SOCIAL SECURITY ADVISORY COMMITTEE

The use of public funds in supporting the mobility needs of disabled people

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About this report

This project was conducted as part of the Social Security Advisory Committee's Independent Work Programme, under which the Committee investigates pertinent issues relating to the operation of the benefits system.

We are very grateful to Katie Goodbun, a post-graduate researcher with extensive experience in both academic and non-academic environments and who is currently an assistant lecturer in the School of Psychology at the University of Kent, who joined us on a three-month secondment to undertake this research. We are also grateful to the Economic and Social Research Council who funded Katie's time working with the Committee. Thanks also go to our extensive stakeholder community for their active engagement with this project. In particular, we extend our thanks to the disabled people and their organisations, carers and voluntary sector organisations who gave their time to share their thoughts and experiences and to advise and support us during this project. We are also very grateful to Motability for their input and to officials from the Department for Work and Pensions (DWP) who provided factual information.

The views expressed and recommendations reached in the report are solely those of the Committee, and have been informed by the direct experience and perceptions of disabled people and others. The bulk of this research was completed prior to the outbreak of COVID-19 in the UK. Since that time, Motability has made improvements in terms of their governance, procedures and website. Nonetheless, we are confident that our observations remain valid in the context in which they are given.

Table of Contents

Executive Summary5
1. Introduction11
2. Approach22
3. Broad Findings: mobility and Motability24
4. Financial barriers to Motability
5. Process barriers to Motability48
6. Practical barriers to Motability57
7. Conclusions and recommendations64
Annex A: The Social Security Advisory Committee's call for evidence70
Annex B: Stakeholders Involved in the consultation process
Annex C: Members of the Social Security Advisory Committee

Foreword

Being able to travel is fundamental to disabled people's independent living. Mobility support can mean many things in practice – from buddying or training for people with learning difficulties to subsidised bus passes or a car through the Motability scheme. The common point is that for many, mobility support spells freedom. Supporting the mobility needs of disabled people, through provision of disability benefits, subsidised public transport and a positive, effective, relationship with specialist organisations such as Motability, are fundamental objectives for the Department for Work and Pensions (DWP) and wider government.

Significant public resources are made available for the provision of subsidised cars via the Motability Scheme through disability benefits and tax reliefs. Every year the Motability scheme helps hundreds of thousands of disabled people to participate in society. It is a valued option for many disabled people seeking to lease a suitable vehicle. Within this framework, Motability Operations is the only UK-wide car leasing organisation for disabled people, offering a consistent framework of support for all. As such, it enjoys an effective monopoly status which, absent of the discipline of competition, means that scrutiny and oversight have a greater role to play. Hence, it is important to be sensitive to the characteristic risks than can arise in monopolistic situations, such as low access, limited service and high profits.

A cornerstone of mobility support provision by DWP is equality of access for disabled people who require such support. Figures show that only around one-in-three eligible disabled people access the Motability scheme. Of course, this may be a matter of choice or necessity for some, but the figures do raise important questions, including on equality of access, the application of a standard UK-wide model to a range of different regional conditions, and whether similar advantages might be applied to other types of mobility support, from buses on demand to taxis or more consistent public transport subsidies.

In 2018 the National Audit Office found that Motability Operations had made very significant – and in large part unplanned – profits between 2007-08 and 2016-17. It is not SSAC's role to undertake a full cost benefit analysis of the Motability offer. However, while we recognise the need for prudent financial management and maintaining an appropriate level of reserves, we are concerned about the scale of these repeat profits. We conclude that Motability Operations needs to use its available resources to deliver an effective scheme which is both affordable and equitable. Only in the event of exceptional 'one-off' future profits should it transfer those to Motability the charity to dispense grants, and these should be delivered in accordance with a transparent strategy for grant-making which has been developed transparently with full engagement of disabled people and their organisations.

We undertook this project to complement the report produced by the National Audit Office in December 2018, particularly adding more evidence from the perspective of a diverse group of disabled people. We were also aware of the limited existing research into private transport provision for disabled people. Our public consultation and focus groups have provided some additional richness to that research, and we are hugely grateful to the many disabled people and organisations who contributed to this work.

This report looks at how public funds can be most effectively used to support the mobility needs of all disabled people entitled to higher rates of disability mobility allowances. It also touches on how Government more widely could use its purchasing power and other levers to support more disabled people's mobility. More specifically, it looks at how social security funds are, in effect, being spent via the Motability scheme, whether the scheme provides value for disabled people and whether the scheme is equally accessible to all eligible customers.

We acknowledge that it is very difficult to capture all the complexities of mobility support and private transport for disabled people, particularly in a climate of transition between types of disability benefit. We recognise that Motability provides a valued service to a large number of disabled people in the UK and that research into why two thirds of eligible customers do not use the scheme is scarce at present. Our conclusions and recommendations are therefore cautious and presented in the best interests of disabled people. However, despite this caution we do believe that there is a strong case for Motability to improve the accessibility for disabled people to their service, and for further work to be carried out by the DWP and other government departments to explore the inequalities of access to all forms of transport for disabled people.

Stephen Brien Chair Liz Sayce Vice Chair

Executive Summary

The Government is committed to supporting the mobility needs of disabled people and offers a wide range of benefits to enable the use of both public and private transport. One way in which the Department for Work and Pensions (DWP) supports the mobility needs of disabled people is by enabling those in receipt of higher rate mobility allowances, if they choose, to exchange all, or part of, their mobility allowance to lease a private vehicle. This service is provided by Motability Operations as a sole UK-wide provider¹. As such, it enjoys an effective monopoly status whereby the absence of the discipline of competition means scrutiny and oversight have a greater role to play. Hence, it is important to be sensitive to the characteristic risks than can arise in monopolistic situations, such as low access, limited service and high profits.

Following detailed reviews in 2018, by both the Work and Pensions and Treasury Committees² and the National Audit Office (NAO),³ it emerged that of the 1.7 million people in receipt of higher rate mobility allowances, and therefore eligible for the Motability scheme, only 614,000 (36%) accessed it. A point that was identified by the NAO, whose report made an advisory point to the Government that it should support extensive research into eligible people who do not use the scheme. Whilst a significant body of research exists on disabled people and public transport, very little research has been conducted about the role of private transport for disabled people, or the effect a lack of access to private transport may have on their lives.

In light of these factors, this report explores whether the current support in Motability, coupled with the availability of the Disability Living Allowance (DLA) and the Personal Independence Payment (PIP) mobility component, is the best way to support the mobility needs of disabled people. Specifically, it aims to explore any potential barriers disabled people may face in accessing the Motability scheme and whether those using the Motability scheme benefit more financially than those eligible for the enhanced rate who do not use the Motability scheme.

This report considers the experience of disabled people, both in receipt of higher rate mobility allowances and therefore eligible to use the Motability scheme, and those who are not in receipt of this type of benefit and have no access to the scheme. It considers the knowledge and experience of user-led organisations as well as those serving disabled people. It considers the use of public and private transport by disabled people, the key issues around access to, and use of, the Motability scheme, the experience of benefit reassessment and loss of a Motability vehicle, and the intersection of disability type and access to support for mobility needs. The qualitative nature of the research has enabled us to obtain a richness of data, and provide a fuller and broader understanding of the issues disabled people face in terms of their mobility and transport needs. Given this, a detailed picture has been built up about why many

¹ In Scotland, it is anticipated that there will be alternative providers.

² First Joint Report of the Work and Pensions and Treasury Committees. <u>The Motability Scheme</u>

³ National Audit Office (2018). <u>The Motability Scheme</u>

eligible disabled people do not use the Motability scheme and has shed light on issues that previously may not have been widely discussed.

In terms of the broad findings, public transport was highlighted as inaccessible for many disabled people; conversely the importance of a car, or other suitable private vehicle, was indicated as paramount, not only to the ability to live independently but also to the ability to continue in paid work, and take an active role in society. Having access to their own vehicle was often quoted by disabled people as a 'lifeline'. Given the Motability Scheme's effective monopoly status as the only UK-wide car leasing organisation for disabled people, these positive feelings of access to a private vehicle were often associated with the organisation itself. However, the evidence also revealed that disabled people had very different experiences in accessing the scheme; the reasons for these inequalities were grounded in six broad themes:

- reassessment,
- eligibility,
- reputation,
- financial barriers,
- process barriers, and
- practical barriers.

Whilst all six themes represent issues around mobility and access to the Motability Scheme, our original research intended to explore the use of public funds in supporting the mobility needs of disabled people. Issues around eligibility and PIP reassessments are therefore beyond the scope of the project. However, given their importance, their relationship to barriers to the Motability scheme, and in order to represent the voices of all respondents, they are discussed to some extent in the report, and briefly here.

Reassessment:

Reassessment either from DLA to PIP or from PIP to PIP was a cited as a contentious issue by many of the individuals and organisations who responded to the consultation. The reassessment process that accompanies the PIP award and the loss of vehicles by some, previously eligible people, caused feelings of mistrust, stress and anxiety, and as such acts as a barrier in two ways; either when people's higher rate mobility allowances are reinstated post appeal or for other eligible people with vicarious experience of reassessment and loss of a vehicle. There was a sense amongst some people that the possibility of losing a vehicle through reassessment was too much of a risk to take and outweighed any benefits associated with leasing a car on the scheme.

Eligibility:

Individual respondents and organisations felt very strongly that the current eligibility criteria for the Motability Scheme unfairly disadvantaged those who became disabled after reaching the current State Pension Age (SPA) who could not receive PIP, as well as families with disabled children under three years of age. Neither of these groups

receive mobility related allowances and therefore are not eligible to join the Motability scheme.

Reputation:

Concern was expressed by some about the poor reputation of the Motability Scheme, in particular since the publication of the NAO report; some respondents expressed feelings of mistrust towards the scheme given the reports of excessive profits and remuneration. Concern was also outlined at the lack of transparency of Motability as an organisation and its lack of engagement with disabled people both at a consultation and a strategic level. It is unclear whether, or the degree to which, these concerns present a barrier to people applying for a Motability Scheme vehicle.

Financial barriers to Motability:

This was by far the most frequently cited barrier to accessing the Motability scheme, and often intersected with other process and practical barriers. For many eligible disabled people, it was simply a case of being unable to afford to take part in the scheme; the higher rate mobility allowance was prioritised for other costs such as food or household bills. The advance payment or cost of adaptations, particularly for people with higher or more complex needs and those needing larger or automatic vehicles, was described as a major deterrent for many people, as were the recurrent costs associated with lease renewal. The lack of opportunity to own a car via the scheme was a barrier for some disabled people, and many indicated that they preferred, and were better off, to buy a car privately and pay off any loan associated with the purchase using their higher rate PIP allowance. Issues were also raised about value for money; both in terms of whether Motability provides value for money as well as whether those who use their allowance to access the scheme get better value for money than those who do not access the scheme.

Process barriers to Motability:

A large proportion of respondents voiced their disappointment at what they believed was a 'one size fits all approach' by Motability Operations. The rigidity of the scheme process was a frequently cited barrier for many people; fixed lease lengths were seen as being too long and there was a clear view among respondents that any changes that disabled people needed to make to their lease or vehicle as a result of changes in their condition were not well accommodated. Motability Operations tell us that they endeavour to be as flexible as possible when customers experience changes in their condition, and that they allow hundreds of customers to end their car leases early each month. However, this is not the perception of many disabled people, and could indicate that there is a communications challenge that needs to be addressed.

In addition, a number of concerns were raised around the grants system run by Motability and changes made to the Special Vehicle Fund. Poor promotion of the grants system and a lack of available information meant that disabled people were either unaware that Motability could provide financial assistance, or they perceived the process as being particularly confusing and plagued with difficulties.

Practical barriers to Motability:

The perception of some respondents to our consultation was that practical issues such as a lack of choice of vehicles, particularly larger or automatic vehicles, those that may be required by families or wheelchair users, or more environmentally friendly options, were in short supply via the Motability Scheme. The evidence also revealed practical barriers, such as a lack of awareness of the scheme amongst eligible non-customers, a lack of availability of information on the scheme and its services, and issues related to Motability Scheme dealers. All of these acted as very real barriers or deterrents for people who are eligible to join the scheme.

Recommendations

We recognise that there are no easy solutions here. Ensuring the mobility needs of all disabled people are supported, and that equal access to a private use vehicle via the Motability scheme is made possible are complex issues. Solutions will involve the cooperation of many agencies and further work still needs to be carried out to understand fully the issues highlighted in this report. Nevertheless, we believe that more can be done to support the mobility needs of disabled people, and more specifically improvements can be made to make it possible for more disabled people to access the Motability scheme.

We believe that the following recommendations would help deliver more effective utilisation of public funds in supporting the mobility needs of disabled people:

Recommendation 1

DWP to work with the Cabinet Office's Disability Unit, the Department for Transport, the Ministry for Housing, Communities and Local Government and devolved governments to explore what can be done to promote equality of access by disabled people to bus services throughout the UK, regardless of time of day or region.

Recommendation 2

DWP, in collaboration with colleagues in other government departments as appropriate, to explore the feasibility of extending to those who do not obtain a private vehicle via Motability advantages for broader transport options that are equivalent in value to the tax reliefs that those who do use Motability benefit from. This may include taxi schemes, buses on demand or other community bus schemes, as well as alternative vehicle lease providers to compete with Motability Operations.

Recommendation 3

Although the PIP eligibility criteria and reassessment process are outside of the scope of this report, and were not included in the Committee's call for evidence,

many respondents made reference to them in their submissions. Given the force of those comments, we suggest that the Department – in consultation with other government departments where appropriate – may wish to take the opportunity presented by an imminent Green Paper to consider some of the practical and financial impacts of its policies and processes on claimants' ability to use the Motability Scheme. For example:

- reviewing the length of PIP awards (particularly for life-long and progressive conditions);
- reviewing eligibility criteria for PIP/DLA (in particular reviewing the ages at which a mobility element is not currently included in an award, and specifically considering whether there is merit in extending it to children under three and for some⁴ who acquire a disability after state pension age);
- exploring whether the length of time between reassessment and appeal can be shortened to prevent those with an ongoing entitlement from losing their car and having to re-apply.

While acknowledging Motability's independent status, the evidence available to us suggests that there are opportunities for Motability to strengthen the equity, flexibility and transparency in the way it delivers its business. We therefore trust that the following recommendations are helpful.

Recommendation 4

We strongly encourage Motability to develop a transparent strategy designed to make access to the scheme more equitable.

Motability Operations should place priority on using available resources to deliver an effective scheme that is equitable and as affordable as possible for users; and it should report any profits and projected profits transparently, with independent scrutiny.

Only in the event that Motability Operations makes one-off profits in future should it transfer funds to Motability the charity to dispense grants, and these grants should be planned and dispensed by developing with disabled people and their organisations a transparent strategy for grant-making.

Recommendation 5

We recommend that Motability Operations develops a more flexible scheme/service in line with customers' needs, in particular focussing on:

- a more tailor made lease package
- variable lease lengths
- variable insurance options

⁴ For example, those who have deferred state pension

- better promotion of post lease car ownership coupled with the opportunity to purchase the vehicle at a competitive price.
- more environmentally friendly or electric vehicles available. Given Motability Operation's status as one of the largest buyers of new cars in the UK, we recommend they take a lead in making electric cars more widely available to all disabled people on the scheme.

Recommendation 6

The evidence available to us indicates that, as the funding of the scheme has its origins in public money, there is considerable scope to address concerns about lack of transparency, accountability and engagement. We therefore strongly encourage Motability to:

- foster more systematic and inclusive engagement with disabled people across the country to strengthen its decision making for strategy and policy. We note that Motability carried out a major consultation exercise on its future strategy with disabled people and their organisations in spring 2019. However there is scope for that engagement to go further, for example through the co-production of changes to key issues such as on the criteria for means tested grants and special vehicle funds.
- increase transparency in terms of strategy and the grants system.
- collaborate with DWP, the Financial Conduct Authority, National Audit Office and the Charity Commission to ensure greater confidence in the use of public funds through robust arrangements regarding the scrutiny, transparency and accountability of the organisation and its finances (including its reserves policy); and to ensure the efficient and effective running of the Motability scheme.

Recommendation 7

We recommend that Motability and Motability Operations consider what practical steps they can take to improve their services for customers, including:

- reviewing options for strengthening the communications approach to promote the Motability scheme better, ensuring accessibility of information for all disabled people through clear and well signposted websites.
- publishing clear criteria regarding eligibility for the grants scheme, ensuring that its availability is promoted in an accessible way.
- greater flexibility for mileage limitations to ensure that they do not unduly penalise those who live in rural areas or who need to travel long distances for work and/or education.
- greater accountability for the treatment of customers at Motability dealerships, ensuring improved and more consistent treatment of disabled customers.

1. Introduction

Mobility is key to disabled people's independent living; it enables disabled people to access full participation in all areas of their lives including education and employment, as well as social, practical and community activities.

This report examines how public funds might be used most effectively to support the mobility needs of disabled people. More specifically it explores whether the mobility needs of disabled people on the enhanced rate mobility component of DLA/PIP are supported by access to the Motability scheme, and how the Motability Scheme and DWP can maximise support to overcome barriers to inclusion.

As of December 2018, there were 1.72 million disabled people eligible to be customers of the Motability scheme.⁵ Around 36% of eligible disabled people accessed the scheme between 2014 and 2017, compared to 29% in 2008. One of Motability and Motability Operations four strategic objectives is to improve reach and awareness. While the numbers of customers have risen over the last decade, it remains the case that almost two in three eligible people do not access the scheme. This report examines potential barriers disabled people face in accessing the scheme.

