single body with responsibility for enforcement across transport modes would be more effective at asserting the rights of disabled travellers and bringing about systemic change.

Conclusions and recommendations

The experiences of disabled people using transport

1. Aside from the structural legal issues, it is clear from the evidence that myriad specific practical issues need to be addressed, across all transport modes and relating to all kinds of disability, to improve compliance and practice on a daily basis. We will seek to hold the Department for Transport, local authorities and providers to account for addressing these issues. The meaningful involvement of disabled people must be central to the work of operators and government at all levels in solving these problems, and such involvement must be adequately funded, planned and supported. (Conclusion, Paragraph 38)

From policy aspiration to implementation: where do things go wrong?

2. The 2018 Inclusive Transport Strategy set a goal of “creating a transport system offering equal access for disabled people by 2030”. Regardless of the status of individual actions set out in that Strategy,

it is evident that the overall goal will not be achieved on that timescale. A positive direction of travel is not enough—and, indeed, we have seen progress go backwards in some respects since the Covid-19 pandemic. There needs to be more emphasis on a concrete delivery plan to achieve the overall outcome of closing the accessibility gap, rather than administrative actions which, while positive in themselves, risk adding up to no more than the sum of their parts. (Conclusion, Paragraph 45)

3. The Government should publish within 12 months a new Inclusive Transport Strategy. This strategy must have a stretching ambition, but one underpinned by metrics, actions, costings and milestones which clearly map out a practical pathway to deliver on that ambition. It must be cross-modal and closely linked to the Government's promised Integrated Transport Strategy, but a specific focus on accessibility is needed. (Recommendation, Paragraph 46)
4. Decision-makers too often deem accessibility to be in conflict with, and less important than, other policy goals, technical requirements or cost pressures. The Government's starting point must be that accessibility has to be delivered, not that it will only be delivered if other factors do not get in the way. (Conclusion, Paragraph 58)
5. As part of a new Inclusive Transport Strategy, the Government must set out concrete timescales for achieving independent accessibility across the rail network, and commit to setting out within 12 months a road map for how to meet those timescales. This

road map must inform the rolling stock, station and network enhancements strategies of the Department and, when it is operational, Great British Railways. (Recommendation, Paragraph 59)

6. Progress in implementing agreed accessibility upgrades at stations has been too halting, and delivery too slow and costly. The Department for Transport and its agencies and partners should consider adopting a different commissioning approach based on a rolling programme of rapid interventions, as opposed to individual station projects commissioned separately. By creating certainty and consistency for contractors, this should speed up delivery and lower costs. (Recommendation, Paragraph 60)
7. Station accessibility audit information must be published in full within two months of this report to permit independent scrutiny of progress, the resources required and any decisions made to rule out works at particular locations. In its Inclusive Transport Strategy, the Department should commit to compiling and publishing in open data format a register of key accessibility assets on the rail and bus network which can be drawn upon by journey planning tools. (Recommendation, Paragraph 61)
8. The seemingly routine, everyday nature of assistance failures on the rail network is unacceptable. Accessibility must not be viewed through the same lens as customer service, where less than 100 per cent performance is considered normal. Accessibility failures should be vanishingly rare, not commonplace,

but too few actors in the system currently behave as if that is the case. A change of mindset throughout the transport system is urgently needed, recognising that accessibility is both a non-negotiable matter of human rights and discrimination, and a health and safety issue. (Conclusion, Paragraph 66)

- 9.** The Government's new strategy for inclusive transport should set out what practical measures it will take to embed the principle that every instance of not meeting accessibility obligations constitutes a serious failure for which operators and service providers will be held accountable. This must include measures to collect comprehensive data on such failures. (Recommendation, Paragraph 67)
- 10.** Despite all the mechanisms in place to safeguard accessibility, proposals which risked significantly damaging disabled people's access to the rail network by closing hundreds of ticket offices were published in 2023 and only withdrawn after a huge response to public consultation. This was a waste of time and resources and it resulted in a burden being placed once again on disabled people themselves to advocate for their needs. (Conclusion, Paragraph 74)
- 11.** The Department must set out in response to this report how it will change its processes in order to build accessibility into decision-making processes both internally and at agencies overseen by the Department, and how it will ensure that internal checks and balances for accessibility are effective.

