National Centre for Social Research

Inclusive Transport Strategy Evaluation Follow Up Report
Assessing Implementation and Outcomes

Authors: Joshua Vey, Bernard Steen, Stacey Link, Yesha Bhagat, Nevena Ilic, Katy Robertson, Joy Mhonda
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Acknowledgements

Glossary

Terms used in this report

- **Access for All** – a funding programme launched in 2006 to address the issues faced by disabled passengers and passengers with mobility restraints (such as heavy luggage or pushchairs) when using railway stations in Great Britain. The funding is used to create an obstacle free, accessible route from the station entrance to the platform.

- **National Rail Accessibility Map** – launched in 2019, the National Rail Accessibility Map enables train passengers to check which accessibility features are present at train stations in advance of their journey.

- **Assistance dog** – a dog which is specially trained to support the needs of people with disabilities and medical conditions.

- **Blue Badge** – a parking permit valid for people with disabilities, allowing them to park in designated disabled parking bays.

- **Bus Back Better** – a national strategy launched in 2021 setting out the Government's plans for improving buses in England outside of London.

- **Changing Places toilets** – standard accessible toilets do not meet the needs of all disabled people. Changing Places toilets provide additional equipment and space to allow those with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis to use the toilets safely and comfortably.

- **Community transport** – accessible, community-based transport solutions, to address transport needs not met by conventional transport services. Examples of community transport include community and dial a ride bus services (among many others), which often operate on a door-to-door basis.

- **Concessionary bus passes** – schemes that enable passengers who meet the relevant criteria to travel at a discount or for free, for example if they have reached state pension age or who are 'eligible disabled'. In England, though there is one national statutory concession, Local Authorities are typically responsible for administering their own concessionary bus pass, whereas Scottish and Welsh Government administer a single national bus pass.

- **Access for All Control Period 6 (2019 to 2024)** – Control Periods are five-year timeframes (starting on 1 April and ending on 31 March, to coincide with the financial year) over which specific financial investments and upgrades to the rail network are to be implemented. In each Access for All Control Period, a specific tranche of stations receives funding to implement physical accessibility improvements (see Access for All).

- **Disability** – a person is defined as disabled if they have a physical or mental health condition or impairment, lasting or expected to last 12 months or more, which has an impact on their ability to carry out day-to-day activities (as per the Equality Act 2010).

- **Disability Confident Employer scheme** – a Government scheme designed to encourage employers to recruit, retain and develop disabled people.

- **Disabled People's Protection Policy lanyard** – also known as the Hidden Disabilities Sunflower, the Sunflower Lanyard indicates to people around the wearer that they may need some extra support or assistance.

- **Disabled Persons Railcard** – the national disabled persons concessionary rail pass in Great Britain. It enables disabled passengers who meet the relevant criteria to travel by train at a discount.

- **D34 and D50 concessions** – rail concessions for passengers with visual impairments and wheelchair users, labelled D34 and D50 concessions in reference to the percentage discount on an adult fare. These concessions can only be applied to tickets when bought in person from a ticket office.

- **Equality Act 2010 –** an Act of Parliament that provides a legal framework to protect individuals against discrimination, harassment or victimisation based on nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

- **Inclusive Transport Leaders Scheme** – a Government initiative that recognises the best performing operators for their actions to improve the accessibility of their services and to promote good practice in the wider industry.

- **Inclusive Transport Strategy** – a governmental strategy aimed at creating a transport system which offers equal access to disabled passengers by 2030.

- **Local Licensing Authorities** (also known as licensing authorities) – are organisations responsible for issuing licenses, permits, or certifications required for individuals or businesses to operate legally. It is important to note that, while they have been referred to as 'local licensing authorities' throughout this report, taxi and Private Hire Vehicle drivers can be licensed by authorities outside of the area in which they predominantly work, so not all authorities are necessarily "local".

- **Logic model** – a logic model is a description of a chain of causes and effects, showing how the actions involved in an intervention or policy are expected to lead to the intended outcomes. Logic models are typically presented in graphical form.

- **Makaton** – a sign language that relies on communication via speech, signs, symbols and body language.

- **Modal leads** – the ITS consists of 96 separate policy commitments (or 'ITS actions'), across all main modes of transport. Responsibility for the delivery of the ITS actions was generally grouped according to individual modes of transport (such as bus, rail, taxi and aviation) or in some cases, several related modes. Throughout the report, 'modal lead' is used to refer to DfT staff with lead oversight of a group of ITS actions relevant to specific transport modes.

- **Non-visible disabilities** – disabilities which are not obvious and/or visible, for example mental health-based disabilities or hearing and visual impairments.

- **Passenger Assist** – a service for pre-booking staff assistance on rail journeys. Passenger Assist is generally intended for older and disabled rail passengers, and assistance can involve helping passengers on and off trains, reserving wheelchair spaces and seats, provision of information, and more general assistance.

- **Passenger charter** – guidance provided by some local authorities or transport organisations/providers, which outlines passenger entitlements when using relevant transport services.

- **Priority seating** – seating on public transport that is intended for anyone who may require additional accommodations when sitting. It offers greater accessibility than standard seating, typically by providing more space and by being located closer to the entrance/exit.

- **Rail Ombudsman** – an independent, not-for-profit organisation offering a free, expert service to help resolve customer complaints about service providers within the rail industry.

- **Reference Wheelchair Standard** – the Reference Wheelchair Standard is used to define the size and weight of wheelchairs and other mobility aids that can be accommodated on public transport services.

Acronyms used in this report

- AAP Accessibility Action Plan
- ADR Alternative Dispute Resolution
- AIT Accessible Inclusive Travel Division
- ATP Accessible Travel Policy
- AV Audio Visual
- BEIS Department for Business, Energy and Industrial Strategy
- BSL British Sign Language
- CAA Civil Aviation Authority
- CBP Concessionary Bus Pass
- CTA Community Transport Association
- DfT Department for Transport
- DPPP Disabled People's Protection Policy
- DPTAC Disabled Persons Transport Advisory Committee
- DVLA Driver and Vehicle Licensing Agency
- DVSA Driver and Vehicles Standards Agency
- GSS Government Statistical Service
- ISP Inclusive Service Plan
- ITLS Inclusive Transport Leaders Scheme
- ITS Inclusive Transport Strategy
- KPI Key Performance Indicator
- LLA Local Licensing Authority
- LM Logic Model
- LTA Local Transport Authority
- MCA Maritime and Coastguard Agency
- MSA Motorway Service Area
- NTS National Travel Survey
- ORR Office of Rail and Road
- OTC Office of the Traffic Commissioner
- PHV Private Hire Vehicle
- PSED Public Sector Equality Duty
- PSVAR Public Service Vehicle Accessibility Regulations

- RDG Rail Delivery Group
- REAL Respect Empathise Ask Listen training programme
- RNIB Royal National Institute for Blind People
- RTIG Real Time Information Group
- TfL Transport for London
- TUAG Turn Up and Go
- WAV Wheelchair Accessible Vehicle

Executive summary

The Inclusive Transport Strategy (ITS), published in July 2018, is an ambitious programme of work which aims to create a transport system that offers equal access for disabled passengers by 2030. At its core, the ITS has an ambition for disabled people to have the same access to transport as everyone else, and to be able to **travel confidently**, **easily** and **without extra cost**. The ITS consists of 96 separate actions, across all main modes of transport, often involving multiple stakeholders.

About this report

This report presents the final results from the evaluation of the ITS. The aim of the evaluation is to assess the **progress made towards delivering the ITS policy commitments**, to measure and assess any **change in outcomes for disabled people** between the evaluation baseline and follow up and identify **what lessons can be learned for the future**. Starting in 2020, the evaluation involved extensive mixed-method fieldwork. This report primarily draws on:

- two waves of survey fieldwork with both disabled and non-disabled people, in 2020 and 2023;

- one wave of survey fieldwork with assistance dog users, in 2023;

- qualitative interviews with train and bus operators, and with Local Licensing Authorities (LLAs) responsible for licensing taxi and private hire vehicle (PHV) operators, in 2023;

- qualitative interviews with DfT staff and other strategic stakeholders, in 2023;

- secondary analysis of other high-quality datasets, including the National Travel Survey; and,

- the ITS Scorecard, which collates a range of metrics on disabled people's travel over time.

This report is part of a series of five reports that present the results of the ITS evaluation and are published together on GOV.UK. The report titled "Inclusive Transport Strategy Evaluation Summary report: learnings and lessons for future policy" provides an overview of all the research and summarises the key findings of the evaluation, with a focus on learning about how future accessible transport policy should be designed and delivered. It includes additional findings not covered in this report, which come from in-depth qualitative research with disabled people and advanced quantitative analysis of the survey data.

The impact of the COVID-19 pandemic

It is important to understand the ITS, and its evaluation, within the context of the COVID-19 pandemic. The pandemic caused major disruption to the transport industry, and led to enormous changes in travel behaviour. While the impact was most acute in the short term, there were also longer lasting effects.

The COVID-19 pandemic affected disabled people's travel

The pandemic had a greater impact on the transport behaviour and experiences of disabled people than non-disabled people. Even after all travel restrictions were lifted in 2022, disabled people were around twice as likely as non-disabled people to have avoided public transport, especially during busy times, and to have used different transport modes, as a result of concerns about COVID-19. Disabled people were three times as likely as non-disabled people to say their confidence had been strongly affected by these concerns. Many people experienced a shift towards hybrid working, although this affected non-disabled people more than disabled people, who were less likely to be in employment.

The pandemic also affected the delivery of the ITS

The pandemic significantly disrupted the delivery of the ITS by reducing the resources available—both human and capital—and by shifting the immediate priorities of key actors. Although many ITS actions were delivered, a large proportion of these were delivered later than intended, and several were not delivered at all. Within the DfT and transport operators, staff working on accessibility were often deployed to work on the pandemic response. Transport operators were more focussed on matters of financial survival and deprioritised accessibility improvements.

Whilst progress was made on the ITS, it is clear that the ITS would have made substantially more progress had the pandemic not occurred.

Key findings

Did the ITS achieve its intended outcomes?

The evaluation assessed a subset of high-profile actions within the overall set of 96. It used a repeat survey to assess whether key outcomes associated with each action improved between 2020 and 2023. The ITS evaluation provides an assessment of the policy commitments that were planned for the first four years of development. However, the DfT intends to achieve their overall ambitions for the ITS by 2030 and will therefore continue working towards these ambitions over a longer timeframe.

Overall, the evaluation did not find that key outcomes for disabled people improved over this time. It should not, however, be concluded from this that the kinds of accessibility initiatives included in the ITS are not an effective means of improving outcomes for disabled people. There are a range of reasons why the evaluation may not have identified positive changes. Firstly, many ITS actions were delivered later than intended, which meant that some of the impacts may not have come into full effect when the 2023 survey fieldwork was conducted. Secondly, many of the actions may have had substantial impacts locally, or for specific groups of transport users, and these impacts may not be visible in a general population survey. Thirdly, positive impacts from the ITS may have been offset by the lasting changes to travel behaviour and experiences caused by the pandemic.

The ITS actions were grouped into themes. The sections below summarise what was delivered under each theme, and the extent to which the intended outcomes were achieved.

Planning and information

The primary aim of this theme was to enable disabled people to plan their journeys more easily. All of the actions under this theme had been completed or partially progressed: the online National Rail Accessibility Map, which tells passengers the accessibility features at train stations, was made live; and additional funding to install audio-visual (AV) information on buses was announced, although had not yet been delivered to bus operators at the time of fieldwork. However, the planned online models of train stations—intended to help people to plan their journeys around stations—was not yet delivered at the time final evaluation fieldwork took place (2023).

Despite progress, the evaluation did not find that disabled people could plan their journeys more easily. In part, this may be because of the actions that had not been fully delivered. However, it was also likely related to the low levels of take-up of online and app-based services. Older disabled people, who were more likely to have mobility impairments and require physical accessibility adjustments, were much less likely to have used online and app-based services. It will be important for future policies to ensure that planning and information tools are accessible to all disabled people.

Interactions with staff and passengers

This theme aimed to improve disabled people's interactions with staff and other passengers. Substantial progress had been made on the actions under this theme. The "it's everyone's journey" public information campaign ran several times and aimed to raise public awareness of disabled people's needs and entitlements. New legislation was introduced to require all bus and train operators to offer staff disability training. The DfT established an accreditation scheme for transport operators, to recognise good performance on accessibility, and published a disability awareness training package for operators to use with their own staff, intended for use across transport modes.

However, the evaluation identified limited awareness and engagement from operators with these DfT initiatives, and financial barriers to fully rolling out new training packages. The evaluation did not find that disabled people's interactions with staff and passengers improved. This may be because several of the initiatives were delivered later than planned, due to the pandemic, or had not been fully rolled out. It may also be because disability-related negative experiences are a small proportion of overall negative experiences with staff and passengers: training initiatives may well have led to substantial improvements, but for a small number of disabled people using particular services, and so not have been detected in national surveys.

Assistance and facilities

This theme aimed to improve the assistance and facilities available to disabled people, to improve awareness of these services, and to help disabled people to access them more easily. Most of the actions under this theme had been largely delivered. The rail Passenger Assist app was fully implemented, and disabled people can now book the service two hours in advance of travelling, rather than needing to book it a day in advance as they did before the ITS was published. Funding was made available for additional Changing Places toilets (toilets that provide additional accessibility features – see Glossary) at Motorway Service Areas: at the time of fieldwork, 49 additional Changing Places toilets had been installed, with 10 more planned.

The ITS also intended to increase awareness of journey assistance tools, such as the Disabled People's Protection Policy lanyard (Sunflower Lanyard). Survey data showed an increase in awareness of these tools, and the DfT observed an increase. This was largely as a result of the pandemic—with disabled people using the tools as a way of communicating their needs in relation to the newly introduced public health measures—rather than deliberate awareness raising activities delivered through the ITS.

The evaluation did not find that awareness or use of Passenger Assist increased, nor did the use of an app to book it, or overall satisfaction with the service. Use of trains was generally much lower amongst disabled people than non-disabled people, so these findings may suggest a need for greater awareness raising outside of rail settings, to reach disabled people who do not currently travel by train. The findings also suggest the key driver of satisfaction may not be challenges associated with booking the service: other factors may be more significant, such as the behaviour of transport staff, or experiences of failed assists, where booked assistance is not provided. More research would be necessary to understand this in more detail.

Accessible vehicles

The primary aim of this theme was to increase the number of wheelchair accessible vehicles (WAVs) provided by taxi and PHV operators. In accordance with Section 167 of the Equality Act 2010, all LLAs are required to maintain and publish a list of the designated wheelchair accessible taxis and PHVs licensed within their jurisdiction. At the time the ITS was published, the main function this served was to provide information about vehicle accessibility, to aid disabled passengers in identifying vehicles which may meet their needs.

DfT encouraged LLAs to publish lists of WAVs, but compliance was initially low. As a result, the Equality Act was amended in 2022 to make publishing such lists a statutory requirement. The evidence indicates that although more LLAs have published lists since this time, it has not yet led to an increase in the number of WAVs in operation. A key reason for this cited by LLAs who participated in the research was insufficient financial incentives for taxi and PHV operators to purchase WAVs.

Complaints

The aim of this theme was to improve disabled people's awareness of their rights, and to make it easier to raise complaints, with a view to ultimately increasing the number of accessibility-related complaints made. Progress was made against most of the intended actions. The Rail Ombudsman was set up in 2018. DfT published best practice guidance for LLAs for consultation, which included guidance on handling complaints about taxis and PHVs, although later than intended, due to the pandemic. A key action—to develop an online tool for disabled bus passengers to report issues—was not delivered.

The evaluation did not find that disabled people became more aware of their rights, found it easier to complain, or complained more often about accessibility issues between 2020 and 2023. There was some evidence that for disabled bus passengers it became more difficult to report issues, and that satisfaction with the outcomes of complaints on buses fell. This reiterates the importance of completing the remaining ITS actions.

What can be learnt from the design and implementation of the ITS?

The ITS was a large and ambitious policy programme that aimed to bring multiple stakeholders together to deliver change across modes. By speaking to a range of stakeholders involved in the ITS—both inside and outside of the DfT—the evaluation sought to understand how future accessible transport policy can learn from the ITS, to build on its successes and overcome its shortcomings.

The ITS demonstrates how effective an ambitious transport strategy can be for rallying government around a single improvement agenda—it prompted a lasting culture of cross-modal engagement with accessibility that, largely, had not existed in the DfT previously. Despite this, while many of the ITS actions were delivered, and may reasonably be expected to lead to positive outcomes for disabled people in time, it is not clear that the discrete actions benefited substantially from being part of the overarching strategy. There was a view amongst stakeholders that the ITS needed greater clarity around how the 96 actions would fit together, across modes, to achieve a single set of overarching goals. Although the ITS involved a logic model, stakeholders felt that future strategies could involve a more fully articulated programme theory, setting out how each commitment is expected to deliver individually and collectively. This theory could then be mirrored in the delivery structure of the programme, with multiple teams all reporting into a central, overarching team, with clear lines of accountability and substantial senior engagement from start to finish.

There were also learnings about how best to design the individual policy actions that comprise the strategy. These should be narrowly defined enough to make clear what is required and enable accountability, while being open-ended enough to stimulate continued improvements, even after the initial actions are completed. Each action should be accompanied by a set of interim milestones, and a measurable set of outcomes or KPIs.

The transport sector includes an enormous range of different stakeholders, with complex and often unclear lines of responsibility. Many of the ITS actions involved encouraging stakeholders in the industry to undertake accessibility initiatives. The evaluation found that this was not always effective: more substantial change was often achieved when this kind of encouragement was accompanied by extra funding, new legislation, or increased enforcement.

Next steps

The COVID-19 pandemic has led to changes in the way disabled people travel: the places they go, the modes they use, and how confident they feel. As a result, it is more valuable to see the second wave of the evaluation fieldwork as providing a new baseline for future policy development. Rather than being an endpoint, the data can act as a starting point for the next phase of research and policy.

As the impact of the pandemic on the ITS became clear, decisions were made in 2022 and 2023 to expand the scope of the evaluation to include more exploratory research, to generate insights for the next phase of policy development. This additional research identified possible policy interventions that have the potential to benefit all or most transport users—including non-disabled users—as well as interventions that could successfully target specific groups of disabled people. The results of this work are summarised in the report "Inclusive Transport Strategy Evaluation Summary report: learnings and lessons for future policy".

1. Introduction

1.1 Background

The Inclusive Transport Strategy (ITS): Achieving Equal Access for Disabled People, published in July 2018, was an ambitious programme of work which aimed to create a transport system that offers equal access for disabled passengers by 2030. At its core, the ITS had an ambition for disabled people to have the same access to transport as everyone else, and to be able to **travel confidently**, **easily** and **without extra cost**.

To help provide disabled people with the confidence to travel, the ITS aimed to bring about a range of improvements to public transport, both in terms of physical accessibility and customer service. The ITS set out several actions, through which the Department for Transport (DfT) and other government bodies would lead on the development of an inclusive transport system.

This report presents the results of the evaluation of the ITS. The findings are based on extensive primary research with disabled people, non-disabled people, transport operators, DfT staff, and others. It aims to provide a detailed assessment of the extent to which the ITS was delivered as intended and to which the intended outcomes have been achieved. It also aims to identify key learning that can be used to inform future policy development. This learning is synthesised with findings from other outputs of the ITS evaluation and developed further in the report "Inclusive Transport Strategy Evaluation Summary report: learnings and lessons for future policy".

1.2 Evaluating the ITS

The DfT committed to monitoring and evaluating the delivery of the strategy to:

- Learn and build an understanding of the actions that represent best value for money and use the findings to develop further policy interventions

- Understand how the landscape of inclusive transport is changing to help to inform where future efforts should be directed

- Make the results of the ITS visible to stakeholders, including disabled people and Parliament

The DfT commissioned the National Centre for Social Research (NatCen), an independent research organisation, to conduct the evaluation on their behalf. The evaluation focusses on the delivery of the ITS from 2019 to 2023, over which period the DfT intended to deliver the majority of their plans. Underpinning the strategy is a Logic Model (LM) that sets out how the ITS actions were intended to lead to the desired change (see Figure 1). The LM includes several thematic pathways, which reflect the themes set out in the Inclusive Transport Strategy published in 2018. Each pathway has its own set of activities and outputs, which the DfT expected would contribute individually and collectively (with other sets of activities and outputs) towards their overall objective of providing disabled people with better access to

public transport. The original LM, as it was drafted in 2018, can also be viewed in Figure 12 in Appendix C).

The purpose of this evaluation report is to bring together various data sources, to evidence the extent to which the activities and outputs in the ITS LM have been delivered as intended, and the extent to which the intended outcomes and impacts have materialised. The evaluation takes a theory-based approach: by drawing on a wide range of data sources, it aims to assess the extent to which the causal pathways in the LM have occurred in practice.

1.3 Research aims

This report and analysis set out to understand three overarching research questions, which were devised to guide the overall evaluation approach described in Section 1.2:

- How has disabled people's experience of travel changed since the Inclusive Transport Strategy was published?

- How have the actions and ambitions of the Inclusive Transport Strategy been delivered? What has worked well? What has not worked well?

- What impact have the actions of the Inclusive Transport Strategy had on disabled people's experience of travel?

Chapter 11 summarises what can be concluded from this report in response to each of these questions.

The five pathways in focus for the evaluation are summarised as follows:

1. **Planning and Information**: intended to enable disabled people to plan their journeys by improving the provision of real-time information and planning tools.

2. **Interactions with staff and passengers:** intended to improve disabled people's interactions with transport staff and other passengers, primarily by promoting greater awareness of disabled passengers' needs and entitlements.

3. **Assistance and facilities:** intended to ensure that disabled passengers use the assistance and facilities available to them, by raising awareness and improving the provision of assistance and facilities.

4. **Accessible vehicles:** intended to improve the physical accessibility of public transport vehicles and increase the number of accessible vehicles in operation.

5. **Complaints:** intended to ensure that disabled passengers are aware of their entitlements when things go wrong, find it easy to complain and that transport operators act on complaints.

As the ITS is a large strategy, underpinned by a number of pathways and more than 80 individual policy commitments ('ITS actions'), the evaluation explores only the pathways and ITS actions that are most relevant to its overall aims and ambitions. As such, the LM does not feature every ITS action. The evaluation also does not cover the sixth pathway of the original LM, 'Transport Policy', which was intended to ensure that transport policy and delivery takes better account of disabled people's needs. This pathway was actioned internally by the DfT through the provision of disability equality training to staff, and the Transport Equalities Centre of Excellence which ensures that staff are complying with their responsibilities under the Public Sector Equality Duty.

Figure 1: The ITS LM, reformatted for the Evaluation Report
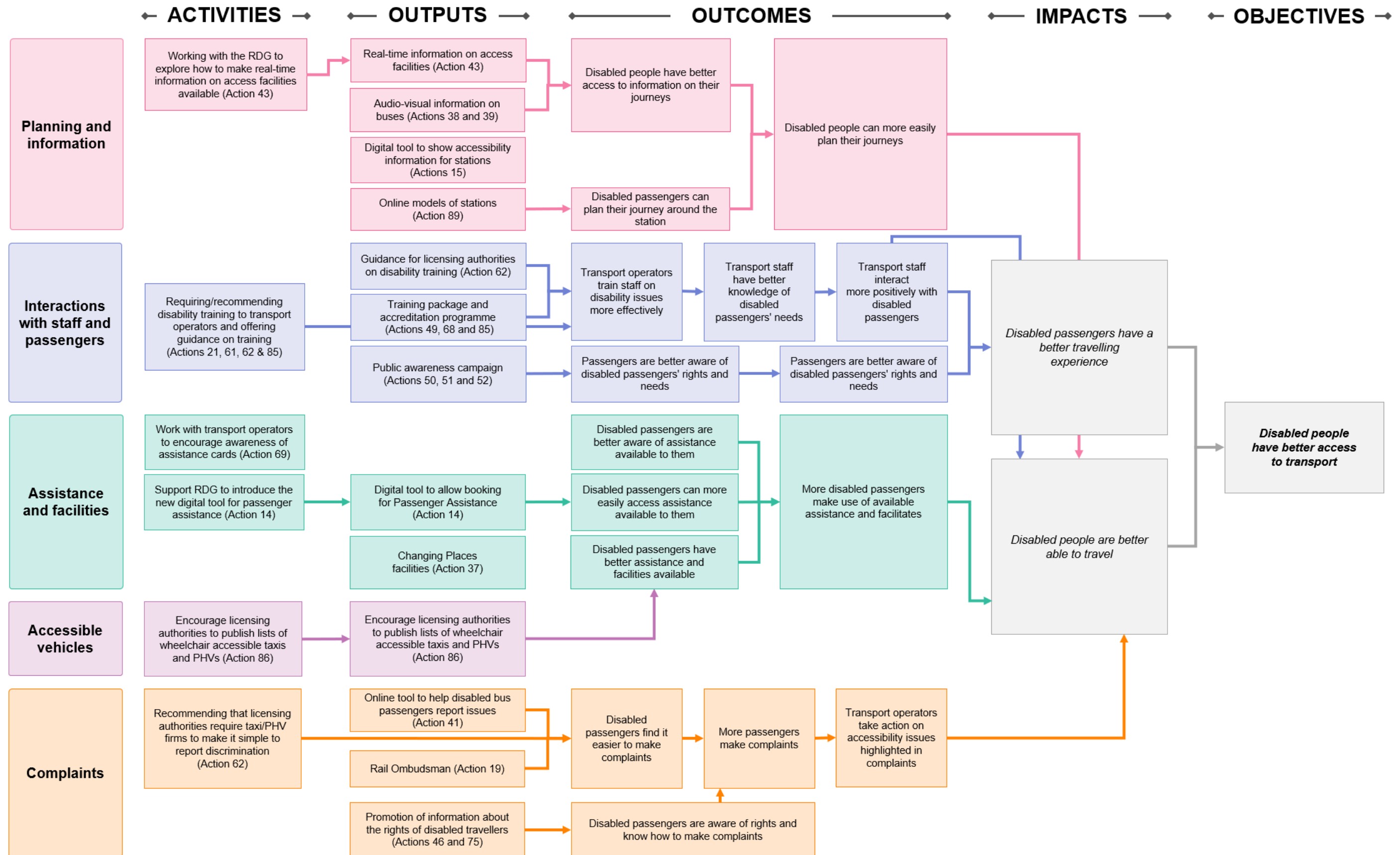
1.4 Research activities

The evaluation involved a wide range of primary data collection, and analysis of secondary datasets. Below is an overview of the various research activities involved in the evaluation.

Wave 1 took place in 2020 – 2021 and included:

- **ITS Panel Survey:** A nationally representative, online and telephone random probability survey of British adults to understand the views and experiences of disabled and non-disabled people.

- **Assistance Dog User Survey:** An online and telephone survey of assistance dog users to understand the experiences of assistance dog users travelling by taxi and private hire vehicle.

- **Qualitative research with disabled people,** to explore experiences of travelling using different transport modes and any barriers and enablers to travel.

- **Qualitative interviews with train and bus operators, and Local Licensing Authorities,** to gain their perspectives on their policies and working practices, awareness and impact of the ITS and experiences relating to disabled people.

Wave 2 took place between March 2023 and October 2023 and included:

- **ITS Panel Survey:** The same as in Wave 1, see above.

- **Assistance Dog User Survey:** The same as in Wave 1, see above.

- **Qualitative interviews with train and bus operators, and Local Licensing Authorities:** The same as in Wave 1 – see above.