This section introduces the Motability scheme as well outlining relevant existing research related to disabled people and the current transport options available to them.

The Motability Scheme:

The Motability scheme is made up of several organisations:

- Motability a disability and transport charity with broad objectives and a vision that no disabled person should be disadvantaged by poor access to transportation. One of the charity's responsibilities is to oversee the Motability Scheme..
- Motability Operations the company responsible for the operation of the scheme. Motability Operations is not a subsidiary of the charity. It is an independent company under contract to the charity. It does not pay a dividend to its shareholders (four UK High Street Banks⁶) so any surpluses are reinvested or paid to the charity.
- Motability Foundation established to support Motability to achieve its vision .

Whilst we have been careful to refer to the correct organisation throughout the report, consultation responses often used the term 'Motability' in a more generic sense. As such, evidence included which uses the term Motability may therefore refer to one or more of the Motability organisations.

⁵ National Audit Office (2018). <u>The Motability Scheme</u> mobile by exchanging part, or all, of their higher rate of mobility allowance to lease a new car, scooter, wheelchair accessible vehicle (WAV) or powered wheelchair.

⁶ Barclays, HSBC, Lloyds and RBS.

The Motability scheme was set up in 1977 on a small scale with Motability Operations being established the year after.

Motability is independent of government. It is a registered charity that operates in partnership with government, the charitable sector, banks, and the motor and insurance industries. Motability's status means that it is governed by the Charity Commission, with Motability Operations governed by the Financial Conduct Authority. It receives no direct public funding, is not a public body and, as such, is not ordinarily subject to the National Audit Act 1983. However, it does receive tax relief on Value Added Tax (VAT) and Insurance Premium Tax (IPT) and – indirectly – social security funding intended to support the mobility needs of disabled people. Against that background, and in recognition of the legitimate public interest, in 2018 Motability responded to a recommendation from the Commons Treasury and Work and Pensions Committees by submitting itself to a value for money investigation by the National Audit Office under section 6(3)d of the National Audit Act 1983. We discuss some of the findings from this investigation later in the report.

In line with policy to enable disabled people to live more independently, the Motability scheme aims to enable disabled people to become more mobile by exchanging part, or all, of their higher rate of mobility allowance to hire a new car, scooter, wheelchair accessible vehicle (WAV) or powered wheelchair.

Who is eligible for the Motability scheme?

Anyone who is in receipt of (and has 12 months left on their award):

- Higher rate mobility component of Disability Living Allowance (DLA)
- Enhanced rate of the mobility component of Personal Independence Payment (PIP)
- War Pensioners' Mobility Supplement (WPMS)
- Armed Forces Independent payment (AFIP)

All of the above are currently paid at £61.20 per week with the exception of WPMS which is provided by Veterans UK and is paid at £68.35 per week.

For those who opt to lease a Motability car, payments are deducted from the higher rate mobility allowance every four weeks and are paid directly to Motability Operations Ltd by the DWP on behalf of the claimant. The standard lease is available over three years, with an option for a five-year lease for wheelchair accessible vehicles (WAV's). All running costs, such as insurance (for up to three named drivers), servicing, maintenance, tyre and windscreen repair and replacement, and breakdown cover are included in the cost.

The Motability scheme is not open to an individual if they become disabled after state pension age (SPA); they may be eligible to claim Attendance Allowance (AA)

instead. If a person of SPA was in receipt of the higher rate mobility component from DLA or PIP before they reached SPA, they would retain PIP or DLA if they continued to satisfy the eligibility criteria and therefore would not need to claim AA. AA does not have a mobility component and therefore does not qualify someone to access the Motability scheme.

Motability estimate that leasing a vehicle via the scheme is approximately 45% cheaper than if an individual sourced a vehicle on the open market. This is a great benefit to disabled people, many of whom would otherwise be unable to afford a private vehicle. The Motability Scheme is able to offer such a discount via three major areas of tax relief. Firstly, under the VAT Act 1994 vehicles leased to a disabled person in receipt of a mobility allowance are zero-rated and have no VAT levied. Secondly, the first sale of an ex-lease vehicle that has been part of the Motability scheme can also be zero-rated and is again not subject to VAT. Together these tax exemptions comprise around a 45% discount on a vehicle. Thirdly, Motability Operations receives additional tax relief through an exemption to Insurance Premium Tax (IPT). Taken together, these tax reliefs were valued at £888 million in 2017.⁷

Given its effective monopoly status, Motability Operations is also able to 'bulk' buy vehicles providing further value to users of the scheme.

The Motability Scheme offers three pricing options for leasing a vehicle:

- Cars that cost less than the mobility allowance the remainder of the allowance, including any increases is paid direct to the claimant.
- Cars that cost all the mobility allowance this payment includes any increases in the allowance during the period of the lease.
- Cars that cost all the mobility allowance **and** an advance payment the advance payment is a one-off cost designed to increase choice in the range of cars available to larger and more expensive cars. The advance payment covers the cost between the total cost of the lease and the higher rate of allowance. If a customer leaves the Scheme early they will, depending on how long they have been on it, receive some of the payment back on a pro-rata basis.

All new Wheelchair Accessible Vehicles (WAVs) come with an advance payment, ranging from a few hundred to a few thousand pounds. Nearly new WAVs are also available; these also come with an advance payment but generally lower than those for a new WAV. Costs such as fuel, insurance excess, parking or speeding tickets are not included in the cover.

⁷ National Audit Office (2018). <u>The Motability Scheme</u>

A breakdown of the proportion of Motability customers on each of the three pricing options is shown in Table 1. The pricing options shown do not include the cost for any adaptations that may be required.

Table 1: percentage of Motability customers by pricing option (figures correct as of	
July 2018) ⁸	

Pricing Option	Proportion of customers (%)	Example car
Car lease costs less than the qualifying mobility allowance	2	Hyundai i10 1.0 66 bhp 5 door (customer keeps £10.75 per week) SEAT Leon 1.2. TSI 110bhp
		(customer keeps 75p per week)
Car lease costs the qualifying mobility allowance. No advance payment.	13	Nissan Qashquai 1.2. DIG-T 115 bhp Acenta 5 door 5 seat.
Car lease cost qualifying mobility allowance plus an advance payment (between January and March 2018, the average advance payment was £839)	85	Hyundai Tucson 1.6 GDI SE Nav 132 Blue Drive (advance payment = £299) BMW X1.2. OTD 190bhp xDrive 20d Sport 5 door (Advance payment = £1,999)

Some disabled people may need adaptations made to their car to accommodate their needs. There are a wide range of adaptations on offer through the Scheme, many of which are offered at no extra charge, however other adaptations cost the disabled person in the same way as an advance payment and can range from a few hundred up to around £10,000.

Although many of the adaptations incur a large cost, if the type of adaptation needed is essential and the disabled person is unable to afford it then Motability, the charity, can in some circumstances offer financial help. All financial assistance applications are means-tested, and help will be given only towards the everyday mobility needs of a disabled person. Applications are assessed at the discretion of Motability and are made on a needs basis only.

The grants provided by Motability are primarily funded by Motability Operations and The Motability Tenth Anniversary Trust, now the Motability Foundation, and can be used as payment towards the vehicle, the adaptations or driving lessons. Each application is considered on a case-by-case basis.

⁸ National Audit Office (2018). <u>The Motability Scheme</u>

In 2019/20 Motability helped 25,795 disabled people with a charitable grant, committing to spend over $\pounds70$ million.⁹ The average award amounted to just over $\pounds2,700$ per recipient. The following extract from Motability's Annual Report and Accounts 2019-20 provides a summary of the grants awarded by type.

	£		Number of grants	
PROGRAMMES	2019/20	2018/19	2019/20	2018/19
Cars and Adaptations	13,770,482	6,028,270	7,560	4,986
Wheelchair Accessible Vehicles	18,788,663	13,933,205	3,932	3,281
Complex Driver Solution	18,524,525	11,963,718	613	459
Scheme-Related Grants (A)	51,083,670	31,925,193	12,105	8,726
Driving Lesson Support	1,401,623	1,006,308	1,113	856
Stopped Allowance Support	3,658,469	-	3,498	-
PIP - Transition Support Payment	13,671,000	18,953,000	8,924	12,981
PIP - Additional Transition Support	407,490	775,668	135	259
Access to Work	26,085	-	20	-
Access to Mobility (B)	19,164,667	20,734,976	13,690	14,096
Grants to Individuals (A)+(B)	70,248,337	52,660,169	25,795	22,822

What is unclear from the annual report is the total number of grants applied for during these periods and what proportion of them were fulfilled.

There appears to be no current research on how charitable grant information is disseminated to the disabled community or how user friendly the application process for grants is for disabled people of different ages and different access requirements. Little information appears on the Motability website explaining the criteria for a grant:

"Our grants are means tested to ensure that our funding supports those with the greatest need. This means we will look at your financial situation, including household income and savings, to determine if you are able to make a contribution" ¹⁰

Information on the website instructs people to contact Motability by phone to discuss the options available and to request a digital or paper copy of the application form.

In recent years Motability have also begun to offer transitional support for people who are no longer eligible for the scheme following a reassessment from DLA to PIP, or from PIP to PIP. A support package is in place to assist people when they are required to return their vehicles after reassessment. In most cases people have approximately eight weeks from when their allowance payments end to return their car to Motability. If the car is returned in good condition people will be offered a transition support payment; the amount will depend on when the individual joined the scheme and they additionally have the option to reduce the payment but extend their hand-back deadline to up to 26 weeks. Additional Transitional Support is also

⁹ Motability (2019). <u>Motability Annual Report and Accounts 2019-20</u>

¹⁰ Motability: <u>Grants for Cars and Vehicle Adaptations.</u>

available as part of the scheme's grants process. Help is available to put towards the cost of buying a replacement vehicle or buying vehicle adaptations.

Customer satisfaction with the scheme is consistently high, and outstrips their target of 92%. Overall satisfaction among customers with the scheme was 98% for 2018-2019, with the same percentage of customers reporting that they would recommend the scheme and intended to renew their lease; given that their customer base is one in which a large percentage may have complex needs their satisfaction levels are impressive. Inevitably, the views of two-thirds of eligible disabled people who do not use the scheme are not captured, and DWP should consider how it could tap into the views of that group to build a better understanding of why they do not use the Scheme.

As highlighted earlier very little is known about disabled people in terms of their transport needs, their knowledge of and satisfaction with the Motability scheme, or whether there are any potential barriers for them in accessing the Scheme. The scheme agreement makes Motability responsible for provision of information and awareness of the scheme among eligible disabled people who are not customers and whilst historically they appear to have carried out little research to understand why people may not use the scheme. Motability have indicated that work is now being carried out in this area. Limited information is available as to why eligible non-customers do not use the scheme. However, in its response to our consultation, Motability told us that their own research suggests that nearly half of eligible non-customers are unaware of the scheme and a further 9% are unaware of its services.¹¹

Furthermore, the most commonly cited reason for eligible non customers who are aware of the scheme, and choose not to use it, is because they prefer to use their own car; it should be noted however that this particular piece of research was based on a small sample size, and responses were guided choice options only.

Disabled People and Alternative Subsidised Transport Options

In addition to eligibility for the Motability scheme, individuals on a higher rate of mobility allowances (e.g. DLA, PIP) may also be eligible for other transport entitlements. Whilst there is some consistency across regions of the UK in terms of these benefits, the area in which the individual lives, impacts both the range of transport options and the subsidised transport costs available to them.

In general, disabled people appear to be eligible for greater public transport benefits, both in terms of what public transport is available to them and what they are entitled to, if they live in a major UK city. A summary of the transport benefits available to disabled people on the higher rate of Mobility allowances is summarised below; it

¹¹ Oxford economics (2016) <u>The Economic and Social Impact of the Motability Scheme</u>

must be noted however that conditions attached to these benefits (e.g. times at which it can be used) vary by region.

Other transport benefits available to disabled people on higher rate mobility allowances:

- English National Concessionary Pass free bus travel anywhere in England during off-peak hours. A similar scheme runs in Scotland, Wales and Northern Ireland.
- Taxicard scheme considerably reduced, flat fee fares. Approved taxi companies only.
- Companion bus pass travel for companion (restricted to county-wide travel).
- Freedom pass (London only) free travel, at any time of the day, on the underground, overground, bus services and DLR; with free travel on national rail at the weekend and between 09.30 04.30hrs on weekdays.
- Disabled persons railcard for £20 per year offers a third off train travel.
- Disabled persons coach card for £12.50 per year offers a third off coach travel.
- Congestion Charge (London) If you hold a blue badge you can register up to two vehicles for a 100% discount.
- Toll charges many toll charges (e.g. M6 toll, Dartford Crossing, the Humber Bridge etc) are free for blue badge holders and/or people in receipt of higher rates of mobility allowances.

Access to Work

If the support an individual may need at their place of work is not covered by standard reasonable adjustments an employer is expected to provide, they may be able to get support from the Access to Work scheme

To be eligible for Access to Work individuals must have a paid role, or be about to start or return to one. Depending on the needs of the individual, support may be offered to cover all or part of the costs of practical support in the workplace. The grant can pay for:

- special equipment, adaptations or support worker services to help an individual complete tasks such as answer the phone or go to meetings.
- help getting to and from work (e.g. adaptations to a vehicle; taxi-fares to and from work; a support worker if an individual cannot use public transport on their own).

Applications for help from Access to Work can be made on line or via the phone.

Previous Research on Disabled People and Access to Transport

There has been a growing recognition in recent years that having access to suitable transport greatly improves the quality of people's lives. Many disabled people, particularly those who have restricted mobility, do not have access to suitable, affordable or accessible transport and as a consequence may experience transport deprivation and increased social exclusion. Additionally, they may be deprived of the opportunity to take part in social, political and employment related activities.¹² Such inequalities can also bring about negative consequences at a societal level in the form of lost production, functional dependence and social marginalization.^{13&14}

A significant body of work has been published on the existence of inequalities in access to transport for disabled people. The majority of this work focuses on access to and use of public transport. On average, disabled people travel far less than non-disabled people. It is estimated that disabled people undertake one third less journeys than non-disabled people,¹⁵⁽¹⁶⁾ and that disabled people travel shorter distances by foot or with assistance.¹⁷ The level of planning that it takes for disabled people to make a trouble-free journey is often not taken into account by transport planners,¹⁸ and a lack of appropriate seating or the height of vehicles can also be barriers to travelling for many disabled people.¹⁹

A lack of public transport opportunities can make it harder for people to attend hospital appointments, other commitments or social and family activities,^{20&21} and many disabled people end up dependent on lifts from parents, other family members or carers.^{22&23} Reliance on lifts can cause embarrassment or the feeling of becoming a burden for many disabled people and can further add to a reduction in the number

¹² Oh, J, Smith, C. S., Qatra, R., & Al-Akash, M. (2017). <u>Estimating and enhancing public transit</u> accessibility for people with mobility limitations

¹³ Gleeson, B. (1996). "A Geography for Disabled People?" *Transactions of the Institute of British Geographers, 21*, 387–96. doi:10.2307/622488

¹⁴ Yeo, R., & Moore, K. (2003). <u>Including Disabled people in poverty Reduction Work: 'Nothing About</u> <u>US, Without Us.'</u>

¹⁵ Wilson, L. (2003). *An Overview of the Literature on Disability and Transport.* London: Disability Rights Commission <u>An Overview of the Literature on Disability and Transport.</u>

¹⁶ Aldred, R. and Woodcock, J.(2008). <u>Transport: Challenging Disabling Environments</u>

¹⁷ Church, A., Frost, M. and Sullivan, K. (2000). <u>Transport and Social Exclusion in London</u>

¹⁸ Deka, D., Feeley, C., & Lubin, A. (2016). Travel patterns, needs, and barriers of adults with Autism Spectrum Disorder. *Transportation Research Record: Journal of the Transportation Research Board, 2542*, 9-16. Doi: 10.3141/2542-02.

¹⁹ Pyer, M. & Tucker, F. (2017). <u>'With us, we, like, physically can't': transport, mobility and the leisure</u> experiences of teenage wheelchair users

²⁰ Butler, R. (1998). Rehabilitating the Images of Disabled Youths. In: T. Skelton and G. Valentine, eds. *Cool Places: Geographies of Youth Cultures*. London: Routledge, 83-100

²¹ Murray, P. (2002). <u>Disabled Teenagers' Experiences of Access to Inclusive Leisure</u>

²² Deka, D., Feeley, C., & Lubin, A. (2016). Travel patterns, needs, and barriers of adults with Autism Spectrum Disorder. *Transportation Research Record: Journal of the Transportation Research Board, 2542*, 9-16. Doi: 10.3141/2542-02.

²³ Pyer, M. & Tucker, F. (2017). <u>'With us, we, like, physically can't': transport, mobility and the leisure</u> experiences of teenage wheelchair users

of journeys or activities a person undertakes.¹⁶ Added complications can arise for disabled people who are wheelchair users or who can only travel in adapted vehicles, and for whom public transport or lifts in non-adapted vehicles is not an option. Barriers to public transport are also evident, though less well researched, for disabled peopled with visual impairments, learning difficulties or mental health issues. A lack of travel information in an electronic format, via audio announcements or in large print are issues for people with more visual, mental health or cognitive based impairments; issues with delays, the re-routing of services or over-crowding on public transport have also been highlighted as issues.²⁴ Lack of transport is one of the most cited reasons by disabled people for being discouraged from looking for employment²⁵ and evidence suggests that disabled people with limited mobility experience far higher levels of unemployment than their non-disabled peers.²⁶

One study which explored the effects of transport and mobility on access to leisure activities in U.K teenage wheelchair users found that negative experiences of using public transport had impacted upon teenager's future intention to use buses and trains. Teenage wheelchair users were highly dependent upon the use of private vehicles, in particular lifts from parents and family, and as a result this limited both their opportunities for leisure activities and restricted the spontaneity in their lives.¹⁹ Although issues with public transport for disabled teenagers are not dissimilar from those experienced by disabled adults, the inaccessibility of public transport marks significant differences in teenagers lives when compared to their non-disabled peers. Many of the young people felt that issues around transport had led to transport anxiety for both themselves and their families; rather than representing independence and a means to access social activities, transport was often viewed in a negative way and one which heightened their feelings of frustration and dependence.