Relying on consultations to highlight problems after policies and interventions have already been designed is not acceptable. (Recommendation, Paragraph 75)

- 12.** We welcome the aspiration expressed by the Department in the last Parliament to involve the Disabled Persons Transport Advisory Committee more thoroughly in the policy-making process beyond policy specific to accessibility. This was long overdue, considering that DPTAC was established in 1985. (Conclusion, Paragraph 76)
- 13.** The Department should share with this Committee a work plan mapping out DPTAC's involvement in upcoming policy decisions, and publish quarterly reports detailing the impact that DPTAC has had on the Department's decision-making. (Recommendation, Paragraph 77)
- 14.** The establishment of Great British Railways presents a once-in-a-generation opportunity to fix accessibility as a core goal and responsibility of the railway and as a guiding principle for its decision-making. The opportunity must not be squandered, and we urge the Government in bringing forward its legislation to consider the full range of mechanisms that could be used to achieve this. (Conclusion, Paragraph 79)
- 15.** Operators are at pains to emphasise the complexity of the systems they work within, especially when it comes to journeys involving multiple organisations or modes. But people are entitled to expect to be able to make complicated journeys to get where they need to go; disabled people are no different. Systems and staffing must be able to cope with complexity.

Similarly, resilience to external shocks—such as the sudden increase in air travel after the ending of pandemic restrictions—must be sufficient to cope with accessibility requirements. (Conclusion, Paragraph 83)

- 16.** It is not sufficient for training to be delivered on disability awareness, accessibility and preventing discrimination: the training must be of a guaranteed minimum standard and proven to be effective in improving outcomes. The Department for Transport should, with the active participation of disabled people, establish an expert unit to review within 12 months the training packages currently available across modes to identify, benchmark and standardise best practice, and conduct ongoing quality assurance. (Recommendation, Paragraph 84)
- 17.** The presence of staff is often a crucial determinant of the ability of disabled people to travel. Ahead of the establishment of Great British Railways and nationalisation of operating companies, the Department must be prepared to intervene where necessary to ensure that changes to staffing levels on the rail network do not have the effect of reducing access and inclusion. When legislating for the creation of Great British Railways, it must take steps to ensure that that body gives accessibility appropriate weight in future decision-making about the number, roles and location of staff. (Recommendation, Paragraph 87)

The burden on individuals

- 18.** We welcome the focus in the Government’s rail reform consultation paper on streamlining, consolidating and strengthening powers for protecting passenger interests, resolving complaints and monitoring rights and standards. However, the focus on accessibility in the consultation document appears relatively weak in comparison to the severity of the problem. It will be necessary for the passenger watchdog to have substantial expertise in and resources dedicated to accessibility and inclusion if it is to make a significant difference to the everyday experience of disabled travellers. We draw attention to our recommendation later in this report that the Department assess whether a single body with responsibility for enforcing the rights of disabled travellers across transport modes would be a more effective model for bringing about change than mode-specific and general passenger rights bodies. (Conclusion, Paragraph 96)
- 19.** An unreasonable burden is currently placed on disabled people themselves in holding transport operators and authorities to account for fulfilling their duties. Legal action is rarely a practical option for most individuals, so it is especially important that complaints processes are made more accessible and effective. The user should not have to be an expert either in the law or in organisational structures across varied transport modes to know whether they have a valid complaint, to whom it should be addressed, how to contact that body and how to escalate the complaint if necessary. In the long term, there may be

a case for rationalising the number of organisations who deal with transport accessibility complaints, but in the meantime, a unified ‘front of house’ service could make a meaningful difference to users. We note plans to establish a passenger standards authority in the rail sector, but this covers just one mode of transport and will not be an accessibility-specific body. (Conclusion, Paragraph 104)

20. We recommend that the Department for Transport work with disabled people’s organisations to design a unified service to receive and triage accessibility complaints or reports of failures, ensure that they reach the relevant operator, authority or regulator, and follow them up if not resolved. Such a service would require an investment in knowledgeable and resourceful staff and in effective and accessible advertising. This should be in place within 12 months. Data about reported problems gathered through this platform should be made available to operators, regulators, campaigners, parliamentarians and the general public. (Recommendation, Paragraph 105)

21. Users of such a service must receive assurance that information about complaints and failures is being aggregated and used proactively to improve systems and services, not just to effect redress to the individual. In order to achieve this, the Department should:

- analyse information gathered through this mechanism both to hold operators to account for resolving specific problems promptly, and to enable systemic issues and trends to be identified and addressed; and
- report quarterly on what issues have been resolved and services improved as a result. (Recommendation, Paragraph 106)