- **Qualitative interviews with DfT stakeholders**, to explore how the ITS was developed, delivered and implemented.

- **Analysis of secondary datasets,** to understand the impact of the pandemic on disabled people. Data included the National Travel Survey (NTS) and the ONS Opinions and Lifestyle Survey.

In addition to the above, the **ITS scorecard** was developed as part of the ITS evaluation, to monitor changes relating to disabled people's travel. It brings together 23 key indicators that provide an overview of the state of progress towards the ITS aims in each year of delivery. As such, it was published annually from 2021 to 2024.

It is important to acknowledge the long-term effects of the COVID-19 pandemic on travel attitudes and behaviour. This has had consequences for measuring the impact of the ITS on disabled people's experience of public transport. It is challenging to separate changes that may be attributable to the ITS from changes that may be due to the pandemic, especially since the pandemic affected the travel attitudes and behaviour of disabled and non-disabled people differently. Wave 2 research activities included specific questions about the impact of the pandemic on disabled and non-disabled people's travel behaviour. Furthermore, a secondary analysis was undertaken of the National Travel Survey (NTS) and Office for National Statistics (ONS) datasets to explore the impacts of the COVID-19 pandemic.

There was also a need to understand how the COVID-19 pandemic affected the delivery of the ITS, from a DfT and industry perspective. This was explored through all of the stakeholder interviews.

1.5 The structure of this report

The report is structured as follows:

- **Executive summary:** provides an overview of the key findings.

- **Chapter 1, Introduction:** provides background to the ITS and research.

- **Chapter 2, Summary of methods:** summarises the data collection methods.

- **Chapter 3, Overview of the ITS:** provides further context on the approach the DfT took to the development; implementation; governance and monitoring of the ITS.

- **Chapter 4, The impact of the COVID-19 pandemic:** explores the impact of the COVID-19 pandemic on: a) travel behaviour and experiences, and how this differed for disabled people and non-disabled people b) ITS delivery.

- **Chapters 5-9:** present key findings for each of the following ITS pathways:
  - Pathway 1: Planning and information (Chapter 5)
  - Pathway 2: Interactions with staff and passengers (Chapter 6)
  - Pathway 3: Assistance and facilities (Chapter 7)
  - Pathway 4: Accessible vehicles (Chapter 8)
  - Pathway 5: Complaints (Chapter 9)

- **Chapter 10, Learning about policy design and delivery:** outlines the learning that can be taken from the ITS and applied to the development, delivery, governance, monitoring and evaluation of future policy.

- **Chapter 11, Conclusions:** summarises what can be concluded from this report in response to the three overarching research questions it sought to address.

- **Appendix A**: progress against additional ITS actions (for example, actions that did not feature in the logic model or which no primary data was collected on).

- **Appendix B**: list of all ITS actions that are relevant to the evaluation. These are presented according to the themes addressed in this report.

- **Appendix C**: ITS logic model as it was originally formatted by the DfT in 2018.

2. Summary of methods

This chapter summarises key information about the data collection methods that informed this report. More detail can be found in the Technical Report.

2.1 Defining and analysing 'disability'

For the purposes of this research, disability is defined in line with the Equality Act 2010. Under this definition, a person is disabled if they have a physical or mental health condition or impairment, lasting or expected to last 12 months or more, which has an impact on their ability to carry out day-to-day activities. All survey questions that measured disability followed the Government Statistical Service (GSS) harmonisation guidance.

2.2 Quantitative research

2.2.1. The ITS Panel Survey

The ITS Panel Survey was a nationally representative random probability survey of British adults that was carried out in two waves. Wave 1 took place in August 2020 and Wave 2 in March 2023. It was conducted using the NatCen Panel, online and over the phone.

The aim of the survey was to provide high-quality quantitative and longitudinal estimates for the Inclusive Transport Strategy (ITS) evaluation at baseline and in the final year of ITS delivery (the 2022/23 financial year). The survey sought to understand the views and experiences of disabled people and to allow robust comparisons to be made both between disabled and non-disabled people and between waves. Respondents were asked about how often they used different modes of public and private transport; any negative experiences using different modes or interacting with staff; their experiences of reporting issues; and the factors that affect their confidence when travelling, amongst many other topics. At Wave 2, respondents were also asked how the COVID-19 pandemic had affected their behaviour and travelling confidence.

Disabled people were oversampled to allow for subgroup analysis. At Wave 1, 3,039 people took part, of whom 1,140 of the respondents were disabled. In wave 2, 3,861 people took part, of whom 1,878 were disabled. The response rate amongst those invited to take part was 76% at both Wave 1 and Wave 2. Participants could take part either online or by phone, where digital methods were inaccessible. Weights were used which correct for design effects and non-response bias based on a large number of individual and local characteristics (see Technical Report for more detail).

Random samples of disabled and non-disabled people will differ in their socio-economic profiles. When making comparisons between these two groups, differences may simply reflect their distinct socio-economic profiles. To tackle this, logistic regressions were used, which allow for comparisons between disabled people and non-disabled people, as if these groups were similar according to a set of key socio-economic characteristics. The characteristics used in these were age, sex, employment and region. Differences are only reported when it is

possible to be confident that they are not solely explained by the underlying socio-economic differences discussed above.

2.2.2. Survey of assistance dog users

An online and telephone survey of assistance dog users was carried out in two waves. Wave 1 took place in December 2020 and Wave 2 took place in April 2023. The aim of the survey was to understand the experiences of assistance dog users travelling by taxi and private hire vehicle (PHV), and in particular to understand the prevalence of 'access refusals', in which assistance dog users are illegally denied service. The survey asked respondents about their experiences of access refusals, whether they had made complaints, and the effect of access refusals on their behaviour and confidence. At Wave 2, respondents were also asked how the COVID-19 pandemic had affected their behaviour and travelling confidence. The online survey was compatible with major screen reader software, including JAWS and NVDA, which allow many people with visual impairments to use computers. Participants were offered the option of conducting the survey over the phone if they preferred.

There is currently no comprehensive sampling frame of assistance dog users. In order to reach the target population, the recruitment process relied on organisations that provide assistance dogs, or work with assistance dog users, to promote the survey. Organisations shared the survey via a range of channels, including email invitations, newsletters, social media, and radio. In total, 198 assistance dog users took part at Wave 1 and 403 assistance dog users took part at Wave 2. Where the base for a question is over 50, percentages are reported, and where the base is under 50, absolute figures are reported. Due to the self-selecting nature of the achieved sample, it is not possible to confidently generalise from the results to the wider population of assistance dog users. No statistical tests or weights have been applied. Findings from the survey should be treated as best estimates given the inherent challenges involved in surveying this population.

It was not possible to make robust comparisons between Wave 1 and Wave 2 of the Assistance Dog User Survey. This is because there were substantial changes in the profile and characteristics of respondents at both waves. At Wave 1, 66% of respondents said their assistance dog helped with their visual impairment compared to 20% of respondents at Wave 2. At Wave 1, 4% of respondents said their assistance dog helped with their hearing impairment compared to 60% of respondents at Wave 2. This was likely due to difference in communications and advertisements from organisations across the two waves. As a result, it is not possible to make comparisons between Wave 1 and Wave 2 data. As such, this report does include Wave 1 data, but standalone Wave 1 findings are presented in the ITS evaluation baseline report.

2.3 Qualitative research

2.3.1. Research with transport operators and Local Licensing Authorities

Qualitative research was conducted with train and bus operators, as well as Local Licensing Authorities (LLAs), who are responsible for the licensing of taxis and private hire vehicles. The aims of this strand were to understand:

- The progress transport operators and LLAs had made in planning and implementing improvements to the accessibility and inclusivity of their services (including but not limited to improvements that were associated with the activities and outputs of the ITS).

- Key contributors to progress and challenges faced.

- The contribution of the ITS to this and how the Department for Transport (DfT) can support transport operators and LLAs to make further improvements in future.

Transport operators and LLAs were initially invited to participate in the research by the DfT and opted in directly to the National Centre for Social Research (NatCen). In-depth interviews, lasting 45 minutes, were conducted with those who responded. This included 10 train operators, 8 bus operators and 6 LLAs.

It should be noted that as this strand of the research used a qualitative methodology, it did not aim to provide a representative picture of the views and experiences of transport operators and LLAs. However, the sample was designed to maximise the range and diversity of stakeholder views and characteristics captured by the research, including different geographies and other specific characteristics.

2.3.2. Research with DfT stakeholders

Qualitative research was conducted with 11 DfT stakeholders, including DfT staff in the Accessible and Inclusive Travel team; DfT modal leads (throughout the report, this term is used in reference to DfT staff with lead oversight of a group of ITS actions relevant to specific transport modes, such as bus, rail, taxi or aviation); DfT staff involved in the design and development of the ITS; and Disabled Persons Transport Advisory Committee (DPTAC) stakeholders. The aims of this strand were to understand:

- How the ITS was developed, including the underpinning ITS actions

- How the ITS was delivered, governed and monitored.

- Progress made towards implementing the ITS.

- Key contributors to progress, challenges faced and learning that can be applied to the development and delivery of future accessible and inclusive transport policy.

Interviews were conducted with stakeholders who had responsibility for individual or multiple transport modes, who were members of DPTAC, or who were involved in the development of the ITS (Chapter 3 provides more detail about how each of these teams fed into the ITS).

2.4 The Inclusivity Scorecard

As part of the ITS evaluation, an Inclusivity Scorecard was developed to monitor changes in measures relating to disabled people's travel. The scorecard was intended to evidence the extent to which the ITS is bringing about its intended improvements to disabled people's travel, through a yearly publication on GOV.UK.

The scorecard included 23 different indicators, which were identified after consultation with key stakeholders within the DfT. All indicators were sourced either from public databases or directly from governmental departments. The scorecard was reported in financial years (1 April to 31 March). This includes three baseline years (2015 to 2018) and the four years of the ITS (2019 to 2022), so that trends can be observed both prior to the start of the ITS and over the course of its delivery.

It was not possible to make full comparisons between ITS scorecard years for every metric included in the final publication, because of changes to data collection. Firstly, for some metrics there were pauses to the collection of data during the COVID-19 pandemic – either because the number of people using public transport had substantially decreased and/or because it was not safe to carry out face-to-face interviewing. Secondly, for some metrics, data collection had resumed using a different methodology. These changes meant that it was not appropriate to compare between all scorecard years for certain metrics.

2.5 Understanding the impact of the COVID-19 pandemic

There is limited existing research on how the impact of the COVID-19 pandemic has differed for disabled people. In order to understand this, two questions were added to the ITS Panel Survey and Assistance Dog User Survey in Wave 2, to assess whether people have used different modes of transport or avoided transport because of concerns about coronavirus.

In addition to this, data analysis was conducted using multiple data sources to explore the impact of the COVID-19 pandemic on disabled people. This included primary analysis of the ITS Panel Survey and secondary analysis of the National Travel Survey (NTS) and the ONS Opinions and Lifestyle Survey. Analysis of these data sources is explained in further detail in Chapter 4. To understand the impact of the COVID-19 pandemic on the delivery of the ITS, this was also explored in stakeholder interviews at Wave 2.

3. Overview of the ITS

This chapter provides context on the approach the Department for Transport (DfT) took to the development; implementation; governance and monitoring of the Inclusive Transport Strategy (ITS).

3.1 ITS development

Figure 2: Steps towards the publication of the ITS in 2018
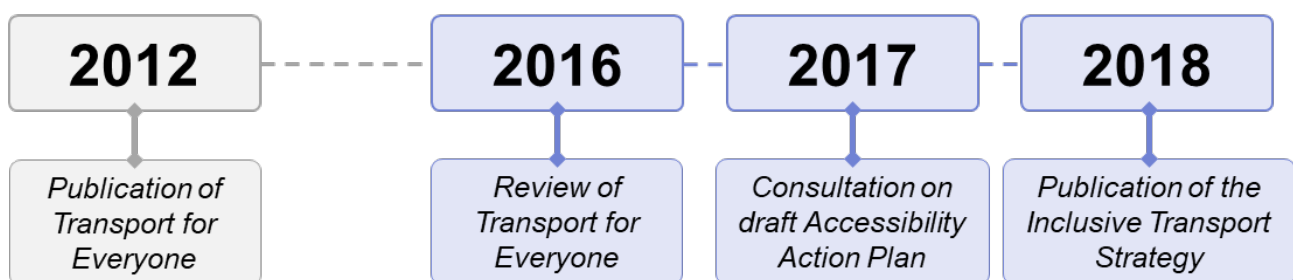
1. **Review of Transport for Everyone**. Transport for Everyone outlined the DfT's priorities for improving disabled people's experiences of public transport in the three years following its publication on 12th December 2012. In 2016, the DfT undertook an internal review of Transport for Everyone, to identify lessons learnt and remaining barriers to having an accessible transport system.

2. **Consultation on draft Accessibility Action Plan (AAP)**. At this stage, the review was intended to inform the creation of an updated action plan, rather than a strategy. The DfT published the draft AAP on GOV.UK from 24th August to 22nd November 2017. The paper identified 48 proposed actions to address the remaining gaps. Following this, the DfT invited written feedback on the draft. During the consultation period, the DfT also ran a series of public events, including workshops and a national roadshow which received input from transport operators, local authorities, disabled people's organisations and the general public.

3. **Publication of the ITS**. The DfT analysed the consultation responses with input from a range of internal stakeholders including modal leads (i.e. the DfT staff that had lead oversight of each group of ITS actions relevant to specific transport modes i.e. bus, rail, aviation and maritime), the Disabled Persons Transport Advisory Committee (DPTAC), ministers and special advisors (who are temporary civil servants, employed to advise and assist Government ministers on political matters, where it would be inappropriate for permanent civil servants to become involved). A set of recurring themes were identified in the feedback, which were used to shape the resulting ITS policy (staff training; awareness and enforcement of passenger rights; improving information; improving physical infrastructure; and the future of inclusive transport). During this time, the DfT's intention evolved into an ambition to deliver a transport strategy, rather than a new action plan. The DfT published the ITS on GOV.UK on the 25th July 2018.

3.2 ITS delivery, governance and monitoring

3.2.1. Key stakeholders

The DfT governs the English transport network (and devolved nations, where relevant) via several dedicated teams that are responsible for policy and delivery related to different modes of transport. As a large-scale policy that covered multiple modes of transport, the delivery of the ITS would require extensive input from across the DfT (including the underpinning teams responsible for different modes of transport), wider Government and the transport industry. Those with the closest involvement in ITS governance and delivery are described below.

Figure 3: Delivery and governance arrangements for the ITS
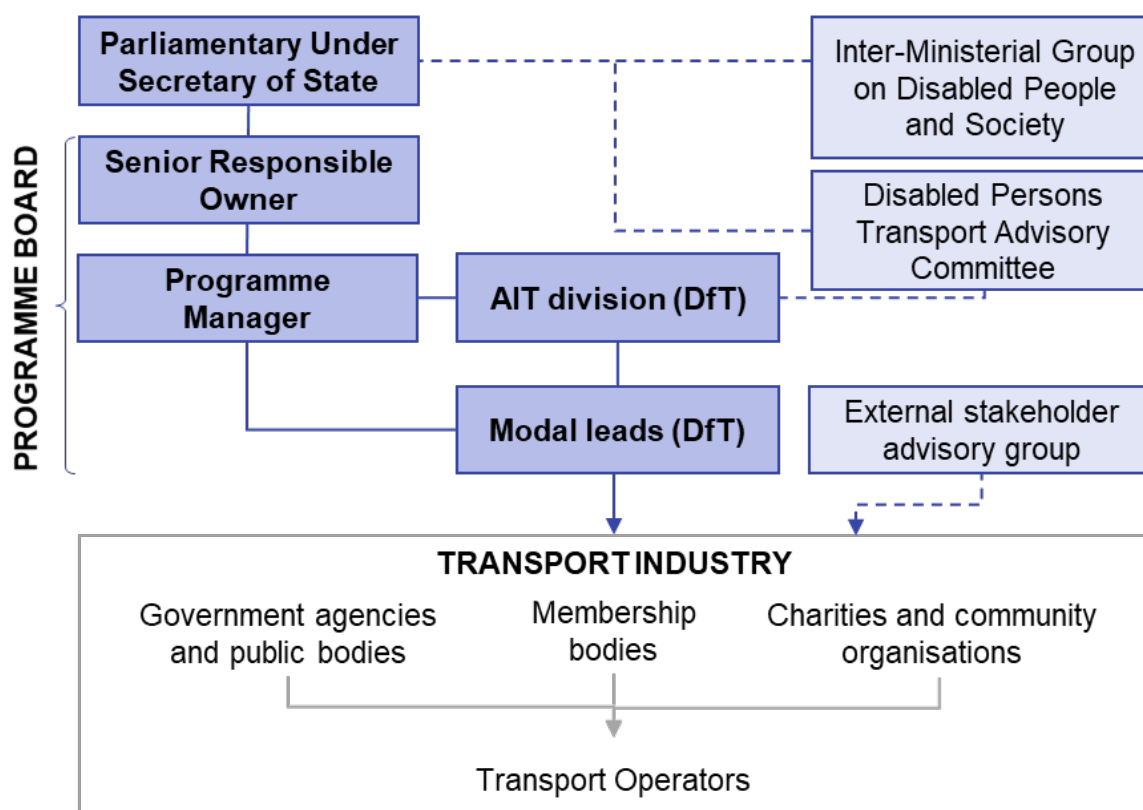
The Accessible and Inclusive Travel Division (AIT) and DfT modal teams. ITS actions that applied to multiple modes of transport were generally owned by the cross-modal accessibility branch within AIT, who also held overall responsibility for ITS governance and the coordination of modal teams. Mode-specific actions generally sat within the relevant modal team, who were responsible for communicating relevant policy requirements between Government actors (such as ministers and Treasury) and transport industry representatives. The AIT Division also monitored and reported on the progress of actions completed by modal teams.

Disabled Persons Transport Advisory Committee (DPTAC). As the Government's independent, expert committee on the transport needs of disabled people, DPTAC played a crucial advisory role since the ITS was first in development.

The transport industry. Day-to-day delivery of the ITS actions was largely channelled via industry representatives (such as Government agencies and public bodies; industry

membership bodies; community organisations and charities). Such representatives received governmental support via modal leads and further support via the external stakeholder advisory group.

The external stakeholder advisory group. This group was chaired by the Programme Manager. It was set up to provide external scrutiny on the ITS and to support on the rollout of the ITS actions. It received input from local government, transport operators, disabled people's organisations and charities.

3.2.2. ITS Governance

ITS governance occurred primarily through programme board meetings. These meetings were attended by representatives from modal teams, including the owner of each ITS action. During the meetings, action owners provided progress updates and each action would receive an updated confidence rating that assessed how likely it was to be delivered successfully and according to the intended deadline (taking into consideration any risks associated with time, cost or quality). The meetings also provided an opportunity for modal teams to discuss factors that were affecting multiple ITS actions.

While these meetings were initially held quarterly, monitoring requirements became simpler in the latter stages of delivery and so the meetings were held on an ad-hoc basis. It also should be noted that after the fieldwork period concluded, the DfT were planning to move governance of the remaining Inclusive Transport Strategy programme to the Improving Transport for the User board. This is an internal board which operates at a higher strategic level and provides senior support, challenge, insight and advice on the delivery of the DfT's Improving Transport for the User (ITU) strategic aim.

3.2.3. ITS monitoring and evaluation

The ITS monitoring and evaluation approach was laid out in the DfT's framework for monitoring and evaluation, published on 19 December 2018. The framework specified how the DfT intended to assess progress towards the actions and ambitions of the ITS. This would include an assessment of the difference the ITS was making to disabled people and how the DfT could improve their approach to future policy. This framework specified the measures of change and success the DfT intended to use and provided a logic model to show the chain of events by which the DfT expected the ITS actions most relevant to the evaluation to achieve their intended impact (the logic model, as it was originally drafted, can be viewed in Appendix C).

4. The impact of the COVID-19 pandemic

In order to understand how the Inclusive Transport Strategy (ITS) was delivered and what impact it may have had for disabled people, it is crucial to set the strategy within the context of external developments. The COVID-19 pandemic caused enormous changes in travel behaviour, as well as within the transport industry and transport policymaking. These effects were most noticeable in the short term, but the pandemic also continues to have longer term effects.

This chapter explores the impact of the COVID-19 pandemic on, firstly, travel behaviour and experiences, and the extent to which the impact was different for disabled people than for non-disabled people. Secondly, it explores how the pandemic and recovery period impacted the delivery of the ITS.

4.1 Data used in this chapter

Multiple data sources are used in this chapter, to produce a rounded picture of changes to disabled people's travel. This includes the National Travel Survey (NTS), the ITS Panel surveys and the ONS Opinions and Lifestyle Survey. These data sources vary in the time periods and geographies they cover and the behaviours and experiences they measure. The NTS data spans the 2018 to 2021 period and used travel diaries to collect high-quality granular information on the number of trips people took, the modes they used, and the purposes of their journeys, for people living in England. The second wave of the ITS Panel Survey covered Great Britain, and asked people about the 12 months from March 2022 to March 2023, including questions to assess the extent to which people felt the COVID-19 pandemic had affected their travel behaviour and their confidence. The ONS survey, which spans the period March 2020 to December 2021 and covers Great Britain, included a range of questions about the impact of the pandemic on people's lives more broadly. All three data sources used high-quality random probability samples. Finally, this data is also supplemented with findings from the Civil Aviation Authority (CAA) Airport Accessibility Report, which assesses all airports with an annual passenger volume of more than 150,000 against the Airport Accessibility Performance Framework.

4.2 Key findings

- For disabled and non-disabled people, there was a similar and substantial decline in the average number of trips made over the course of the pandemic. Use of buses, trains, taxis and private hire vehicles declined more than use of private vehicles or active travel (cycling and walking). Use of trains declined more amongst disabled people than non-disabled people, whereas use of buses and taxis declined less amongst disabled people.

- Even after all pandemic restrictions were lifted in 2022, concerns about COVID-19 still affected the travel behaviour of many disabled people, as well as their confidence when travelling. Surveyed in 2023, disabled people were roughly twice as likely as non-disabled people to agree that they had avoided public transport, avoided travelling during busy times, or used different modes, due to concerns about COVID-19. Disabled people were

three times as likely as non-disabled people to say that their confidence travelling had been strongly affected.

- The pandemic-related changes to travel behaviour are strongly connected to changing working practices: in particular, the shift to hybrid working. From 2018 to 2021, the average number of commuting, business or education-related trips fell by double the amount that other types of trips did, for both disabled and non-disabled people. Since non-disabled people were much more likely to be in employment, this means that 38% of the decline in their travel was attributable to a decline in commuting, business, or education related trips, compared to 19% for disabled people. So, although travel reduced by a similar amount overall for disabled and non-disabled people, this obscures substantial differences in the types of changes that disabled and non-disabled people experienced.

- The pandemic severely affected the capacity of actors at all levels to engage in the ITS, including both within the Department for Transport (DfT) and the transport industry. This meant that a significant proportion (but not all) of the ITS actions were delivered later than planned or not as originally intended. However, the pandemic did also create opportunities for the DfT to deliver on some of the ITS actions in a way that would not have otherwise been possible – for example, new agreements gave the DfT power to write new staff training requirements into the contracts of all train operators at once.

- During the COVID-19 economic recovery period, the transport industry contended with a range of large-scale economic developments such as inflation and industrial action. In some cases, such developments continued to limit the available time and resources that could be spent on delivering the ITS actions.

4.3 The Impact of the COVID-19 pandemic on disabled people

4.3.1. Overall changes in travel behaviour

For both disabled and non-disabled people, there was a substantial decline in the number of trips made during the pandemic (Figure 4). From 2018 to 2021, the average number of trips taken in a year fell from 1,061 to 821 for non-disabled people (a 23% fall), and from 743 to 594 for disabled people (a 20% fall). In 2018, disabled people took 70% of the number of trips that non-disabled people took, and by 2021 this had not changed significantly. At an aggregate level, therefore, the NTS data suggests that the pandemic affected the travel behaviour of disabled and non-disabled people similarly.

Figure 4: Average no. of trips per year, 2018-2021, for disabled and non-disabled people, in England (NTS)
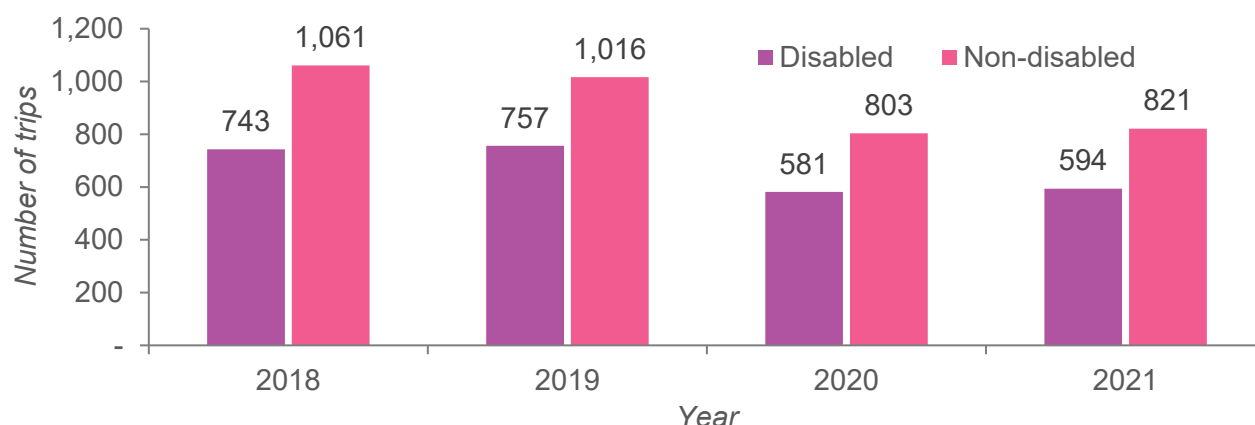
Bases: adults aged 16+ in England in 2018 (11,415), 2019, (11,545), 2020 (5,229) and 2021 (8,233).

4.3.2. Differences between modes

There were, however, some differences between disabled and non-disabled people when looking at specific modes. Figure 5 shows the change from 2019 to 2021 in the average number of trips by bus, train and taxi, for disabled and non-disabled people. Use of buses and taxis reduced for both groups but reduced less for disabled people (by 39% and 38% respectively) than for non-disabled people (by 48% and 45% respectively). Use of private vehicles, whether as a driver or a passenger, reduced by the same amount for disabled and non-disabled people (23% and 22% respectively).

By contrast, use of trains was already much lower for disabled people than non-disabled people prior to the pandemic and reduced by substantially more. In 2019, disabled people took 29% of the number of train trips that non-disabled people took. By 2021, the number of train trips that disabled people took reduced by 59%, whereas it reduced by 42% for non-disabled people. Similarly, active travel (walking and cycling) was lower for disabled people prior to the pandemic and reduced by more. In 2019, disabled people took 70% of the number of trips that non-disabled people took. By 2021, the number of active travel trips taken by disabled people reduced by 7%, compared to 1% for non-disabled people.

Finally, findings presented in the CAA's Airport Accessibility Report indicate that the volume of disabled and less mobile passengers travelling by air has recovered faster than the overall volume of passengers. Between 2019 and 2022, total passenger volumes fell by 25.2% while the volume of disabled and less mobile passengers only dropped by 13.3%. Speculating on what may have driven this trend, the report presents evidence of a simultaneous decrease in the proportion of trips made for business travel and an increase in the proportion of trips made for visiting friends and family. The report suggests that, as there is a high demand for such trips among disabled and less mobile passengers, the increase in volumes of travel among this group may have been driven by increased demand for trips to visit friends and family.