With the objective of informing what policies could best meet mobility needs, preferred mode of transport by older and disabled people, more specifically mode choice decisions for shopping trips within Greater London, has also been examined.²⁷ Overall there was a preference for the use of a private car and independent travel over the use of public transport. The results of the study also demonstrated that there is a strong positive correlation between income and likelihood of a person within the household having a car. Given the preference for travel by car and the relationship between income and car availability within a

²⁴ Mackett, R. (2015). <u>Cognitive Impairments, Mental Health and Travel</u>

²⁵ Loprest, P. & Maag, E. (2001). <u>Barriers to and Supports for Work among Adults with Disabilities:</u> <u>Results from the NHIS-D. Urban Institute</u>

²⁶ Denny-Brown, N., O'Day, B., & McLeod, S. (2015). Staying Employed: Services and Supports for Workers with Disabilities. *Journal of Disability Policy Studies, 26*, 124–31. doi:10.1177/1044207315583899

²⁷ Schmocker, J., Quddus, M. A., Noland, R. B., & Bell, M. G. H. (2008). <u>Mode choice of older and disabled people: a case study of shopping trips in London</u>

household, pricing policies that reduce the cost of running a private vehicle may have a significant effect on improving the mobility of older and disabled groups.

More often than not, disabled people are grouped together for research purposes despite different types of disability presenting very different needs. One such group is people with Autism Spectrum Disorder (ASD). Although ASD has been widely researched in other fields very little attention has been paid to the travel or transport needs of people with ASD despite the fact that more often than not they are eligible to disability allowances. A study in the U.S found that just over 60% of their sample of 703 adults with ASD, had never used any public transport.²⁸ Barriers for using public transport included difficulty planning trips by themselves, difficulty in getting to public transport 'stops', and concerns about treatment from drivers and other passengers. Only around 30% of the sample had ever received any travel training.

For adults in the U.S with ASD by far the most common form of transport is getting a lift in a private vehicle from someone within the same household. Only 9% had a driving license themselves and many of them either had some difficulty in driving or only used their driving license as a form of I.D. Issues around being dependent on others for a lift were similar to those found in the study with teenage wheelchair users in the U.K; dependency for travel caused anxiety, aggression and agitation amongst people with ASD. Concerns were also raised around missing out on activities when no-one was available to drive, as well as issues around 'drivers' also missing out on their own activities due to their transportation responsibilities. This situation was regarded as challenging for both the disabled person and their driver. In such a situation and with such reliance on the accessibility of private vehicles there is a real danger that certain groups of disabled people are at risk of social isolation and transport deprivation.

Despite improvements over the last couple of decades in the accessibility of public transport for disabled people a large proportion prefer to rely on private vehicles. For many disabled people the car represents autonomy, freedom and independence and is symbolically and practically very important to them.²⁹ Further reasons for the popularity of private vehicles include comfort, safety of travel away from crime, and the directness of the journey.³⁰ Given this, it is worth noting that very little research, particularly within the U.K., has explored the accessibility of private vehicles to disabled people.

To the best of our knowledge only one piece of research has tackled the question of the potential barriers to 'automobility' for disabled people. In 2017 a study in

²⁸ Deka, D., Feeley, C., & Lubin, A. (2016). Travel patterns, needs, and barriers of adults with Autism Spectrum Disorder. *Transportation Research Record: Journal of the Transportation Research Board, 2542*, 9-16. Doi: 10.3141/2542-02.

 ²⁹ Power, A. (2016). <u>Disability, (auto)mobility and austerity: shrinking horizons and spaces of refuge.</u>
³⁰ Schmocker, J., Quddus, M. A., Noland, R. B., & Bell, M. G. H. (2008). <u>Mode choice of older and</u> <u>disabled people: a case study of shopping trips in London.</u>

Australia explored both the benefits of private vehicles as well as any barriers disabled people may face in accessing private modified vehicles;³¹ it should be noted that the scheme available in Australia varies to that provided in the U.K. However, it may be possible that some commonalities in barriers and benefits are present.

The main barriers to accessing a private vehicle included the initial purchase cost of the car, any adaptations that were necessary and ongoing costs of fuel. For many owning a car was considered a financial burden and the study explores the notion that as well as feeling forced to own a car in order to participate in social situations, they also felt an ongoing financial burden associated with car ownership. Financial costs were a particular issue for those with a 'congenital disability', power wheelchair users, people with multiple disabilities, those with higher support needs and individuals who didn't drive themselves. This issue was particularly compounded by the fact that these groups generally also had higher or additional costs of care as well as lower income or employment rates than the general population. Information provision was also highlighted as a barrier to accessing private vehicles.

Benefits of having access to a private vehicle for disabled people included social and recreational outcomes, independence, 'downtime' and employability. In addition, benefits relating to independence intersect with social group identity and the development of self-identity.

Overall the research indicates how type of impairment and support needs affect the barriers individuals face as well as the benefits they experience from access to a vehicle.

Despite improvements over recent years in access to public transport for many disabled people in the UK, it appears that a large proportion still prefer and rely on using private vehicles. Limited research suggests that for disabled people accessing a private vehicle is an unaffordable, but much desired, option. Given this situation it is of paramount importance that research explores disabled people's options when it comes to using private vehicles and any potential barriers they may face in doing so. Furthermore, it is vital that disabled people are at the heart of this research and that they are part of the decision-making process both about public transport³² and private vehicle use and policy. Research into transport options for disabled people and access to a private vehicle, in the UK via the Motability scheme, are considered in this report.

³¹ Darcy, S. & Burke, P. F. (2017). <u>On the Road Again: The Barriers and Benefits of Automobility for</u> people with Disability

³² Pyer, M. & Tucker, F. (2017). <u>'With us, we, like, physically can't': transport, mobility and the leisure</u> experiences of teenage wheelchair users

2. Approach

In 2018, following concerns raised in the media over the high level of financial reserves of Motability Operations Ltd and the pay and bonuses received by its executives, the Charity Commission undertook a detailed review of Motability's financial accounts and its relationship with Motability Operations; the Charity Commission advised that no regulatory concerns had emerged as a result of the review.

Later that year the Commons Treasury Select Committee and the Work and Pensions Select Committee jointly recommended that the NAO should conduct a review of the scheme; one of the objectives of the review was to evaluate whether current levels of boardroom pay were justified and whether better value could be achieved. In December 2018 the NAO published their report. Key findings included:

• Of the 1.7 million disabled people eligible for the scheme only 614,000 (36%) were Motability customers.

Between 2008 and 2017 Motability Operations accumulated £2.19bn profits; only £1.14bn had been planned. This under-estimation of profits was primarily due to under valuing the re-sale of vehicles at the end of 3-year lease periods; Motability customers were charged £390m more in lease agreements for depreciation than turned out to be necessary given the eventual market. However, for completeness we should also report that an independent review of the forecasting model did not find any systemic issues.³³

In addition to recommendations by the NAO to Motability and Motability Operations, one advisory point given to the Government was to support extensive research into eligible people who do not use the scheme.

We do not have the expertise and resources required to undertake a full cost benefit analysis of the Motability Scheme. Instead, this report focuses on potential barriers to the Motability scheme and whether the current support the Motability Scheme receives, coupled with the availability of the DLA/PIP mobility component, is the best way to support the mobility needs of disabled people.

³³ <u>Motability Operations Annual Report and Accounts 2019</u> state that an independent third-party review "confirmed that Motability Operations' residual value forecasting approach is appropriate and effective. It finds no evidence of systemic bias that resulted in either under- or overforecasting,nor was there anything which would lead to expectations of a materially different forecast output than that which has been seen over recent years."

Specific aims of the project:

- Explore any potential barriers disabled people may face in accessing the Motability scheme.
- Gain a greater understanding into the key issues for people accessing/not accessing the Motability scheme.
- To understand the degree to which factors such as experience of disability, gender, age, ethnicity and geography impact upon people's opportunity to access the Motability scheme.
- Explore whether other models, aside from an effective monopoly approach, would provide more effective and efficient support to disabled people and better value for money.
- Evaluate whether those using the Motability scheme benefit more financially than those eligible for the enhanced rate who do not use the Motability scheme.

The project is intended to complement and add value to the publications from both the NAO and DWP rather than to replicate work already undertaken, and importantly puts disabled people at the heart of the research.

The findings in this report draw on evidence from a range of sources:

- **A public consultation** which generated 55 responses from individuals and 15 from organisations;³⁴
- Two focus groups with key stakeholders;
- Seven in-depth semi structured interviews with both individuals and organisations;
- **Secondary evidence** from Disability Equality Scotland (DES)³⁵ which provided the views of 365 of their members in response to a poll entitled 'Motability Consultation';
- A literature review of international and national studies; and
- **Meetings** with DWP officials and representatives of Motability.

The qualitative nature of the study has enabled us to obtain a richness of data, and provide a fuller and broader understanding of the issues disabled people face in terms of their mobility and transport needs. Given this, a detailed picture can be built up about why two thirds of eligible people do not use the Motability scheme and has shed light on issues that previously may not have been widely discussed. It should be noted that we were unable to obtain data on Motability users by type of impairment or ethnicity, and are therefore unable to comment on whether inequalities in access to the scheme exist based on these dimensions.

³⁴ A full list of respondents can be found at annex C.

³⁵ A membership organisation for disabled people and disability groups/organisations.

3. Broad Findings: Mobility and Motability

The public consultation together with focus groups and interviews explored a range of topics associated with supporting the mobility needs of disabled people. These included the availability of public transport, the Motability car-leasing scheme and the intersectionality of characteristics such as age and experience of disability. A copy of the consultation document can be found in Annex A.

Public transport

Public transport was overwhelmingly considered as inadequate for use by disabled people. Whilst a desire to use public transport was expressed by many, particularly if they were not frequent travellers and/or had environmental concerns about car usage, the two-fold issue of transport inaccessibility and availability were highlighted as a problem.

The nature of people's conditions coupled with access barriers meant that for many people using public transport was not an option; even in major cities where more investment has been made in making transport accessible for disabled people there will remain people with certain disabilities that cannot access it.

"As the condition progresses it becomes more difficult to use public transport to stay active. This might be because you may need to use or take extra equipment such as walkers, rollators and wheelchairs. Also, public transport isn't as accessible as it could be for people with mobility issues. Only just over 200 train stations in the UK are fully accessible⁴ and more than 40% of the railway stations across England, Scotland and Wales do not have step-free access, leaving disabled people unable to travel by train." (Parkinson's UK).^{36&37}

Reponses from individuals on accessibility were based around how a lack of access, given their conditions, prevented them from using public transport.

"I am not able to use public transport for various reasons associated with my disability" (Consultation Respondent)

"I am unable to use public transport, as I cannot fold into lower cars or climb up into higher buses/coaches. The shaking and bumping makes my back dislocate and causes pain" (Consultation Respondent)

"I can't use any public transport and rely on a car totally". (Consultation Respondent)

The availability, or frequency, of public transport was also highlighted as a major issue for disabled people; furthermore, this intersected with location or place of

³⁶ Department of Transport (2019). <u>Experiences of disabled rail passengers</u>

³⁷ Leonard Cheshire (2018). Disabled people can't use over 40% of train stations

residence and was a contributing factor towards the importance of having access to a private vehicle.

"...people who have the good fortune to live somewhere which has an efficient public transport system, such as in London, or other large cities. By contrast, those living in some rural areas, where public transport is infrequent or even non-existent, Motability can be a lifeline." (Consultation Respondent)

"Until recently, I lived in a rural village, there were only 3 buses a week to one destination only, so a reliable car was essential". (Consultation Respondent)

The intersection of both these issues, accessibility due to an individual's specific impairment and availability of public transport is particularly highlighted in a response by a woman who lives in rural west Wales and cares for her teenage autistic son:

"...there is not much public transport on offer. If there was, we could only use it sparingly as our son cannot be in close proximity to people, especially in large numbers (i.e. more than five or so) and certainly not if being noisy (i.e. talking)." (Consultation Respondent)

Later in the response, whilst highlighting the importance of the Motability scheme to her family, she reiterates this point:

"We don't have much in the way of public transport locally, no rail, few buses, and if it were available we would not be able to use it for the most part, due to my son's inability to be safely around other people." (Consultation Respondent)

More accessible and frequent public transport is more commonly available in major UK cities than in smaller towns or rural areas. This was frequently cited as an issue for many disabled people who did not live in an area with good transport links and impacted both on their ability to travel but also their need to use their higher rate mobility allowances to run a private vehicle. A survey by Citizens Advice Scotland found that 64% of respondents were dissatisfied with the service frequency of local buses, 16% could not travel to their nearest hospital or GP surgery by bus, and 13% were unable to use the bus to get to work.³⁸ This was particularly a problem for those living in remote areas and the use of a car was essential to prevent disabled people from becoming housebound.

"...disabled people are unable to access essential services by public transport. This can be due to the infrequent of services or in many cases because the locations are not served by public transport at all." (CAS)

Respondents from other rural areas also commented:

³⁸ Creating Better Journeys – Citizens Advice Scotland, March 2018 <u>https://www.cas.org.uk/system/files/publications/creating_better_journeys_report.pdf</u>

"...there are gaps in provision for those in villages and hamlets – many services are under five journeys a day meaning very long waits and delays whilst out of the home which leave vulnerable people exposed to the elements, often without warm food/warm drink as they cannot bear the costs." (Consultation Respondent)

The nature of travel in a rural area is often much more extensive and journeys are longer than those made in towns and cities:

"The affordability of public transport over a larger rural area with different providers on the network also affects people's ability to use it" (Consultation Respondent)

It should be noted that respondents were not against using public transport but rather it was felt that it was not accessible nor available to them:

"...if public transport was fit for purpose (available, accessible and affordable) and met their needs, some people would prefer to use public transport and use their PIP or DLA to cover the costs of this and some of their other outlays." (Mobility and Access Committee for Scotland, MACS).

The consultation demonstrated overwhelmingly that, for disabled people, accessing the Motability scheme was not a 'choice'. Lack of accessible and available public transport meant that many people felt forced into leasing a car to be able to travel about even when they only needed to use it infrequently. Conversely not accessing the scheme was also viewed as not being a 'choice'. Many people, who didn't access the scheme, did not use public transport out of preference, instead they could not access a Motability car and were therefore forced to rely on others for lifts or use public transport.

"It often isn't because they prefer using public transport. Many people with MS are unable to use buses easily. They struggle to walk to the bus stop, wait at the bus stop, the buses aren't easily accessible, and continuing with the journey once they reach their destination is often difficult." (MS Society).

These points highlight the inequalities in transport options, both in terms of location and type of impairment, amongst disabled people. Moreover, it raises concerns about the either/or situation that disabled people face in terms of available transport. Many feel compelled to run a private vehicle due to being unable to use public transport, whilst for others accessing the scheme is not an option and they therefore have to rely on public transport, lifts from others, or not travel at all. Non-disabled people are not generally faced with this situation and, as highlighted in the focus groups, in the pursuit for equality it was felt that disabled people should not be made to choose between public and private transport, but rather have all options available to them as their non-disabled peers do. While DWP does not hold all of the levers necessary to deal with the issues that have been raised with us about public transport, the Minister for Disabled People should be an important voice in cross-government discussions about this issue.

Importance of access to/use of a private vehicle

The importance of having access to a private vehicle was clearly demonstrated in the response to the consultation. Whereas public transport was shrouded in issues for many disabled people, the consultation supported previous evidence in revealing that having access to a private vehicle was viewed as overwhelmingly positive by disabled people.

Given the effective monopoly status of the Motability Scheme in the UK to provide a car leasing service for eligible disabled people, the evidence demonstrated that the importance of the car to disabled people was in many, but not all cases, tied in with feelings of positivity towards the Motability scheme.

Having access to a car was described by many disabled people as a 'lifeline'; the frequent use of this term within the consultation process was striking, as was the passion with which people talked about their vehicles. Whilst these feelings were reported by some individuals currently part of the scheme or by those who own a car privately, unfortunately more often than not it was a term attached to a vehicle that a disabled person had subsequently lost through reassessment from DLA to PIP or from enhanced rate PIP to standard rate PIP.