22. As one way of reducing the need for complaints in the first place, we recommend that all licensed transport providers be required to appoint an accessible transport champion with the specific responsibility for navigating journeys on a regular basis to assess conditions against a checklist, as a lean and rapid way of assessing the passenger experience. Champions should have an understanding of accessibility needs on a pan-disability basis, and personal experience of navigating transport as a disabled person or carer. (Recommendation, Paragraph 107)

The legislative framework

23. The landscape of legislative and regulatory requirements for transport accessible is overly complicated and fragmented and needs to adapt to changing uses of transport. This prevents both operators and travellers readily understanding rights and obligations, and makes redress harder to access. (Conclusion, Paragraph 123)

- 24.** The Department for Transport should lead a review of transport accessibility legislation in collaboration with the Office for Equality and Opportunity, and with meaningful involvement and leadership by disabled people, to assess how it could be streamlined, clarified and updated, and whether it should be underpinned by greater specification of the standards providers must work to. Specification of standards should include matters currently subject only to the Public Sector Equality Duty or the duty to make reasonable adjustments. The review should be completed within 12 months of the publication of this report. (Recommendation, Paragraph 124)

Regulation and enforcement

- 25.** The case of e-scooters demonstrates the importance of ensuring that enforcement is not an afterthought when new elements are introduced into transport networks. Should the Government eventually seek to legislate for permanent e-scooter rental schemes or use of privately-owned e-scooters on public roads, it must not rely on saying that it is up to local authorities or police forces to use their powers to manage detrimental impacts on disabled people without proving that this can be effective. It must present evidence from the extensive rental trial schemes demonstrating that it is possible for operators and local authorities to manage such schemes in a way which does not further impair disabled people's safe and confident access to the street

environment. This may require the Government to make additional resources available for enforcement. (Recommendation, Paragraph 157)

- 26.** The confidence that regulators evince in informal methods of enforcement and its deterrent effect on other operators is not justified by the experience of travellers. We recognise that reputational incentives such as performance rankings have a part to play, as do informal collaboration and education, but failure to adhere to legal requirements demands more robust and immediate responses. Thresholds for taking formal enforcement action are in general set too high, requiring evidence of repeated and enduring failures. As a result, the number of formal actions that have been taken in each sector is so low that they can generally be recalled individually by enforcement bodies. This cannot be right when disabled travellers themselves typically lose count of the number of times they encounter serious problems. This results in a significant enforcement gap, and operators getting away with repeated poor practice. (Conclusion, Paragraph 164)
- 27.** There appears to be no effective or easily available enforcement route for accessibility in the street environment in particular. There is instead a reliance on upstream measures such as local authorities following good practice, consulting effectively and having “due regard” under the Public Sector Equality Duty, but these appear insufficient to ensure good outcomes for accessibility. (Conclusion, Paragraph 165)

- 28.** The Secretary of State should immediately give regulators an explicit mandate, backed by the necessary resources, to be far more proactive within the scope of their current powers in identifying and enforcing against breaches of accessibility law and regulations by operators. The Department should set annual reporting requirements for regulators to publish updates on the number of breaches of accessibility laws, regulations and guidance that they have a) identified, b) addressed through informal action and c) taken formal enforcement action against. This transparency would enable the public to gauge the success of a new stance of proactive enforcement. (Recommendation, Paragraph 166)
- 29.** The Department should within 12 months review the roles of enforcement bodies with responsibilities for transport accessibility and prepare to legislate where necessary:
- to ensure that all have consistent and sufficient powers at their disposal, and have both the powers and resources needed to intervene formally at lower thresholds than is currently the case;
 - to assess whether such bodies should be given the power and resources to act on breaches of the Equality Act general duties and the Public Sector Equality Duty in matters within their remit, in order to facilitate swifter resolution of breaches and take some of the burden of legal action away from individuals;

- to ensure that no transport mode, including the street environment, is left uncovered by an effective enforcement regime; and
- to assess whether a single body with responsibility for enforcement across transport modes would be more effective at asserting the rights of disabled travellers and bringing about systemic change. (Conclusion, Paragraph 167)

Formal minutes

Tuesday 4 March 2025

Members present:

Ruth Cadbury, in the Chair

Steff Aquarone

Dr Scott Arthur

Catherine Atkinson

Katie Lam

Alex Mayer

Laurence Turner

Access denied: rights versus reality in disabled people's access to transport

Draft Report (*Access denied: rights versus reality in disabled people's access to transport*), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 167 read and agreed to.