Figure 5: Average number of trips per year, 2019 and 2021, for disabled and non-disabled people, for bus, train, taxi, active travel, and private vehicles (NTS)

Bases: adults aged 16+ in England in 2019 with a disability (2,032) and without a disability (9,454), and in 2021 with a disability (1,466) and without a disability (6,730).

4.3.3. Concerns about COVID-19 and the impact on confidence

The above data shows substantial changes that are likely to be related to the COVID-19 pandemic. However, the ITS Panel Survey asked participants directly about the extent to which concerns about COVID-19 had affected their travel behaviour and confidence. These questions were asked in March 2023, and prompted participants to reflect on the last year, a period in which there were no pandemic restrictions in place.

This data shows large differences between disabled and non-disabled people, with disabled people much more likely to report that their behaviour and confidence were affected by concerns about COVID-19 (Figure 6). Disabled people were roughly twice as likely as non-disabled people to agree that they had avoided public transport, avoided travelling during busy times, or used different modes due to concerns about COVID-19. Participants were also asked about the extent to which concerns about COVID-19 affected their confidence when

they travelled, and disabled people were three times as likely as non-disabled people to say that these concerns strongly affected their confidence (25%, compared to 8%). For all of these measures, there was little or no variation between disabled people with different types of health condition or impairment: rather, these concerns were widespread across all groups of disabled people.

Figure 6: Impact of concerns about COVID-19 on travel behaviour, disabled and non-disabled people (ITS Panel Survey, Wave 2)
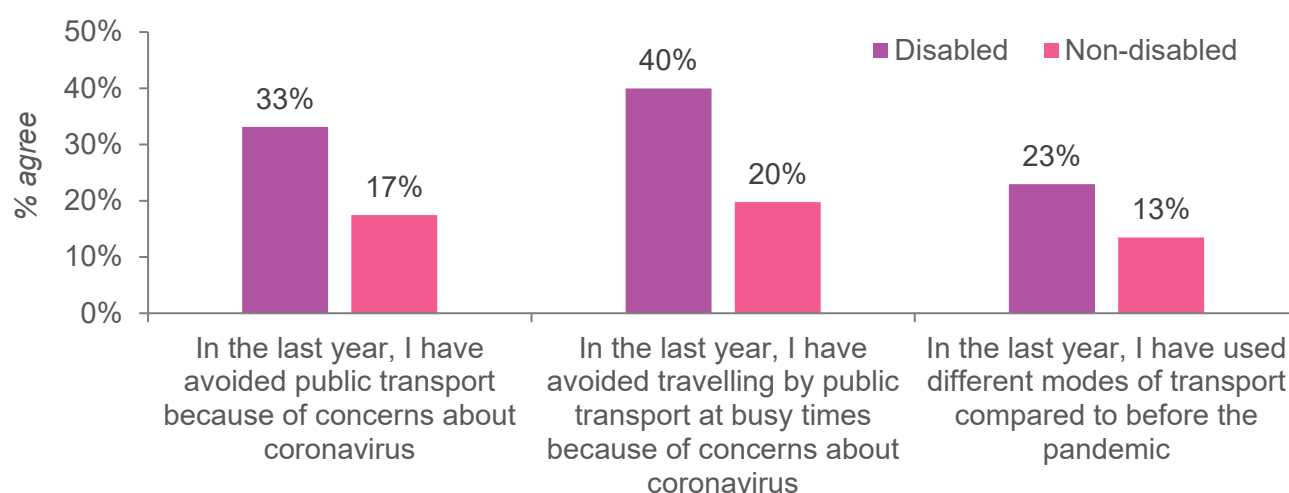
Bases: GB adults aged 16+ with a disability (1,874) and without a disability (1,979).

Primary research completed for the evaluation found a similar impact on confidence when looking at how individuals' confidence changed over time, by focussing on those participants who took part at both Wave 1 and Wave 2 of the ITS Panel Survey. When asked how confident respondents felt overall when travelling, between Wave 1 and Wave 2, 37% of disabled people became less confident travelling compared to 26% of non-disabled people.

4.3.4. The impact of changing work patterns

The pandemic-related changes to travel behaviour are strongly connected to changing working practices—in particular, the shift to hybrid working. From April to May 2022, 38% of people who were in work worked from home at least some of the previous week, and this did not differ between disabled people and non-disabled people. In February 2022, 84% of workers who had to work from home during the pandemic said they planned to carry on with a mix of working from home and in their place of work in the future.

As a result, the number of trips where the main purpose was commuting, business, or education fell considerably. From 2018 to 2021, the average number of commuting, business or education trips fell by 35%, compared to an 18% fall, on average, for all other journey purposes.

Disabled people were less likely to be in work than non-disabled people, and as a result were less likely to be regular commuters. In 2021, 54% of disabled people aged 16 to 64 were in

employment, compared to 82% of non-disabled people. [i] In 2021, non-disabled people aged 16-59 took an average of 170 commuting trips (or 21% of their total trips), whereas disabled people took just 70 (or 10% of their total trips). The NTS data also suggests that working disabled people may have reduced the amount they commuted more than working non-disabled people during the pandemic. Amongst full-time employees, for disabled people the average number of trips fell by 25% from 2019 to 2021, compared to 17% for non-disabled people. Amongst part-time employees, for disabled people the average number of trips fell by 34%, compared to 20% for non-disabled people.

Because of these differences, although the average number of trips taken by disabled and non-disabled people fell by a similar amount, there were differences in the types of journeys that people took fewer of:

- For disabled people, there was a 20% reduction in the average number of trips from 2018 to 2021. Around a fifth of this (4 percentage points) is accounted for by the decline in work-related travel, whereas over half (10 percentage points) is accounted for by a decline in shopping-related travel.

- For non-disabled people, there was a 23% reduction in the average number of trips from 2018 to 2021. Around two-fifths of this (9 percentage points) is accounted for by the decline in work-related travel, whereas just a quarter (6 percentage points) is accounted for the decline in shopping-related travel.

Overall, the evidence provides a complex picture. The pandemic significantly affected disabled people's confidence to travel, and disabled people remained more concerned about COVID-19 even after restrictions lifted than non-disabled people. Disabled people's changing patterns of travel behaviour are likely to be related to this, but are also related to other aspects of their lives, and in particular different patterns of employment and commuting.

4.3.5. Implications for the ITS evaluation

The stated aim of the ITS is for disabled people to be able to travel confidently, easily and at no extra cost. The evaluation intended to assess whether, at Wave 2, disabled people could indeed travel with greater confidence and ease, and at less additional cost, and to assess whether some of the gaps between disabled and non-disabled people had narrowed.

The above considerations show that the COVID-19 pandemic was likely to have significantly affected the ability of the evaluation to identify whether there have been positive changes as a result of the ITS. The pandemic has disproportionately affected the travelling confidence of disabled people. Data also suggests that disabled people have disproportionately avoided public transport or travelling in busy periods, and were more likely to use different modes, out of concern about COVID-19. The evidence suggests that these impacts on disabled people persisted beyond the lifting of all pandemic restrictions.

Throughout this report, significant caution was therefore taken in commenting on the potential impact of the ITS on outcomes for disabled people. All such conclusions are tentative.

Readers should avoid reading too much into findings that show change over time. Conversely, where change over time was not found, readers should avoid concluding that the ITS actions have failed, since the effects of the pandemic may well have offset or counterbalanced the effects of the ITS. Readers should therefore avoid going beyond the conclusions presented in the report.

4.4 The impact of the COVID-19 pandemic and recovery period on ITS delivery

Qualitative findings from the stakeholder interviews with DfT stakeholders and transport operators indicated that the COVID-19 pandemic severely affected the capacity of actors at all levels to engage in the ITS, including both within the DfT and within the transport industry. For a significant number of ITS actions (although not all), this slowed down implementation or meant plans could not be delivered as originally intended. One perception was that the ITS never fully regained the momentum that was driving it before the pandemic:

> *"I think COVID has scuppered it, as it has with many things. In all honesty, I think the momentum was lost"* Bus operator

Within the DfT, several staff working on the accessibility improvements associated with the ITS were redeployed to work on the pandemic response. This had a lasting impact on the speed of ITS implementation and, in some cases, what could be achieved. Other impacts included a drop in the level of industry engagement the DfT had been able to sustain before the pandemic. It also created a need to reconsider understandings of disabled people's travel because – as outlined in 4.3 – the pandemic had fundamentally changed this.

> *"The [ITS] vision has been through quite a lot of upheaval during the pandemic and so I think we're only just starting to get back to full swing now […] our team dropped down to one person during COVID"* DfT stakeholder

Within the transport industry, the impact was universal but most pronounced for aviation, rail and bus. Within these sectors, there was a sustained period in which little to no revenue came in. For train operators, for example, the Government took on full revenue and cost risk, meaning the train operators were entirely reliant on DfT. This had the effect of de-prioritising the accessibility improvements associated with the ITS and the accessibility agenda in general, as companies only had the capacity to focus on matters of financial survival.

> *"The whole [aviation] industry disappeared and nothing happened for a couple of years, and we had lots to do to make sure that aviation could survive and come back"* DfT stakeholder

While the economic outlook improved significantly for the transport industry during the COVID-19 economic recovery period, it still had to contend with a range of large-scale economic developments during this time. In many cases and across modes, this continued to limit the capacity of the industry to deliver the planned accessibility improvements associated with the ITS. This had a similar effect across modes. In the rail industry, for example, large-scale developments such as inflation, unforeseen delivery costs and industrial rail action made accessibility improvements more expensive and time consuming to deliver while also reducing the available resource (i.e. staff, money or raw materials) to do so.

"The last three or four years, we've had a whole set of black swans, as they call them in project delivery land […] in 2018, '19, none of that was on anybody's radar […] but that is not unique to [Access for All], that's been a wider issue that the industry is having to grapple with for everything" DfT stakeholder

4.4.1. Staff disability training and the end of rail franchising (Action 21)

In the case of Action 21, the DfT had intended to introduce new requirements of private companies when taking part in rail franchising (i.e. when tendering to become a train operating company). This included providing enhanced disability awareness training to their staff, and committing to the involvement of disabled people in the design and delivery of that training.

Following the COVID-19 pandemic and the enactment of the Emergency Measures Agreements and Emergency Recovery Management Agreements, rail franchising came to an end. While the DfT already had the power to make changes to the contracts of train operators individually, these new agreements gave them power to write such requirements into the contracts of all existing train operators at once. Through doing so, the DfT not only achieved their intended outcome much faster than they may otherwise have, they also superseded the rail franchising system entirely.

5. Pathway 1: Planning and information

5.1 Overview of pathway

As shown in Figure 7, the overall intended outcome for the planning and information pathway was to improve the ease with which disabled people can plan their journeys. To achieve this, the Department for Transport (DfT) set out actions intended to improve disabled people's access to information about their bus and train journeys and enable disabled people to plan their journeys around rail stations. The DfT planned to achieve these outcomes by working with the Rail Delivery Group (RDG) to provide real-time information on access facilities. They also intended to work with the RDG to create online models of rail stations, to enable passengers to familiarise themselves with the layout before travelling. Finally, they also planned to help fund increases in the provision of audible and visual (AV) announcements on buses.

Figure 7: Pathway for the planning and information element of the ITS logic model
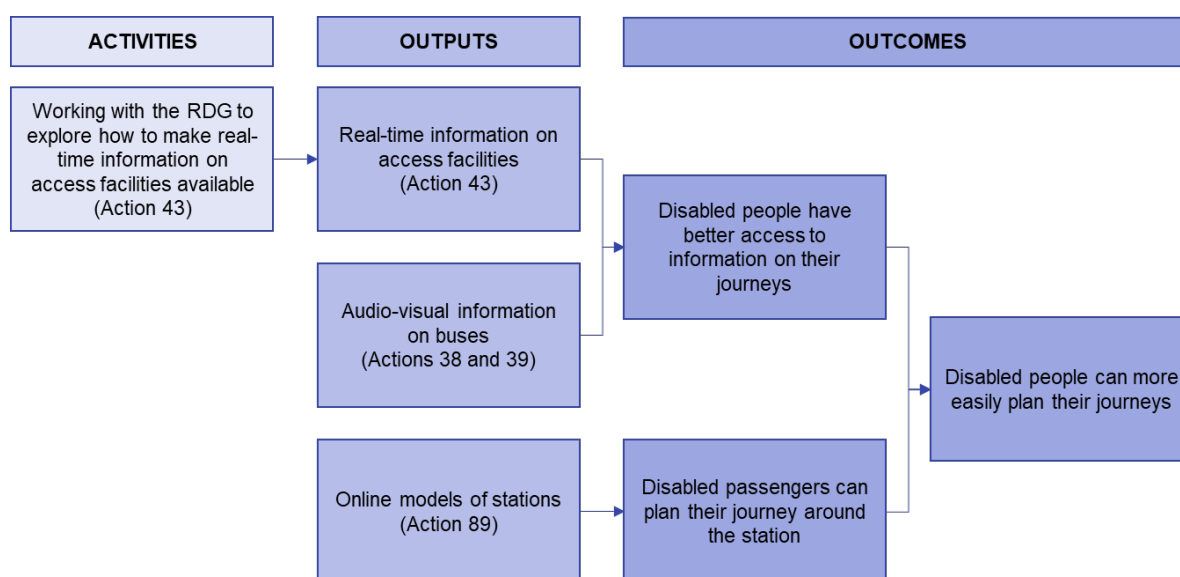
5.2 Summary of findings

- Progress had been made on all the planned actions, with most achieved or on track to be delivered against their target dates, although online models of train stations and funding to increase the provision of AV information had not been fully delivered at the time of fieldwork. Evidence shows that further work is required to ensure that real-time information about the status of all facilities is provided and kept up to date, and to fully implement the rollout of AV information to bus fleets.

- In addition to the planned Inclusive Transport Strategy (ITS) actions, transport operators had also conducted similar work under their own accessibility initiatives – for example, work to provide more real-time information in multiple accessible formats.

- The findings confirmed that having the right information in advance of journeys was important for disabled people's confidence. However, the survey did not show any improvement in the ease with which disabled people can plan their journeys. This may be partly explained by the fact that only one of the intended actions was fully delivered at the time of fieldwork. In part, it may also be explained by the fact that relatively few disabled people used digital technologies, such as apps and websites, to access information about accessibility. The findings suggest more work could be done to improve awareness or uptake of the digital tools, and that it remains important to provide information in non-digital formats.

5.3 Progress towards delivery of actions

5.3.1. Provision of digital information about train stations (Actions 15, 43 and 89)

Several actions were intended to improve the provision of digital journey information for rail passengers. The following work was to be led by the RDG, with support from the DfT:

- Produce a digital station accessibility map, by August 2018. The intention was for the map to enable better journey planning by informing customers how accessible all train stations across the national rail network are. The map would be available for customers to view online or to download and take with them on their journey (Action 15).

- Provide more real-time information on the availability of access facilities such as step-free access, accessible toilets and Changing Places toilets (Action 43). No specific outputs were specified for this action, rather it was intended to simply explore options for providing more real-time information.

- Develop an online station model, to enable passengers to familiarise themselves with the train station layout and environment before they travel (Action 89).

Progress made

At the time of fieldwork, the DfT had either delivered or were on track to deliver all three actions. The RDG launched their National Rail Accessibility Map on 17th April 2019 (Action 15). The DfT had either already integrated or planned to integrate various real-time information on the status of access facilities. Information about the provision and status of accessible toilets, Changing Places toilets and lifts had been integrated and there were plans for the status of escalators to be integrated. The DfT had made progress towards the provision of an online station model by conducting a station accessibility audit. During Phase 1 of the audit, the DfT collected more than 900,000 pieces of data at 2,500 stations across the country. At the time of fieldwork, the DfT were working with RDG on Phase 2 of the audit, which would involve establishing how to make the information publicly available (e.g. through the originally intended online station model).

While some train operators who participated in the research were highly aware of these activities and the intentions behind them, others displayed no awareness, or did not realise they were connected to the ITS. In some cases, participants were implementing similar projects under separate accessibility initiatives. They had also carried out a range of other work around journey information and planning. This included (but was not limited to) introducing:

- Real-time information on the availability of lifts and escalators

- Live platform information in different formats, including new British Sign Language screens

- Virtual 360-degree train carriage tours on the train operator's website, intended to reassure those with travel anxiety by informing them what to expect on board

- Staff name badges indicating the sign language they speak (such as BSL, Makaton etc.)

- Real-time information on how busy trains are

- Audio guides for stations, available via QR code or geolocation

Challenges and lessons learnt

Train operators and DfT stakeholders who participated in the research identified a range of challenges and lessons learnt:

- **Collaboration and regular communication.** Train operators who participated in the research felt that engaging with the RDG had been productive, because the RDG were able to bring multiple train operators together to share best practice. This collaboration meant that consistent information could be gathered across operators. However, with so many groups involved, there were challenges, at times, in ensuring that communication and the delegation of responsibilities was effective.

- **Updating information.** DfT stakeholders and train operator staff who participated in the research found updating information (such as changes to stations or facilities) complicated. There was a view that this lacked a clear and standardised process. As a result, the information given to the RDG could become inaccurate quickly. For example, a DfT stakeholder noted that some information included on the National Rail Accessibility Map (Action 15) – such as which stations had step-free access – was outdated at the time of fieldwork as it had not been updated to reflect recent changes. At the time of fieldwork, the DfT were planning to address this through Phase 2 of the station accessibility audit (see above).

    "Putting out inaccurate data is almost as damaging as putting out, in many ways worse than putting out no data. People turn up or people won't use the station because they think they can't because it says there are no lifts, for example, when there are". DfT stakeholder

- **Map accessibility.** A DfT stakeholder and a train operator who participated in the research mentioned that the general route and station maps (not the National Rail Accessibility Map) published on the National Rail website could be made more accessible for those with visual impairments or colour blindness by improving the colour scheme.

- **Notifications.** The provision of real-time information on changes to accessibility features, such as a lift being out of order, could sometimes still be inconsistent and unreliable. This meant disabled passengers would sometimes still have to proactively check the information before starting a journey. Participants suggested exploring ways of providing alerts or notifications to passengers ahead of time.

5.3.2. Funding and rollout of AV announcements across bus fleets (Action 39)

The DfT intended, by March 2019, to announce a new £2 million fund to support small bus operators with the rollout of audible and visual (AV) announcements across their fleets (Action 39).

Progress made

The Department partnered with the Real Time Information Group (RTIG) to deliver the grant to operators, and announced its plans slightly later than intended, on 29 October 2019. It was originally intended that the £2m available would support around thirty smaller operators to provide AV information onboard their services, but with the total amount available subsequently increased to £4.6m it was anticipated that virtually all operators operating twenty or fewer vehicles would be able to receive support. However, the formal launch of the scheme was held back until the publication of the Public Service Vehicles (Accessible Information) Regulations 2023, to ensure alignment between the support provided and new regulatory requirements. The new legislation required most local bus and coach services to provide information to passengers about their journeys while they are on the vehicle and came into force on 1st October 2023.

Impact analysis completed by the Department for the Accessible Information Regulations highlighted that – without support – the smallest operators would likely face disproportionate financial burden from their compliance, and therefore might require longer to implement the change. In response, the DfT designed the Grant, along with mitigation measures within the Regulations themselves, in such a way that the smallest companies could begin to benefit from improved accessible information more quickly than they might.

At the time of fieldwork, some operators who participated in the research had made substantially more progress on introducing AV information to their fleets than others: some had installed equipment to provide AV across almost their whole fleet, while others had only just started. Those that had made more progress tended to have started their AV information implementation prior to the ITS, typically as part of their own accessibility initiatives and/or in response to customer feedback. These operators also tended to have existing relationships with AV information suppliers and manufacturers. Those who had progressed slower were building these relationships from scratch.

Challenges and lessons learnt

When reflecting on the wider challenges and learning associated with increasing the provision of AV information (rather than the grant specifically), bus operators who participated in the research mentioned the following:

- **Regulations.** Under the 2023 PSVAR regulations, most bus operators are now required to provide information to passengers about their journeys while they are on the vehicle. However, the 2020 PSVAR regulations – which were still in effect at the time of fieldwork – did not include any requirements regarding onboard information. Some bus operators who participated in the research expressed that progress could have been made sooner were such requirements already in place (this also applied to other changes to the design of buses, discussed further in Chapter 8).

  "When we buy buses, we're asking for our manufacturers to go beyond the regulations and not stick to the minimal specs because the minimal specs just aren't good enough.… there are buses being designed and coming off the manufacturing line today that just aren't fit for purpose" Bus operator

- **Costs.** Within the 2023 PSVAR regulations, the DfT have also sought to minimise any cost burden associated with making bus fleets AV capable for larger operators, who are not supported through the grant. However, this legislation had not been passed at the time

of fieldwork and some larger bus operators who participated in the research expressed concerns that carrying out the work across their larger fleets would come with significant financial burden, as the £2 million fund attached to the ITS was intended to benefit smaller operators only.

- **Meeting deadlines and service disruption.** Some bus operators who participated in the research were concerned that suppliers of AV equipment and installation services may not be able to keep up with the demand introduced by the deadline to retrofit buses with AV capabilities by 2026. Participants expressed concerns that the companies which supply and install the AV equipment might not be able to keep up with the demand. Participants also mentioned that with significant retrofitting work, many buses would need to be taken temporarily out of service. This would in turn impact service provision and extensive planning would be required, to manage the disruption to services.

- **A need for greater standardisation of technology and more accessible safety features**. One bus operator who participated in the research explained that even though their entire bus fleet had audio visual (AV) equipment, it only worked on around half of the buses at the time of fieldwork as some of it was incompatible with other technology that had since been installed. Another bus operator explained that their London buses had driver assault screens, to protect the driver's safety. As the screens are so thick, it can make it difficult for those with hearing or speech impairments to communicate with the driver verbally.

5.4 Evidence of a change in outcomes

This section draws on two sources of data: the ITS Panel Survey and the Assistance Dog User Survey. Overall, the evidence does not show any change in the intended outcomes between Wave 1 and Wave 2: there was no evidence that disabled people found it easier to plan their journeys at Wave 2.

In part, this may be because some actions had not been fully delivered: for example, online models of train station layouts had not been completed. Furthermore, the formal launch of the £2 million fund to support small bus operators with the rollout of AV announcements across their fleets had been delayed until the 2023 PSVAR regulations. These regulations also made it a *requirement* for bus operators to provide AV information on their services and introduced mitigations to any financial burden experienced by larger bus operators by doing so. It should not be concluded, therefore, that this lack of change reflects the effectiveness of the measures taken by the DfT, it was simply too early for them to have fully come into effect.

However, in the case of real-time information on access facilities, it is also likely related to the low levels of take-up of online and app-based services. Older disabled people, who are more likely to have mobility impairments and require physical accessibility adjustments, were much less likely to have used online and app-based services. More work may be needed to promote awareness of the National Rail Accessibility Map and/or to integrate it within other journey planning platforms (for example, mainstream apps and/or accessible travel apps which are more widely used).

5.4.1. Planning journeys around rail stations

The following data relates to the use of technology to help plan journeys around train stations. Data was collected at both waves on whether passengers used digital maps of train stations,

and whether they used a mobile phone to access real-time information about access facilities at train stations.

- **The evidence shows no increase in the use of digital maps by disabled people to help plan journeys around train stations but did show an increase in use of mobile phones to access real time information**. At Wave 2, 24% of disabled people (including non-users of trains) had used a digital map showing accessibility information about train stations, and 17% had accessed real-time information about access facilities at train stations on their mobile phone.

- **Younger disabled people (aged 18 to 39) were much more likely to have used a digital map or accessed real-time information than older disabled people (aged 60+)**. This included being more likely to access real-time information about access facilities on their mobile phone compared to older disabled people. Interestingly, although people whose health condition or impairment affects their mobility were perhaps most likely to benefit from digital maps showing accessibility information about train stations, they were amongst the least likely to have used one: 16% had used such a map, compared to 31% of disabled people who did not have a condition or impairment that affected their mobility. However, this is strongly related to age: those whose health condition or impairment affected their mobility were older, on average, than other disabled people.

- **There was some regional variation in use of digital maps.** Disabled people in London, and in Wales, were more likely to have used digital maps to plan a train journey than disabled people elsewhere.

5.4.2. Access to information on journeys

Since the start of the evaluation, change in the proportion of buses that provide AV information has been monitored through Metric 22 of the ITS scorecard (Table 1). Metric 22 represents local bus operator data held by the DfT. The evidence shows that, since the start of the ITS, the percentage of AV compliant buses has increased year on year, from 39% in 2020/21 to 47% in 2022/23.

Table 1: Percentage of buses on local services on which audible and visible information is provided in each year of the ITS (metric 22)

Metric	Vehicle type	2016/17	2017/18	2018/19	2019/20 (year 1)	2020/21 (year 2)	2021/22 (year 3)	2022/23 (year 4)
22	Buses	34%	36%	39%	39%	41%	43%	47%

Data was collected at both waves on whether bus users noticed audio-visual information on bus journeys, and if so, how helpful they found it. At Wave 2, additional data was collected on whether people used websites or apps to access live information about the status of a bus journey, and if so, how helpful they found it.

- **Around half of disabled people noticed AV information on buses, and most found it helpful, and this was consistent over time.** The proportion of disabled bus users that had noticed AV information on a bus journey was just over half at Wave 1, at 53%, and did not increase at Wave 2. This was despite the fact that the proportion of buses that were AV compliant had increased. Among disabled passengers who said they noticed audio-visual information on buses, over two thirds (71%) said they found it helpful at W1 and the proportion did not increase at W2. At Wave 2, just over half (54%) of all bus users had

used a website or smartphone to access live information about the status of a bus journey. Of those disabled people who accessed live information using a website or app, 81% found it helpful. Disabled people were slightly less likely to find audio-visual information useful than non-disabled people.

- **Those living in London were generally much more likely to have noticed audio-visual information.** Similarly, they were more likely to have accessed live information on a website or app than those living elsewhere. Relatedly, those living in urban areas were more likely to have accessed information in this way than those living in rural areas.

5.4.3. Ease of journey planning

Data was collected on whether people had negative experiences on buses or trains due to a lack of information before travel or on route. Data was also collected on the extent to which a lack of information about the availability or state of accessibility adjustments and toilet facilities affected people's confidence when travelling.

- **There was no change in the proportion of disabled people who had negative experiences on buses or trains due to a lack of information**. The evidence does not show any decline in the proportion of disabled people having these negative experiences, or who felt their confidence was affected by a lack of information about the availability or state of accessibility adjustments or toilets. At Wave 1, the proportion of disabled people that had a negative experience on buses due to a lack of information before travel or on route was low, at 12%, and 13% had such an experience on trains. This had not changed at Wave 2. A similar proportion of non-disabled people experienced these issues. For both modes, disabled people with mental health conditions were more likely to report these experiences than disabled people without mental health conditions.

- **Similar to Wave 1, confidence was affected by a lack of information.** At Wave 1, just over a fifth (21%) of disabled people felt their confidence had been affected by a lack of advance information about the availability or state of accessibility adjustments, and there was no change at Wave 2. At Wave 2, disabled people were much more likely to feel their confidence had been affected by these issues (21%) than non-disabled people (8%).

- **There was no change in how much a lack of information about the availability of toilet facilities affected people's confidence**. The proportion of people whose confidence was affected by a lack of information about the availability of toilet facilities was just over a quarter (26%) at Wave 1. This remained unchanged at Wave 2. At Wave 2, disabled people were more likely to feel their confidence had been affected by a lack of information (36%) than non-disabled people (21%).