Some of the comments by individuals and organisations demonstrate the perception of a car as a lifeline very clearly:

"That Motability vehicle was my life line to a level of independence and the ability to get out and meet people and do a few of the things that able bodied people are able to take for granted." (Consultation Respondent)

"A Motability car will often be an invaluable lifeline to a disabled person and its loss can be nothing short of a cataclysmic disaster. The car can be the main source of independence, providing the only means of getting to work, and may be the only way that someone can leave their home." (Disabled persons Transport Advisory Committee (DPTAC))

"A Motability vehicle can be a lifeline for so many people..." (Consultation Respondent)

"The Motability scheme gives disabled people much more freedom to travel and generally experience a more rewarding life than if they did not have access to a car..." (Consultation Respondent)

"My car is my lifeline to the outside world." (Consultation Respondent)

"The...car enables me to live a productive life and to help many other disabled people in the community, near and far, so it is worth so much to me." (Consultation Respondent)

The data provided by the consultation highlight not only the importance of access to a car for disabled people but also the positive impact it can have on them. The evidence of individuals and organisations included in the consultation supports previous research that having access to transport, to be able to get out and about, impacts positively on both mental and physical health, and combats against social isolation and loneliness. The practical value of having a car was also commented on; the ability to be flexible in terms of appointments or being able to attend a medical appointment at short notice, as well being able to travel where there is no direct public transport route.

"Being able to participate in the Motability scheme has a huge positive impact on my life...enables me to participate in society." (Consultation Respondent)

"Having use of the scheme is good for my mental health…lt's good for my physical well-being too." (Consultation Respondent)

Personal Experience #1:

X was diagnosed with MS in 2008. She lives with her husband in a small, rural village in North Yorkshire. In 2011 she retired because she could no longer drive because her MS had got worse.

X found out about Motability from her friend and found the information useful and easy to find. She's been using the scheme now for over five years. "At the moment I have an estate car with a swivel passenger seat. We previously had a minivan which I could drive my wheelchair into. I thought having the swivel seat would be better but it's not. I realise now it's better to get a wheel chair drive into the car. We will change it when our lease on the current car runs out".

"Having a Motability car is brilliant. My husband can take me out now and I'm not stuck at home all the time. It allows me to be more active and independent. The car has a completely positive effect on my life. It would be terrible if we had to return it. I wouldn't be able to get out. I wouldn't be independent."

Provided by MS Society.

Conversely the loss of a vehicle, in many cases the loss of a Motability car via a downgrading of benefits, can increase stress, anxiety, depression and isolation, and in many cases can exacerbate an individual's health conditions.

"Our lives would be destroyed without the... car. It has a HUGE positive impact on us." (Consultation Respondent).

"I was over the moon to get a motability car. I was devastated 3 years later when they took it from me...I will never get over losing my career. I had studied hard; I worked hard to get where I was...took away my future." (Consultation Respondent).

Having access to a car also helps disabled people to remain in employment. According to an MS Society survey 20% of Motability users who had responded to the survey agreed that it had enabled them to remain in their employment, furthermore 13% reported that if they no longer had access to a car they would be unable to keep their job.³⁹ Motability themselves report that for 39% of disabled people they surveyed who are able to work, not retired or in full time education having a Motability car has enabled them to stay in work, get a job or progress in the labour market.⁴⁰

"It is something I really could not do without...a car is vital for all activities, not least getting to and from work" (Consultation Respondent)

The positive aspects of having a car provided by the Motability Scheme are invariably directly associated with the scheme itself. Respondents commonly commented on the 'peace of mind' provided to them by being on the scheme and having aspects such as insurance and servicing included in the cost; a 'worry-free' approach.

"It gave me peace of mind knowing that everything was covered". (Consultation Respondent).

"... a very worry-free scheme for my mobility requirements." (Consultation Respondent).

"It has also given us peace of mind because servicing, breakdown, insurance, tyre and windscreen replacement are provided a s part of the package." (Consultation Respondent).

"Having a reliable vehicle is paramount in maintaining the independence of disabled people. The scheme gives users peace of mind that if anything does go wrong with their vehicle Motability will sort it out for them". (Disabled Motoring UK).

Despite the positivity associated with having access to a vehicle via the Motability scheme figures suggest that only around one in three eligible disabled people currently access the scheme. The consultation revealed that there were a number of actual and perceived barriers for disabled people in accessing the Motability

³⁹ MS Society (2015). MS Enough: Make Welfare make sense, 2015. Data available in MS Society response to SSAC consultation on Motability.

⁴⁰ Oxford Economics. <u>The Economic and Social impact of the Motability Car Scheme</u>.

scheme. Whilst many of the issues raised were specific to individuals, or to the organisations representing disabled people, broad themes also emerged.

What are the barriers to accessing the Motability scheme?

Six broad themes emerged from the evidence in relation to barriers associated with accessing a private vehicle via the Motability scheme. Whilst all six represent issues around mobility and access to Motability, the original research intended only to explore the use of public funds in supporting the mobility needs of disabled people. The three themes which are directly related to the research were revealed to be, what we have termed, financial, process and practical barriers and will be discussed in detail in the next three chapters.

The other three themes which emerged from the data: reassessment, eligibility and reputation, whilst not directly related to the original questions emerged as critical from the perspective of disabled people and organisations that responded to our consultation. In order to represent the voices of all respondents, each of the three themes will be discussed briefly here. Issues around reassessment, eligibility and reputation are linked to accessing the Motability scheme and as such the question of supporting the mobility needs of all disabled people cannot be fully understood without considering these concerns. Access to the scheme cannot be discussed in a vacuum which excludes these wider, but related, issues.

Reassessment

Reassessment either from DLA to PIP or from PIP to PIP was a very contentious issue for many of the individuals and organisations who responded to the consultation. Motability figures from 2017-2018 estimate that 25,000 disabled people lost their vehicles due to reassessment from DLA to PIP;⁴¹ Parkinson's UK commented that the transfer from DLA to PIP has affected many people with the condition, and the MS Society estimated that at least one in four people with MS are losing out on PIP, although it should be noted that other disabled people have seen their disability benefits upgraded. Around 144k claimants who did not receive the higher rate of mobility component are now in receipt of the enhanced rate of mobility in PIP. Whilst many disabled people have had their decisions overturned – in 2019 75% of PIP and ESA appeals were revealed to have been successful,⁴² others were either not successful or could not face what they considered to be a stressful appeals process, and therefore lost access to the scheme which had helped facilitate a more independent life. The appeals process can be long and stressful and people in this situation are normally required to return their Motability vehicles within eight weeks of the initial decision; a transitional support scheme is available, and provided by Motability, for people who were receiving DLA prior to 2014. Calls were made to extend this support scheme to those who acquired a Motability vehicle after 2014, or

⁴¹ Motability (2018). Motability Annual Report and Accounts 2017/18

⁴² Disability Rights UK (2019). PIP and ESA appeal success rate now 7 per cent

to allow people to keep their Motability vehicles until at least after appeals had been heard.

The negative impact can be further compounded by location; the loss of a vehicle particularly affects those who live in rural areas or areas with little or no public transport.

The loss of a Motability vehicle has a hugely detrimental effect on the lives of disabled people; increasing stress and anxiety, contributing to the deterioration of both physical and mental health conditions, increasing social isolation and loneliness, reducing freedom and independence and in some cases contributing to the loss of employment.

"Impacts have included an increase in stress and detrimental impacts on health, a loss of independence and the prospect at accruing debt due to the unaffordability of a car without the Motability scheme." (Citizens Advice Scotland, CAS).

"... the loss of his award two years ago has had a 'detrimental effect' on his life and has resulted in him being 'in debt up to my eyeballs and struggling to cope". (SCOPE).

"...the mental distress and the lack of the vehicle and then having to go through acquiring another car when she had the benefit restored was soul destroying and made her condition so very much worse." (Consultation Respondent).

"I am scared I will lose everything. If I lost the mobility aspect I would become a prisoner in my own home. I am in my early 40s. I still want to do my own shopping but I cannot do this without the use of a car. We also have to travel over 20 miles for medical treatment and supportive therapy. I am very frightened about the future." (MS Society member).

The reassessment process that accompanies the PIP award and the loss of vehicles by many, previously eligible people, has caused feelings of mistrust as well as stress and anxiety, and as such acts as a barrier to accessing the Motability Scheme. This barrier was perceived as such not only by those who had had their benefits reinstated, but also other eligible individuals who had vicarious experience of the reassessment process and loss of a Motability vehicle. There was a general sense amongst individual respondents that the possibility of losing a vehicle through reassessment was too much of a risk to take and outweighed benefits associated with leasing a car on the scheme; these feelings were supported by the evidence provided from organisations who suggested that disabled people are increasingly reluctant to become reliant on a car that had the potential to be withdrawn after reassessment. These feelings of uncertainty and mistrust were exacerbated by the nature of short-term PIP awards made to a significant number of claimants, the rigidity of the scheme in terms of fixed lease lengths and intersected with worries about finance (losing advance payments if the car had to be handed back, or having to pay for advance payments or adaptations for a second time if their eligibility was reinstated).⁴³

"I do not use the Motability scheme, despite qualifying, due to the fact that so many disabled people are losing their Motability cars on reassessments, despite no change to their conditions. Instead, I use the PIP mobility money to run and maintain my old car, since at least this cannot be taken away from me." (Consultation Respondent)

"...we as a faction of society have decided that Motability is too easy to lose with the incessant reviews and assessments, so most of us fund our own cars with the mobility aspect of our payments." (Consultation Respondent)

"I am disabled and receive the higher rate of PIP and am eligible for the Motability scheme. I don't, however use it, for reasons which I think apply to many disabled people. I believe that the knowledge that a subsequent assessment may result in the loss of the higher rate is a key deterrent." (Consultation Respondent)

"One of the main reasons behind disabled people's fear of losing their PIP/DLA award is the short length of awards." (SCOPE)

Eligibility

The type of benefit a disabled person received, and in particular not being a recipient of the enhanced mobility rate of PIP, was perceived as a major barrier to accessing the Motability scheme. Two specific groups of people affected by the eligibility rules, and discussed at length during the consultation, were people who moved onto disability benefits after the reaching state pension age (SPA) and disabled children under three years of age.

Disabled people over SPA:

The evidence revealed that many individuals and organisations felt the unequal access to PIP, and ultimately the Motability Scheme, discriminated against people who had developed mobility issues or disabilities after SPA; this group were felt to most significantly miss out when it came to accessing the Motability Scheme. Although these individuals may be eligible for AA, the benefit does not have a mobility element and therefore does not allow access to the Motability scheme.

"...there are older people claiming Attendance Allowance who, despite having significant mobility needs in many cases, are not entitled to the support that

⁴³ <u>Personal Independence Payment: Official Statistics to April 2020</u> note that, for DLA reassessment claims, ongoing awards were the most common award type (two out of five – 40% – of all claims awarded). For new claims, the statistics show that, seven out of ten (70%) claims awarded were short term (with a review period of 0 to 2 years), nearly one in ten (9%) were longer term (over 2 years) and just over one in ten (11%) were ongoing.

motability offers because of their age. We would like to see this unfairness addressed... Mobility support should be considered a right for all those who need it, particularly when the mental and physical health impacts of immobility and isolation are taken into account." (Motor Neurone Disease Association, MNDA).

"Many people become disabled after they reach retirement age, yet they are denied access to the motability scheme because they don't meet the PIP eligibility criteria and have to apply for Attendance Allowance. Is this discriminatory?" (Consultation Respondent)

"The scheme discriminates against people whose disability began over the age of 65, as none of the eligibility benefits can be claimed then." (Consultation Respondent)

The Department's position is that it is normal for pensions and benefits systems to have diverse provisions for people at different stages of their lives, because the help provided needs to reflect varying priorities and circumstances. A mobility allowance is not provided for those whose disability needs arise after SPA as it is expected that many older people will develop mobility issues as they age. However, Age UK argue that older disabled people with mobility impairments also need to remain independent and active. Whilst this is achievable for some via public transport, for many older people such services are unreliable or non-existent and therefore a car is essential.

Personal Experience #2:

"An East of Scotland CAB reports of a 78 year old client who has impaired vision and is registered blind. He has mobility issues, and uses a mobility scooter. He is currently in receipt of the higher rate of Attendance Allowance, has a Blue Badge and a travel card issued by a local charity. The client wanted to know if he would be eligible for a Motability car. The CAB adviser commented 'it seems unfair that pensioners with mobility issues who are in receipt of Attendance Allowance cannot access the Motability scheme. This was highlighted by the fact that the next client I saw is also a pensioner aged 74 but has been in receipt of DLA higher rate mobility component for several years and is able to use her benefit to lease a vehicle. Two clients in their seventies, similar mobility issues, different outcomes because of what benefit they were awarded at what particular time in their lives'."

Provided by CAS

The inequalities in access to the scheme were highlighted not only by individual respondents but also by organisations representing disabled people such as Parkinson's UK, MNDA, SCOPE, Age UK and CAS. The lack of access to a private

vehicle for older people was particularly an issue for those living in rural areas and/or areas with little or no public transport.

For people over SPA, in receipt of AA and living in areas unsupported by frequent or accessible public transport, the ineligibility to apply for a Motability vehicle was linked to rural poverty, isolation and poor mental health.

"In remote rural areas where accessible transport schemes and public transport is not sustainable motability scheme vehicles should be a priority for anyone with mobility issues and the GP or Hospital Specialist's medical professional opinion should be the deciding factor rather than a benefit system which is flawed." (Consultation Respondent)

Disabled children under three years of age:

Currently children can only receive the higher rate mobility component of DLA from three years of age; this decision is based on the views of medical advisors that because the majority of children can walk by the age of two and a half, by the age of three it is realistically possible to make an informed decision as to whether the inability of a child to walk is the result of a disability.⁴⁴ As a result of this ruling, families of children under three, with limited mobility or life limiting conditions are ineligible to access the Motability scheme.

In response to our public consultation the UK charity 'Together for Short Lives' provided some background information about the families affected as well as their thoughts on the policy. Together for Short Lives are a UK based charity which support families caring for seriously ill children. Their aim is to build a "strong and sustainable children's palliative care sector – so that no family is left behind".

DLA or PIP is available to all families who incur extra costs as a result of additional care or mobility needs of a disabled child. As outlined above only children over three years are eligible to qualify for the enhanced rate of mobility allowance and over five years for the lower rate mobility component. However, children with life-limiting and life-threatening conditions often require ventilators, large equipment or other types of technology to stay alive. Others have permanent wheelchairs and may not be able to use pushchairs suitable for other children of a comparable age. Often wheelchairs are heavy or need to be fixed to a vehicle, and families require adapted or broad base vehicles for transport.

In addition, for families supporting a disabled child, 64% of mothers and 24% of fathers will be forced to give up paid work; together with the extra costs of caring for a disabled child this means that many such families will be living in poverty. Without financial support, adapted or specialist vehicles are simply out of their reach.

⁴⁴ Written question, Dr Sarah Wollaston MP, answered by Justin Tomlinson MP. 26 October 2015

A freedom of information (FOI) request made in March 2017 indicated that there were 2,307 children under three years of age eligible for a blue parking badge in England, these children were dependent on bulky equipment or needed access to a vehicle in case of emergency medical treatment. In January 2018 a pilot scheme by Motability and the Family Fund was launched to help children under three who were not eligible for the mobility component of DLA but who needed help transporting bulky medical equipment. In 2019 the Chairman of Motability declared that the pilot had been a success and had enhanced the lives of many families. It stated that as an organisation it was committed to taking over the funding from the Motability Tenth Anniversary Trust and accelerating the support for this group of children and their families. Motability has subsequently confirmed funding for a further pilot of Family Fund Mobility Support to support families with children under three years of age.⁴⁵

Together for Short Lives has called on the government to make specialist vehicles, or an equivalent mobility payment – available to all children in the UK under three of age who require access to mobility support. Their response to our consultation highlights the inequality in access to mobility support as a result of age. Once the under-threes pilot is fully rolled out, it will support this need.

"Together for Short Lives is calling on the Department for Work and Pensions and Motability to extend the higher rate mobility rate of disability living allowance (DLA) to children under three years." (Together for Short Lives).⁴⁶

The following evidence from SCOPE sums up the eligibility situation:

"It is widely acknowledged that the Motability scheme is beneficial for disabled people. But not every disabled person who could benefit from it is eligible to do so." (SCOPE)

Reputation

"Motability is a national scandal with a surplus of tens of millions that should be going to aid the very people it purports to help." (Consultation Respondent)

Concern was expressed by respondents to our consultation at the poor reputation of the Motability Scheme, in particular since the publication of the NAO report in 2018. Feelings of mistrust of the scheme stemmed in part due to concerns about reputation and feelings by individuals that excessive profits were being made from disabled people's benefits. Many people felt that they were being charged more than necessary for the lease of their Motability car and one response suggested the issue was viewed as "disabled tax".

 ⁴⁵ Motability has committed funding of £0.5 million to Family Fund for a further 12-month pilot.
⁴⁶ Motability's role is overseeing the Scheme; the Department is responsible for the benefits that passport claimants onto the Scheme.

In 2019 Disability Equality Scotland (DES) ran a poll gathering members' views on the reserves, remuneration and charitable donations; 98% of the 394 respondents expressed concern with the financial situation of Motability. Furthermore, the poor reputation of Motability had a direct knock-on effect on the uptake of the scheme by eligible customers.

Some of the comments to DES poll questions included:

"The reputation of Motability is one the biggest barriers. They are greedy and part of an old boys' network." (DES poll respondent).

The reputation of Motability. The excessive profits they are making from our benefits then giving away as only they see fit, the pay and bonuses for senior managers and the lack of engagement with customers. Until these things change, I won't take a mobility car." (DES poll respondent).

"My reason for not renewing my lease is because I don't want to be part of a charity that abuses their remit and preys on people with disabilities. I would suggest this is also why around 60% of disabled people who are eligible, do not take up the scheme." (DES poll respondent).