Summary agreed to.

Resolved, That the Report be the First Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

Adjournment

Adjourned till tomorrow at 9.30 am

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the inquiry publications page of the Committee's website.

Wednesday 14 June 2023

Christiane Link, journalist, campaigner and consultant for transport accessibility; **The Baroness Grey-Thompson DBE**, Cross-Bench Peer, transport accessibility campaigner; **Stephen Anderson**, transport accessibility campaigner; **Alan Benson MBE**, transport accessibility campaigner Q1–73

Wednesday 13 September 2023

Mick Lynch, General Secretary, National Union of Rail, Maritime and Transport Workers (RMT Union); **Louise Rubin**, Head of Policy and Campaigns, Scope; **Christopher Brooks**, Head of Policy, Age UK; **Katie Pennick**, Campaigns and Communications Manager, Transport for All Q74–121

Anthony Smith, Chief Executive, Transport Focus; **Stephanie Tobyn**, Director of Strategy, Policy and Reform, Office of Rail and Road Q122–170

Simon Moorhead, Chief Information Officer, Rail Delivery Group; **David Horne**, Managing Director, London and North Eastern Railway Company; **Richard**

Allan, Managing Director, Chiltern Railways; **Andy Mellors**, Managing Director, Avanti West Coast Q171–255

Wednesday 25 October 2023

Doug Paulley, Accessible transport campaigner; **Professor Anna Lawson**, Professor of Law, School of Law, University of Leeds; **Catherine Casserley**, Barrister, Cloisters Chambers; **Caroline Stickland**, Chief Executive Officer, Transport for All Q256–321

Wednesday 22 November 2023

Stephanie Tobyn, Director of Strategy, Office of Rail and Road; **Jacqueline Starr**, Chief Executive Officer, Rail Delivery Group; **Ms Alison Smith**, Accessibility and Inclusion Lead, Network Rail and Great British Railways Transition Team Q1–46

Anna Bowles, Head of Consumer Policy and Enforcement, Civil Aviation Authority; **Rob Griggs**, Policy and Public Affairs Director, Airlines UK; **Karen Dee**, Chief Executive Officer, Airport Operators Association Q47–78

Mr Keith McNally, Operations Director, Confederation of Passenger Transport; **Loveday Ryder**, Chief Executive, Driver and Vehicle Standards Agency; **Councillor Linda Taylor**, Vice-Chair of Local Infrastructure and Net Zero Group, Local Government Association Q79–111

Wednesday 13 December 2023

John Kirkpatrick, Deputy Chief Executive Officer,
Equality and Human Rights Commission Q112-141

Anthony Browne, Parliamentary Under-Secretary of
State, Department for Transport; **Guy Opperman**,
Parliamentary Under-Secretary of State, Department
for Transport; **Huw Merriman**, Minister for Rail,
Department for Transport; **Liz Wilson**, Deputy Director
for Accessible and Inclusive Travel, Department for
Transport Q142-207

Published written evidence

The following written evidence was received and can be viewed on the inquiry publications page of the Committee's website.

ATL numbers are generated by the evidence processing system and so may not be complete.

1	ABTA	ATL0068
2	ASLEF	ATL0102
3	ASLEF	ATL0033
4	Airlines UK	ATL0034
5	Airport Operators Association	ATL0013
6	Anonymised	ATL0126
7	Anwar, Mr Khalid	ATL0077
8	Banks, Mr Philip	ATL0078
9	Beeley, Ruth	ATL0121
10	Bennett, Ms Susan	ATL0076
11	Bishop, Mrs Jennifer	ATL0086
12	Blocker, Judith	ATL0091
13	Bosson, June	ATL0124
14	Buckley, Mrs Tessa	ATL0082
15	Burgess, Kenneth	ATL0090
16	CAA Consumer Panel	ATL0019

17	CPT (The Confederation of Passenger Transport)	ATL0012
18	Case, Thomas	ATL0097
19	Chadwick, Vivienne	ATL0085
20	Civil Aviation Authority	ATL0132
21	Civil Aviation Authority	ATL0064
22	Clarke, Hilary	ATL0094
23	Coates, Gareth	ATL0075
24	Community Transport Association	ATL0043
25	Conchie, George	ATL0127
26	Crohn's and Colitis UK	ATL0037
27	Crosby, Gordon	ATL0040
28	Department for Transport	ATL0061
29	Disability Rights UK	ATL0060
30	Disability Sheffield	ATL0118
31	Dowling, Jamie	ATL0106
32	E., Alex	ATL0004
33	East Surrey Transport Committee	ATL0038
34	Egan, Rita	ATL0001
35	Eglinton, Caroline	ATL0089
36	Equality and Human Rights Commission	ATL0015
37	Fellows, Marion	ATL0063
38	FirstGroup plc	ATL0050
39	Go Ahead Group	ATL0030
40	Gosport Access Group and Disability Forum	ATL0053