6. Pathway 2: Interactions with staff and passengers

6.1 Overview of pathway

As shown in Figure 8, this logic model pathway was split in two elements.

Figure 8: ITS Pathway for the interactions with staff & passengers element of the ITS logic model
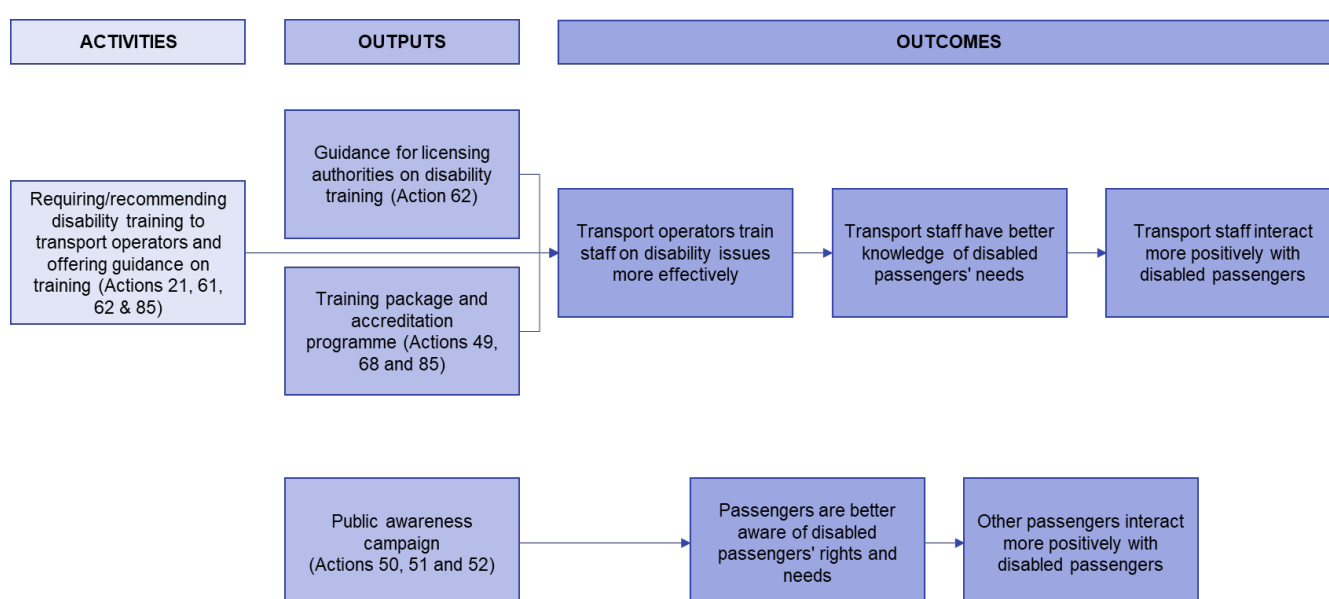
Interactions with staff. The overall intended outcome for this element was to improve the way that transport staff interact with disabled passengers. To achieve this, the Department for Transport (DfT) intended to undertake actions that would lead to improved training and knowledge of disabled passenger needs among transport staff. The DfT planned to achieve these outcomes by encouraging transport operators and Local Licensing Authorities (LLAs) to offer disability training and by providing guidance on such training; including through the creation of a training package and an 'Inclusive Transport Operator' accreditation scheme.

Interactions with passengers. The overall intended outcome for the passenger element was for other passengers to interact more positively with disabled passengers. To achieve this, the DfT intended to improve public awareness of disabled passengers' rights and needs. The DfT planned to achieve these outcomes by launching a public disability awareness campaign.

In addition to the Inclusive Transport Strategy (ITS) actions featured in the logic model, this chapter also discusses the recommendation/requirement to involve disabled people and organisations in staff training (Action 74). Other related actions are discussed in Appendix A, and provide further context on the actions discussed in this chapter.

6.2 Summary of findings

Progress was made on all the planned actions. Where actions were planned to take place from 2020 onward, they were generally delayed, which was largely due to the COVID-19 pandemic. In some cases, actions were yet to be fully delivered at the time of fieldwork.

- **Interactions with staff**. Following the introduction of new policies, staff disability training was a requirement for all frontline customer facing staff and driver disability training was a requirement for all bus operators. All bus and train operators who participated in the research offered such training and had made significant improvements to their training offer, including by involving disabled people in its design and/or delivery. However – across the bus, train and taxi industry – the cost of providing and undertaking training remained a significant challenge.

- **Public awareness of passenger rights and needs**. Both the DfT and transport operators had undertaken a range of actions to promote public awareness of disabled passenger needs and entitlements.

- **The flagship ITS initiatives (Inclusive Transport Leaders Scheme and REAL training programme) and LLA best practice guidance.** These were generally seen as having great potential to help bring the whole transport industry in line with the DfT's accessibility agenda. However, awareness and engagement had been relatively low. Going forwards, the industry would welcome higher recommended standards for training and more industry specific guidance. There may also be a need for greater (and more joined up) communication about DfT initiatives, and greater incentivisation, standardisation and/or enforcement, to maximise participation by transport operators.

Despite progress on actions, the evidence does not show that disabled people's interactions with transport staff and with other passengers have improved since Wave 1. Likewise, the evidence also does not show an improvement in disabled passengers' awareness of their own entitlements. This may be because several of the initiatives were delivered later than planned, due to the pandemic, or were not fully rolled out. It may also be because disability-related negative experiences are a small proportion of overall negative experiences with staff and other passengers. It may be the case that new training packages or public awareness campaigns have had a large impact for a small number of disabled people using particular transport services, but that the numbers are too small to detect in national surveys.

6.3 Progress towards delivery of actions

6.3.1. Cross-modal training and accreditation (Actions 49, 68 and 74)

The DfT intended to deliver three cross-modal actions (i.e. policy commitments that applied to multiple modes of transport). The DfT's plans and progress made are outlined separately for each. The challenges and learning across actions are similar and are therefore presented together.

Cross-modal training package (Action 68)

The DfT intended to develop a disability awareness training package by the end of 2020, for use by all transport operators (across transport modes, and by LLAs) (Action 68). The DfT

delivered this through the 'Respect, Empathise, Ask, Listen' (REAL) disability equality training programme. The online resource was published on GOV.UK on 4 December 2020 and was available for anyone to download at no cost. As outlined in Appendix A, this followed new requirements for all bus operators to mandate disability training for their drivers (from March 2018) and all train operators to mandate disability training for all frontline customer facing staff (from July 2021).

Transport operators who participated in the research had generally not used REAL, or only to lightly supplement existing training, and some were not aware of it. Among bus operators who participated in the research, one perception was that REAL may be of greater benefit to smaller companies who lack funding to create a training course from scratch. Train operators engaged in the research had typically not engaged with the guidance as they had already developed or revised their own bespoke staff training in response to the 2019 Accessible Travel Policy (ATP) guidance.

Involving disabled people and organisations in staff training (Action 74)

The DfT intended to introduce new recommendations and requirements for transport operators to involve disabled people or representative organisations in staff training, where such policies did not exist already (Action 74). This was to ensure course content was informed by disabled people's lived experiences. This was already a legal requirement for the aviation industry, so this action applied to rail, bus and taxi/Private Hire Vehicle (PHV) industries. This was to be delivered by the end of 2020.

Delivery of this action varied by industry, including whether it was a recommendation or requirement. For the bus and taxi/PHV industry, this action was delivered later than planned, as a *recommendation* within the DfT's REAL training package (Action 68). By contrast, for the rail industry, this action was delivered on time via the Office of Rail and Road's (ORR) ATP *requirements* (see Appendix A).

All transport operators and LLAs who participated in the research felt that lived experiences were a crucial component of effective disability training and undertook a range of actions to improve their training offer. For some, such improvements came after these new recommendations/requirements. In others, they predated them. The changes transport operators had made to incorporating lived experiences in training were:

Greater emphasis on the range and diversity of needs among disabled people. This included greater focus on non-visible disabilities, as they can initially be harder to understand. Sometimes this change was in response to a staff training feedback survey: *"'That was really good, I know how to deploy a ramp, I know how to guide someone but how do I assist someone that's overstimulated, those kind of things"* (Train operator).

To help inform the design and/or testing of training, transport operators had also consulted with disabled organisations to inform and test their training design. This included engagement both with organisations representing all disabled people and specific groups, to ensure the training reflected both general and specific needs: **"***people that know what they're talking about, rather than people who have got academic knowledge of a subject, which is what we've used previously"* Train operator).

- **Greater emphasis on responding appropriately and with empathy (rather than simply following set procedure)**. Examples of this included assessing whether or not customers actually required/wanted assistance and using the right terminology: *"it would be common for a manager to shout to a member of staff, 'I've got a wheelchair here for you' […] one of*

the benefits from having disabled people involved has been their feedback: 'I'm not a wheelchair, I'm a person, so please don't refer to me as a wheelchair'. It's just little things like that that have massively improved". Train operator.

- **Presentation and simulation of disabled people's lived experiences**. Presentation included in-person teaching by those with lived experience, or with pre-prepared content (e.g. case studies or personal accounts). Simulation exercises included role play and travelling on the service whilst using a wheelchair or wearing Royal National Institute for Blind People (RNIB) simulation goggles, so that they could better empathise the travelling experiences of those with specific disabilities.

In some cases, participants said that such changes had led to marked improvements. This was evidenced anecdotally, for example through customer feedback, ORR metrics or third-party research. In some cases, train operators who participated in the research also attributed much of this change to the new ATP guidance. This included requirements around training and to have at least one person responsible for accessibility at board and operational levels (Action 8 – see Appendix A). This helped to facilitate senior management level buy-in, which in turn fostered top-down corporate engagement with accessibility and ensured that accessibility was a dedicated workstream, with its own budget. In some cases, train operators had hired those with lived experiences into such roles.

Transport operator accreditation scheme (Action 49)

The DfT intended to develop and deliver a transport accreditation scheme by the end of 2019 (Action 49). This would formally recognise the best performing operators for their actions to improve the accessibility of their services and to promote good practice in the wider industry (including through use of REAL / Action 68 and by receiving Disability Confident Employer accreditation). This took the form of the Inclusive Transport Leaders Scheme (ITLS), which was launched on 25 February 2020 and would run in cycles, recognising three different levels of operator progress: 'Committed', 'Operator' and 'Leader'.

At the time of fieldwork, there had been two accreditation cycles. A third cycle had opened on the 30 March 2023 and was expected to remain open until further notice. To ensure news of the reopening in spring 2023 reached eligible operators in advance of the launch date, the following communication channels were used:

- Modal leads (i.e. DfT staff with lead oversight of a group of ITS actions relevant to specific transport modes) highlighted the relaunch of the scheme to their respective operators.
- An article was published in 'Weekly News', which reaches over 360 transport industry representatives.
- Ministerial Tweets of support were sent.

In the previous two cycles, a total of two transport operators were awarded Leader status. At the time of fieldwork, it was expected that the latest cycle would lead to several more applications and accreditations (at the end of 2023, the number of new accreditations had reached four, with a further 3 applications being processed and more accreditations expected to follow). Among transport operators who participated in the research, some had applied/reapplied or were planning to apply. Some had been waiting for the accreditation window to reopen for a while, whereas others had only recently become aware of the ITLS, after their local authority (bus operators) or the Rail Delivery Group (rail operators) contacted them about it.

Transport operators who took part in the research associated three main benefits with the ITLS. Firstly, it ensures that every transport operator makes improvements that are consistent with the DfT's ambition. They felt it could help to achieve industry standardisation and in turn a more consistent disabled passenger experience. Secondly, they felt being accredited would send the right message to disabled passengers – i.e. that the transport operator takes accessibility seriously. Finally, transport operators typically make changes to their service in quick succession without evaluating their effectiveness. As such, applying for the ITLS had prompted them to stop and assess all their accessibility work to date.

Challenges and lessons learnt

The COVID-19 pandemic and economic recovery period. Both REAL and ITLS were first launched in 2020. This coincided with the pandemic, meaning that initial capacity to support their ongoing delivery was very limited and therefore little promotion took place. Similarly, among transport operators who participated in the research, some had never heard of the schemes and/or lacked the time or resources to engage.

Greater promotion is needed going forwards. As outlined in Chapter 10, there was a need for more joined up communication about and promotion of the DfT's flagship initiatives. DfT stakeholders who participated in the research were aware of this need and indicated that going forward their focus would be to undertake greater ongoing promotion of both initiatives.

There may be a role for incentivisation and/or enforcement. Some transport operators explained that evidencing they meet the ITLS requirements was time consuming and required them to set aside dedicated resource. One view was that, while it might be the *right thing* to do, the lack of commercial incentive or mandate to undertake this work may prompt inaction. Suggestions for how the DfT could change this included tying the ITLS to funding mechanisms and making application a contractual requirement.

Indeed, DfT stakeholders who participated in the research were working to understand how ITLS accreditation could be promoted as more of a benefit to industry operators and were considering a consultation about whether incentivisation could play a role. Changes that the DfT had already made at the time of fieldwork, to support operators further, had included work to condense and improve the ITLS guidance on the Government website (including a more user-friendly application form). The revised guidance was scheduled to go live in Spring 2024.

ITLS accreditation cycles may be too restrictive. In some cases, participants had struggled to plan for their application, as a result of uncertainty about when the window would reopen. One feeling was that opening for accreditation in a defined window may put certain transport operators off applying, if they do not feel they have sufficient time to make any necessary service improvements. The DfT were aware of this and, as a result, opted to keep the most recent window open until further notice.

Lack of coordination on training requirements. Train operators who participated in the research expressed frustration that REAL was published after the majority of train operators already had, or were developing, disability training in line with ATP guidance. Furthermore, they felt the two publications asked for slightly different things. One suggestion was that a single, bespoke training package for the whole rail industry would have been more useful, rather than asking train operators to develop training from scratch and producing multiple guidance documents.

Train operators who participated in the research called for more specificity from REAL. Feedback included that, as a cross-cutting package, REAL is not precise enough about how rail operators should apply the guidance to create any added value on the ATP guidance: *"It was nowhere near what we'd done, so I think we just parked it and we just did our own thing"* (Train operator). Furthermore, participants suggested it could be strengthened with greater detail on specific issues such as non-visible disabilities and rail operators called for greater nuance – for example it references booked assistance, when some companies were already operating a fully developed 'turn up and go' service. Finally, they suggested that disability training has more of an impact when information is accompanied by presentation of real-life examples, whereas REAL was primarily made up of information heavy slide decks: *"it was probably raising the right points […] [but] if I put that in front of my colleagues, they would skip, skip, skip, skip to the end"* (Train operator)*.*

Training is expensive. Training runs over several days. As such, booking frontline staff off work is expensive and can create resourcing issues, particularly for larger operators who may need to train several hundreds or thousands of employees in one go. In some cases, this made it difficult for transport operators to run their full course more often than once every two years. In the bus industry, the cost was also exacerbated by high turnover of drivers. This had, in many cases, led to greater use of online training, which participants explained was significantly cheaper but also meant that specific elements such as simulation exercises were less effective.

One DfT stakeholder who participated in the research also acknowledged the expense of training. The ATP guidance requires train operators to provide refresher training every two years. However, they also have an obligation to shareholders to run a cost-effective service, which had sometimes led to compromises on the quality of refresher training. At the time of fieldwork, the DfT were working with train operators to find ways of running high quality training within budget.

6.3.2. Taxi and PHV driver training (Actions 62 and 85)

The DfT intended to encourage Local Licensing Authorities (LLAs) to mandate driver disability training in their licensing policies (Action 85). This action was not intended to involve specific activities or outputs, but simply involve ongoing consideration of how to support LLAs.

The DfT also intended to revise existing best practice guidance on how LLAs can use their powers more effectively throughout taxi/PHV licensing (Action 62). This would target improvements to various aspects of the disabled passenger experience, including driver disability awareness training, and complaints and enforcement (see Chapter 8). The DfT intended to revise and publish their best practice guidance on GOV.UK, by December 2019. Following this, the DfT would invite feedback from the public, LLAs and the industry on the proposed updates, before publishing a final version.

Progress made

The DfT merged these two actions and published their revised best practice guidance for consultation from March to June 2022, which was later than planned. Various factors had contributed to this delay, including the COVID-19 pandemic. At the time of fieldwork (May 2023), the DfT were working towards publishing the final version[ii]. The DfT were also exploring ways of getting more LLAs to mandate training from drivers as only around half already did so. This was expected to include greater promotion of REAL.

One LLA who participated in the research had drawn on the best practice guidance when updating their licensing policy (including training recommendations). However, not all of the LLAs who participated in the research were aware of the guidance or had participated in the consultation. One suggestion was that the DfT should recommend that LLAs require drivers to undertake refresher training every five years. This was because, at the time of fieldwork, the only way a driver's existing licence could be revoked was by evidencing malpractice. Therefore, mandating refresher training would provide regular opportunities to assess driver competency. Other reflections on the guidance are covered in Chapter 8.

A wider difficulty in encouraging drivers to undertake training (and operate Wheelchair Accessible Vehicles (WAVs)) was a lack of incentive. LLAs who participated in the research expressed that WAVs are more expensive yet less profitable to operate. Applicants must typically pay several hundred pounds to undertake training, with no guarantee they will pass the assessment. Therefore, by mandating that drivers undertake training (or operate a WAV), this could create a 'race to the bottom' if neighbouring LLAs do not introduce the same requirements. Some participants felt that greater financial incentive and/or standardisation/enforcement may be the only way of affecting consistent change and improvements in the levels of disabled customer service (this is discussed further in Chapter 8):

> *"The only way that this would truly, truly be tackled is […] in an area, there was say like a minimum service level that was required […] we need five wheelchair-accessible vehicles, with correctly-trained drivers […] We will subsidise that, but in turn, these vehicles cannot be used for regular private-hire work"* LLA

6.3.3. Launch a disability awareness campaign (Actions 50, 51 and 52)

The DfT intended to develop and launch a public campaign to raise awareness of disabled passenger rights and needs when using transport (Action 50). The DfT intended to develop the campaign jointly with the Disabled Persons Transport Advisory Committee (DPTAC) and disabled people's organisations in 2019, but the ITS did not specify a launch date. The DfT also intended for the campaign to promote awareness of Concessionary Bus Passes, the Disabled Persons Railcard and Passenger Assist (Action 51); and to increase disability awareness among transport operators, raise awareness that hate crime is a criminal offence and of how to report such incidents (Action 52).

Progress made
The DfT announced the "it's everyone's journey" public information campaign in October 2019. The campaign has run in several iterations since then:

- **25 February to 17 March 2020:** the first campaign aimed to raise awareness of specific, occasionally subconscious, passenger behaviour that can negatively affect disabled people's travel – for example, blocking designated wheelchair spaces, pushing past other passengers or being unprepared to give up a seat. The campaign received support from 200 partners and ran over video-on-demand, broadcast and digital radio, social media and posters placed in bus and train environments. The campaign did not run in full due to the COVID-19 pandemic. DfT monitoring indicated that 38% of people who recalled the campaign reported themselves as having taken an action as a result.

- **October 2021 to March 2022:** the second campaign was tailored to raise awareness of the heightened needs of disabled people using public transport during the pandemic – for example, the protection of those more vulnerable by wearing a face covering throughout the journey and maintaining space on behalf of those less able to do so. The campaign

also promoted operator actions to encourage disabled passengers back onto public transport – for example, increased cleaning.

- **October to November 2022**: the first iteration of the campaign returned. This time the campaign ran across social media, digital audio and out-of-home posters across bus and train environments. DfT monitoring indicated that 45% of campaign recognisers reported that they would take considerate action on public transport as a result.

While not a primary focus of "it's everyone's journey", the campaign has also included messaging intended to raise awareness of concessionary bus passes, the Disabled Persons Railcard and Passenger Assist.

Transport operators who participated in the research were not explicitly asked about the campaign, but some spontaneously mentioned that campaign materials had been helpful in pushing out an industry-wide customer message. One participant had also used content from the campaign to help educate staff on non-visible disabilities:

> *"We use the "it's everyone's journey" stuff quite heavily. I really, really like that. We're using that as part of our approach to educating staff on hidden disabilities"* Train operator.

Other awareness-raising activities by transport operators included:

- **Updating the company website with disability-specific information**. For example, information about how the service can meet the needs of those who require priority seating and non-visible disabilities (among other groups), and relevant customer rights/entitlements. For wheelchair users, this included clear emphasis that, legally, they have priority over access to any wheelchair accessible bus space (this related to Actions 28 and 29 – see Appendix A). This was initiated in response to customer feedback about a lack of information. Another operator commented that since dedicating a senior role *exclusively* to accessibility, uploading such information has become significantly faster and more efficient as it removes the need to consult multiple company directors.

- **Promoting the local authority's Bus Passenger Charter**. Bus Back Better requires all local authorities to maintain a Bus Passenger Charter. In this charter, they are required to outline passenger entitlements when using bus services across the area. This replaced previous requirements for every bus operator to maintain their own charter. This research did not ask about this explicitly, nonetheless, some bus operators who participated in the research mentioned and welcomed this development. They felt a more centralised approach would provide customers with more consistent information and greater confidence, as not every bus operator in the same area always provided a charter.

- **Promoting the Disabled Persons Railcard**. This included via the Passenger Assist app and company websites. As the Rail Delivery Group run their own nationwide campaign to promote the railcard, not all train operators who participated in the research felt a need to promote it themselves. In some cases, participants had focussed promotion on lesser known concessions, such as the D50 and D34 discounts which offer concessions wheelchair users and passengers with visual impairments (see Glossary).

- **Promoting Concessionary Bus Passes (CBPs)**. In some cases, bus operators who participated in the research did not promote CBPs because they saw this as the Local Authority's sole responsibility. Others felt that promoting CBPs was part of their responsibility to encourage passenger awareness of their entitlements, and/or would ultimately generate cost savings by encouraging more people to use the bus. They either did so directly or by supporting Local Transport Authority partners. Some bus operators

who participated in the research said their promotion had focussed on what the CBP enables customer to do (e.g. the locations they can access and the amount they can save on travel). In some cases, bus operators who participated in the research also promoted their Local Authority's companion pass, which enables disabled passengers to travel with someone else at no extra cost, where they rely on them for assistance.

- **Bespoke campaigns focussing on how staff can assist those with non-visible disabilities**. For example, educating staff that customers with health conditions that affect depth perception (e.g. dementia) may require use of a ramp, not just wheelchair users. This was initiated in response to ORR research which indicated that those with social/behavioural disabilities had the poorest staff interactions.

- **Plans for a national community transport week**. The Community Transport Association and the DfT were designing a campaign to run in October 2023. It would focus in particular on promoting community transport to younger disabled people, to combat the misconception that community transport is only intended for older people.

Challenges and lessons learnt

In terms of promoting awareness of disabled passenger rights and needs in general, one challenge participants emphasised was the need to avoid treating disabled passengers any differently to other passengers. They explained that drawing attention to the barriers disabled passengers face can make them feel uncomfortable and different to everyone else, rather than increasing confidence:

> *"There shouldn't be any need to specifically call out passengers with disabilities […] That's an important aspect of these charters that there shouldn't need to be any additional requirement other than assistance technology! [i.e. Braille, easy read etc]"* Bus operator

> *"We were able to get representatives to come and help us […] What they generally said was, and this was a bit of a lightbulb moment, they said, 'We want to be treated like everyone else is treated.' They said, 'Actually, what we want is just to use what you've got […] we don't want to look special. We don't want a bell that rings differently to everyone else'"* Bus operator

In terms of promoting awareness and uptake of concessionary travel:

- **Local Authorities can be perceived by operators as reluctant to promote CBPs**. Some bus operators who participated in the research explained their Local Authority had been reluctant to promote their CBP to new customers, or to promote greater use of the CBP to existing customers. Perceived reasons for this included Local Authority restrictions on what marketing to disabled people is allowed and the fact that the Local Authority ultimately has to subsidise the cost of disabled people's travel, and so greater use of the CBP may place greater financial pressure on them.

- **There is not a uniform approach to CBPs in England, which can be confusing for customers**. While there is one national statutory concession in England, Local Authorities are able to apply discretionary enhancements based on local need and priorities. This means that the rules accompanying use of CBPs can vary from one Local Authority to the next (e.g. whether the Local Authority offers a carers discount), which can be confusing for customers. One suggestion was that the disabled passenger experience would be improved with a single national product – in line with Wales and Scotland.

- **D34 and D50 concessions**. Train operators who participated in the research explained that these concessions have never been updated (since their introduction in the early 20th century). As such, disabled passengers have no way of using these discounts except at a ticket office. Participants also emphasised that, not only does this present them with fewer options for buying tickets than other people, it also becomes even more restrictive in the context of ticket office closures.

Train operators who participated in the research also shared several reflections on rules governing eligibility for concessionary schemes – these are discussed in Appendix A, in relation to the Disabled Persons Railcard review (Action 60).

6.4 Evidence of a change in outcomes

This section draws on two sources of data: the ITS Panel Survey and Assistance Dog User Survey. Overall the evidence does not show any positive change in the intended outcomes relating to interactions with transport staff and other passengers between Wave 1 and Wave 2.

This may be related to the factors discussed above: limited awareness and engagement from transport operators with DfT training initiatives, and barriers to fully rolling out new training packages for all staff. It may also be related to the fact that several of the initiatives were delivered later than intended. Furthermore, it takes time for new training to first translate into improved staff behaviour before translating into improved outcomes for disabled people.

In general, disabled-related negative experiences are a small proportion of overall negative experiences with staff and other passengers, so even if there have been large benefits for a small number of disabled people using some services, this would not be detected in national surveys. Likewise, individual campaigns such as "its everyone's journey" may need to be run on a very large scale and potentially over a number of years to have a detectable, nationwide impact.

6.4.1. Staff understanding and knowledge of disabled passengers' needs

Disabled people were asked how well they feel staff on public transport understand the needs of disabled people. The evidence does not show an improvement in disabled people's perceptions of transport staff's understanding of their needs:

- **Most disabled people felt transport staff understood their needs, and this did not change over time.** At Wave 1, at 72% of disabled bus users felt that staff understood their needs, with no change at Wave 2. At Wave 1, 76% of disabled people felt that rail staff understood their needs, and 79% felt that taxi drivers and/or telephone operators understood their needs. This did not change at Wave 2.

- **There is some evidence that individuals with specific disability types were less likely to feel that staff on different modes understood their needs**. For buses and taxis, disabled people with mental health conditions were less likely to feel that staff understood their needs (64% for buses and 70% for taxis, compared to 75% and 78% of those without, respectively).

6.4.2. Interactions with transport staff

Participants who used public transport in the last 12 months were asked whether they had any negative experiences with transport bus, train or taxi staff. Those who did were then asked whether having negative staff interactions affected their travelling confidence. The evidence does not show that the proportion of disabled people who experienced positive staff interactions has increased since Wave 1:

- **Negative experiences with transport staff were relatively rare, and did not become any more or less common**. The proportion of disabled train users who had a negative experience with train staff behaviour at Wave 1 was very low (6%), but was higher with bus staff (12%) and taxi drivers or telephone operators (13%). This did not change significantly at Wave 2. In general, disabled people were around twice as likely to have had a negative experience with staff than non-disabled people, across buses, trains and taxis.