In November 2019 the DES launched a second poll including questions about Motability. 93% of 365 respondents indicated that they had faced barriers accessing Motability; 222 of the respondents went on to provide comments. Out of these 222 around 37 of them highlighted issues such as the poor reputation of the Motability Scheme and furthermore Motability's primary concern for profits was seen as a barrier to accessing the scheme. This poll identified reputation as a barrier that was second only to finance, although there is no evidence that this view is held more widely. In particular, respondents highlighted an intersection between the reputation of the Motability Scheme and financial concerns; Motability Operations were perceived as greedy and people were unwilling to line the pockets of "fat cats", or to give away profits to other ventures that did not benefit those who paid into the scheme.

"I feel that the mobility scheme is nothing more than a hire company focusing more on company profits than the needs of disabled people." (Consultation Respondent)

The comments above also highlight the wider issue, raised by both individuals and organisations, of the lack of transparency by Motability and Motability Operations as organisations.

Whilst both DPTAC and the Motability and Access Committee for Scotland (MACS) indicated that Motability had been willing to meet and discuss concerns raised by members, MACS indicated that communications with Motability:

"...would suggest there is still an unwillingness to be more transparent, meaningfully engage and consult with MACS regarding Scottish customers concerns and needs." (MACS).

MACS also reported that, in its engagements with Motability and Motability Operations, they had found a lack of transparency around recruitment and selection processes as well as about senior manager and executive remuneration.⁴⁷ These echo disabled people's concerns about not being involved in any of the decision making with regards to what happens to the unplanned profits generated by the Scheme.

"As a result, some disabled people have lost confidence in the transparency and credibility of the Scheme and chosen not to take up a Motability vehicle, despite being eligible, while others have opted out." (DES)

Transparency is also an issue for individuals attempting to access information about scheme related grants. In general, it was felt that Motability do not promote certain aspects of the scheme well enough or that information was not easily accessible. For example, only a few respondents purchased their car at the end of the lease period with the majority of people were unaware that this was an option. There was a sense from respondents that making money from leasing cars was the main crux of the business and anything outside of this was of secondary concern and available on a request only basis. As one respondent put it:

"Motability do not make it widely known that you can have an "open" insurance policy allowing anyone to drive with the main named person's approval." (Consultation Respondent)

A lack of transparency by Motability was also referred to in relation to the changes made by the organisation to the Special Vehicle Fund several years ago. This is discussed in more detail later in the report.

A related issue addresses the concerns for many that Motability Charity executives and its board of Governors was neither sufficiently diverse or representative of disabled people. MACS suggested that individuals are often recruited via an internally connected network, primarily located in the South of England and who have little experience of what the average disabled person's experiences of day-today living or restricted incomes are really like. MACS also expressed concern at a lack of diversity on the Board which, at the time, had only one woman, no one from the BAME community, nor any Trustee from Scotland, Wales or Northern Ireland. We are pleased to note that more recent appointments to the Board have improved diversity.⁴⁸

The question of accountability was also raised. Motability is accountable to the Charity Commission; and Motability Operations to the Financial Conduct Authority.

 ⁴⁷ Motability Operations remuneration information is provided in its <u>2019 Annual Report and Accounts</u>
⁴⁸ Mobility Annual Report and Accounts 2019-20.

However, the perceived lack of transparency by Motability and Motability Operations gave rise to a view that they were simply not accountable to anyone. While that is not the case we would argue that, since Motability Operation's income is derived from disabled peoples' benefits, there is a compelling case to strengthen further the existing accountabilities through a strengthened oversight role for DWP.

"If there are concerns about Motability's reserves or the remuneration paid to is executives, a better alternative...would be to bring the scheme under stricter public control." (Consultation Respondent)

"The reputation of Motability is one of the biggest barriers...reverse robin hoods! Who holds them to account?" (DES poll respondent)

It is critical to understand how issues of reassessment, eligibility (issues over which DWP has responsibility) and the reputation of Motability affect the lives of disabled people both in terms of access to private vehicles and moreover in terms of mobility and transport in a wider context. Whilst questions around these three issues were not originally included in the consultation, they are intrinsically linked to the equality of access of the Motability scheme by disabled people, and remain integral to the conversation going forward. Each of the three barriers as discussed above, in particular reassessment and eligibility warrant further research.

4. Financial Barriers to Motability

Financial concerns were by far the most commonly cited barrier to accessing the Motability scheme, by both individual respondents and organisations. It should be noted, however, that financial concerns do not exist in isolation but were found to frequently intersect with other factors associated with the inaccessibility of the Motability scheme. Financial reasons were also the most frequently occurring barrier to accessing the scheme in the DES poll of its members in November 2019; financial concerns were almost three times more commonly cited with 91 out of 222 respondents reporting them as an issue.

Although the scheme was simply unaffordable for many people there were a number of different factors which influenced the reasons many disabled people cited finance as a problem. These factors are discussed below.

Other costs

Accessing the Motability scheme was not possible for many individuals simply because it was unaffordable; the income they received via the enhanced rate mobility allowance had to be prioritised for other costs such as food or household bills.

"The scheme costs too much for people on low incomes who need and rely on their benefits to survive. I don't understand why it costs so much when they make so much profit that they donate to non-customers." (DES member). "...people are needing the mobility element to live on, having to forgo being able to access the community." (Consultation Respondent)

"I for one cannot afford to have a vehicle. I have other things to pay like food heat etc." (Consultation Respondent)"

For others, whose finances are stretched, the £61.20 per week for the enhanced rate of the mobility component of PIP has to be spent on general living costs. While they could choose to have a Motability car, this would be at the expense of genuine essentials, such as food, clothing and utility bills, so any option is not a genuine one." (Consultation Respondent).

Personal Experience #3:

X was diagnosed with MS in 2016. He left work as a joiner after it became too dangerous for him to continue. He applied for PIP and received 0 points for both components. Following a tribunal, X was awarded the enhanced rate for both mobility and daily living.

X has chosen not to access the Motability scheme. "I have looked into it but because of my mental health it's too much to think about right now. Some of the initial costs seem quite high, like a deposit. I use a mobility scooter and I have my own car which has an electric hoist. If my legs get worse though, I'll need to get a van with a drop-down ramp."

"I did have savings, but they've gone right down and I can't afford to top them up because we have to use the money we get from PIP to pay for other things. If I got a Motability vehicle, in the end I'd have no money at all."

Provided by MS Society

Some individuals were reported to be using the Motability scheme but struggling financially as a consequence. An example provided by SCOPE included a call they had recently received on their helpline from someone concerned about their financial situation; they had been forced to cut costs in other areas of their life because the mobility element of their disability allowance did not fully cover the cost of running their car, and they wanted to ensure they could afford to keep using it.

On average disabled people have a lower level of financial resilience than nondisabled people. For example, McKnight (2014) found that in 2008/10 net financial wealth was, on average, over £15,000 lower in households containing a disabled person than in households with only non-disabled people.⁴⁹ Additionally, disabled

⁴⁹ See Table 2 of McKnight, A. (2014). <u>Disabled people's financial histories: uncovering the</u> <u>disability wealth penalty, CASE paper 181</u>

people are more likely to be trapped in debt⁵⁰ and may be faced with extra living costs associated with their disability. Research by Scope revealed that disabled people face, on average, extra costs of around £583 a month,⁵¹ research for MNDA found that people living with MND and their families face extra costs of up to £1,000 a month,⁵² and the additional cost of Parkinson's is estimated to be around £16,582 a year.⁵³

"We believe that low income and poverty is a factor in people not leasing a Motability vehicle.... A Motability car might not be the priority, whereas paying utility bills and medication costs are likely to be prioritised above this expenditure...So while mobility is an important element to maintaining wellbeing, participating in the Motability scheme may not be viable due to cost." (Parkinson's UK)

Extra costs associated with disability combined with low income meant that in many cases a Motability vehicle, though very desirable and vital to independence and mobility, was nothing more than an aspiration for many disabled people. This was even more profound for disabled people who would need a larger vehicle, a vehicle with adaptations, an automatic car or a WAV; all of these options are more expensive than a standard small car and as such disabled people with more complex needs are disadvantaged in accessing the scheme. While Motability's grants programme is designed to provide support in such circumstances it is not sufficiently transparent, understood or generous to address these issues.

"Motability is not an option for these people and there is no question of a voluntary choice for them." (DPTAC)

"For people on low or restricted incomes, their disability assistance payments are used for day-to-day living and are essential for the running of the household. Using the allowance for a lease car is beyond their financial capability and their dreams." (MACS).

There was overwhelming evidence that the scheme was thought of as too expensive and urgently needed to be made more affordable. Two areas related to costs emerged as particularly problematic: upfront deposits/advance payments and adaptations.

Advance payments

A particular issue for many of the respondents, with regards to costs, were the upfront or advance payments required for many larger or higher specification vehicles. This intersected specifically with type of disability; individuals who needed

⁵⁰ Ibid

⁵¹ Scope (2019). Disability Price Tag

⁵² Vibert, S. (2017). <u>MND Costs: Exploring the financial impact of Motor Neurone Disease</u>

⁵³ Gumber, A. (2017). <u>Economic, Social and Financial Cost of Parkinson's on Individuals, Carers and</u>

their Families in the UK

larger vehicles to transport large or heavy equipment, to accommodate adaptations or who needed automatic vehicles often cited the large advance payment as a barrier.

"You shouldn't have to pay more for an automatic if that's what you need because of your disability." (DES member)

The advance payment on a Motability vehicle represents the difference between the amount Motability Operations receive from direct payments from an individual's benefits allowance and the overall cost of the vehicle; it is calculated by considering additional factors such as servicing, maintenance and the expected resale value at the end of the lease agreement.⁵⁴ Advance payments can range from a few hundred to several thousands of pounds depending on the vehicle. The advance payment is not a deposit and is required in full before the vehicle can be collected; for many this up-front lump sum payment poses a very real barrier to accessing the scheme.

Whilst insurance, servicing and breakdown cover are all covered in the lease price other costs such as fuel are not. The cost of running a car is a further problem for some disabled people, particularly for those whose entire enhanced mobility allowance is being paid directly to Motability to cover the cost of the car lease.

".... if all of your DLA/PIP allowance is taken to fund a vehicle then you also need to have enough money from elsewhere to pay for petrol, diesel, adblue etc in order to be able to use the vehicle...people do not necessarily have any spare money for fuel and other items." (Disabled People Against Cuts).

Furthermore, any optional extras such as electric windows or air conditioning, or separate air conditioning controls for the back of a vehicle in the case of a WAV, are not included in the lease price and must also be paid for up front along with any advance payment.

"The cost of the advance payment on vehicles is often cited by disabled people as problematic although usually there seem to be some smaller vehicles available without one. These vehicles may not be suitable for people's needs however." (Disabled People Against Cuts).

"Vehicle types available for wheelchair users without hefty advanced payments is the biggest barrier. It is hard to save for the advanced payment if you need an automatic and a bigger car for your chair." (DES member).

"The main barrier for me is cost. I would need a significant advance payment (3,000+) in order to lease a suitable vehicle and the lease payments would use my entire mobility component so I would have to cover the cost of fuel from my other benefits." (Consultation Respondent)

⁵⁴ Motability. Payment and Cost for Cars

Many of the respondents expressed their preference for leasing a second hand vehicle on the scheme if it could be offered at a lower cost (i.e. minimal or no advance payment); making the scheme more affordable would enable more disabled people to access it. While it is the case that second hand vehicles cannot be leased, there are a number of cars available requiring no advance payment or that are available for less than the full mobility component. Motability should explore why there is such a misunderstanding among potential customers about what is on offer, and consider how its communications might be strengthened to improve the position.

Costs of adaptations

According to Motability around 500 adaptations are currently offered at no extra cost and any adaptation installed at beginning of a lease period will be maintained as required at no extra charge.⁵⁵ However, many adaptations do involve a cost, and this can range from tens or hundreds of pounds to over £10,000 for a single adaptation. Adaptations must be paid up-front along with any advance payment and for many disabled people this is simply unaffordable and as such not a viable option. Motability has a car and grant programme which provides support to some but, as the grants are discretionary, this help is not universally available.⁵⁶

Whilst this is a problem for people with many different types of disabilities, the costs involved for individuals requiring an adapted WAV are particularly significant, with adaptations such as wheelchair swivel seats costing over £12,000. In addition, any adjustments made to adaptations or any adaptations that are required mid-lease can result in additional charges.

"Despite the value of the Motability scheme in allowing disabled people to live more independent lives, we have found that the high cost of adapting a vehicle through the scheme is putting many disabled people off from applying." (SCOPE).

"Adaptations, such as wheelchair lifts, can be very costly. Upon fitting the necessary adaptations, other extras, such as heating to the back of the vehicle or additional seating may prove too costly, so the disabled person, would have to travel in the back of the 'van' (WAV) in his/her wheelchair, but with no heating!" (Consultation Respondent).

DES commented that in order to encourage more disabled people to apply for the scheme it was important to make the scheme more affordable, a sentiment echoed by many respondents. Two ways they suggested to make it more affordable were to reduce monthly payments and remove unnecessary costs associated with adaptations. Going one step further several organisations in the focus groups suggested that to make the scheme equally accessible for all disabled people, all

⁵⁵ Motability. <u>Adaptation prices</u>

⁵⁶ Motability committed £13.8m through this programme in 2019-20

adaptations should be available for free. Removing the financial barrier of the costs of adaptations would enable more disabled people to use the scheme.

SCOPE also addressed the issue of affordability of adaptations commenting that:

"Government needs to consider alternative ways of offering financial support to those who cannot afford the upfront costs of adapting their Motability vehicle."

Recurring payments:

Recurring advance payment or costs of adaptations upon lease renewal were also reported as problematic for many people. A standard lease has a three-year term whilst a lease for a WAV, because it is generally more heavily adapted, is five to seven years. Users of the scheme may be eligible for a 'good condition' bonus when they return their car at the end of a renewal period, however if they renew their lease, they will also need to pay any advance payments or adaptation costs a second time. For many people who had been on the scheme for many years, and who had renewed their lease several times, this was a major downfall of the scheme. Advance payments and adaptations can be very costly and many disabled people struggle to pay for these once; paying these costs every three years was simply out of the question according to many of the respondents. Many felt that having to change car every three years meant they were paying far more than they should for the scheme.

Advance payments and recurring costs were a particular issue for disabled people with complex needs.

"...some customers will be put off by the price of the Advance Payments for certain vehicles, especially for Wheelchair Accessible Vehicles. These payments are required every three to five years and this recurring payment may be off putting to some. They may opt to buy a cheaper second hand vehicle." (Disabled Motoring UK).

This issue was further highlighted in the response by a parent of 21-year-old with complex cerebral palsy who uses a powered wheelchair and a communication aid. As a family they had experience of two Motability vehicles: one a WAV and one a standard vehicle. In their view the main barrier to Motability is:

"The cost of the advance payment for a WAV suitable for a power chair user (and their family). This can be thousands of £s and is not a deposit and you get nothing (apart from a good condition payment, if eligible) back after five years and so have to find the advance payment all over again." (Consultation Respondent)

She went on to comment that disabled children and people who need WAVs are unfairly penalised for needing an adapted car; such perceptions of inequalities and feelings of discrimination were echoed by many respondents and organisations. *"If you need adaptations you may be disadvantaged over other customers." (Disabled Motoring UK).*

Fixed lease costs were also cited as problematic from the point of view of time. One respondent to the consultation reported that she had enquired at Motability Operations at the time of renewal about the possibility of extending her lease but going forward with a reduced monthly payment for her vehicle; something she had previously done with a vehicle leasing company prior to becoming disabled. Motability Operations agreed that the lease could be extended for two additional years but that they would continue to take the same monthly payment (the whole of her DLA enhanced rate allowance). However maintenance costs do rise as vehicles age and the Motability scheme, unlike many commercial leases, provides maintenance of the vehicles, so this example may not represent a like-for-like comparison.

Recurring payments were not only cited as a problem for advance payments and adaptations; there was also considerable confusion around the cost involved in moving adaptations from one vehicle to another at the time of lease renewal. Information provided by the Motability Scheme suggests that, while the recycling of adaptations was not recommended from a safety perspective, the majority of their access and stowage adaptations can be transferred to a new car at the point of lease renewal. However this was not the experience of many of the consultation respondents. Whilst a few individuals had been able to have minor adaptations transferred to a new car, for the majority of people moving adaptations across to a subsequent vehicle was viewed as costly and problematic, and served as a secondary barrier to using Motability.

"Hand controls are different for each make of car, so it's not as if you can keep them for your next car, because there might not be anything suitable in the same make. Even with extended leases for heavily adapted cars, adaptations such as hoists are expensive to have uninstalled and reinstalled in your next car." (Consultation Respondent).

Having to change vehicles is part of the renewal lease agreement as dictated by Motability Operations; however, many individuals expressed interest in being allowed to renew their lease and keep the same car for another renewal term. Having to change vehicles meant that they were liable for the costs of any advance payments and/or moving adaptations. Being able to buy their car at the end of a lease period, at a competitive price, was also suggested by many respondents as an option they would like available to them. Whilst the Motability Scheme historically offered this as an option, in recent years it appears that this is less commonly taken up.

"Motability Operations deliberately removed HP several years ago removing the guarantee for customers to retain their cars at the end of the loan agreement if they wished. Today MO customers can purchase their lease car at the end of the lease but it isn't a right and very few customers do this." (Consultation Respondent).

One respondent from the interviews commented that whilst she had asked to purchase her vehicle at the end of the lease period the price that Motability Operations were asking was very high and not at all competitive or affordable.