41	Grand, Mrs Sophie	ATL0005
42	Gray, Alexandra	ATL0116
43	Greater London Forum for Older People	ATL0088
44	Haylor, Valerie	ATL0123
45	Heathrow Airport Ltd	ATL0047
46	Heraty, Ms Maggie	ATL0099
47	Howell, Mrs Pamela	ATL0003
48	Hurst, Mr Robert	ATL0087
49	Ideas Limited	ATL0110
50	Ideas Limited	ATL0073
51	Jackson, Pete	ATL0058
52	Jennings, Mr Anthony	ATL0092
53	Jennings, Mr Anthony	ATL0052
54	Jeynes, John	ATL0039
55	Jukes, Mr Mark	ATL0002
56	Labour Representation Committee	ATL0101
57	Lancaster University Management School	ATL0028
58	Learning Disability England	ATL0115
59	Leonard Cheshire	ATL0045
60	Lieber, Helen	ATL0103
61	Link, Christiane	ATL0020
62	Liverpool City Region Combined Authority	ATL0066
63	Lloyd, Felicity	ATL0096
64	London Councils	ATL0129

65	London Luton Airport	ATL0046
66	London TravelWatch	ATL0051
67	Manship, Beth	ATL0042
68	Marsden, Mr Renford	ATL0081
69	Martin, James	ATL0120
70	Meehan, Kevin	ATL0128
71	Mental Health Foundation	ATL0009
72	Mitchell, Simon	ATL0122
73	Mobility and Access Committee for Scotland	ATL0057
74	Morgan, Nicky	ATL0059
75	Muscular Dystrophy UK	ATL0111
76	My Disability Plus	ATL0071
77	National Autistic Society	ATL0036
78	National Centre for Accessible Transport	ATL0014
79	National Federation of the Blind of the UK	ATL0072
80	National Pensioners Convention	ATL0025
81	Network Rail	ATL0130
82	Office of Rail and Road	ATL0117
83	Office of Rail and Road	ATL0131
84	Office of Rail and Road	ATL0048
85	Osman, Dr Yusuf	ATL0095
86	Parliamentary Advisory Council for Transport Safety (PACTS)	ATL0031
87	Paulley, Doug	ATL0112

88 Paulley, Doug	ATL0021
89 Paulley, Doug	ATL0022
90 Paulley, Doug	ATL0023
91 Paulley, Doug	ATL0055
92 Pearson, Mrs Caroline	ATL0100
93 Picton, Adrian	ATL0084
94 Portsmouth City Council	ATL0107
95 RMT	ATL0125
96 RMT	ATL0067
97 Rail Delivery Group	ATL0016
98 Ringrose Law	ATL0008
99 Rodger, Dr Sunil	ATL0069
100 Rodger, Dr Sunil	ATL0119
101 Royal National Institute of Blind People (RNIB)	ATL0114
102 Scope	ATL0062
103 Sergeant, Adam	ATL0007
104 Shopmobility South Gloucestershire	ATL0011
105 Smith, Mr John	ATL0098
106 Southeastern trains	ATL0026
107 Stops, Mr Vincent	ATL0054
108 Sustrans	ATL0044
109 TSSA (Transport Salaried Staffs' Association)	ATL0113
110 The Chartered Institute of Logistics and Transport	ATL0010

111 The Consumer Council	ATL0065
112 The Consumers Association	ATL0049
113 Together Trust	ATL0018
114 Transport Focus	ATL0027
115 Transport for All	ATL0109
116 Transport for All	ATL0017
117 Transport for Greater Manchester	ATL0108
118 TravelWatch NorthWest	ATL0035
119 Wheels for Wellbeing	ATL0104
120 Wheels for Wellbeing	ATL0041
121 Whitlow, Mr Paul	ATL0080
122 WinVisible (women with visible & invisible disabilities)	ATL0070
123 Woodward, Miss Amy	ATL0083