- **Around half of respondents to the Assistance Dog User Survey had experienced a taxi/PHV access refusal and in the majority of cases, this was in relation to their assistance dog**. At Wave 2, 49% of assistance dog users who had attempted to use a taxi in the last year had experienced an access refusal, meaning that the driver had refused to transport their assistance dog, and the figure was similar (47%) for PHVs. In almost all cases, participants reported that the driver provided an illegitimate reason for refusing to transport their assistance dog, as opposed to providing a valid exemption notice, issued by their LLA on medical grounds. Respondents to the Assistance Dog User Survey who had experienced an access refusal were also asked whether this affected their confidence. At Wave 2, 93% said access refusals by taxi/PHV drivers affected their travelling confidence when travelling by taxi/PHV (see Chapter 9 for more information on access refusals).

6.4.3. Disabled passengers' awareness of concessionary passes

Disabled people were asked whether they owned any type of concessionary bus or rail pass because of their long-term health condition or impairment at any point in the last 12 months. The evidence does not show an increase in use of these concessionary schemes between waves:

- **The proportion of disabled people who had a Disabled Persons Rail Card or any kind of pass that allowed them to travel for free or at a discounted rate by bus (for example, a Freedom Pass or a disability bus pass) was relatively low, and did not increase**. At Wave 1, 7% of disabled people had a Disabled Persons Rail Card and there was no change at Wave 2. Among those who did not have at Wave 2, 24% stated this was because they did not know these cards existed. At Wave 1, 30% of disabled people had a card that allowed them to use local buses for free or at a discounted rate in relation to their disability. There was no change at Wave 2.

- **There was some regional variation in whether disabled people held any kind of concessionary bus pass in relation to their disability**. Disabled people in London were the most likely to hold a bus pass in relation to their disability (39%). In Scotland, this was 33% and in other regions this ranged from 21% to 26%.

6.4.4. Interactions with passengers

Respondents who used public transport in the last 12 months were asked whether they had any negative experiences with other passengers on public transport, how frequently, and whether these experiences affected their confidence. Overall, the evidence does not show that disabled people's experiences with other passengers have improved between waves:

- **Disabled people were more likely than non-disabled people to have had a negative experience with other passengers on the bus or train**. The proportion of disabled people who had a negative experience when travelling during the previous 12 months did not change between Wave 1 and Wave 2. At Wave 2, disabled people (12%) were twice as likely to have had a negative experience with other train passengers compared with non-disabled participants (6%). On buses, 16% of disabled people compared with 10% of non-disabled people said they had a negative experience with other passengers. For both buses and trains, disabled people with a mental health condition were more likely to have had a negative experience with other passengers than those without. However, in the case of buses, this is largely accounted for by the fact that this group were younger, on average, than other disabled people, and were therefore more likely to be regular bus users.

- **The frequency of disabled people's negative experiences with other passengers did not increase.** At Wave 1, 21% of disabled participants who had had a negative experience with other passengers said they had a such an experience at least once a month, which was similar to non-disabled passengers, and did not change at Wave 2. At Wave 2, disabled people were more likely to say their confidence was affected by negative interactions (38%, compared to 26% of non-disabled people). Disabled people with mental health conditions were almost twice as likely to say their confidence was affected (52%, compared to 27% of those without).

- **There is some evidence of a decrease in the proportion of disabled people who had a negative experience with access to priority seating or accessible toilets**. From Wave 1 to Wave 2, there was a decrease in the proportion of disabled people who said they had a negative experience with passengers not moving out of priority seating (from 21% to 14%). Likewise, there was a decrease in the proportion of disabled people who had a negative experience with other passengers using accessible toilets when they did not need to (from 8% to 5%). These findings may, however, be related to lower overall rates of transport use post-pandemic. That is to say, disabled people may have had fewer negative experiences with access to priority seating and accessible toilets because there were fewer passengers to interact with on their journeys.

- **Disabled people felt less confident than non-disabled people in asking other passengers to give up their seat, and this had not improved since Wave 1**. Respondents were asked whether they would feel confident asking another passenger to give up their priority or non-priority seat for them. At Wave 1, just under half (48%) of disabled people said they would not feel confident asking for a priority seat and 61% said they would not feel confident asking for a non-priority seat. This remained consistent at Wave 2. For non-disabled people, 28% said they would not feel confident asking for a priority seat at Wave 1 and there was no change at Wave 2.

7. Pathway 3: Assistance and facilities

7.1 Overview of pathway

As shown in Figure 9, the overall intended outcome for the assistance and facilities pathway was to ensure that passengers could make use of the assistance and facilities provided on transport services. To support this, the Department for Transport (DfT) intended to raise public awareness of the assistance and facilities available and to improve their quality, including by making them more easily accessible. To achieve these outcomes, the DfT intended to work with transport operators to encourage greater awareness of journey assistance cards, help fund the installation of new Changing Places toilets, and support the Rail Delivery Group (RDG) in their introduction of the Passenger Assist app. Related actions not featured in this logic model pathway include increasing awareness and take up of Passenger Assist via a public awareness campaign and working with the Civil Aviation Authority (CAA) to review accessibility performance standards for airports and airlines.

Figure 9: Pathway for the assistance and facilities element of the logic model
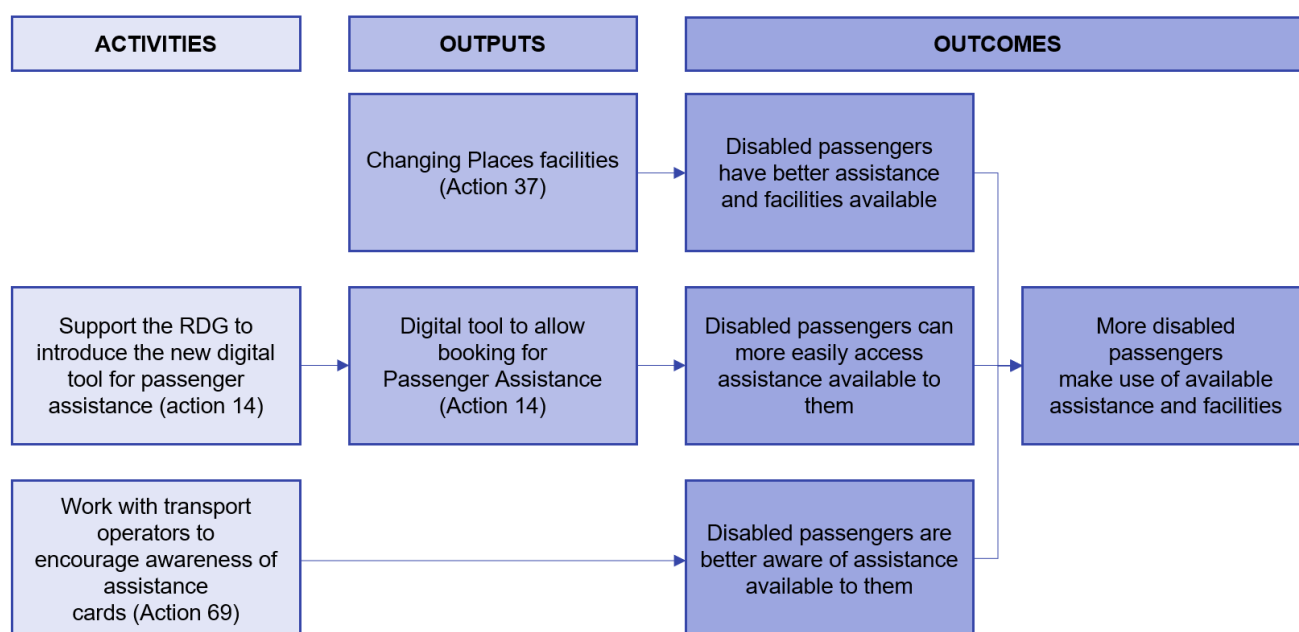
7.2 Summary of findings

- Progress had been made on of all the planned actions to improve the provision of assistance and facilities. In some cases, this had occurred as a result of wider contextual factors meaning it was no longer necessary to undertake planned actions under the Inclusive Transport Strategy (ITS). For example, awareness of journey assistance cards increased substantially as a result of the COVID-19 pandemic, meaning that specific actions to promote awareness we deprioritised.

- The ITS Panel Survey indicated that awareness of journey assistance tools increased. There was also evidence to suggest that by fully implementing the Passenger Assist app and bringing the booking notification period down to 2 hours, the DfT had been successful in improving the efficiency of rail assistance operations.

- However, at the time of fieldwork, there was no observed positive change in other intended outcomes such as an increase the proportion of those using journey assistance tools and the Passenger Assist app. This may be because use of trains is generally low amongst disabled people: the findings may indicate a need for greater awareness raising outside of rail settings, to reach disabled people who do not currently travel by rail.

- In addition to the actions listed in the ITS, train operators who participated in the research had engaged in various work to improve their passenger assistance services. Their reflections demonstrate that, from an operator perspective, building resilience to limitations on the available resource (for example, staff shortages) is crucial for ensuring that assistance is provided consistently across the rail network. Finally, the findings indicate that providing passengers with a range of options for booking and accessing passenger assistance remains crucial.

7.3 Progress towards delivery of actions

7.3.1. Encouraging greater use of journey assistance cards (Action 69)

Journey assistance cards are intended to provide disabled people with easier access to assistance by allowing them to communicate their support requirements to transport staff non-verbally. Typically, they contain messages that reflect the needs of the user (such as, *'I have a mobility impairment'* or *'I have difficulty speaking'*) and can be printed or displayed via a phone screen.

The DfT intended to encourage greater use of journey assistance cards by ensuring that most transport operators offered them by 2020 (Action 69). The DfT planned to incentivise transport operators to participate in journey assistance card schemes through the creation of a new transport operator accreditation scheme (see Chapter 6). The DfT were also considering the creation of a DfT endorsed logo for journey assistance cards.

Progress made

The DfT's plans to encourage greater use of journey assistance cards were put on hold as a result of limited internal resource during the COVID-19 pandemic. Despite this, DfT stakeholders who participated in the research explained that without any Government intervention, journey assistance cards saw a rise in popularity during the pandemic. There was also a change in how they were used, as many disabled people turned to them as a way of communicating their needs in relation to the newly introduced public health measures (including, for example, through use of the Hidden Disabilities Sunflower lanyard). At the time of fieldwork, the DfT were evaluating what value Government intervention could provide and had drafted a paper outlining policy options. After the fieldwork period had concluded, this was shared for consultation with DfT staff with lead oversight of a group of ITS actions relevant to specific transport modes, and the Disabled Persons Transport Advisory Committee (DPTAC), who agreed that no immediate action was required but welcomed re-evaluation of this in the future.

Among transport operators who participated in the research, work to provide and promote journey assistance cards was primarily initiated with input from disabled people, or in response to disabled customer feedback. For example:

Helping Hand assistance card. Brighton & Hove and Metrobus spoke about their work to design the 'Helping Hand' assistance card. Helping Hand is a journey assistance card that was created in the years before the ITS and is intended to enable people to discretely inform drivers, or other passengers, of any assistance required. The operator had received feedback from disability groups that it had helped disabled people to feel more confident when using their services. The participant attributed much of this success to the fact that it had been designed with input from local and national disability groups as well as users from local community groups. Co-production with disabled people had, for example, helped to ensure the accessibility of the final colour, overall design and wording on the cards. The bus operator felt this demonstrated the pivotal contribution that engagement and co-production with disabled people can make towards providing a more accessible service. Since launch, the Helping Hand scheme had seen uptake among other operators as well as local councils.

Assistance dog cards. A train operator who participated in the research had introduced an assistance card to enable assistance dog users to make other passengers aware of their assistance dog. This was in response to incidents where passengers had made their way to empty seats, not realised the assistance dog was sitting on the floor in front of the seat, and accidentally stood on the dog. The assistance card was intended for assistance dog users to place on empty seats above their dog.

7.3.2. Encouraging greater use of Passenger Assist (Actions 14 and 31)

Passenger Assist enables disabled people to book assistance in advance of their train journey. Through the ITS efforts were focussed on achieving a phased reduction to the Passenger Assist booking notification period:

- **Phase 1** would require passengers to book no later than 10pm the day before travel and was intended to be implemented by 1 April 2020

- **Phase 2** would require passengers to book at least 6 hours before travel and was intended to be implemented by 1 April 2021

- **Phase 3** would require passengers to book at least 2 hours before travel and was intended to be implemented by 1 April 2022.

The DfT's planned improvements to Passenger Assist under the ITS included:

- **Supporting the RDG to introduce the new digital passenger assistance smartphone app (Action 14)**. Under this action, the DfT planned to implement phase 1 by February 2021.

- **Support the RDG's Passenger Assist awareness-raising campaign, which the RDG intended to run online and at in-station events (Action 31)**. They also intended, from the end of 2018, to require that private companies commit to promoting greater awareness of Passenger Assist during rail franchising competitions (i.e. when tendering to become a train operating company).

Progress made

At the time of fieldwork, the DfT had completed all phases of the Passenger Assist rollout according to the planned dates. The Office of Rail and Road's (ORR) awareness raising activities took a different form to the originally planned campaign. On 27 July 2019, the ORR published new guidance that required all train operators to maintain an Accessible Travel Policy (ATP). Under the ATP guidance, all train operators are now required to promote Passenger Assist. Under the previous Disabled People's Protection Policy (DPPP) guidance, the ORR required train operators to operate, but not to promote, a Passenger Assist service.

Train operators who participated in the research had all introduced the new Passenger Assist app, which had both a customer facing booking function and a staff interface that enabled them to view the details of booked assistance in real-time. This was felt to be a significant improvement to the old, paper-based approach, through which such details would need to be printed off in advance. Most train operators who participated in the research had introduced the app in 2020, following the new ATP guidance.

> *"We'd get like a five o'clock report in the morning […] these are your assistances for the day, but if anyone booked after that five o'clock, it wouldn't be included in the report […] [now] they've always got the latest real-time information available to them"* Train operator

Train operators who participated in the research had promoted Passenger Assist in a variety of ways, such as posters, leaflets, social media posts, and information on their websites. One operator had also started promoting the service via their accessibility group, which was made up of both disabled and non-disabled people across the region.

Other work to promote staff assistance, outside Passenger Assist, had included:

- **Introduction of TUAG**. The DfT require all train operators to operate a TUAG service (which does not require disabled passengers to book assistance in advance). One DfT stakeholder who participated in the research expressed that the full implementation of TUAG for all rail services is the DfT's ultimate aim, but variation in current staffing capacity means that it will take a number of years before all train operators can make the necessary changes to achieve this. This was reflected in the research findings – train operators who participated in the research were at varying stages of implementation. However, some were already operating an immediate TUAG service in addition to Passenger Assist, and, in some cases, the majority of requests for assistance were occurring via TUAG.

- **'Try a bus/train days' and travel mentoring**. Some bus and train operators who participated in the research had started providing disabled customers the opportunity to practice using their service, with the option of staff assistance and in a safe environment without other passengers. Similarly, some bus operators who participated in the research offered the opportunity for disabled people who were unfamiliar with using their local bus to travel with assistance from a mentor, who could help them to learn how to use the bus (for example, where to get off).

- **Mitigating capacity limitations.** Train operators had taken various measures to ensuring the resilience of their assistance service (for example, when short staffed or during peak travel times). To meet levels of demand for their TUAG service, for example, some train operators who participated in the research had recruited more staff. To help meet demand without recruiting more staff, another train operator had created a dynamic response team, dispersed evenly across the network so that a staff member would always be in short

reach of any customer who required non-booked assistance. In another example, a train operator explained that failed assistance was more likely to occur during times of high demand. To ensure that failed assistance could be corrected as swiftly as possible, they had created a WhatsApp service so that, in the event of failed assistance, customers could contact the train manager immediately.

Challenges and lessons learnt

Key challenges and learning associated with providing staff assistance:

- **The Passenger Assist app is not always compatible with the health conditions or impairments of disabled people**. Train operators who participated in the research highlighted that disabled people have a diversity of needs and preferences, and digital booking tools are not suited to everyone, meaning that the operation of a telephone booking service remains important. This is reflected in ORR guidance, which requires train operators to provide a 24/7 national freephone passenger assist line.

- **Train operators who participated in the research widely supported the DfT's ultimate aim of fully implementing TUAG**. Train operators who participated in the research emphasised that, wherever possible, providing a TUAG service in place of Passenger Assist is the right thing to do. This is because, unlike Passenger Assist, TUAG does not introduce additional requirements of disabled people and therefore is closely aligned with the DfT's ambition to provide disabled and non-disabled people with equal access to public transport: *"if you go to a meeting, you might know what time it starts. You might not know what time it's going to finish. So this [requirement to book passenger assistance], essentially, is discriminatory because disabled people don't have the same opportunity that non-disabled people do just to be flexible"* DfT stakeholder.

- **Staffing and coordination of Passenger Assist.** As highlighted throughout this chapter, the ability of train operators who participated in the research to provide any form of passenger assistance was reliant on their capacity to respond. Where, for example, the level of staffing fell out of line with passenger demand (for example, during peak times), this could affect the consistency and quality of assistance provided. Participants expressed that, during the initial rollout of the Passenger Assist app, the experience of booking assistance had, at times, become more complicated where the journey extended across multiple rail networks. This was because train operators were at different stages of implementation, so passengers had to make multiple bookings for a single journey, and via multiple channels (e.g. over the new Passenger Assist app and over the phone). As the Passenger Assist app is now fully implemented, this is no longer an issue.

7.3.3. Funding for new Changing Places toilets (Action 37)

Standard accessible toilets do not meet the needs of all disabled people. Those with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis, often need extra equipment and space to allow them to use the toilets safely and comfortably. These needs are met by Changing Places toilets, which – where available – are provided in addition to accessible toilets.

Within the ITS, the Government committed to providing £2 million of new funding, to enable more motorway service area operators to install Changing Places toilets at existing and new sites in England facilities (Action 37). This was achieved in partnership with Muscular

Dystrophy UK, who managed the process on behalf of the DfT. Following two funding announcements (in 2019 and 2020), Muscular Dystrophy UK are supporting the installation of 59 new Changing Places toilets at motorway service areas (MSAs). Initial progress was slower than planned, due to construction delays that followed the COVID-19 pandemic. Despite this, 49 of these Changing Places toilets had been constructed at the time of fieldwork, and construction was planned for the remaining ten.

Another improvement by one train operator who participated in the research was the introduction of stoma shelves to all accessible toilets at all train stations on one their network in 2022. Stoma shelves provide a hygienic surface for people with a stoma to spread out their stoma bags and accessories. This work had been funded through the company's minor works budget (all train operating companies are contractually required to spend a proportion of their annual small works budget on improvements to the accessibility of their service).

7.3.4. Review aviation assistance performance standards (Action 72)

The DfT committed to work with the Civil Aviation Authority (CAA) to review performance standards for airports and airlines (Action 72). This included standards such as the amount of time taken for a passenger to receive assistance when boarding and leaving aircraft. The DfT intended to achieve this, by 2020, through the introduction of a new framework for measuring the provision of assistance by airlines, and by revising the existing framework for measuring the provision of assistance by airports.

The CAA published an updated and strengthened accessibility performance framework for airports in April 2019, which they use to assess compliance with legal obligations and reports annually. Work on a separate accessibility performance framework for airlines was postponed due to the COVID-19 pandemic. At the time of fieldwork, the CAA had published its draft framework for consultation from 25 April to 21 July 2023. The CAA were planning to publish a summary of responses to the consultation in due course.

7.4 Evidence of a change in outcomes

This section draws on ITS Panel Survey data. Overall, there was some evidence of an increase in levels of awareness surrounding journey assistance tools. There was also evidence that the proportion of disabled people who experienced difficulties booking Passenger Assist had decreased. However, there was no positive change in the other outcomes under this pathway: the evaluation did not find that awareness or use Passenger Assist increased, nor did the use of an app to book it, or overall satisfaction with the service. Use of trains is generally much lower amongst disabled people than non-disabled people, so these findings may reflect a need for greater awareness raising outside of rail settings, to reach disabled people who are currently non-users of rail services. As a type of journey assistance tool, the ITS has also monitored use of blue badges. Related findings are presented at the end of this section.

7.4.1. Disabled passengers are better aware of assistance available to them

The ITS Panel survey indicated that awareness of journey assistance tools in general may have increased among disabled people. However, there was no increase in awareness of Passenger Assist or pre-booked assistance for airports and water services. Disabled

respondents were asked whether they held a journey assistance tool, and those who did not, were asked why.

- **The proportion of disabled people who held a journey assistance tool remained at 5% across both waves**.

- **The proportion of disabled people who did not hold a journey assistance tool because they did not know these tools existed decreased**. At Wave 2, 37% of those who did not own a journey assistance tool said this was because they did not know they existed, compared to 50% at Wave 1.

- **At Wave 1, 50% of non-disabled people and 42% of disabled people were aware of passenger assist and this remained consistent at Wave 2**. At Wave 2, disabled people with a mental health condition were less likely to be aware of Passenger Assist (this was 34% for those of with a mental health condition and 46% of those without). However, this is largely accounted for by the fact that this group were younger, on average, than other disabled people and so less likely to have need to use Passenger Assist in general.

- **At Wave 1, 52% of disabled people were aware of being able to book special assistance at the airport, and this remained consistent at Wave 2.** At Wave 2, disabled people with a mental health condition or cognitive impairment were less likely to be aware of the assistance available to them. However, this is largely accounted for by the fact that this group were younger, on average, than other disabled people, and younger people in general were less likely to be aware of special assistance.

- **At Wave 1, 37% of non-disabled people and 26% of disabled people were aware of the assistance available for water travel services, and this remained the same at Wave 2**. At Wave 2, disabled people with a cognitive impairment were less likely to be aware of the assistance available to them. However, again, this is largely accounted for by the fact that this group were younger, on average, than other disabled people.

7.4.2. Disabled passengers can more easily access available assistance

This section presents ITS Panel Survey data concerning use of Passenger Assist. While this outcome was not specific to Passenger Assist, there were no relevant survey metrics relating to other modes of transport.

- **The proportion of disabled people who used Passenger Assist at least once a week was low at Wave 1 (6%), and this remained consistent at Wave 2**. Overall, across both waves, 12% of disabled people who used the service did so at least once a month.

- **Around one in six (16%) disabled users of Passenger Assist had ever used a smartphone to book it.** This figure combines Waves 1 and 2, since the proportion of disabled people who had used Passenger Assist was too small to make comparisons between waves.

- **Overall, 6% of disabled people who never attempted to use Passenger Assist said this was because they were not sure how to access the support**. This was consistent at Wave 1 and Wave 2. At Wave 2, those with impairments or health conditions that affected their mobility or dexterity more likely to give this answer than those without. This group were generally older, on average, than other disabled people. In the case of mobility, 12% of those affected gave this answer, compared to 3% of those without. In the case of dexterity, 13% of those affected gave this answer, compared to 5% of those without.

7.4.3. Disabled passengers have better assistance and facilities available

This section presents ITS Panel Survey and ORR data concerning experiences and satisfaction with Passenger Assist. Both sets of data indicate broadly similar levels of satisfaction with the service. As above, while this outcome was not specific to Passenger Assist, there were no relevant survey metrics relating to other modes of transport. This section also presents findings from the ITS Panel Survey on experiences with toilet facilities.

- **There was no change in the proportion of disabled people who experienced difficulties using accessible toilets on a train, at a train station or motorway service station**. At Wave 1, the proportion of disabled people who had difficulties accessing toilet facilities on a train and at a train station, or at a motorway service station was low, at 10% and 5% respectively. This remained the same at Wave 2. Disabled people were twice as likely to have experienced difficulties with using motorway service station toilets than non-disabled people at Wave 2 (respectively, this was 4% and 2%). In addition, those with mobility or dexterity impairments were more likely to be affected.

- **Disabled people with a mobility impairment were more likely (than those without) not to have used Passenger Assist because they lacked confidence the programme could support them**. At Wave 2, 4% of those who had never attempted to use Passenger Assist gave this answer.

- **Satisfaction with Passenger Assist remained high.** The ITS Panel Survey indicates no change in experiences and satisfaction since the start of the ITS: 90% of disabled Passenger Assist users were satisfied with the service at Wave 1, and this did not change at Wave 2. The ORR data (Table 2) indicates a slight increase in satisfaction from 87% in 2021/22 to 90% in 2022/23, which was reported by ORR as being statistically significant. Metric 17 represents data taken from the Office of Rail and Road.

Table 2: Percentage of people who were satisfied with the whole Passenger Assist process (from booking to receiving assistance) in each year of the ITS (metric 17)

Metric	2016/17	2017/18	2018/19	2019/20 (year 1)	2020/21 (year 2)	2021/22 (year 3)	2022/23 (year 4)
17	85%	86%	85%	86%	86%	87%	90%

7.4.4. Use of blue badges

Blue badges are parking permits valid for people with disabilities, that allow them to park in designated disabled parking bays. The ITS did not include any specific policy commitments that related to blue badges. However, following changes to Blue Badge eligibility criteria, the DfT committed monitoring the number of blue badges held by people with a non-visible disability through the ITS Scorecard. Data collection for this metric has been ongoing since the first year of the evaluation. The evidence shows that this number has increased year on year and in the fourth year of the ITS, it was almost four times higher in the first year of the ITS (86,000 compared to 22,463).

Table 3: Number of blue badges held by people with non-visible disabilities in each year of the ITS (metric 21)

Metric	Vehicle type	2016/ 17	2017/ 18	2018/ 19	2019/20 (year 1)	2020/21 (year 2)	2021/22 (year 3)	2022/23 (year 4)
21	Cars	-	-	-	22,463	39,702	64,000	86,000

8. Pathway 4: Accessible vehicles

8.1 Overview of pathway

As displayed in Figure 10, the intended outcome for this pathway was to ensure that disabled passengers can make use of the assistance available when travelling by taxi/Private Hire Vehicle (PHV). The Department for Transport (DfT) planned to improve the quality of assistance available by ensuring that taxi and PHV operators provide more wheelchair accessible vehicles (WAVs). To achieve this, the DfT intended to encourage all local licensing authorities (LLAs) to publish lists of wheelchair accessible taxis and PHVs. This chapter outlines the DfT's progress towards increasing the number of wheelchair accessible taxis/PHVs.

Figure 10: Pathway for the accessible vehicles element of the ITS logic model

ACTIVITIES	OUTCOMES		
Encourage licensing authorities to publish lists of wheelchair accessible taxis and PHVs (Action 86)	Taxi/PHV operators provide more wheelchair-accessible taxis and PHVs	Disabled passengers have better assistance available	More disabled passengers make use of available assistance
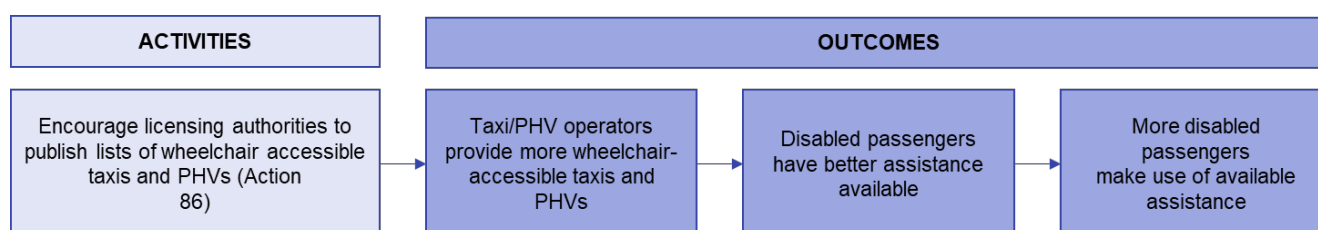
While the ITS actions that related to the accessibility of bus and train vehicles and stops/stations were not featured in this pathway, and were not a focus of this research, this topic was raised by transport operators who participated in the research. Related findings are presented in this chapter. The DfT also intended to improve the accessibility of aircraft design. This action is not featured in the accessible vehicles pathway and is covered in more detail in Appendix A.