"There is no competition to Motability Operations (MO) and this enables MO as a monopoly to set residual values and pricing at whatever level they wish to. As a result residual values are set artificially low and at the end of contract Motability Operations make excessive profits on resale of the car. Effectively they are deliberately overcharging customers." (Anon).

However, the Motability Scheme business model depends on their effectiveness in getting the best possible price for the cars they sell. While it has been suggested that they should sell cars to leaseholders at a favourable rate, the cost of this, once surpluses return to a reasonable level would be borne by all leaseholders, including those who do not want to buy a car.

Private vehicle ownership

A number of respondents indicated that it was more cost effective or cheaper for them to buy a car privately; taking out a loan to buy a car and financing the loan repayments with their PIP/DLA mobility payments.⁵⁷ These comments were commonly intersected with the desire to own rather than lease a car.

"I find the Motability scheme too expensive. It is cheaper to buy a car outright and pay for insurance than if I was on Motability." (Consultation Respondent)

"I can go buy a car with a bank loan... far cheaper than via mobility. Money can be borrowed cheaply and you can get often 10% or more off the price of a new vehicle. Compare that with Motability and you pay through the nose for the car and it's never yours." (Consultation Respondent)

"As a disabled person eligible for Motability...I have never taken it up because its cheaper to use PIP to get a loan for a more suitable vehicle and have it serviced independently. Once the loan is paid off...the vehicle is mine to keep or sell on, profits do not go back to a company that's already made huge profits off disabled people only to make further huge profits on working people by selling over priced products to a captive market." (Consultation Respondent)

"The lack of ability to buy the car outright at the end of the lease may be another deterrent" (Consultation Respondent)

The idea that the money people pay towards their vehicle is benefiting themselves rather than Motability was a preference expressed by many of the respondents;

⁵⁷ This comparison does not take account of the wider Motability package.

several comments were made along the lines of never having anything to show for the money despite making considerable payments over many years.

"Price is the main barrier. Especially for something you won't own and pay over £8,500 towards over the 3-year period, as well as an advanced payment. Better to go it alone and have something to show for your money." (DES member).

"I am not willing to give my full PIP for a car I will never own. It could be less each month as they are making huge profits." (DES member).

"It's like signing up to a never ending credit agreement with nothing to show for it. I would rather have something at the end of the 3 years of over £200 per month payment not to mention the loss of advanced payment regardless of what Motability get on the resale value." (DES Poll respondent).

The personal experience below demonstrates this point clearly.

Personal Experience #4:

C.C chose not to lease a vehicle through Motability because it was not good value for money. She uses a powerchair and needed a WAV (Wheelchair Accessible Vehicle). The advance payment for a vehicle suitable for her needs was approximately £3,000 and she could not afford to pay this. Instead she purchased a second hand WAV for £6,000 and uses her higher rate DLA mobility component to repay the loan and cover the costs of insurance, servicing and fuel.

Over the course of the 5-year lease she calculated that a Motability WAV would cost her around £19,000. Purchasing privately cost around £10,000 with the added bonus of being able to keep the vehicle at the end of the 5 years when, she estimates, it will have a value of around £1,000. In the long run purchasing a WAV privately will cost just over half as much as it would have done to lease the vehicle through the Motability scheme.

Consultation Respondent

Value for money

For many people the issue of value for money was closely linked to ownership of a car and for this reason the Motability scheme was perceived as not being good value for money, even when taking into account the inclusion of insurance, servicing and breakdown in the cost. Given the choice, many people opted to buy a car privately as outlined in the section above and believed they were getting better value for their money.

"The Motability scheme is something I chose not to partake in as it was ridiculously poor value for money and a vehicle through them did not meet the needs of my family or me." (Consultation Respondent).

"It can be better value for money getting a loan to privately purchase a second hand vehicle than it is to have the luxury of leasing a new vehicle from Motability." (Consultation Respondent).

Perceived value for money also intersected with the feeling expressed by some that being on the Motability Scheme provided them with worry-free motoring. Despite the belief that, in monetary terms they would possibly be better off accessing a car outside of the scheme, the pervasive desire to have all aspects of motoring taken care of meant that some people were effectively paying for their 'peace of mind.'

"The benefits I think outweigh the costs, but in sheer money terms, we're probably worse off as we would otherwise buy a much cheaper less reliable and older car." (Consultation Respondent)

The issue of value for money is two-fold. Whilst there is an issue around the value for money the Motability Scheme provides for disabled people compared to that they would receive via accessing a vehicle privately, there is a second point of interest around whether disabled people paying their enhanced rate mobility allowance to use Motability are gaining more in terms of value for money than those who choose not to or cannot access the scheme.

Motability themselves indicated in their response that for a weekly payment of £61.20 (enhanced rate mobility PIP allowance) customers of Motability are actually obtaining a value of around £110 per week. In real terms disabled people who are able to access the scheme are financially advantaged compared to those who do not, or cannot, access the scheme, but who get the payment directly to their bank account. This is a matter which has not gone unnoticed by either disabled people or organisations; there was very much a sense that those people who opt in to the scheme get 'more for their money' than those who don't. This again highlights the inequalities faced by disabled people who feel due to barriers that they cannot access the Motability scheme.

"The value of the goods received on the Motability scheme is much more than the value of the enhanced rate. Hence you do get 'more for your money' and is a reason why I choose to use the scheme when I had to get a new car... Those who use the scheme benefit more in terms of value received however those that receive money potentially have more flexibility in how they use it". (Consultation Respondent)

"It looks like those entitled to the enhanced mobility component of PIP who lease Motability cars secure a large financial benefit. By comparison, those who don't use Motability appear to miss out." (DPTAC). "...by using the Motability scheme a person's allowance will stretch much further... However, it is personal choice and people may prioritise using their allowance to help fund other areas of the lives. E.g. Household bills." (Disabled Motoring UK).

The evidence, as set out above, suggests that the cost of using the Motability scheme can present considerable challenges for some in accessing an appropriate car to meet their personal needs. For disabled people living in poverty the scheme is simply unaffordable as priority has to be given to other costs of living. The position is compounded by lease costs, advance payments, costs of adaptations and issues around value for money, all of which are particularly a factor for disabled people with higher or complex needs. Financial factors play a considerable role in the inequalities disabled people face in leasing a car through the Motability scheme; moreover, those who cannot afford to be part of the scheme are also missing out on gaining added value to their rate of enhanced mobility allowance. Given the inequalities evidenced here, financial pressures and unaffordability means that the current option to use the Motability Scheme does not represent a genuine choice for many disabled people. As it stands there are two major issues which need to be addressed in light of these findings:

- The Motability scheme needs to work towards becoming equally affordable to disabled people no matter what their financial situation or nature of their disability.
- The 'value for money' disabled people receive from their enhanced rate mobility allowance should be equal, whether they 'choose' to access the Motability scheme or not. Given the purchasing power, and IPT and VAT relief options available to the government, alternative transport options for people who do not or cannot use Motability, and which provide equal value for money, need to be considered.

"Disabled people should not be prevented from applying for the Motability scheme if their PIP or DLA award does not adequately cover the costs incurred from using the scheme." (SCOPE).

5. Process Barriers to Motability

A large proportion of respondents voiced their disappointment at what they believed was a 'one size fits all approach' by Motability. The rigidity of the scheme process was a frequently cited barrier for many people; fixed lease lengths were too long and any changes disabled people needed to make to their lease or vehicle as a result of their condition were not well accommodated. This section reflects on evidence that aspects of the Motability Scheme 'process' may act as barriers to using the scheme for some eligible disabled people.

Restrictive nature of the lease terms:

The evidence suggests that there are two main concerns regarding the rigidity of the length of the lease period. For many people the standard three or five-year length period is too long as their disability may change during that period, for others they may not have an entitlement that is long enough to qualify for the scheme.

"Three years is too long a period. My condition changes over three years and it's hard to predict what I will need from a vehicle any more than 6-12 months at a time so I can't tie myself into a three-year lease." (DES Poll Respondent).

"The three-year lease period is too long. It would be better if this could be reduced and this would help people with awards shorter than 3 years." (DES Poll Respondent)

The perceived inflexibility of the scheme intersects with financial issues raised in the previous section. A common reflection was that due to the nature of disability, the needs of individuals change over time, often quite rapidly, and in many people's experience Motability Operations is simply not responsive to this; it does not allow changes to vehicles or to the lease contract at what was considered an affordable cost during the lease period. Many organisations called for a more flexible leasing strategy; this echoes the claims of individuals that the scheme is rigid with a 'one size fits all' approach and that this is detrimental to accessing the scheme. While Motability has told us that they do make changes to leases to respond to changes in an individual's needs, our research raises questions about why this is not better understood by its customers.

"...if they are not ordered with the vehicle their purchase afterwards or part way through the lease is prohibitively high. It would be helpful if subsidised fitting of adaptations could be available throughout the leasing period. A disabled person's needs can become evident at any time." (Consultation Respondent)

These issues were particularly highlighted by organisations representing individuals with progressive conditions such as Parkinson's or MND.

Personal Experience #5:

A female MS sufferer who uses a powered wheelchair accessed the Motability scheme to lease an adapted vehicle with a swivel lift. After a short period of having the vehicle it became too much for her husband to manoeuvre her to the chair and the vehicle is now unused. The woman has not approached Motability because she knows that adapting the vehicle mid-lease will be too expensive and knows that she will have to wait until the end of the three-year lease period to make any changes. She remains unable to use the vehicle.

Case study provided my MS Society

The rigidity of the lease scheme was outlined as a particular problem for people on a short PIP award. Whilst DLA awards could be set for two, three or five year periods, PIP award lengths can be set from a minimum of nine months. These short awards cause particular issues for disabled people eligible for the Motability scheme; not only do they need at least 12 months left on a higher rate award to apply for the scheme, but potential negative outcomes from frequent reassessment can cause insecurity, anxiety and a barrier to accessing the scheme.

Disability Rights UK told us that, between the period April 2013 and April 2018, 23% of PIP awards were made for just one and a half years or less.⁵⁸ More recent official <u>PIP statistics (to April 2020)</u> note that, for DLA reassessment claims, 40 percent of all claims were ongoing awards.⁵⁹ For new claims, that figure is 11%.

Organisations such as MNDA and Parkinson's UK reported that short term awards presented particular problems for their members and that such awards made no sense for individuals with progressive conditions that were only likely to get worse. DES suggested that it would beneficial if there were short-term lease options on offer available to disabled people with fluctuating health conditions.

While the inclusion of additions such as insurance and breakdown cover was welcomed by many, some respondents challenged the Scheme about their automatic inclusion in the lease contract. The one size fits all approach to including insurance was not welcomed by everyone; not all respondents required other named drivers or young drivers on their policy, but felt as though they were being charged a standard fee that subsidised the insurance of others who had more comprehensive needs. Focus group discussions also challenged that the assumption that all disabled people wanted or needed everything (i.e. breakdown cover, insurance, servicing etc.) included in the fixed cost; this was deemed patronising and some disabled people on the scheme may prefer the option to source these services themselves. These observations interlinked with many comments suggesting that Motability was out of touch with disabled people. The evidence demonstrates a need for the Scheme to consider a more flexible approach, taking into account individual needs.

"The lease wouldn't provide for my needs in terms of type of car and costs. Why don't they ask what our basic needs are without adding things on that people don't want like third drivers?" (DES Poll Respondent).

Frequency of use

The need for a car is relevant for many people partly due to the lack of suitable or accessible public transport in their area. For this reason, many people commented that although they had a Motability vehicle, they only used it infrequently, perhaps for a shopping trip or medical appointment. These people believed they had little choice

⁵⁸ Disability Rights UK (2018). Available at: <u>DWP publish new PIP award duration guidance</u>

⁵⁹ Those in receipt of an ongoing award will receive a light touch review after 10 years

in using the scheme because although they didn't need a car often, they did need one on occasion. Due to the nature of the lease process, the only options are to lease a vehicle or not lease a vehicle, there are no more flexible options for those who only want to use a car once a week for example. The cost of leasing a car via the scheme is comparatively high for disabled people who use it infrequently.

"The Motability scheme makes clear financial sense if one does a reasonable mileage per year." (Consultation Respondent)

"The lease cost is too much and for me doesn't represent value for money as I only use my car twice a week. If there was a way of hiring a car on these occasions it would make more sense. I don't have a bus service or accessible taxis service where I live." (DES Poll Respondent)

It was commented that entering the scheme due to infrequent need of a vehicle could be viewed as a form of forced car-ownership, and it was suggested that there is a significant need for a more flexible option to allow eligible disabled people to lease a car as and when it is needed.

Grants scheme

In 2018-2019 Motability invested £33.7 million in financial assistance and provided over 10,000 discretionary grants to help disabled people access the scheme. According to Motability's latest annual report they intend to pledge £71 million on grants to support more than 25,000 people in 2020-2021 This is a finite pot of money due to be allocated to between 15,000 and 20,000 recipients (equating to an average award of £3,000 each). In addition to affordability issues, grants are also used, subject to set eligibility criteria, to support families of children under three who have restricted mobility, as well as the Access to Work scheme.⁶⁰

The availability of grants through Motability is welcome. However, we have been told that many who might be eligible are unaware that the Grants scheme exists and that those who are aware have a perception that the process for achieving one is difficult to navigate.

"Grants are available to cover adaptations, on a means tested basis...the fact that such a system of grants exists is not generally known – this needs to be remedied by a much-improved communications strategy." (Consultation Respondent)

"I am not aware of any particular grants available but expect charities such as British legion may give grants to assist." (Consultation Respondent)

"...more information should be made available regarding grants for adaptations of Motability vehicles." (Consultation Respondent)

⁶⁰ A funded lease vehicle can be provided by Family Fund subject to eligibility criteria set out on its website.

Many people who responded to the consultation were unaware of the grants system. Those who were had mostly found out about them after actively searching on the Motability website for information about accessing financial help. While we welcome recent improvements that have been made to the website, clearer navigation of the website is needed to ensure that customers are aware of the potential support available.

"...while most of those eligible for a Motability car are aware of the basic scheme, few seem to be aware of the grants towards adaptations. There is a significant communications problem with Motability, which should review its communication strategy as a matter of urgency." (D.F)

DES expressed the view that there are issues around the grants system including lack of advertising, an erosion of the support that had been provided through the Special Vehicle Fund and the bureaucracy of the grants process. In addition, they also highlighted issues with the means testing format of the current grants scheme; a sentiment echoed by some individuals who responded to the consultation. Means testing for individual eligibility includes an assessment of the individual's partner and other people living in their household; and whilst it provides a better targeting of resources, some people were not comfortable with this process as well as having concerns around the data protection of information, such as bank account details for all members of the household, that needed to be submitted as part of the application process.

"I did not apply for a grant to cover costs as my husband works full time, we are not in receipt of any means tested benefits and I did not think we would qualify." (Consultation Respondent).

"Not everyone likes to be subjected to a means tested assessment." (DPTAC)

The consultation only heard from one individual who specifically indicated that they had been a beneficiary of a grant. This response reinforces the complex nature of the system and the restrictions it can apply. The individual responded that using the grant had helped with the upfront costs of a WAV but gave her very little choice. She was given the choice of two long wheel base vehicles and despite finding another, more suitable option herself, this choice was not permitted on the grant fund. She also indicated that she had issues with Motability who would not agree a way of safely locking down her wheelchair during travel; ultimately this led to a formal complaint against Motability and engaging the services of a lawyer to resolve the issue.

"Grants are available from Motability but they are looking for the most costeffective option. It can limit a person's choice." (DPTAC)

Concerns were also raised within the focus groups around the nature of the appeals process used alongside the grant scheme. In accordance with charity law, all

appeals are considered by Motability's Governors, but the need for the appeals process to be handled by an independent body was raised as a concern.⁶¹

Since the publication of the consultation on 5th November 2019, Motability have updated their web content on the availability of grants.⁶² More detail is now provided on the different types of grants available, and content has been added explaining the prioritising of grants, information on adapting a vehicle mid-lease due to a change in condition, and the inclusion of information on accessing a grant to pay for driving lessons. This is welcome.

Whilst more detail is provided the exact eligibility criteria are still not particularly clear on the website; rather the areas that will be considered, such as disability, household circumstances, equipment needed during travel and financial means, are listed. An application for a grant must still be initiated by calling Motability by telephone, which may not be accessible to all disabled people (for example people with hearing impairments); other methods of contact are not made clear on the website.

Objections were also made at the use of Motability funds in the provision of Access to Work grants. Anyone who has received the offer of an Access to Work grant for the following equipment: manual or powered wheelchairs, scooters and vehicle adaptations from the DWP can apply to Motability for a grant for the costs of the Social and Domestic contribution; applicants for the grant do not need to be Motability scheme customers. Mobility and Access Committee for Scotland (MACS) objected to the use of individuals' disability mobility allowances, from which grant scheme funding orginates, being used to provide grants to people not on the scheme; these views were echoed by the comments provided by some individual respondents together with a dissatisfaction at the lack of involvement of disabled people in decisions around the use of Motability funds.

Specialised vehicles for people with more complex needs

Grants are available to people who have complex needs and require a highly adapted vehicle.⁶³ These adaptations generally cost over £10,000, and cover the costs of adaptations such as drive from wheelchairs, internal transfer vehicles or vehicles with complex driving controls.

The evidence revealed particular anger and frustration by changes that were made to the eligibility criteria several years ago without consultation with Motability customers. In addition, recipients of the fund were not made aware of the changes to the eligibility criteria by Motability, and many only became aware of the more restrictive criteria when they came to renew their lease. Some of these recipients went on to lose their eligibility due to the changes. The new eligibility criteria made it

⁶¹ Complaints related to a vehicle lease may be escalated to the Financial Ombudsman.