8.2 Summary of findings

- The DfT's initial progress of this pathway was limited by low compliance rates from LLAs to publish designated WAV lists. However, following amendments to the Equality Act 2010 in 2022, the DfT were able to progress this action by enforcing (rather than simply encouraging) compliance.

- While there is evidence that the act has led to more LLAs publishing a designated WAV list, the evidence also indicates that one of the expected outcomes in this ITS pathway – an increase in the number of WAVs in operation – has not been achieved. LLAs who participated in the research explained that achieving this would require them to incentivise and/or enforce the operation of WAVs by taxi and PHV drivers. However, they felt they had a lack of options for how to achieve this and highlighted a need for further direction from the DfT in future.

- In addition to the action listed in the ITS, the LLAs, bus and train operators who participated in the research were undertaking a wide range of wider work to increase the physical accessibility of their vehicles, stops and stations – such as improvements to

waiting areas, boarding and access to priority space/seating. Access for All, a funding programme launched in 2006 to address the issues faced by disabled passengers and passengers facing mobility restraints, (see Appendix A) was widely praised for its funding contribution to train station improvements. Despite this, train and bus operators who participated in the research felt that significant step change is still required to make transport vehicles and infrastructure as accessible as possible, and that further funding, legislation and standardisation would help to initiate such change.

8.3 Progress towards delivery of actions

8.3.1. Encouraging LLAs to publish lists of designated WAVs (Action 86)

In accordance with section 167 of the Equality Act 2010, all LLAs are required to maintain and publish a list of the designated wheelchair accessible taxis and PHVs licensed within their jurisdiction. At the time the ITS was published, the main function this served was to provide information about vehicle accessibility, to aid disabled passengers in identifying vehicles which may meet their needs.

This action (Action 86) was not intended to involve specific activities or outputs, but rather to simply continue the DfT's ongoing work to encourage LLAs to publish lists of designated WAVs. It should be noted that while this was a measure the DfT actively encouraged LLAs to comply with, at the time of fieldwork LLAs had no legal duty to do so, nor did DfT have power to enforce compliance.

Progress made

The DfT had continued to communicate this requirement clearly, through general correspondence with LLAs and the revised best practice guidance on how LLAs can use their powers more effectively throughout taxi/PHV licensing (Action 62, outlined in more detail in Chapter 6). However, compliance was initially lower than hoped for (70% as of 2022). Indeed, as outlined in Section 8.3.1, only 72% of LLAs maintained list of wheelchair accessible taxis in 2019 and for PHVs this figure was at 62%.

As a result of this shortfall, drivers of WAVs in areas where a s167 list was not being maintained by the respective licensing authority had no specific legal duty to provide wheelchair users with assistance, to refrain from refusing them carriage, or from charging them extra. This meant that wheelchair users taking journeys in such areas were potentially at a higher risk of experiencing discriminatory treatment.

The Taxis and Private Hire Vehicles (Disabled Persons) Act (passed in April 2022) sought to correct this by *requiring*, rather than simply recommending, that LLAs maintain and publish a list. To ensure that all disabled people could travel free from the fear of discrimination, it also introduced new duties for non-exempt taxi drivers, PHV drivers and PHV operators and with respect to any disabled person, not just those who use wheelchairs. Operators and drivers convicted of failing to fulfil such duties would now face a criminal conviction and a fine of up to £1,000.

All LLAs who participated in the research had published a designated WAV list at the time of fieldwork. Some LLAs had already published a list before the 2022 Act was passed, whereas other LLAs had more recently published their list, in response to it. LLAs identified various

benefits that had come from publishing a designated WAV list. For example, the publication of new WAV lists by LLAs has enabled PHV operators who do not maintain such lists themselves to more easily identify potential WAVs and WAV-trained drivers in the local area that might be available to operate their private hire service. As outlined in Section 8.3.1, the proportion of LLAs who maintained list of wheelchair accessible taxis had increased to 94% in the 2022/23 financial year, and for PHVs this figure was at 91%.

Other work by LLAs who participated in the research had included working on an Inclusive Service Plan (ISP). An ISP is a document that provides an assessment of the level of demand for accessible services in the area, and how the LLA plans to meet it. In its best practice guidance to LLAs (see Chapter 6), DfT suggested that all LLAs have an ISP. One of the LLAs who participated in the research was working on the creation of an ISP in response to feedback from disability groups, which suggested that taxi and PHV services in the local authority area could be made more wheelchair accessible. In response, the LLA was in the process of consulting with disability groups and operators about how accessible existing service provision was and to establish what accessibility improvements their revised licensing policy should seek to address.

Challenges and lessons learnt

LLAs who participated in the research discussed a number of challenges associated with maintaining a designated WAV list and taking wider action to increase the number of WAVs in operation:

- **Unavailability of WAVs.** One issue described by LLAs who participated in the research was that simply having a taxi or PHV included on the LLA's list of designated WAVs would not guarantee its availability for disabled people to use. In particular, this was the case where a large proportion of a taxi drivers time was already taken up with pre-arranged work such as home-to-school runs or with customers who required larger vehicles for the transportation of equipment.

- **The Reference Wheelchair Standard was considered to be outdated**. LLAs who participated in the research felt strongly that the DfT should introduce a new specification to replace the Reference Wheelchair Standard. They explained, for example, that many types of wheeled mobility aids are larger than the standard and so cannot be accommodated by a standard WAV (e.g. wheelchairs with electric motors). Another suggestion included greater recognition within industry guidance that disabled people have a diversity of needs and while a WAV may suit one disabled passenger best, others may require a saloon car.

- **WAVs were felt to be expensive, yet less profitable.** LLAs who participated in the research reported that drivers often perceive there to be uncertain demand for WAVs, when compared to saloon cars, as they are perceived as serving a smaller customer base. Furthermore, they are regarded as more expensive to buy and maintain. It was suggested that this creates a disincentive for drivers to own one. Some LLAs who participated in the research expressed that introducing greater financial incentive and/or greater enforcement might be the only way of prompting significant change from the industry:
  - **Greater financial incentive**. Some LLAs who participated in the research had introduced policies to make WAVs more affordable, for example by waiving or reducing the licence fee for WAVs, relaxing the vehicle age limit (i.e. allowing owners a longer time to spread the cost of more expensive vehicles), or by introducing grants for WAVs.

- **Greater enforcement.** One LLA who participated in the research had introduced a cap of 50% on the total proportion of their taxi fleet that could be non-wheelchair accessible. Another LLA explained that, to achieve their eventual aim of having a fully wheelchair accessible taxi fleet, they had introduced a policy in 2013 that required any newly licensed taxi to be a WAV (with an exemption for any non-wheelchair accessible vehicles that were already in operation at the time).

"The only way the taxi trade thinks, really. 'It's costly to me. What are you going to do to help me?' All we do is license people to be able to run their own businesses. They need to make business decisions and they want to make money" LLA

One feeling was that LLAs did not have the capacity to introduce greater financial incentive or enforcement. As such, it was suggested that greater government support was needed: for example, funding or VAT exemptions for LLAs to subsidise the cost of WAV ownership and/or new enforcement powers to mandate drivers to operate WAVs.

- **LLAs who participated in the research would welcome more extensive guidance and support from government**. Some LLAs said they would find it useful to receive more direction from the DfT, and that this would lead to greater consistency in service provision across the country. They emphasised, for example, that current guidance tends to recommend a 'mixed fleet' but does not specify what proportion of the fleet the DfT expect to be made accessible. Some also said they would benefit from more guidance about how to bring about improvements to the accessibility of local fleets.

8.4 Evidence of a change in outcomes

The ITS evaluation did not involve any research with disabled people to assess whether it has become easier for them to access wheelchair accessible vehicles. However, the ITS scorecard monitored change in the number of licensed wheelchair accessible taxis and PHVs in England and Wales for each year of the ITS. As displayed in Table 4, the evidence shows that, for taxis, the proportion of WAVs in operation has decreased and then plateaued at 55% and, for PHVs, it has remained consistent year on year, at 2%.

Table 4: Percentage of taxis and PHVs that were wheelchair accessible in each year of the ITS (metrics 19-20)

Metric	Vehicle type	2016/17	2017/18	2018/19	2019/20 (year 1)	2020/21 (year 2)	2021/22 (year 3)	2022/23 (year 4)
19	Taxis	58%	58%	58%	57%	54%	55%	55%
20	PHVs	2%	2%	2%	2%	2%	2%	2%

Metrics 19 to 20 represent annual [Taxi and Private Hire Vehicle Statistics](). These statistics also indicated that, in the final year of the ITS (the 2022/23 financial year), 94% of authorities maintained a list of wheelchair accessible taxis (this had increased from 72% in 2019) and 91% maintained a list of wheelchair accessible PHVs (this had increased from 62% in 2019). This data suggests that while the DfT has been successful in their intention to encourage (and mandate) LLAs to publish designated WAV lists, this has not yet contributed to an overall increase in the number of WAVs in operation.

8.4.1. Improving physical accessibility of bus and train fleets

The ITS acknowledged that understandings of disabled people's needs evolve over time, and that vehicle specifications may require modernising. To address this, the DfT intended to:

- Review and make recommendations on the continued use of the Reference Wheelchair Standard (Action 17). This went ahead as planned – following an assessment of the prevalence, dimensions and uses of wheeled mobility-aids, the DfT published their recommendations on 29th March 2022. Appendix A provides more details on Action 17.

- Undertake a subsequent review on the continued use of the Public Service Vehicles Accessibility Regulations (PSVAR, Action 81 – see Appendix A). This action was originally intended to be delivered by 2028 and at the time of fieldwork was underway. Appendix A provides more details on Action 81.

- Undertake research in 2019 to review the impact of existing accessible rail design standards (Action 52). This went ahead as planned. The research established that, as of January 2022, all passenger carriages were compliant with modern accessibility standards.

While these actions have yet to result in activities or outputs that require action from transport operators, some operators who participated in the research had undertaken work to improve the physical accessibility of their fleets. These improvements were prompted by a range of initiatives, including new industry standards, specific funding streams or in response to disabled customer feedback or groups.

Improvements to vehicle boarding. Several bus and train operators who participated in the research as part of the evaluation had made improvements to their ramp infrastructure and maintenance procedures, to make them more resilient to failure (for example, by opting for manual rather than electric ramps) and to bring them in line with health and safety standards. One train operator who participated in the research was also in the process of procuring a new fleet. As part of this process, they had engaged with their disabled panels about the features that new trains should have to be more accessible, which had led to the identification of level boarding as a top priority.

Improvements to priority space and seating. For one train operator who participated in the research, this included the simultaneous installation of priority seats that had greater leg room and (to prevent competing use of the new seats) more luggage space. Bus operators who participated in the research also made various improvements to the accessibility of priority space and seating, including:

- Replacing standing poles (i.e. a pole that is permanently fixed into the floor of the bus) with pull down poles (i.e. a pole that the driver deploys) to secure wheelchairs. This was to avoid obstructing wheelchair users when reversing into a priority space.

- Repositioning new bell pushes, to make sure they are accessible for wheelchair users.

- Larger priority spaces, such as double wheelchair bays. One bus operator who participated in the research had been able to increase their priority spaces enough to accommodate multiple passengers simultaneously (for example, wheelchair and buggy users, or those with luggage) without reducing the number of seats, by opting for fold down seats.

Challenges and lessons learnt

Transport operators who participated in the research discussed a number of challenges associated with improving the accessibility of their vehicles.

Reflections on bus fleets included:

- **PSVAR 2000 was considered to be outdated**. A view expressed by bus operators who participated in the research was that, while the regulations were a step change for their time, understandings of accessibility (and of wheeled mobility aids in particular) have evolved significantly since then and vehicle design needs to 'catch up'.

- **A need for stronger PSVAR laws**. One view was that there was also a need for more stringent legislation to enforce compliance, for example a legal requirement for all bus flooring to be dementia-friendly.

In terms of rolling stock, some train operators who participated in the research explained that their train fleet was very old and could not be retrofitted in any way. This had significantly limited the types of accessibility improvements they could make. This was a particular issue where AV announcements were concerned, with some train operators who participated in the research explaining that they were reliant on train staff to make announcements manually as a result. Another train operator suggested that the DfT should exercise greater control over rolling stock. They pointed out that if all train operators were required to replace their rolling stock at exactly the same time, all trains would have a consistent design – for example, all train doors would be consistently positioned – and this would in turn lead to more consistent station infrastructure.

> *"getting the same trains with the same threshold levels, with the same doors in the same positions […] Right now it [level boarding] is not achievable because of different rolling stock, different platform heights, freight vehicles […] I would say sits with DfT and they need to really push on that to make sure that we start to actually look at long-term strategies"* Train operator

8.4.2. Improving bus stops/stations and train stations

The ITS acknowledged that much of Britain's transport infrastructure was not built at a time when the physical accessibility of buildings and vehicles was yet considered to the degree that it is now. To address this, the DfT intended to:

- Improve the physical accessibility of bus stops/stations by creating a standard for their accessibility (Action 63 – see Appendix A). As a result of the COVID-19 pandemic, the DfT's work on this action was in the early stages at the time of fieldwork.

- Improve the physical accessibility of train stations primarily through Access for All Control Period 6 (rail funding period – see Glossary) (Actions 34, 40, 78 and 79). Access for All, is explained in more detail in Appendix A.

Some transport operators and DfT stakeholders who participated in the research commented that, by and large, this was the area in which the most significant improvements are needed to the accessibility of transport services – particularly where rail is concerned. They had undertaken a range of improvements.

"We've got a largely Victorian infrastructure, and even the newer stuff, a lot of was built in the '60s and things and nobody really thought about accessibility up until mid, late-'90s to be honest" DfT stakeholder

Improvements to the physical accessibility of bus stops/stations included the installation of features such as raised kerbs and shelters, lighting or waiting areas. Improvements to train stations were in some cases funded by Access for All funding, but also various other funding sources such as minor works budgets. For some train operators who participated in the research, Access for All had played a fundamental role, enabling them to significantly increase the proportion of their stations that were accessible. However, train operators and DfT stakeholders who participated in the research widely felt there was a long road ahead on the road to full, industry-wide station accessibility. Participants identified the following challenges with improving train station accessibility:

- **Station accessibility improvements are *exceptionally* expensive**. Train operators who participated in the research explained that installing a single lift requires at least £1 million. Furthermore, one DfT stakeholder who participated in the research remarked that even though the Access for All Control Period 6 budget appears generous compared to other ITS actions, it is not a significant budget compared to other rail programmes. This could be further complicated by accessibility standards, which require that accessibility improvements to any feature of a train station must deliver full compliance. One view was that while this was right, the greater cost can have the effect of deterring train operators from initiating improvement works: *"the idea obviously being, it stops people just doing half a job […] say they've got £5,000, £10,000 to spend, because you're affecting the ramp, you're going to have to make a fully-compliant ramp, and then that adds on an extra zero probably, so it's £100,000"* Train operator.

- **Getting permission can be difficult**. Where train operators who participated in the research had listed buildings on their network, this could introduce an additional challenge to introducing certain station accessibility improvements. One train operator explained they would first need to get approval from the station landlord, then from the local preservation officer and even after that, the local authority could block the planned work.

- **Access for All covers a narrow range of improvements**. One view was that, in general, Access for All should be commended, but also that more attention and funding should be given to accessibility improvements away from the platform to ensure that the entire station is accessible – for example, Blue Badge parking spaces and step free ticket halls.

  "When the Equality Act came in, supermarkets were very, very quick […] every Tesco, for example, is now completely wheelchair accessible. We're governed by the same law, yet railway stations are not […] that's the step change that we need to make" Train operator

9. Pathway 5: Complaints

9.1 Overview of the complaints pathway

The overall intended outcome for the complaints pathway was to ensure that transport operators act on accessibility-related complaints, both through improvements to complaints process and the enforcement of disabled passenger rights (Figure 11). To achieve this, the Department for Transport (DfT) intended for the number of complaints made by disabled people to increase, by raising disabled passenger's awareness of their rights and of how to complain, and by making it easier to complain. The DfT intended to achieve these outcomes by creating an online tool to help disabled bus passengers report issues, by recommending that Local Licensing Authorities (LLAs) make it simple to report discrimination by taxis and Private Hire Vehicles (PHVs), by establishing a Rail Ombudsman, and by more generally promoting information about the rights of disabled passengers.

Figure 11: Pathway for the complaints element of the ITS logic model
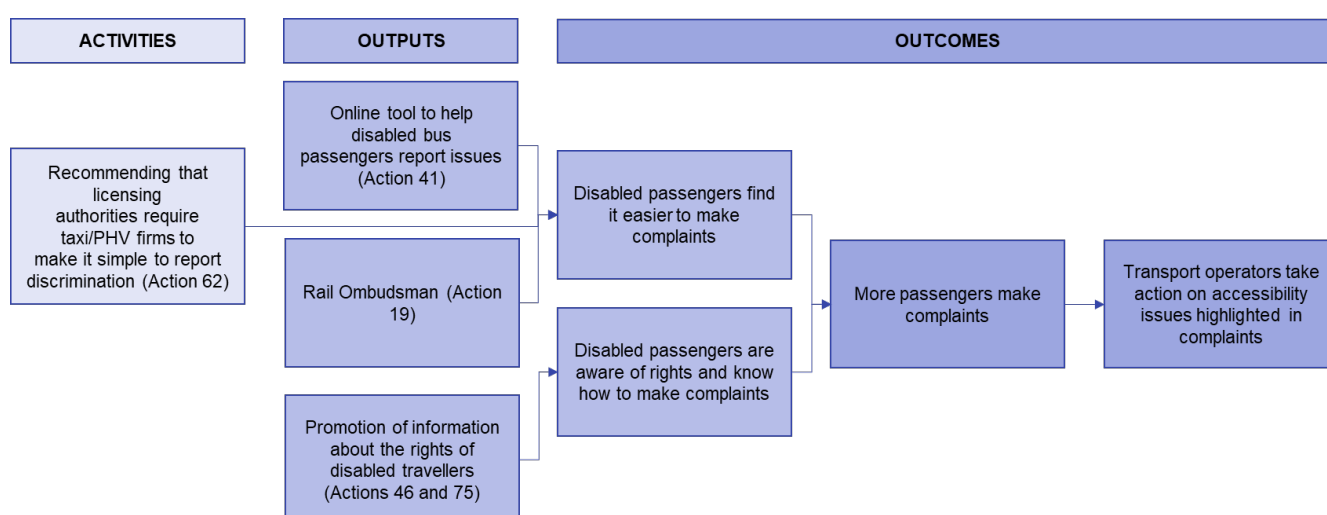
To deliver on Action 57, the DfT developed the Air Passenger Travel Guide (previously known as the Aviation Passenger Charter). While this action was not originally included in the complaints pathway, it is covered in this chapter as the travel guide includes information for passenger on their rights, including how to raise complaints in the event things do not go as planned. The DfT also intended to review and strengthen, if necessary, the Civil Aviation Authority's (CAA) powers to enforce regulations. This last action is not featured in the complaints pathway. As no primary research was conducted on this action, it is covered in Appendix A.

9.2 Summary of findings

- Progress had been made on all the planned actions, with the exception of developing an online tool for disabled bus passengers to report issues (Action 41). However, the DfT had

- sought to facilitate improved bus sector enforcement action by the Driver and Vehicles Standards Agency (DVSA) through other means.

- Despite this progress, the survey did not find that disabled people became more aware of their rights, found it easier to complain, or complained more often about accessibility issues between Waves 1 and 2. In fact, there was some evidence that, between Wave 1 and Wave 2, disabled bus passengers found it harder to make complaints, and that satisfaction levels surrounding how complaints were handled decreased for disabled bus passengers. These findings reiterate the importance of completing the remaining ITS actions.

- In addition to the actions listed in the Inclusive Transport Strategy (ITS), transport operators and LLAs who participated in the research had engaged in various work to improve the way they recorded, processed and responded to complaints. However, key barriers remained, including difficulties in categorising or escalating complaints, and in establishing responsibility, or proving unlawful discrimination occurred.

9.3 Progress towards delivery of actions

9.3.1. Promotion/enforcement of passenger rights (Actions 46, 57, 62 and 75)

Actions 46, 57, 62 and 75 were designed to help transport operators and LLAs to promote information about disabled passenger rights, provide accessible ways of registering complaints and – where issues arise – take enforcement action:

- Action 62 applied to LLAs specifically. Under this action, the DfT planned to revise their existing best practice guidance on how LLAs can use their powers more effectively on a range of issues including driver licensing requirements (see Chapter 6), complaints and enforcement action. The DfT intended to publish for consultation revised best practice guidance by the end of 2019.

- Actions 46 and 75 applied to both transport operators and LLAs and was designed to encourage better promotion of information among disabled passengers about their rights and the level of service they can expect. These actions were not intended to involve specific activities or outputs, but rather to simply continue the DfT's ongoing work with passenger and industry representative bodies, and with regulators.

- Action 57 applied to the aviation industry specifically. Under this action, the DfT intended to enable more informed choices by disabled people about travelling by air. The DfT did not specify exactly how they would deliver this action, they simply intended to work with the aviation industry to improve the information and advice provided to disabled passengers travelling by air. This would include by distributing free information, promoting aviation special assistance service and promoting opportunities for air cabin assessments.

Progress made

The DfT published its revised best practice guidance for LLAs for consultation from 28th March until 20th June 2022 (Action 62). The final version was published on 17 November 2023.

As part of their ongoing work to promote information about the rights of disabled passengers (Actions 46 and 75), the DfT had either carried out or planned to carry out the following:

- Updates to government-hosted online information about local bus and taxi/PHV services.

- Publication of an Aviation Passenger Charter on 17 July 2022 (this was relaunched and rebranded as the Air Passenger Travel Guide in October 2023) and initial stakeholder engagement to understand key gaps and obstacles in the provision of information about the accessibility of aviation.

- Regular engagement with the Confederation of Passenger Transport and Bus Users UK.

- Ongoing work with the DVSA to collect more detailed information when responding to accessibility related complaints concerning buses and coaches (e.g. through upgrades to call centre scripts), with the aim of enabling improved enforcement action.

- Work with the charity 'Scope' to establish a co-branded guide which sets out existing passenger rights and service information for land transport, encompassing buses, coaches, taxis, PHVs, light rail and rail sectors. At the time of fieldwork, the guide was close to completion.

- Action 57 evolved into an intention to provide a single source of information about aviation consumer rights and what level of service people are entitled to receive at each stage of booking and air travel. This would have a significant focus on accessibility, it would include information about the right to free assistance and how to complain when things go wrong. The DfT delivered this by creating two passenger charters:

- The Passenger COVID-19 Charter (NB: publication no longer publicly available) was created to provide passengers – including disabled passengers – with advice about all international travel during the COVID-19 restrictions. It included information about the industry's responsibilities to meet people's individual needs and encouraged passengers to contact travel operators to discuss the available adjustments to the provision of passenger assistance. It was published on 17 May 2021.

- The Air Passenger Travel Guide (formally known as the Aviation Passenger Charter). This was developed in collaboration with the aviation sector, consumer and disability groups. It was originally published on 17 July 2022, and an updated version was launched on the 19 October 2023. This guide provides passengers with information about their rights and responsibilities whilst travelling by air at each stage of their journey, from booking and including 'if things go wrong'. It also includes a dedicated section on accessibility and the additional rights of disabled and less mobile passengers.

Transport operators and LLAs who participated in the research had also carried out various complaints and enforcement improvements, which were primarily focused on providing new digital channels for complaints submission and new modes of signposting. New digital complaints channels included via social media or dedicated platforms such as – in the case of train operators – the Passenger Assist app. Meanwhile, LLAs who participated in the research had introduced vehicle-based signposting in response to new statutory guidance, for example, notices on vehicle windows or QR codes on the back of car seat headrests. Other modes of signposting for transport operators and LLAs included via their websites, booking confirmation emails and posters.

Other work by transport operators who participated in the research included new mechanisms for face-to-face customer engagement (for example, via city centre-based drop-in clinics and attendance at community events), where customers could receive information and pose queries or complaints in person, and bus passenger charters, established in response to Bus

Back Better requirements (Bus Back Better is the Government's national strategy for improving buses in England outside of London).

Challenges and lessons learnt

Not all of the LLAs who participated in the research were aware of the best practice guidance published by the DfT (Action 62) or had participated in the consultation. Of those who had, LLAs welcomed the guidance. They did not share any feedback on the content of the guidance as it relates specifically to complaints or enforcement processes, but there was a perception that from some that the guidance was of limited use in general as their practices already exceeded what was recommended. Relatedly, one perception was that the DfT could have undertaken greater consultation of LLAs, to make use of their expertise about what should be included in future best practice guidance.

With regards their wider work, transport operators and LLAs who participated in the research raised the following challenges and lessons learnt:

- **Complaints categorisation processes**. Where complaints could be accurately and precisely categorised, this enabled transport operators and LLAs to identify issues more quickly, take more appropriate enforcement action, and identify longer-term areas for improvement. One train operator who participated in the research had introduced improvements to their categorisation process specifically in response to Key Performance Indicators (KPIs) that the DfT had introduced. Meanwhile, a key barrier to improving complaints categorisation for LLAs was a lack of suitable database products:

  "I'll just search for wheelchair. That's the only way I can do it […] We deal with alcohol licensing as well […] we can't even filter complaints between pubs and taxis […] but there's not really any companies that are really producing decent licensing databases" LLA

- **Performance indicators**. A train operator who participated in the research explained that in the past, the ORR had questioned why the complaints reports they submitted had included cases where the customer was satisfied with the response (for example, if they were compensated with a free coffee). The participant explained this was worth doing because such issues should not have occurred and including them in their Office of Rail and Road (ORR) reports provides full transparency on how well the service is performing for disabled passengers. To enable better identification of areas for improvement, this train operator had started making all accessibility complaints visible to senior staff through their internal reporting processes. Similarly, the train operator suggested that accessibility complaints should not be evaluated as a proportion of total journeys:

  "Unless you look at it in the right way, it looks like everything's fine all the time. It's like, 0.001 per cent [of booked passenger assistance], fantastic, we're doing a great job, but within that figure there can often be things that are opportunities for improvement" Train operator

- **Capacity and expertise**. The ability of organisations to provide a more accessible service was in large part dependent on whether they had a sufficient number of staff, or whether they held sufficient expertise. One bus operator who participated in the research attributed the quality of their complaints procedures to the fact they had a large complaints team, which enabled them to deal with complaints quickly. Furthermore, this bus operator had a dedicated safeguarding team which meant that any complaint that related to individuals

with protected characteristics would be fast tracked through a higher-level process, with a higher level of senior oversight.

- **Establishing responsibility or proving discrimination**. It could be difficult to establish which organisation was responsible for an issue or complaint, or to prove that discrimination had taken place. For example, train operators explained it could be difficult to identify whether company staff or Station Facility Owner staff were at fault, and this could prolong the complaints handling process (train station operators are known as 'Station Facility Owners', and are responsible for handling the day-to-day management of all the station's facilities). In the case of LLAs, participants stated that it could be difficult to prove that drivers had discriminated against disabled passengers. One key example given was instances where a PHV driver is suspected of cancelling the journey via an app upon realising a customer is a wheelchair or assistance dog user. A second example was where the LLA suspects a PHV driver of overcharging a disabled passenger but cannot prove this as, unlike for hackney carriages, they do not have direct sight over PHV meterage and pricing.

- **Fear of dogs among drivers**. One LLA who participated in the research explained that, within their licensing authority area, there had been some instances where a driver had refused to transport an assistance dog because they were afraid of dogs. In the instances where this had occurred, the LLA had taken enforcement action. To prevent such an issue occurring again, they were also seeking to address this proactively through driver training.

9.3.2. Online service for reporting issues experienced on buses (Action 41)

The DfT intended to provide a new, online service to assist disabled passengers in reporting issues with the accessibility of bus travel (Action 41). This was to be accompanied by enforcement action against non-compliant bus operators by the DVSA and Office of the Traffic Commissioner. The online service was not developed due to insufficient capacity at the DfT and partner organisations such as the DVSA. However, the DfT felt their separate work with the DVSA to improve their existing complaints processes (see 9.3 Progress made) had enabled some progress towards the overall outcome of improved enforcement action.

9.3.3. Establishment of the Rail Ombudsman (Action 19)

The DfT intended to establish a Rail Ombudsman (Action 19), and this was delivered according to original timeframes (by the end of 2018). The Rail Ombudsman investigates unresolved customer complaints about service providers in the rail industry and has the power, where necessary, to issue legally binding decisions.

This action did not require any activity from train operators, but participants were asked for their views on, and experiences with, the Rail Ombudsman. Among those who participated in the research, Train Operators' interactions had been limited to one or two cases per year (a stakeholder attributed this to the high quality of signposting and compensation their company provided). Nonetheless, train operators who participated in the research felt the Rail Ombudsman provides a valuable service, for example through the role it plays as an impartial mediator and through its guidance to train operators on how to respond to complaints within the timeframe required to avoid penalties. Train operators who participated in the research also identified areas for improvement, namely that the Rail Ombudsman can lack context on how incidents occurred, and that the organisation could affect greater change in the rail industry by getting involved in a higher number of cases and by helping to drive cultural change more generally.

9.4 Evidence of a change in outcomes

This section draws on two sources of data: the ITS Panel Survey and Assistance Dog User Survey. Overall, the evidence does not show any positive changes in the outcomes targeted by this pathway between Wave 1 and Wave 2. In particular, there is evidence that between Wave 1 and Wave 2, disabled bus passengers found it harder to make complaints, and that satisfaction levels surrounding how complaints were handled decreased for disabled bus passengers. These findings reiterate the importance of completing the remaining ITS actions.

9.4.1. More passengers make complaints

Participants were asked whether they had faced any of a wide range of negative experiences on trains, buses and taxis/PHVs. For each negative experience they had, participants were asked whether they had reported it. This section looks at whether there was any change in the proportion of people who reported at least one of their negative experiences.

Overall, since the start of the ITS, the evidence does not show an increase in the proportion of disabled people who reported their negative experiences, but the proportion of accessibility related complaints received by bus and train operators has slightly increased (Table 5):

- **The proportion of bus or train passengers who made a complaint did not increase.** For buses and trains at Wave 2, there was no change in the proportion of people – disabled or non-disabled – who reported at least one of their negative experiences. For buses, 61% of disabled people had a negative experience, and of these, 19% reported at least one of them. For trains, 54% of disabled people had a negative experience, and of these, 22% reported at least one of them. On buses, disabled people were around twice as likely than non-disabled people to have reported at least one of their negative experiences (19% of disabled people, compared to 10% of non-disabled people).

- **The proportion of taxi/PHV users who made a complaint fell from Wave 1 to Wave 2, for both disabled and non-disabled people.** At Wave 1, 29% of disabled people reported at least one of their negative experiences, compared to 20% at Wave 2. This change may be due to an increase from Wave 1 to Wave 2 in the number of negative experiences with taxi/PHV availability, which may be less likely to lead to complaints than other negative experiences, such as poor driver behaviour. Respondents to the Assistance Dog User Survey who had experienced an access refusal were also asked whether they reported their most recent access refusal. At Wave 2, almost half (48%) of these respondents reported the incident to a taxi licensing authority or private hire vehicle operator or complaints body. Comparisons cannot be made to Wave 1 due to changes in the profile of the sample.

- **The proportion of complaints made by train passengers that were accessibility related has, overall, increased slightly since the first year of the ITS, while for bus passengers there has not been a sustained increase**. Metrics 13 to 14 are displayed in Table 5 and represent data taken from Bus Users UK (not in the public domain) and the Office of Rail and Road statistics.

Table 5: Percentage of complaints made by bus and train passengers that were accessibility related in each year of the ITS (metrics 13-14)

Metric	Vehicle type	2016/ 17	2017/ 18	2018/ 19	2019/20 (year 1)	2020/21 (year 2)	2021/22 (year 3)	2022/23 (year 4)
13	Trains	1%	1%	1.2%	1.2%	0.8%	1.2%	1.5%
14	Buses	4%	4%	7%	5%	7%	6%	4%

9.4.2. Disabled people aware of their rights and know how to make complaints

The evidence does not show that disabled people's understanding of their rights, and knowledge of how to make a complaint, has improved:

- **Understanding of how to make complaints on buses, trains and taxis/PHVs has not improved among disabled people**. At Wave 1, across buses and trains, around one in five disabled people who did not report their negative experience said this was because they did not know how (23% and 17% respectively). There was no change at Wave 2. For Taxis/PHVs, this was just over a quarter (28%) and did not change at Wave 2. Respondents to the Assistance Dog User Survey who had experienced an access refusal were asked whether they were aware of the responsibility that LLAs have for investigating access refusals and taking enforcement action. Almost half (47%) stated that they were not aware.

- **Around a third of disabled people were aware of the Rail Ombudsman, and awareness did not increase over time**. Participants were asked whether they had heard of the Rail Ombudsman – an independent organisation that offers a free service to help with unresolved or poorly handled complaints. At Wave 1, 35% of disabled people were aware of the Rail Ombudsman, which remained unchanged at Wave 2. At Wave 2, awareness increased slightly amongst the general population, from 34% to 38%, but this was a result of increased awareness amongst non-disabled people only. This may, in part, be related to much lower levels of rail use amongst disabled people, compared to non-disabled people (see Section 4.3.2).

9.4.3. Disabled people find it easier to make complaints

The evidence does not show an improvement in the ease with which disabled people could make complaints:

- **There is some evidence that disabled people found it harder than non-disabled people to report negative experiences, and that reporting some experiences became more difficult over time for disabled people**. On trains, disabled people were twice as likely as non-disabled people to have found it difficult to report a negative experience (49% found it difficult, compared to 24% of non-disabled people), although there was no such difference on buses, and too few participants who reported negative experiences with taxis/PHVs to determine differences between groups. On buses, the proportion of disabled people who found it difficult increased: at Wave 1, 28% of disabled people found it difficult, rising to 47% at Wave 2. This finding, although statistically significant, should be interpreted with caution, as it is based on a relatively small sample of disabled bus users who reported a negative experience: we can be confident that the proportion of disabled people who found reporting their experience difficult increased, but there remains uncertainty about by how much.

- **Fewer disabled bus passengers found it easy to make complaints than taxi/PHV and train passengers**. Disabled people who had a negative experience of any kind on trains, buses or taxis/PHVs, and who reported this negative experience, were asked how easy or difficult they found it to make a complaint. At Wave 2, 49% found reporting a negative experience on trains difficult (this was unchanged since Wave 1). Similarly, 47% found reporting a negative experience on buses difficult. For taxis/PHVs, due to the low number of people who reported a negative experience, the two waves have been combined: 31% found reporting a negative experience difficult. Respondents to the Assistance Dog User Survey who had reported an access refusal were also asked how easy or difficult they found it to do so. At Wave 2, almost half (47%) said this was difficult.

- **Disabled people identified a range of barriers to making complaints**. Those who had a negative experience but did not report it were asked why. Across buses and trains, at Wave 1 around one in ten said this was because the way of complaining was inaccessible, and there was no change at Wave 2. For taxis/PHVs at Wave 1, the proportion who found complaining inaccessible fell from 19% at Wave 1 to 8% at Wave 2. At Wave 1, the proportion of disabled people who said that reporting their experience would take too long was just under one in five for buses and taxis (18% and 17% respectively) and just under one in six for trains (15%). Again, there was no change from Wave 1 to Wave 2. Respondents to the Assistance Dog User Survey who had experienced an access refusal and did not report this to their LLA were also asked why. At Wave 2, 20% said the way of reporting was inaccessible and 13% said it would take too long.

9.4.4. Transport operators act on accessibility issues highlighted in complaints

The ITS Panel Survey did not collect data on the actual outcomes of the complaints that disabled people reported. However, participants were asked how satisfied they were with how their complaints were handled. Overall, there was no increase in satisfaction levels for disabled people, and for buses, satisfaction levels fell.

- **Across public transport modes, a third or less of disabled people were satisfied with how their complaints were handled.** Satisfaction amongst train users was higher at Wave 2 than at Wave 1, but only among non-disabled people: 35% of disabled people were satisfied at Wave 2, whereas for non-disabled people, the proportion who were satisfied rose from 34% at Wave 1 to 55% at Wave 2. Satisfaction amongst disabled bus users was lower at Wave 2 than at Wave 1: at Wave 1, 32% of disabled people were satisfied with how their complaint was handled, which fell to 15% at Wave 2. For non-disabled people there was a similar change, but it was not statistically significant. Overall, 34% of taxi/PHV users were satisfied with how their complaint was handled (due to the low number of people who reported a negative experience, data from both waves, and from disabled and non-disabled groups was combined).

- **For Assistance Dog users who reported access refusals to LLAs, there was variation in whether legal action was taken.** Among those for whom no legal action was taken, participants explained that this was for a variety of reasons: there was insufficient evidence; the LLA deemed there to have been no legal violation; it would have been too costly or time consuming to prosecute; or because the LLA said the respondent should have informed the taxi or PHV company they would be travelling with a dog.

10. Learning about policy design and delivery

This chapter considers what learning can be applied from the Inclusive Transport Strategy (ITS) to the **design** and **delivery** of future policy, particularly where this concerns transport strategy and/or improvements to the accessibility of the transport system. Unless stated otherwise, the findings in this chapter are drawn from DfT stakeholder interviews. As outlined in Chapter 2, this included 11 interviews with Department for Transport (DfT) staff involved in the design and development of the ITS and Disabled Persons Transport Advisory Committee (DPTAC) stakeholders.

Overall, participants highly commended the ITS vision and felt it had many elements of a strong delivery framework. They also shared constructive feedback on how policymakers can draw from the ITS to ensure that future transport strategy is fully set up to deliver on its ambitions – both through its design and through the effective use of policy levers.

10.1 Designing policy

This section considers what learning could potentially be applied to the design of future policy. Four components of the ITS are examined in turn – the overarching programme theory, the programme structures, the design of the individual policy commitments, and wider engagement with the accessibility agenda.

10.1.1. Programme theory

A comprehensive programme theory should articulate the overall outcomes intended for a policy and how each policy commitment is expected to contribute individually and collectively to the achievement of these outcomes[iii]. This section outlines reflections from DfT stakeholders who participated in the research on the programme theory underpinning the ITS.

In terms of its intended outcomes, participants widely commended the ITS for setting out to go further than previous accessible transport policy. When the strategy was in development, the DfT identified that it should do two things differently to preceding policy:

1) Firstly, the draft Accessibility Action Plan (AAP) consultation responses (see Chapter 3) indicated that the remaining gaps in transport accessibility were people centred, not just infrastructural. Specifically, the next policy would need to do significantly more to improve disabled people's confidence that transport services could deliver on their needs, and also to improve the confidence of transport staff to deliver on such needs.
2) Secondly, it was decided that the next policy should be a transport *strategy*, rather than another action plan. This meant the ITS would entail a more comprehensive set of improvements to the transport system and would incorporate multiple modes of transport. These improvements would be interconnected with other accessibility work and underpinned by an overarching and longer-term set of goals.

Participants felt that both intentions were well reflected in the resulting ITS strategy and praised the ITS for not holding back in its ambition. However, stakeholders felt the ITS could have benefitted from a more developed programme theory. In particular, there was a view

that the DfT could have more fully developed the logic model, by ensuring it took account of every ITS action and by reverse engineering it from the 2030 deadline (by which time the DfT intended for disabled people to have equal access to the transport system). This would mean that all elements of the programme theory (i.e. inputs, activities, outputs, outcomes and impacts) would have been appropriately set up to deliver on the deadline and every ITS action would have clearly corresponded to a causal pathway within the logic model.

> *"What we ended up with was a longer-term focus bolted on to a list of actions and things that we were doing, with a few slightly more strategic ones added on at the same time"* DfT stakeholder

10.1.2. Programme structures

Translating programme theory into practice requires fully developed structures for delivery, staffing and governance. This section outlines participants reflections on the programme structures underpinning the ITS.

One recommendation was that the overall programme could have been strengthened with a series of more developed sub-programmes and projects, each with a dedicated delivery structure. It was felt that a single programme may not be sufficient to account for all of the ITS actions because they were spread across many teams that were responsible for different transport modes, each of which required a different delivery approach. Furthermore, it was felt that some transport modes can naturally dominate without the right checks and balances, due to the differing size and complexity of transport modes, as well as the differing number of ITS actions dedicated to each. Underpinning the programme with dedicated sub-structures may therefore have given individual projects and transport modes the attention they deserved, while also ensuring they fed into the overarching strategy.

Relatedly, improving the accessibility of the entire transport system requires door-to-door accessibility for every passenger. This means that improvements should not only be targeted at individual transport modes but also transport interchange and street infrastructure. DfT stakeholders and transport operators who participated in the research highlighted that street infrastructure had received less attention because responsibility sits with local authorities and so is not in the DfT's direct control. It was therefore recommended that future policymakers do more to ensure the integration of transport services and infrastructure at every stage of the journey, by addressing such gaps in responsibility.

> *"The Department for Transport is very much divided up into road, rail, bus and so on, but of course, most journeys involve more than one of those modes […] The problems often occur at the interchange, the interface between the modes, and no one really has responsibility for that"* DfT stakeholder

In terms of staffing and governance, DfT stakeholders who participated in the research felt that ITS programme board meetings had provided an invaluable forum for the modal leads (DfT staff with lead oversight of a group of ITS actions relevant to specific transport modes), and other colleagues, to freely discuss factors affecting the delivery of single or multiple ITS actions, particularly in the earlier stages of ITS delivery. This fostered strong working relationships between modal leads and enabled them to identify opportunities for knowledge and capacity sharing.

However, participants also put forward two recommendations for maximising the strategic function provided by programme governance:

1) Firstly, programme and modal governance could have been closer integrated, since a significant number of the ITS actions were already subject to separate, mode-specific governance processes, that usually did not feature the ITS programme board:

    "they're not in the decision-making chain […] the various programme portfolio boards, investment board, up through senior management and ministers. It's a dotted line out to the ITS governance" DfT stakeholder

2) Secondly, participants explained that programme board involvement was originally intended to be the remit of senior modal staff, who would have the necessary seniority to embed the accessibility agenda in the wider work of their team. However, DfT stakeholders who participated in the research identified a lack of senior buy-in, which meant programme board involvement was delegated to those leading on day-to-day accessibility work and, resultingly, the work of the programme board was more directly focussed on delivery of the ITS actions (and less on strategic considerations). One reflection was that this was not an ITS-specific challenge and that the number of programme boards senior grades must engage with can *"sometimes diminish the quality of discussions at senior level"* (DfT stakeholder).

Finally, knowledge transfer was felt to be crucial for ensuring that future policy is resilient to staffing changes. ITS staffing changes had at times contributed to feelings of discontinuity and uncertainty about the direction the strategy was going in. In particular, prior decisions and progress were not always clear to staff who started on the strategy at a later date and in one example, it was reported that prior work was forgotten about. To one DPTAC (Disabled Persons Transport Advisory Committee) stakeholder, it had also been unclear, at times, who DPTAC's current point of contact for the strategy was, and they felt this meant DPTAC had not always inputted as usefully as they might otherwise have.

10.1.3. Policy commitments

In addition to effective programme structures, it is also crucial that policy commitments themselves are well-designed. DfT stakeholders who participated in the research spoke about the importance of balancing levels ambition when designing long-term policy commitments.

Firstly, some of the ITS actions were perceived as being less ambitious. These actions were fairly straightforward to deliver and in line with available resource, but unlikely to deliver significant change for disabled people. Participants felt this applied to ITS actions that were devised when the DfT had intended to pursue another action plan, rather than a strategy. As such, they were conceptualised as standalone, short-term solutions to very specific problems. A number of the ITS actions also primarily involved work the DfT was already doing, planning to do, or amounted to the first (and sometimes most straightforward) step towards achieving an outcome. In some cases, such actions were perceived as being inconsistent with the overall level of ambition articulated in the strategy and could have been tied more directly to the delivery of measurable improvements in outcomes for disabled people.

Two examples of actions that might be considered less ambitious for some of the reasons outlined above include Action 14, which simply described actions that were already underway and Action 1, which simply committed the DfT to announcing plans at a later date:

- Action 14: the work to introduce the new Passenger Assistance application is currently ongoing. RDG is currently implementing a new version/provider of Passenger Assist which will include the mobile app.

- Action 1: announce our actions in response to the recent Blue Badge consultation by the end of this year.

By contrast, a smaller number of the ITS actions, that were designed later, had a greater strategic focus. Some of these policy commitments were perceived as being too ambitious. Although on paper they would deliver significant change for disabled people, they were not workable in practice. One possible contributing factor was ministerial pressure to deliver the ITS actions in as short a timeframe as possible. DfT stakeholders who participated in the research felt this conflicted with the need for a longer and more deliberate process, that was capable of delivering the full extent of change envisioned by the ITS.

Relatedly, participants highlighted that delivering significant improvements to the accessibility of public transport usually requires significant funding, yet there was limited funding attached to the ITS and also uncertainty about the availability of future funding, to support long-term change. It was recommended that future policymakers do more to manage ministerial expectations, demonstrate the limits of what can be delivered in a given timeframe or budget and keep decisions in line with "the art of the possible.

> *"[We need to] be prepared to fight our corner… with stakeholders and with ministers on the role of a strategy. To accept that it's not generally possible or right to try and do everything all at once, and that a proper strategy would allow us to actually space things in a sensible way, and to demonstrate continued delivery against a strategic aim"* DfT stakeholder

Ultimately, this resulted in an inconsistent set of actions that were not, on the whole, ideally set up to function collectively or to deliver on the ambition articulated in the ITS. Specific suggestions for how policymakers could potentially improve future policy commitments included the following:

- **Closer senior involvement from strategic DfT staff during the design of policy commitments**, to ensure that policy commitments designed by different teams are consistent with each other, and with the level of ambition articulated in the overall programme. Relatedly, one perception was that agreeing on policy commitments that could be applied to multiple modes of transport had potentially become more straightforward at the time of fieldwork, when accessibility had been introduced in every transport minister's portfolio, including the Secretary of State. This was not the case during the development of the ITS, when responsibility belonged to the now defunct position of Transport Accessibility Minister. This meant that other transport ministers made the ultimate decisions (in line with their own priorities) about whether or not the mode-specific actions under consideration were included in the ITS.

  > *"There isn't necessarily a problem per se with one minister being [responsible for] accessibility and the other being [responsible for a specific mode], the challenge can be just the quality of the relationships between them and whether or not it's possible to influence and identify opportunities"* DfT stakeholder

- **Measurable deliverables for every ITS action**. ITS actions were generally not tied to a measurable set of deliverables – for example, targets, milestones or outcomes – unless this occurred through separate programme boards to the ITS. This meant that, for a significant number of the ITS actions, their wording did not commit the DfT to delivering any specific activities or outcomes. This did have some benefits, including that the DfT

could progress the action based on what they felt would best deliver on the aims of the ITS at the time, and with the available resource. The DfT could also continue to expand on their work to meet that commitment after delivering their initial plans. However, it was also felt that stronger deliverables would have provided a greater accountability mechanism by ensuring that every action could directly contribute to improvements for disabled people, as well as providing a clearer way of assessing whether they were on track to making such improvements.

> *"Something quite ambiguous, like improved provision of information, it can mean anything […] it could be maybe a bit clearer as to what exactly that means. On the other hand […] if you have a broad deliverable, it means that there's always something that you could add to it […] like a prompt to everyone that this is an area that [still] needs attention"* DfT stakeholder

> *"When you're setting a programme up, you need a clear idea of what you're doing, why you're doing it, and how you're going to measure whether it's been a success or not. I never felt we really had that with this strategy"* DfT stakeholder

- **Greater acknowledgement of how accessibility may interact with existing and future legislation**. Since the DfT first undertook their review of the AAP in 2016 (which led to the development of the ITS), there were significant changes to the policy agenda of the incumbent Government. One example of how new legislation affected the ITS was the introduction of new environmental legislation surrounding the use of zero emission vehicles, including the Welsh Government's National Transport Delivery Plan 2022 to 2027 (which set an ambition for all taxis and PHVs to be zero emission at tailpipe by 2028) and, in England, legislation such as Euro 6 emissions standards. Some LLAs who participated in the research expressed that this had made it more difficult to increase the number of wheelchair-accessible taxis and private hire vehicles in operation, as there were very few WAV suppliers that yet had the capacity to manufacture vehicles that also met vehicles emissions standards (this had in some cases been temporarily mitigated through the use of vehicle exemptions).

10.1.4. Wider engagement with the accessibility agenda

Delivering improvements to the accessibility of the transport system requires the right engagement with the accessibility agenda, both from within Government and the transport industry. This section outlines how well participants felt the ITS achieved this.

DfT stakeholders who participated in the research widely felt that the ITS had helped prompt a lasting commitment to the accessibility agenda within the DfT and had fostered a culture of engagement, across modes, that largely had not existed previously. Reflecting on industry culture, participants also felt there had been significant, positive cultural shifts in attitudes towards accessibility. However, it was also felt that some transport operators and sections of the industry have struggled to fully prioritise the accessibility agenda and that industry and that since the pandemic especially, the industry has not worked as closely with Government towards the same goals. This was largely attributed to capacity limitations and a lack of buy-in to the agenda. DfT stakeholders who participated in the research also reflected that, more recently, as the COVID-19 pandemic has placed greater pressure on the industry, their capacity/willingness to prioritise accessibility has in some cases reduced further.

"There are certain, I guess, modes or parts of industry which accessibility is still thought of as an afterthought and just a thing that they have to do. That is a really important piece of the puzzle if we're going to really meet the ambition" DfT stakeholder

The research identified three recommendations for how policymakers could improve future engagement with the accessibility agenda.

Firstly, it was suggested that the DfT could undertake more consistent engagement and co-design with disabled people, and to do so more routinely. In terms of engagement with DPTAC, research participants explained that DPTAC are not always treated as a statutory committee, largely due to lack of awareness about their existence, how they operate and the role that they play in shaping policy. Reflecting both on the ITS and transport policy in general, participants explained that when DfT staff do not engage with DPTAC from the start, this can lead to missed opportunities and duplication of existing work. An example was the impairment harmonised standard – a DfT stakeholder who participated in the research explained that DfT staff sometimes end up creating their own list of impairments for surveys as they are not aware the standard exists, and because DPTAC have not been given the opportunity to make them aware of this sooner.

Though DPTAC are an authoritative voice on issues affecting disabled people, there was a concern that a single administrative body cannot reflect the range of priorities held by the diverse cross-section of the population that the DfT ultimately deliver policies such as the ITS for. It was felt that the DfT could further strengthen their decision-making by greater diversifying their engagement with the disabled population, including by undertaking more engagement with disabled people in the spaces they inhabit (such as social media and online forums).

"We need to find a way of really being clear that we are getting to grips with how people feel in reality, and that what we're doing is genuinely going to make a difference to people's lives" DfT stakeholder

Secondly, both DfT stakeholders and transport operators who participated in the research emphasised the importance of ensuring that governmental and transport operator policies continue to reflect current understandings of accessibility, which are constantly evolving. One suggestion from transport operators who participated in the research, for example, was that the DfT could do more to disseminate any new recommendations to the industry about how it can align its practices with the needs of disabled people.

"It is a constant process of seeing how transport is evolving and trying to ensure that it continues to meet the needs of everybody as that happens" DfT stakeholder

Thirdly, it was felt that the community transport agenda would benefit from more upfront prioritisation within policymaking. One participant explained that community transport is generally not considered or planned for to the same extent as other services, due to a lack of awareness and understanding around the role that it plays in the transport industry. Furthermore, it is often treated simply as an extension of and "bit of added value on" the bus industry. They felt this was not the right way to view community transport, given that the provision of community transport services is statutory, intended to cover the accessibility gap left by bus service providers and caters overwhelmingly to those with physical disabilities.

Examples of how this is reflected in the Government's current approach included that community transport is not distinguished from other services in national datasets; it does not have its own dedicated funding stream (in England, community transport organisations must

access funding via their local authority's Bus Service Improvement Plan funding); nor does it have its own dedicated permit structure or process for driver Blue Badge applications. It was suggested the DfT could describe community transport more explicitly in any future strategy and more appropriately distinguish it from the bus sector within all aspects of policymaking, including planning, funding and data collection.

10.2 Delivering policy

Within the transport industry, capacity to deliver the full extent of changes the ITS called for varied highly, depending on the specific economic pressures transport operators were under. The industry has required – and will continue to require – ongoing encouragement, support and in some cases enforcement from the DfT to engage with the accessibility agenda. However, the lines of communication and extent of devolution between the DfT and transport industry also varies highly, which means that achieving consistent, industry-wide or even sector-wide accessibility improvements is not straightforward. This section outlines how the DfT might effectively balance the use of three key policy levers to more strongly and consistently deliver on their intended outcomes for disabled people in future. These include communication, funding and regulation.

10.2.1. Communication

Among the transport operators and LLAs who took part in this research, some participants had little or no awareness of the ITS and how it applied to their transport sector in practice. Nonetheless, all participants were at least aware of some individual ITS initiatives, even if they did not know they were associated with the ITS or the DfT. This section presents recommendations for how future policymakers can better communicate their requirements to the transport industry.

More official communications about the policy. Some transport operators and LLAs who participated in the research remarked that they had not received much – or in some cases any – direct communication from the DfT about the ITS. They recommended that, by sending a clearer and more consistent message to the industry that the ITS is a high-profile, national programme, this would have helped to more fully embed knowledge and awareness of the strategy at all levels throughout the industry. Furthermore, as a national strategy, they felt that more could have been done to cascade information about the strategy to transport operators across the country, including in Wales and Scotland (where particular aspects of the strategy applied). Suggested channels for such communication included industry-wide newsletters, emails, updates to websites but also closer engagement with the industry, for example through workshops with transport operators to explain and discuss how the strategy applies to them.

> *"A little bit more transparency over how that high-level ambition cascades all the way down my train crew that are actually helping people on and off the train with a wheelchair"*
> Train operator

Being more prescriptive about the changes Government would like. With some exceptions (e.g. Accessible Travel Policy guidance), transport operators and LLAs who participated in the research explained that the DfT's industry guidance often comes with a large degree of interpretation about how it should be applied. They recommended that if the DfT would like to see a consistent level of change and to bring about a more joined up

disabled passenger experience, then in future the DfT will need to be more prescriptive about what exactly they would like the industry to do.