⁶² Motability (2020). Charitable Grants

⁶³ The eligibility criteria are determined by the Motability Board based on its understanding of the needs of disabled people. In 2019-20 Motability committed £18.7m to the wheelchair accessible vehicle programme, and a further £18.5m to the complex driving solutions programme.

extremely difficult to access the fund if an individual was neither employed, engaged in voluntary work outside of the home, in full time education or solely responsible for the care of one or more dependents. For many people who have complex needs these activities may be not be a possibility. For others a vehicle would be the only way to achieve these criteria; without a vehicle they could not be employed for example, but without employment they could not access the fund.

PIP eligibility does not require people to be engaged in employment, education, caring responsibilities etc., and nor arguably should the eligibility criteria for Motability's grant. For many disabled and non-disabled people, independent living (i.e. community participation, seeing friends and family, getting to medical appointments etc.) is as important as activities such as working.

The eligibility criteria for people with more complex needs to access funding for specialised funding was accessed from the Motability website in November 2019 and at that point in time was published as follows:

Funding for specialised vehicles for people with more complex needs: eligibility criteria (Correct as of November 2019).

Read on for details of what we may consider when reviewing your application for a charitable grant:

- You are **solely responsible** for the care of one or more dependents, such as: a disabled partner or child, care of an elderly relative or young children. You must demonstrate that the vehicle is essential to enable the continuation of the care given.
- You are in **full-time education or training** and a vehicle would allow you to access it independently. Full-time education is defined as: education undertaken in pursuit of a course, where a substantial period of each week is spent receiving tuition, engaging in practical work, receiving supervised study or taking examinations. Training can include being in an unpaid Apprenticeship.
- You are in **paid employment**, where the use of a vehicle is essential for commuting to and from your place of work, or for frequent business use.
- You carry out **voluntary work**, where the use of a vehicle is essential to enable you to undertake this work and you spend a substantial amount of time each week volunteering. Voluntary work can include helping out unpaid at a charity, voluntary organisation or community group, a public-sector organisation like your local council or a social enterprise supporting your local community.
- We also look at some cases on an **exceptional basis**, for example, if you live a long way from local amenities or where there are very limited local transport options, such as local authority transport, NHS transport, volunteer transport or wheelchair accessible taxis.

Disabled People Against Cuts (DPAC) and members of DES were particularly vocal in their criticism of the changes that had been made.

"For those excluded from this because they do not meet the eligibility criteria their lives are likely to be very restricted. In many cases they cannot seek work or undertake education or voluntary work because they do not have any means to access it...To be barred from the special vehicle fund therefore traps them permanently as they are excluded and have no opportunity to change their status to qualify for a vehicle from the fund." (DPAC)

In addition to the changes made to the criteria many people were upset that the changes were made both without consultation and without notifying the then current recipients of the fund or more widely. Of the 16 people who commented on the changes in the DES Poll, 15 of them they referred to the changes as 'secret'. These 'secret' changes highlights both the lack of information Motability provide to their customers and their transparency as an organisation, as well as providing another example of a lack of engagement by Motability with their customers and the disabled community.

"... changes to the grants funding. Hardly any people qualify now so it seems pointless. It doesn't make any sense that so many people can't get help while they are making massive profits and giving the money away to other charities." (DES Poll Respondent).

"Why did they change the grants scheme and without consultation? I now don't qualify under the new eligibility and won't be able to renew my WAV." (DES Poll Respondent).

Since our call for evidence was published on 5 November 2019, the eligibility for support relating to the provision of specialised vehicles for people with more complex needs, provided through the Complex Driving Solutions Programme, has become slightly less restrictive once again; with the wording of each criterion appearing more flexible in its interpretation. However, all decisions on funding are made by Motability on a case by case basis and dependent upon funds available to them at the time. There is no guarantee therefore, that an individual will qualify to receive funding from this grant stream. The updated eligibility criteria are outlined below:

Complex Driving Solutions Programme Eligibility Criteria⁶⁴ (correct as of February 2020 - formerly Special Vehicle Fund)

Our Complex Driving Solutions Programme is currently prioritising funding towards people who can join the Motability Scheme and will receive the most benefit by using the vehicle on a regular basis.

The cost of these vehicles is very high, so to ensure that we are providing grants for maximum benefit, we prioritise funding for disabled people who will find the use of a vehicle essential to support them with one of the following:

- Paid employment you work for an average of 12 hours or more a week;
- **Perform a volunteer role** you perform volunteering work for an average of 12 hours or more a week;
- Attending full time education or training and you need a vehicle to allow you to access it independently;
- **Caring for another person** you are responsible for the care of dependents, for example a spouse or child with disabilities, elderly relatives or young children, and the use of a vehicle is essential to provide the care they need.
- In exceptional circumstances you are in a situation not listed above but your circumstances make the use of a complex vehicle conversion essential for your everyday mobility. Consideration will be given to how long you have been using the Motability Scheme as well as frequent medical appointments where you are unable to use hospital transportation.

Overall, the Motability Scheme prides themselves on their individualised customer service. Whilst good customer satisfaction rates may back this up to some degree, there was overwhelming evidence from the consultation that the service provided is perceived as a standard or general 'one size fits all' approach. The Motability Scheme was perceived as offering little flexibility in terms of lease options, and as being non-responsive to the changing needs of their customers. Further observations provided evidence that Motability lack engagement with their users on issues such as grant eligibility criteria, and despite making millions of pounds available to help people who need financial assistance, that this scheme is not well promoted with many actual and potential customers unaware of its existence. The lack of awareness of financial assistance, together with the strict criteria set by Motability, may actually work against those for who the grant is designed to help and who are the most in need of assistance.

⁶⁴ Motability (2020). Grants for Complex Driving Solutions

6. Practical barriers to Motability

In addition to the larger issues of finance and the scheme process many respondents commented on what we have termed 'practical' issues, ones that have acted as barriers, or are potential barriers, to them accessing the Motability scheme. Practical barriers include availability of information, awareness of the scheme, a lack of choice of cars and issues related to Motability Scheme dealers. These factors are discussed in greater detail below.

Availability of information

In general, the evidence revealed a mixed response to the question of how easily accessible the information on Motability was for disabled people; some commented that it was good and easy to understand whilst others found the availability of information to be poor and not easily accessible. What was evident was that it was not easily accessible to all disabled people.

Some respondents commented that the Motability website is easy to navigate and offers a range of accessible ways to get in touch in order to cater for the diverse needs of their customer base.

"The information form Motability is great...I have never had a problem with them." (Consultation Respondent)

However, this ease contrasted with other views that the website was very difficult to negotiate; for many people who are unfamiliar with the internet, finding the information they required was very difficult. There is still a significant digital divide between disabled people and their non-disabled people.⁶⁵ This reinforces the need access the internet half as much as non-disabled people.⁶⁵ This reinforces the need for an availability of multiple formats of information (e.g. easy-read, screen reader compatible and large print) as well as diverse platforms for information so that those without internet access or smart phones are still able to access key information about Motability.

"The web site takes a degree in IT to manipulate." (Consultation Respondent).

"There seems to be minimal support on using the site. Arguably, the website falls short of commonly-accepted standards. It is not very user friendly." (Consultation Respondent).

"I do not think there is enough information readily available. I did not find the website or the pack that is delivered in the mail that insightful...I did not get a good understanding of how the scheme would work until I went on disability blogs and spoke to the dealership." (Consultation Respondent).

⁶⁵ Ofcom (2019). Access and Inclusion in 2018

Personal Experience #6:

A severely visually impaired man responded to our consultation regarding the information provision by Motability. He commented that although getting information form the Motability website was 'pretty good', he found the search facility very difficult. He commented that he liked to spend time browsing and comparing vehicles to find one suitable for his needs but that could only be done online and as the search facility was not user friendly this became very difficult. He suggested that the website needs 'some work'

Consultation Respondent

The Motability Scheme website contains a lot of useful information on the main Motability car leasing scheme, however, it was clear from the evidence we gathered that respondents did not feel quite so positive about the amount of information, or ease of access to information about areas such as scheme related grants, the grant appeals process, or support provided during the PIP appeals process. Information on these areas was perceived to be extremely difficult to find on the website. Whilst much of this information is available, it is not clearly signposted or promoted by the Motability Scheme. The problem is compounded by the fact that the information is spread across two separate websites: the <u>Motability Scheme</u> website and the <u>Motability website</u> (which contains the detailed information on grants). Given that many of the Scheme's customers are less likely to be familiar with using the internet it is surprising that the information is not more readily available, and this is something that could be easily remedied through better navigation between sites, perhaps including the provision of links between sites.

"The helpline is very good but the website is difficult for Special Vehicle Fund information to be accessed, It is 'hidden' away." (DPAC)

"...there is felt to be major deficiencies with the information provided by Motability and DWP...Motability have some informative videos but these can be difficult to find. Similarly, it is not easy to find information on adaptations and grants to cover their cost." (DPTAC)

"There is sufficient information regarding the Motability scheme available, though more information should be made available regarding grants for adaptations of Motability vehicles...Very little or no information is forthcoming regarding grants, for fitting out Motability vehicles." (Consultation Respondent)

The MS Society commented that there is very little awareness of the assistance and support that Motability can provide to disabled people during the PIP appeals process; it is something that Motability offer, however it is not well promoted or known.

The evidence suggests that information on any aspect of the scheme, that is not directly related to the standard lease of a Motability vehicle, is not clearly or adequately promoted and individuals have to ask directly or find the information through alternative sources. There is a sense that Motability and Motability Operations 'hide away' information about anything that is beyond the main car leasing scheme. One interviewee commented that he thought that Motability Operations would extend a lease beyond 3 years but were not keen to do so and therefore did not promote this option particularly well or clearly. Comments demonstrate that Motability Operations generally have excellent customer service when people telephone their helpline with queries, and Motability Operations view this satisfaction as consolidating their 'individualised' service; however, it would seem that people would also appreciate clearer, more easily accessible information to be provided on all aspects of the Motability Scheme both on the website and in other suitable formats.

Many people found the information on the website useful, however for people with very specific needs the information provided there, and at Motability Scheme events, was simply not good enough. For people who are going to commit their weekly PIP mobility allowance and possibly advance payments for a car, it is vital that they have all the information available to them to make an informed correct decision about the vehicle they are going to choose. Given the inflexibility of changes mid-lease that people have highlighted, the correct choice of vehicle and adaptations is crucial for Motability Scheme customers. Specific information however, such as boot size was difficult to come by for some respondents, yet crucial to their decision making.

"The main problem we found was the difficulty in obtaining information on rear boot space dimensions. This is the main criteria with people who use wheelchairs as to whether they will fit the car...The number of carers (including my wife) walking around the show with tape measures to see if a wheelchair fitted was astonishing. None of the cars shown had any information on boot size." (Consultation Respondent).

"The current mobility scheme search engine does not allowed (sic) for searches to be undertaken with regard to car seat height, or type of transmission control beyond the standard automatic/Manual." (Consultation Respondent).

Unclear rules

One practical barrier related to the availability of information is confusion around the scheme 'rules'; comments were made that the information and rules for using a vehicle leased by a disabled person were confusing. In particular, there was confusion around critical issues such as how Motability vehicles can be used and by whom.

"Some disabled people are also of the misunderstanding that the driver needs to be the disabled person and that the disabled person always needs to be in the vehicle when it is in use. This means that a family frequently don't look into the fine print about the lease and dismiss it as an option." (MACS).

Information presented to us by SCOPE indicated that misinformation was a particular issue; disabled people had varied information on issues such as whether named drivers could use the vehicle without the disabled person present and at what age children qualified for the scheme. The perceived lack of clear information provided by Motability and therefore the reliance on more informal methods of information gathering may be fuelling these issues.

"...there is a lot of ignorance about the scheme rules." (SCOPE)

"The wording of the Motability contract could inhibit the use of the car. 'The car has to be used by, or for the benefit of the disabled person.' I feel it is vague." (Consultation Respondent)

"If the non-driving disabled person lives in a family setting, or is a child, completely adhering to the Motability T&Cs can be extremely difficult and expensive as in theory at least, you should also have another car to use for anything that cannot be directly or even indirectly for the benefit of the disabled person...the current rules and road tax exemption situation mean that actually most of us are in breach at some time or another." (Consultation Respondent)

SCOPE went on to suggest that whilst Motability Operations staff were very helpful in answering individuals questions a clearer digital resource clarifying these issues could reduce the confusion for many disabled people.

Awareness of scheme

It is understood that information about the Motability scheme is provided to PIP recipients in the original award letter that they receive. However, it seems that this information commonly goes unnoticed as many eligible people remain unaware of the scheme. Parkinson's UK commented that for many people the arrival of an award letter represents a stressful and anxious time for the disabled person and their family, and it is therefore no wonder that the request for further information on Motability goes unchecked.

Motability commented that promotion of the scheme was initially the responsibility of the DWP and that, due to GDPR guidelines, they have so far been unable to contact eligible non-users of the scheme. The Department needs to give consideration to how it can ensure that eligible non-users are aware of the scheme within what is permissible within GDPR. For example, including a message within relevant annual benefit statements However, there are many other forms of advertising that, to our knowledge, have not yet been explored and that could reach more eligible disabled

people. Reaching out to disabled people via organisations is a key tool to informing the disabled community and other sites such as Accessible Transport Scotland have been suggested to us as ideal for the integration of Motability Scheme promotional materials.

Whilst all of our respondents were aware of the scheme at the time that they responded to the consultation, many only discovered the scheme by word of mouth or have promoted the scheme to other disabled people who were also unaware of its existence. Better promotion of the Scheme is key in increasing awareness and helping all disabled people to make an informed choice as to whether they wish to participate in the scheme or not.

Research from Motability from 2015-2016 suggests that almost half of eligible nonusers are unaware of the scheme and a further 9% are unaware of the services that it provides,⁶⁶ awareness is particularly low amongst PIP recipients. Clearly more needs to be done to increase awareness of the Motability scheme amongst eligible disabled people.

"The scheme could be better publicised to disabled people. We only found out about the scheme when visiting a car dealer with our daughter who was buying a car. We have also advised disabled friends about the scheme." (Consultation Respondent)

Choice of vehicle

When it comes to choosing a vehicle, there are thousands of cars available to look at on the Motability Scheme website;⁶⁷ these may not all be available in every dealership or suitable for every disability. Respondents were particularly frustrated with the lack of larger vehicles available through the Motability Scheme; more complex or family needs often meant that disabled people required a larger vehicle but there was a perception that there was less choice and these vehicles were often accompanied by a larger advance payment. Similarly, disabled people who required an automatic vehicle felt they were being penalised by a perceived lack of choice and larger advance payments. While the evidence told us that choice and affordability are dependent on severity of impairment or specific needs, Motability are clear that all types of vehicles are available without an advance payment. Therefore, it is clear that further consideration needs to be given to establish why there is a prevailing and consistent view that inequalities exist within the Motability scheme with those having higher needs or requirements being unfairly disadvantaged.

⁶⁶ Oxford Economics. <u>The Economic and Social Impact of the Motability Car Scheme</u>

^{67 (2020)} Motability: Car Search Result

"However, the lack of cars available on the Motability has dramatically [increased] from a few years ago. This is more problematic for wheelchair users who need a wider variety of vehicles as there are more things to take into consideration i.e. boots size, door angle, seat height etc. Having less options for cars has made it difficult to access the mobility scheme. I feel it's a form of discrimination against wheelchair users." (Consultation Respondent)

"The downside seems to be the lack of automatics available, or if are, command a higher advance payment." (Consultation Respondent)

Personal Experience #7:

One respondent reported that he had used the scheme for two years – from 2016-2018- but had to cancel his contract early as his disability needs had changed. He felt lucky because he did not have to pay a cancellation fee and was additionally refunded a proportion of his advance payment. However, due to changes in his condition he needed a bigger 'hatchback' and an automatic vehicle, but the range offered by Motability did not include an appropriate vehicle. They offered him much bigger vehicles e.g. a Mercedes van, but these were too big and excessive for his needs; they also required a much larger advance payment. He commented that he was frustrated that in addition to there being no appropriately sized vehicle available, that larger and automatic vehicles were predominantly diesel and he did not want a diesel car on principle.

In his opinion advance payments appeared to go from one extreme to the other in terms of cost with no mid-range-car or mid-range-advance payment available.

Consultation Interviewee

Poor treatment by dealers

The year on year high customer satisfaction rates recorded by the Motability Scheme are impressive; figures show that on average satisfaction with the scheme sits at around 98-99%.⁶⁸ These figures are drawn from annual telephone surveys based on 600 participants.

In our consultation, on the whole people spoke very highly of the customer service they received from the Motability Scheme. There were however exceptions, with people whose treatment had left them unwilling to deal with the organisation in the future.

"I use mine to run a private car – the benefit is that I do not have to deal with Motability… I would rather stop driving then deal with them again." (Consultation Respondent)

^{68 (2019).} Motability Annual Report 2018-2019

More commonly than this however, were comments about poor treatment by Motability Scheme dealers. Whilst Motability Operations does not have complete control over the dealers, they are representatives of the company, are trained by the company and should be held accountable for their level of service by Motability Operations. Common complaints about Motability Scheme dealers were poor attitudes towards disabled people being treated like second class citizens. This negative treatment of disabled people led directly to a very real barrier to the Motability scheme; the customer service delivered by some Motability Scheme dealers acted as a deterrent from proceeding with leasing a vehicle through the scheme.

"Appalling service and clearly no respect of health problems, disability and limitations of customers. Ignorant and Arrogant." (DES Poll Respondent).

"Attitude of showroom staff. I turned away and wouldn't go back. They treated me like a 2nd class citizen." (DES Poll Respondent).

"I have been treated very badly at car dealerships and would have expected better. Eventually I decided not to get a car from Motability because of this. They were okay until I said I was looking for a mobility car and then customer service went downhill." (DES Poll Respondent).

Poor treatment by dealers is not acceptable in any location; for some people in rural locations however it causes exceptional difficulties. For people who live in isolated areas and have little in the way of nearby facilities poor treatment at a dealership, that they have often travelled a long way to visit, can be particularly detrimental to their wish to lease a car through the Motability Scheme.

One respondent who managed to buy her car from the Scheme nine years ago, and is still running it, commented in interview that she now gets much better treatment from the garage when taking her car to be serviced; being the car owner rather than a Motability customer, in her opinion, made all the difference.

Dealers as 'experts'

Another concern related to dealerships centred around the lack of expertise on offer. Whilst many dealers were helpful there was a general sense that they do not have a clear understanding of the needs of disabled people and their families, and thus are not the 'experts' they claim to be when it comes to advising disabled people on the type of car or adaptations that they require. Evidence suggested that the disabled person was in the best position to understand what their requirements of a vehicle were, but that their voice was not encouraged or heard during this process. In contrast, dealers were viewed as helpful and the process quick and easy when no adaptations were required. Once again, practical barriers are evident for those with complex needs who wish to partake in the scheme.

"Generally excellent service from Motability but find dealerships are not the 'experts' they often claim." (DES Poll Respondent).

"Leasing the car and the service received is going to vary from dealership to dealership but at the end of the day the Motability specialist in the show room does not fully understand what adaptations are needed for every disability and condition and are no more than a glorified salesman pushing for example their Vauxhall over another dealer's Ford." (Consultation Respondent)

"Motability and Motability Charity believe that they are best at making a decision as to what adaptations are most suitable for a customers disability needs. My view is that customers themselves are best placed to make those decisions and that a wider range of independent advice should be accessible rather than Motability dictating what is going to be available on their next drive from wheelchair." (Consultation Respondent)

Whilst practical barriers vary from individual to individual, they are valid points that need to be considered in this report, and act as a very real barrier to disabled people accessing a private vehicle via the Motability scheme. Of particular concern was the sheer number of eligible non-customers who were unaware of the scheme and the inaccessibility of the information on Motability, in particular around financial assistance, for many disabled people. Motability are responsible for the promotion of the scheme and the content of their website, and despite GDPR restrictions that has, according to Motability, made it difficult to contact eligible non-customers directly, it is of concern that more work has not been put in to promoting the scheme and its benefits more widely.

7. Conclusions and Recommendations

The evidence presented in this report demonstrates in very broad terms that for many disabled people public transport is inaccessible; the infrastructure places those living in major cities in a more advantaged position when it comes to using public transport, both in terms of accessibility and affordability. The Motability scheme offers an alternative to reliance on public transport however this is also not equally accessible to all eligible disabled people; barriers to accessing the scheme include poverty, high costs of many larger and adapted vehicles, fixed lease terms, issues with the grants system and more practical factors and perceptions. For those who can use the Motability scheme they find access to private transport impacts their lives in a hugely positive way, enabling them to live more independent lives, remain in employment, enjoy a social life and combat isolation and depression. Wider issues relating to PIP eligibility and the reassessment process were also revealed to be key issues for disabled people.

Going forward, the forthcoming disability strategy is a good opportunity for the Department for Work and Pensions (DWP) to consider the issues brought to light in this report more fully and across government departments. By working together, the DWP and other parts of government can take this, and other research, forward to explore the equality of mobility support provision for all disabled people and to use their purchasing power to add value to the current support system. Some key areas

for discussion and subsequent recommendations, based on the evidence provided in this report are outlined below.

During this research we found a number of inequalities of experience for disabled people in terms of mobility support. These included, but are not limited to, access and availability of public transport for disabled people, Motability customers who only use the vehicle infrequently and disabled people who do not use the Motability scheme.

Recommendation 1

DWP to work with the Cabinet Office's Disability Unit, the Department for Transport, the Ministry for Housing, Communities and Local Government and the devolved governments to explore what can be done to promote equality of access by disabled people to bus services throughout the UK, regardless of time of day or region.

Recommendation 2

DWP, in collaboration with colleagues in other government departments as appropriate, to explore the feasibility of extending to those who do not obtain a private vehicle via Motability advantages for broader transport options that are equivalent in value to the tax reliefs that those who do use Motability benefit from. This may include taxi schemes, buses on demand or other community bus schemes, as well as alternative vehicle lease providers to compete with Motability Operations.

Given the evidence presented in the section 'Broad Findings' which outlined issues of eligibility and reassessment, and given the intensity with which these factors were voiced by participants and organisations, we recommend that the DWP takes a number of these into account when considering their forthcoming Green Paper. Of particular concern for many people were the length of PIP awards and the stage of life at which the mobility element of PIP/DLA can be awarded. Given the emphasis by the government on healthy ageing, working to an older age and combatting social isolation, increasing access to mobility support may offer some help in achieving the positive aspects of increased mobility in later life. Steps towards achieving this might, for example, include enabling people who have deferred their state pension to claim PIP or extending the age at which people can claim PIP to 70 or 75.

Given that some disabled people lose their Motability vehicles following a PIP reassessment and subsequently have their benefits reinstated following an appeal it would be useful for DWP to ensure all relevant evidence is available at the initial reassessment and that the time between reassessment and appeal is shortened to reduce the number of disabled people who lose a Motability vehicle unnecessarily.

Recommendation 3

DWP, in consultation with other government departments as appropriate, should take the opportunity presented by an imminent Green Paper to consider some of the practical and financial impacts of its policies and processes on claimants' ability to use the Motability Scheme. For example:

- reviewing the length of PIP awards (particularly for life-long and progressive conditions);
- reviewing eligibility criteria for PIP (in particular reviewing the ages at which a mobility element is not currently included in an award and specifically considering whether there is merit in extending it to children under three and for some who acquire a disability after state pension age);
- exploring whether the length of time between reassessment and appeal can be shortened to prevent those with an ongoing entitlement from losing their car and having to re-apply.

While acknowledging Motability's independent status, the evidence available to us suggests that there are opportunities for the Motability Scheme to strengthen the equity, flexibility and transparency in the way it delivers its business. We considered it important to share that insight with Motability and offer some recommendations based on that evidence.

Research by Motability themselves has indicated high levels of satisfaction for customers of the scheme. The satisfaction for these users of the scheme is not in dispute, however the evidence we have gathered suggests that the scheme works well for customers who have private means or require smaller and/or non-adapted vehicles; the advance payments and costs of adaptations put the scheme out of reach for some disabled people. Evidence presented to us suggests that access to the scheme is not equal, and many disabled people are missing out on the opportunity to live independent lives. Given the effective monopoly status of Motability Operations and the value for money it can provide more needs to be done on making the scheme equally accessible to all disabled people who could benefit from it.

Whilst issues of general poverty were revealed to be problematic for some disabled people, the inequalities of affordability related to accessing the Motability scheme particularly impacted individuals who required larger, automatic or adapted vehicles. Disabled people who responded to our consultation expressed a wish for Motability Operations to use profits to make the scheme more easily accessible and to reduce both initial and recurring costs; people with different levels of need should be entitled to the same service as each other with no difference in cost. We acknowledge that the financial implications of large-scale changes to the Motability Scheme are

beyond the scope of this report. Motability have indicated that reducing the costs of wheelchair accessible vehicles on the scheme would increase the cost of all cars across the board to compensate for this change. We acknowledge this response but argue that the scheme as it stands unfairly disadvantages many disabled people who require anything more than a standard vehicle.

The Committee was concerned that Motability Operations had made profits that were both sizeable and recurrent, as identified by the NAO. We know that Motability Operations has looked carefully at this and it is our expectation that action is being taken to avoid these in the future. The priority should be to use resources available to deliver an effective, affordable scheme with improved equality of access, as well as maintaining prudent levels of reserves. Profits and projected profits should be transparently reported, with independent scrutiny in relation to the use of public money specifically. Should a one-off profit be made, a transparent grants scheme is appropriate, with involvement of disabled people through broad engagement in setting strategy and eligibility. This would include consideration of the complex issues of potential cross-subsidy, as benefit claimants' monies contribute to profits that may benefit different disabled people through grants, on the basis of clear and agreed criteria.

Recommendation 4

We strongly encourage Motability to develop a transparent strategy designed to make access to the scheme more equitable.

Motability Operations should place priority on using available resources to deliver an effective scheme that is equitable and as affordable as possible for users; and it should report any profits and projected profits transparently, with independent scrutiny.

Only in the event that Motability Operations makes one-off profits in future should it transfer funds to Motability the charity to dispense grants, and these grants should be planned and dispensed by developing with disabled people and their organisations a transparent strategy for grant-making.

Evidence provided to us suggests that the current progress in opening up the accreditation scheme for the provision of a car lease service to disabled people in Scotland has the potential to lead to a more flexible and specialised delivery. Discussions we have held indicate that more specialised lease services are being developed to cater for those living in rural areas or who are infrequent vehicle users. Given the evidence provided in this report regarding users' dissatisfaction with the inflexibility of the current leasing scheme, for example for those with rapidly changing health conditions that affect their adaptation needs we encourage Motability to learn lessons from developments being made in Scotland. Additionally, we encourage

Motability and Motability Operations to assess their own lease scheme in terms of flexibility and aim to enable more disabled people to access the scheme and have a better experience in doing so.

Recommendation 5

We recommend that Motability develops a more flexible scheme/service in line with customers' needs, in particular focussing on:

- a more tailor made lease package
- variable lease lengths
- variable insurance options
- better promotion of post lease car ownership coupled with the opportunity to purchase the vehicle at a competitive price.
- more environmentally friendly or electric vehicles available. Given Motability's status as one of the largest buyers of new cars in the UK, we recommend they take a lead in making electric cars more widely available to all disabled people on the scheme.

The evidence revealed some mistrust of the Motability Scheme, and feelings that it was out of touch with disabled people were often the result of a lack of transparency, accountability and engagement with disabled people and organisations. Practical steps can be made to ensure improvements in this area are made.

Recommendation 6

The evidence available to us indicates that, as the funding of the scheme has its origins in public money, there is considerable scope to address concerns about lack of transparency, accountability and engagement. We therefore strongly encourage Motability to:

- foster more systematic and inclusive engagement with disabled people across the country to strengthen its decision making for strategy and policy. We note that Motability carried out a major consultation exercise on its future strategy with disabled people and their organisations in spring 2019. However there is scope for that engagement to go further, for example through the co-production of changes to key issues such as on the criteria for means tested grants and special vehicle funds.
- increase transparency in terms of strategy and the grants system.

 collaborate with DWP, the Financial Conduct Authority, National Audit Office and the Charity Commission to ensure greater confidence in the use of public funds through robust arrangements regarding the scrutiny, transparency and accountability of the organisation and its finances (including its reserves policy); and to ensure the efficient and effective running of the Motability scheme.

Despite the high satisfaction rates recorded by the Motability Scheme, the consultation revealed a number of practical areas which caused potential or actual barriers for disabled people in accessing the scheme. We acknowledge the improvements made to the website over recent months in terms of information about grants and financial assistance; these changes are greatly welcomed. However, issues still remain with awareness of the scheme, the transparency of the organisation and its decision-making process, as well as with the accessibility of the website information for disabled people of all ages and abilities.

Recommendation 7

We recommend that Motability and Motability Operations considers what practical steps it can take to improve its services for its customers, including:

- reviewing options for strengthening its communications approach to promote the Motability scheme better, ensuring accessibility of information for all disabled people through clear and well signposted websites.
- publishing clear criteria regarding eligibility for the grants scheme, ensuring that its availability is promoted in an accessible way.
- greater flexibility for mileage limitations to ensure that they do not unduly penalise those who live in rural areas or need to travel long distances for work and/or education.
- greater accountability for the treatment of customers at Motability dealerships, ensuring improved and more consistent treatment of disabled customers.

ANNEX A

Call for evidence published by the Social Security Advisory Committee on 5th November 2019

The Social Security Advisory Committee is conducting research that examines how social security funds can be used most effectively to support the mobility needs of disabled people.

We are trying to gather a pool of evidence which we can draw from to help underpin our research. We would therefore welcome input from a broad range of organisations and individuals who have relevant insights or evidence to share with us.

Background to our research project

The Motability scheme allows anyone in receipt of certain mobility allowances to use this payment towards the lease of a car, scooter, wheelchair accessible vehicle or powered wheelchair. In association with the Department of Work and Pensions, Motability aims to support disabled people to achieve greater independence via access to affordable mobility.

The scheme is currently open to anyone in receipt of the Higher Rate Mobility Component of Disability Living Allowance (DLA), the Enhanced Rate of the Mobility Component of Personal Independence Payment (PIP), the War Pensioners' Mobility Supplement or the Armed Forces Independence Payment. Figures from 2017 indicate that of the 1.72 million disabled people in the UK who are eligible to participate in the scheme, 614,000 actually did so; roughly two thirds of eligible disabled people in the UK are not accessing the scheme.

While there has been a significant amount of research on public transport and accessibility for disabled people, there has been relatively little research that explores access to, and benefits of, private transport.

The focus of our research is on exploring whether the current investment in Motability, coupled with the availability of the DLA/PIP mobility component, is the best way to support the mobility needs of disabled people. In particular, the research aims to get a better understanding of any barriers disabled people may face in accessing the Motability Scheme.

We are particularly interested in hearing from disabled people, carers and/or families of adult disabled people, parents/carers of disabled children and charities or organisations who support disabled people.

Call for evidence

The committee would like to hear from anyone who has experience of and evidence on the Motability scheme. We are keen to hear about the experience of those who may be eligible for the Motability scheme but have not taken it up. Our call for evidence is focused on the following:

- 1. For those who are eligible, is not leasing a vehicle through Motability a voluntary choice? Is the decision not to use the scheme related to a preference for using public transport or is it due to other factors? Are disability benefits used for other forms of transport or travel support; and if so what are the benefits of this?
- 2. For disabled people who are on enhanced mobility benefits, what are the main barriers to leasing a vehicle through the Motability scheme? Barriers could include financial, practical, information based or personal factors for example. What are the key issues for those individuals who feel they cannot opt in to the Motability scheme?
- 3. How does participation/non-participation in the Motability scheme impact on the life of a disabled person?
- 4. How affordable are adaptations to a leased vehicle? Does the need for adaptations put people requiring these at a disadvantage in terms of using the scheme? What grants are available for this group of people and what more can be done to support these needs?
- 5. For people who are not eligible, because they do not get the enhanced rate, is there a demand for opening up access to the Motability scheme?
- 6. How available and/or useful is the information on the Motability scheme? Is support available to access this information? How easy is the process involved in leasing a vehicle from Motability for disabled people with varying needs?
- 7. To what degree do the following factors impact disabled people's need for and/or opportunity to benefit from the Motability scheme:
 - i. Different experiences of disability e.g. physical impairment, mental health condition, learning difficulty etc.
 - ii. Other characteristics e.g. age, gender, ethnicity etc.
 - iii. 'Geography' living in a rural or urban environment etc.
- 8. Do those using the Motability scheme benefit more financially than those eligible for the highest/enhanced rate who do not use the Motability scheme?

How to respond

Responses, focusing on the above questions, are needed by **3 December** and should be emailed to:

ssac.consultation@ssac.gov.uk

Or send to:

The Committee Secretary Social Security Advisory Committee 7th Floor Caxton House Tothill Street London SW1H 9NA

The information you send to us will be made available to members of the Social Security Advisory Committee and its secretariat. You should note that the Committee may publish your evidence, and/or include attributed extracts from it, in its report.

You should also note that all information submitted to the Committee as part of this consultation, including personal information, may be subject to publication or disclosure if requested under the Freedom of Information Act 2000. By providing personal information for the purposes of the public consultation exercise, it is understood that you consent to its disclosure and publication. If this is not the case, you should limit any personal information provided, or remove it completely.

ANNEX B

List of organisations involved in the consultation process

The Committee is grateful for the valuable input provided by the following organisations, as well the 55 individuals, who gave their time to advise and support us during this project.

Age UK

Citizens Advice Scotland

Disability Equality Scotland

Disability Rights UK

Disabled Motoring UK

Disabled People Against Cuts

Inclusion London

Leonard Cheshire

Mobility and Access Committee for Scotland

Mobility and Support Information Service

Motability

Motor Neurone Disease Association

MS Society

Parkinson's UK.

Rugby Football Union, Injured Players Foundation

Scope

The Disabled Persons Transport Advisory Committee

Together for Short Lives

Wheels for Wellbeing

ANNEX C

Membership of the Social Security Advisory Committee⁶⁹

Dr Stephen Brien (Chair) Bruce Calderwood Carl Emmerson Chris Goulden Kayley Hignell Phillip Jones Prof. Gráinne McKeever Dominic Morris Seyi Obakin Charlotte Pickles

SSAC Secretariat

Liz Sayce

Denise Whitehead	(Committee Secretary)
Nishan Jeyasingam	(Secretariat)
Jaishree Patel	(Secretariat)
George Watley	(Secretariat)

⁶⁹ David Chrimes and Victoria Todd were also members of the Committee during the period in which this project completed.

SOCIAL SECURITY ADVISORY COMMITTEE

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