> *"The main thing we need across all operators is consistency for the customer, whereas the ATP gives us that, I think we need that a bit more maybe from DfT sometimes, so we're all doing the same thing"* Train operator

10.2.2. Funding

As mentioned in Section 10.1, delivering significant improvements to the accessibility of public transport often requires significant funding, but there was limited funding attached to the ITS. This section presents key recommendations on how future policymakers can support the transport industry via policy funding mechanisms.

Securing buy-in to spending on accessibility. All participants recognised that accessibility improvements are 'the right thing to do' and have clear social value. However, they highlighted that – like most changes to service provision – they can come with significant upfront cost, yet typically generate lower revenue than other projects, at least over the short-term. Furthermore, the economic benefits that come from accessibility improvements are sometimes not as tangible or immediately visible.

This meant it was typically not straightforward to secure buy-in from key financial stakeholders that the potential benefits outweighed the potential costs. From a transport operator perspective, this included securing buy-in from commercial stakeholders to approve spend. From a DfT perspective, this included securing buy-in from HM Treasury to subsidise the industry. Meanwhile, LLAs who participated in the research highlighted that, as Local Authorities, any financial support they offer the industry is entirely dependent on Government funding.

Recommendations for how future policymakers could secure greater funding for accessibility improvements included:

- Having a measurable set of outcomes (as per Section 10.1), to help evidence what the funding will enable the industry to achieve.

- Greater evaluation of existing learning, including consideration of what jointly delivers maximum economic and social value, and greater consultation of the available evidence on this when making policy and funding decisions. Relatedly, one train operator who participated in the research felt that the success of rail projects is typically assessed based on a narrow set of binary questions such as 'was the project delivered on time?', but not 'did it help or not?'. Participants welcomed greater consideration of how learning can be applied from one operator to another, to deliver future projects both in a more cost-effective way and with greater impact for disabled customers.

- Focussing on a narrower range of improvements that are most likely to have an impact (rather than 'maxing out' the range of commitments).

> *"A better case could have been made for doing stuff by flagging up the benefits, the economic benefits for us, taxpayers, operators"* DfT stakeholder

Greater consideration of non-customers. Train operators who participated in the research explained that decisions about how to spend on accessibility are sometimes informed by judgement calls on which customer groups should be prioritised, based on their current size.

This can sometimes overlook customer groups who would otherwise like to travel but currently lack confidence that the transport system can deliver on their needs.

"We could say, well, we have X number of blind customers. We have X number of British Sign Language -user deaf customers. So we times the blind customers by 50 compared to the deaf customers, but actually BSL users and deaf people don't like travelling by train. They don't feel like it's accessible to them […] So should that money be spent doing that thing for the people who are already your customers, or should you actually be reaching out and saying, well, maybe it's a problem these people aren't travelling with us" Train operator

10.2.3. Regulation

As indicated throughout this report, simply encouraging the industry is not always an effective way of prompting consistent change. This section presents key recommendations on how future policymakers can make effective use of regulation to achieve their aims.

Greater use of national minimum standards. Where the DfT had introduced new legislation to deliver on the ITS actions, this had been effective in bringing about a consistent set of changes from the industry – for example, minimum staff training requirements (see Chapter 6) and the Taxis and Private Hire Vehicles (Disabled Persons) Act 2022 (see 8.3.1). Meanwhile, for ITS actions that had not generated as much momentum within the industry, greater standardisation was suggested to be an effective way of initiating step change. This both included examples where standardisation was missing entirely (for example, no standard for LLAs to mandate taxi/PHV driver training) and where standardisation could be taken further (for example, by introducing a uniform national Concessionary Bus Pass for England).

Any regulation is only as good as the enforcement approach that underpins it. The DfT's ability to translate national policy requirements into consistent, industry-wide practice is contingent on the ability of industry bodies to enforce disabled passenger rights. DfT stakeholders who participated in the research stressed that, in many cases, the evidence suggests that the regulations they have in place are sufficient, but future policy needs to consider how such regulations can be more consistently enforced. The role of regulation and the solutions that might be required going forward varied significantly from one industry to the next, and between bodies, for example based on the extent of industry privatisation or the capacity of regulators. Some examples participants gave included:

- The DfT have relatively direct lines of engagement with train operators (compared to other industries) via Network Rail and the RDG. It was clear from the research that this helped to underpin the extent and consistency of delivery against the ITS actions that applied to train operators, but greater coordination may be beneficial.

- Aviation is fully privatised in the UK. As such, the DfT have significantly less control over the industry to go beyond legislative requirements. However, the DfT is focused on working with industry and the Civil Aviation Authority (CAA) to improve aviation accessibility collaboratively, as well as looking at reforms to legislation and the enforcement powers available to the CAA.

- Similarly, while DfT have influence over LLAs, it is the LLAs themselves who have the power to enforce taxi and PHV trade requirements. Meanwhile, as evidenced throughout this report, some LLAs who participated in the research feel that options for exercising their enforcement power effectively are limited without greater industry standardisation or

enforcement, as they risk losing business to less stringent LLAs by introducing greater requirements of drivers.

- Meanwhile, at a higher level, the Equality and Human Rights Commission (EHRC) exists to enforce the Equality Act, but DfT stakeholders who participated in the research expressed a perception that the EHRC generally do not have the capacity to focus on transport to the extent that they could.

> *"Enforcement of regulations is coming out as a big theme of there being a gap there. There's something that the industry or transport providers should be doing, but are they actually doing it? It's not as clear"* DfT stakeholder

11. Conclusions

This chapter summarises what can be concluded from this report in response to each of the three overarching research questions it sought to address.

> **How have the actions and ambitions of the Inclusive Transport Strategy been delivered? What has worked well? What has not worked well?**

By encompassing both infrastructural and people-centred improvements to all modes of public transport, the ITS introduced a bold vision for the next 12 years of development. The ITS demonstrates to future policymakers how effective an ambitious improvement strategy can be for rallying Government and industry around a single agenda.

At the time of fieldwork, the DfT had made significant progress on a large proportion of the ITS actions. Under the ITS, the DfT was successful in bringing about improvements to a range of existing passenger services, such as the reduction of the Passenger Assist booking period to 2 hours before travel. The DfT had also successfully introduced a range of new transport services and operator facing schemes. This included the launch of their flagship initiatives for the ITS – the "it's everyone's journey" campaign, Inclusive Transport Leaders accreditation scheme and the REAL disability equality training programme.

Some of the ITS actions were yet to be delivered, were not delivered as planned or had not led to the intended outputs. In many cases, the COVID-19 pandemic and the ensuing economic recovery period had contributed to this, as it had limited the capacity of actors in both Government and the transport industry to engage. As elaborated on below, some of the new policy measures may simply require longer to be implemented or to take effect. Indeed, at the time of fieldwork, the DfT had various plans for furthering the development and rollout of their flagship ITS initiatives. The research also identified learning that may help guide the DfT in doing so. In particular, where ITS actions primarily involved encouraging actors in the transport industry to undertake accessibility initiatives, this was not always an effective policy lever on its own. Going forwards, more substantial change may be easier to achieve when such communication is accompanied by funding, regulation and/or enforcement, though the exact balance required between these different policy levers will vary across modes.

The ITS demonstrates how programme board structures can function as a valuable forum for cross-modal engagement. However, the research identified that the ITS programme theory could have more clearly articulated how every commitment was expected to deliver on this long-term ambition. The design of individual policy commitments might be strengthened in future by ensuring they are defined narrowly enough to make clear what is required and enable accountability, while being open-ended enough to stimulate continued improvements, even after initial actions are delivered. Commitments should have a measurable set of outcomes, with a series of interim milestones to track whether and how the action is expected to result in the desired outcome. Commitments must also be realistic – those with limited funding attached should not necessarily be expected to produce transformational outcomes.

How has disabled people's experience of travel changed since the Inclusive Transport Strategy was published?

In large part, the changes to disabled people's travel since the ITS publication in 2018 are related to the COVID-19 pandemic, the restrictions put in place as a result, and wider working and lifestyle changes is precipitated.

The pandemic caused enormous short-term disruption and significant longer-term changes to the amount and nature of disabled people's travel. During the pandemic, there was a similar and substantial decline in the average number of trips taken by both disabled and non-disabled people. Disabled people's use of trains declined more than for non-disabled people, and their use of buses and taxis declined less. Between 2022 and 2023, by which time pandemic restrictions had been lifted, disabled people were substantially more likely to avoid travelling on public transport, during busy times or to change their mode use due to concerns about COVID-19. They were also substantially more likely to say that such concerns had strongly affected their travelling confidence.

These changes are related to the widespread shift to hybrid working. This shift affected non-disabled people more, on average, than disabled people, who were less likely to be in work. The pandemic also led to more people doing their shopping online. Both disabled and non-disabled people reduced the amount they travelled for shopping, and over half of the decline in disabled people's travel is attributable to a decline in shopping-related travel. Future research will need to continue explore these shifts and the extent to which they are lasting.

What impact have the actions of the Inclusive Transport Strategy had on disabled people's experience of travel?

Overall, the ITS evaluation data does not show an improvement in the intended outcomes for disabled people between 2020 and 2023. However, we should not conclude, from the absence of evidence of impacts, that the ITS actions that have been delivered to date have not made a positive impact to disabled people, or that they will not have an impact in future. There are a range of reasons why the evaluation may not have identified positive changes.

Firstly, many of the ITS actions were completed later than originally intended or still in progress. It may take time for new policy measures to make a measurable impact. Consequently, some of the impacts may not have come into full effect when the 2023 survey fieldwork was conducted. The DfT, for example, made significant progress on a number of actions after the fieldwork period had concluded, such as through the publication of the PSVAR (Public Service Vehicles (Accessible Information) Regulations 2023), which introduced new requirements of most bus operators to provide information to passengers about their journeys while they are on the vehicle.

Secondly, many of the actions may have had substantial positive impacts locally, or for specific groups of transport users. For example, some local bus operators have installed new audio-visual information, whereas others have not. These impacts may not be visible in a general population survey. In future, there may be a greater role for localised research, monitoring and evaluation, to supplement the findings of national level policy evaluation.

Thirdly, as discussed, the COVID-19 pandemic disproportionately affected the travel behaviour and experiences of disabled people. Any positive impact from the ITS actions may therefore be offset by the lasting changes to travel behaviour and experiences as a result of

the pandemic, and further research is needed to help disentangle the effects of COVID-19 more fully.

Appendix A: Progress of additional ITS actions

Interactions with staff and passengers

Bus operator staff (Actions 42, 61)

The Bus Services Act 2017 stipulates that all bus drivers must receive disability awareness training as part of their Certificate of Professional Competence (a qualification for professional bus, coach and lorry drivers, aimed at improving road safety and maintaining high standards of driving), with effect from March 2018. To support bus operators in providing training, the Department for Transport (DfT) intended to:

- Develop a framework to help monitor bus operator compliance rates and identify a body to enforce compliance, by Spring 2019 (Action 42).

- Publish bus sector training best practice guidance by the end of 2019 (Action 61).

Progress made

The DfT made progress on their commitment to enforce bus operator compliance by publishing rates of compliance in their annual bus statistics on GOV.UK, starting in the year ending March 2019. At the time of fieldwork, the DfT were engaging with the Driver and Vehicles Standards Agency (DVSA) on potential approaches to enforcing compliance.

The DfT delivered their commitment to publish best practice for delivering best sector training later and in a different way to what they had planned. It was merged with Action 68 and delivered through the publication of the Respect Empathise Ask Learn (REAL) training package on GOV.UK (see 6.3.1).

Prioritise access to wheelchair spaces on buses (Actions 28 and 29)

In 2017, following First Group Bus v Paulley, the Supreme court recommended that bus drivers should be required to do more than simply request that a passenger vacates a wheelchair space when it is required by a wheelchair user. A stakeholder group (Task and Finish Group on the Use of Wheelchair Spaces on Buses) was established to explore how this should be taken further. The group advised Ministers that the legislation should be amended and guidance updated, to advise bus operators on how to influence passenger behaviour in such instances.

Following this, the DfT intended to announce plans for how to prioritise access to bus wheelchair spaces for wheelchair users (and other passengers) when there is no other suitable accommodation by the end of 2018 (Actions 28 and 29). In Bus Back Better, the DfT committed to consulting on draft amendments to Public Service Vehicle Accessibility Regulation (PSVAR) Regulations 1990. This was actioned through the Review of the Public Service Vehicles Accessibility Regulations 2000, which was published on GOV.UK and ran from 2 June to 4 September 2023. The DfT had not yet published a response when fieldwork closed.

While this research did not ask about these actions explicitly, bus operators nonetheless spoke about their approach to prioritising access to wheelchair spaces on buses (sometimes with specific reference to First Group Bus v Paulley). Approaches included:

- **Launching a staff campaign.** The aim of this was to equip bus drivers with the skills and confidence to engage with non-wheelchair users who are occupying wheelchair spaces and asking them to move if needed/appropriate (e.g. by folding up their buggy). Relatedly, one position was that it is not right to prioritise the needs of one passenger over another. As such, some operators maintained a first come, first served policy, which meant their drivers would only expect a passenger to vacate a priority space if there was another space available on the bus that suited their needs (e.g. enough space for a pushchair). If there is no such space, they would instead refer the wheelchair user to their taxi guarantee scheme:

  "We won't ever leave someone stranded because they have a wheelchair or whatever it might be. But we also quite firmly disagree that - for example a mum with a baby should be kicked off the bus in favour of someone in a wheelchair […] some others do - but that's not where we sit on it" Bus operator

- **Introduction of a taxi guarantee scheme**. This was to guarantee that if, for any reason, a wheelchair user could not board the bus (including if this was because another wheelchair user was already in the wheelchair bay), the bus company books a free wheelchair accessible taxi for them to fulfil their journey.

- **Introduction of double wheelchair bays to new buses**. This was to ensure that all wheelchair bays were capable of accommodating multiple passengers (see 8.4.1 for more detail), thus making it very unlikely that a wheelchair space would ever be unavailable.

- **Flexible use of priority spaces**. Rather than a double wheelchair space, one approach was to introduce a second space, in addition to the designated wheelchair space, that could be used by wheelchair users or anyone else (for example, those with a pushchair or luggage).

Train operator staff (Actions 8, 21 and 74)

The DfT intended to introduce new requirements of private companies when taking part in rail franchising (i.e. when tendering to become a train operating company) by requiring them to:

- Provide enhanced disability awareness training, covering a range of impairments, including less visible disabilities and commit to involving disabled people in the design and delivery of that training (Action 21).

- Have at least one person responsible for accessibility at board level and at an operational level, to ensure inclusive transport is embedded into customer service (Action 8).

Progress made

In terms of the how staff training is designed and delivered, on 27 July 2019, the Office of Rail and Road (ORR) published new guidance that required all train operators to maintain an Accessible Travel Policy / ATP. By 31 July 2021, all train operators would be required to:

- Ensure the lived experience and expertise of people with a range of disabilities are used in disability awareness training course development and delivery.

- Ensure that through the training, staff hear from disabled people about their lived experience of using the railway and be provided a safe space to explore the issues raised.

- Develop course content and material in consultation with disabled people.

The requirement to deliver enhanced disability awareness training to rail staff was actioned through the enactment of the Emergency Measures Agreements and Emergency Recovery Management Agreements, which meant that rail franchising came to an end. While the DfT already had the power to make changes to the contracts of train operators individually, these new agreements gave them power to write requirements into the contracts of all existing train operators at once. Through doing so, the DfT not only achieved their intended outcome much faster than they may otherwise have, they also superseded the rail franchising system entirely.

"Usually, DfT would have to wait for each train operator's existing contract to run out before introducing new contractual requirements of them, which could have taken up to 20/30 years in some cases […] [during the COVID-19 pandemic] the opportunity was there for things which we'd been discussing with DPTAC and other groups for a while" DfT stakeholder

"We have a full day's training for new starters, and that's absolutely everybody. Even I had to do the training course that I created, which was, I thought, a nice touch [chuckles]. Even the MD's done it, so absolutely everybody" Train operator

Review the eligibility criteria for the Disabled Persons Railcard (Action 60**)**

The DfT intended to undertake a review of the Disabled Persons Railcard eligibility criteria by 2019, with input from the Rail Delivery Group (RDG) and Disabled Persons Transport Advisory Committee (DPTAC). The RDG and DPTAC commissioned a study to assess the level of current and future demand. This was shared with the DfT but the review was then paused when the COVID-19 pandemic started:

"From March 2020 you had full lockdown, so you had no customers, and the Government having to pay for the entire rail industry to run trains with no passengers and no revenue, so the ability or the point of trying to extend or increase the new Railcard at that point can be slightly pointless because, actually, we're trying to keep the railways running" DfT stakeholder

In early 2023, the DfT resumed the review and developed proposals for how to meet the level of demand outlined in the study. At the time of fieldwork, the DfT were planning to decide on how to expand the criteria and seek ministerial approval on this decision by the end of 2023. Following that, the DfT anticipated there would be several discussions with Treasury. The DfT explained that it was not straightforward to secure new funding at the time of fieldwork, due to the amount of funding the rail industry already required:

"The railway at the moment is costing an enormous amount of money to keep it running. It cost an enormous amount of money to run during the pandemic, and those passenger numbers have recovered largely to pre-pandemic levels, but it is still costing the Government full cost and revenue risk" DfT stakeholder

This research did not explicitly ask transport operators about the Disabled Persons Railcard review but train operators *who participated in the research* nonetheless raised it when asked about whether they promoted the railcard. They explained that the RDG had engaged with train operators about the review. This had prompted train operators to put forward a range of

recommendations, based on day-to-day customer and stakeholder feedback. Examples included that:

- It will be important to mitigate against any narrowing of the eligibility criteria and to reassure passengers on this.

- A disabled passenger should never have to pay more than a non-disabled passenger would, regardless of whether or not they travel with a companion.

- Eligibility should be based on a social model of disability, not a medical one (i.e. it should recognise that the barriers that make life harder for disabled people stem from society, and not their disability). Therefore, any disabled passenger that experiences such barriers when travelling by rail should be fully compensated, regardless of what their disability is.

Assistance and facilities

Improving the accessibility of aircraft design (Action 92)

The DfT intended to examine how to improve the accessibility of aircraft design, for example to better accommodate folding wheelchairs (Action 92). The purpose of this would be to minimise the risk of wheelchairs getting lost or damaged in transit and to ensure the passenger has quick access to their wheelchair upon arrival.

At the time of fieldwork, the DfT were not expecting this action to be fully delivered within the lifetime of the ITS due to the extent of change it would require from airlines and the wider industry. However, in January 2022 the DfT published the Aviation Consumer Policy Reform on GOV.UK. Following this, the DfT invited feedback on the draft policy through a consultation that ran from 31 January 2022 to 27 March 2022. The consultation sought views on reforms to compensation for lost or damaged wheelchairs and mobility aids for domestic UK flights. In June 2023 they published their consultation response. In their responses, the DfT committed to:

- Legislating when parliamentary time allows to remove the cap on compensation for wheelchairs or mobility aids damaged on domestic UK flights.

- Work with industry to move to a standard of voluntarily waiving the cap for compensation on both domestic and international flights.

Accessible vehicles

Reference Wheelchair Standard and PSVAR review (Actions 17 and 81)

The Inclusive Transport Strategy (ITS) acknowledged that understandings of disabled people's needs evolve over time, and that vehicle specifications may require modernising in light of this. The ISO Reference Wheelchair standard is the reference point for a range of vehicle and infrastructure designs used across the transport sector and referred to directly and indirectly in accessibility standards for public transport vehicles and infrastructure.

The DfT intended to review and make recommendations on its use of the Reference Wheelchair standard by 2023 (Action 17). Following an assessment of the prevalence, dimensions and uses of wheeled mobility-aids, the DfT published their recommendations on

29th March 2022. The findings were intended to help inform decisions about the design of future vehicles and transport infrastructure.

This would include a review on the DfT's continued use of the Public Service Vehicles Accessibility Regulations (PSVAR) (Action 81). This action was originally intended to be delivered by 2028 and was underway at the time of fieldwork.

Accessible transport infrastructure

Access for All (Actions 34, 40, 78 and 79)

The Access for All programme was launched in 2006 and seeks to increase the physical accessibility of train stations by creating an obstacle free, accessible route from the station entrance to the platform. This generally includes providing lifts or ramps, as well as associated works and refurbishment along the route.

Under the ITS, the DfT committed to the following actions (all were delivered as planned):

- Announcing the tranche of stations to receive Access for All funding over Control Period 6 (1 April 2019 to 31 March 2024) and provide up to £300 million in Government funding. This would include all 27 stations deferred in 2015 by the Hendy Report, a report authored by Sir Peter Hendy, Chairman of Network Rail looking into the re-planning of the Network Rail's Investment Programme (34, 40, 78).

- Allocating a further £20 million via the mid-tier programme, which delivers accessibility improvements that create small-scale enhancements such as tactile paving, handrails and Harrington Humps (low-cost structures designed to raise the height of a low railway station platform to meet the level of the train entrance step) (79).

Standard for accessible bus stops and stations (63)

The DfT intended to commission research in 2019 to identify a standard for accessible bus stations and stops, to benchmark a sample of existing facilities against and develop a toolkit to assist local authorities in improving the accessibility of roadside infrastructure.

This work was delayed as a result of the COVID-19 pandemic. At the time of fieldwork, the DfT had initiated research procurement to carry out this work.

Complaints

Publish an Aviation Strategy Consultation (24)

The DfT intended to publish an Aviation Strategy Consultation at the end of 2018 (Action 24). This would contain policy proposals for improving disabled people's access to, and experience of, using aviation. These proposals were outlined in 'Next Steps Towards an Aviation Strategy' report published on 7 April 2018.

A consultation ran from December 2018 to April 2019. However, the strategy never came into existence:

"we kind of expected that the aviation strategy would take care of a lot of the commitments in the ITS, but because the strategy actually never came to be, it means that we've needed to find out another way" DfT stakeholder

This was due to the combined effects of "a lot of events taking place one after the other". Firstly, the publication of the UK's 2050 net zero target meant that Aviation 2050 would need updating in light of long-term environmental considerations. Then came a succession of events that reduced the DfT's capacity to progress the strategy – including the COVID-19 pandemic.

Following the pandemic, the DfT published the Aviation Consumer Policy Reform Consultation, which built on some of the themes set out in the Aviation 2050 consultation, whilst seeking more detailed and specific feedback, and to provide an opportunity to reflect on recent experiences within the aviation sector, including the impact of the COVID-19 pandemic. The response to this consultation was published in June 2023 and sets out both legislative reforms and non-legislative measures to help ensure passengers receive the best possible service.

In addition, the DfT published a summary of responses to Chapter 5 "Enhance the passenger experience" of the Aviation 2050 consultation in July 2022. This included a section on accessibility, and a new approach to the Aviation Charter (now the Air Passenger Travel Guide) based on the feedback from that consultation.

Review the powers of the Civil Aviation Authority (CAA) (56)

The DfT intended to review the CAA's powers to enforce consumer regulations and strengthen them if the review indicated that this was required (Action 56).

- The DfT consulted on this as part of the Aviation 2050 consultation, however, following a series of events, including COVID-19, the original deadline for delivering this action was missed. Since then, the UK Government undertook various actions, with the intention of reviewing the CAA's enforcement powers. Firstly, On 20 July 2021, Department for Business, Energy and Industrial Strategy (BEIS) published their Reforming Competition and Consumer Policy paper on GOV.UK. This paper outlined proposals for reforming the UK's competition and consumer policies. On 20 April 2022, BEIS committed to creating additional powers for all regulators (including the CAA), through a new parliamentary bill. TheAt the end of 2023, the Digital Markets, Competition and Consumers Bill was going through Parliamentary processes.

- On 31 January 2022, the DfT published Aviation Consumer Policy Reform on GOV.UK, which outlined possible approaches to better protecting and enforcing consumer rights, including by providing the CAA with additional administrative powers to enforce consumer law (including the rights of disabled and less mobile passengers under Regulation 1107/2006). The DfT published its response to this consultation in June 2023, which included a commitment to legislate when parliamentary time allows, to provide the CAA with additional consumer enforcement powers. In addition to this, the consultation response included a commitment to legislate when parliamentary time allows to mandate Alternative Dispute Resolution (ADR) for all airlines operating to, from and within the UK, ensuring all passengers can escalate complaints (including relating to accessibility) where they cannot reach an agreement with the airline.

- The CAA underwent an independent public body review (launched in August 2022), which considered the efficiency and effectiveness of the regulator, including in relation to consumers. The review concluded that the CAA is a highly effective regulator. It also recommended that the CAA should be given additional powers for consumer enforcement.

Community transport

Review whether domestic permit regime is fit for purpose (Action 96)

Section 19 and Section 22 permits allow community transport organisations to charge for their services without holding a Public Service Vehicle (PSV) operator's license. Following a consultation on their continued use, the DfT decided that a fuller consultation on the domestic permit regime was needed. This was intended to take place in 2019 but was delayed due to the COVID-19 pandemic and had not yet taken place at the time of fieldwork.

Appendix B: List of ITS actions

This appendix outlines the ITS actions relevant to this evaluation, according to the themes addressed in this report. A complete list of ITS actions, as they were originally presented, can be found in the <u>ITS monitoring and evaluation framework</u>.

ITS delivery, monitoring and evaluation framework

Delivery framework

16. We will develop a delivery plan to support this Strategy, which will set out the timescales, owners and progress on each action within this document, and will form part of the governance and accountability process set out below.

17. The Department will establish a new stakeholder advisory group involving local government, transport operators, disabled people's organisations, and charities, to be chaired by the Programme Manager. This group will provide external support in rolling out the actions in the Strategy as well as providing a challenge function.

45. In addition the Minister will call a formal annual meeting involving DPTAC, the external stakeholder advisory group and the programme board to review progress, and will meet with both DPTAC and the advisory group on an ad hoc basis as required.

Monitoring and evaluation framework

36. Within six months of the publication of this Strategy we will publish a monitoring and evaluation framework. This will specify key output indicators to assess our progress against our ambition and actions.

44. We will publish regular monitoring reports, beginning with a baseline report, which will set out the progress made against the indicators identified in the framework.

95. We will also publish a baseline evaluation report giving early results on the impact of this Strategy [ITS], with the final evaluation report to be published in 2022.

Planning and information

Journey planning tools

15. Support the work being led by RDG to produce a digital map by August 2018 which shows accessibility information for all stations on the rail network, available online and to download for customers to take with them on their journey.

43. Support the RDG's work to explore how real-time information on the availability of access facilities such as step-free access, accessible toilets and Changing Places toilets can be provided to passengers. Initial scoping work will be completed by Spring 2019.

89. Support the RDG to develop an online model of stations which will enable passengers to familiarise themselves with the layout and environment before they travel.

Provision of real-time information

32. By the end of 2018 consult on draft Accessible Information Regulations to require audible and visible next stop announcements to be provided on local bus services across Great Britain.

33. By the end of 2018, consult on draft Accessible Information Regulations, requiring the provision of audible and visible upcoming stop and route information on board local bus services in Great Britain; and by 2022, to have seen a significant increase in the availability of such information on-board services.

38. Provide further support to the rollout of audible and visual announcements across the sector through the launch of a new £2m fund for bus operators. Further details will be announced in due course.

39. Announce £2 million of funding in the current financial year to help speed up the roll-out of audio-visual information across bus fleets.

Interactions with staff and passengers

Corporate approach to accessibility and staff training

8. Through future rail franchises, require that train operating companies should have at least one person responsible for accessibility at board level and one person at an operational level to ensure inclusive transport is embedded into the service provided.

21. By the end of 2018, include a section focused entirely on accessibility in franchise competitions which will require bidders to commit to providing enhanced disability awareness training for staff covering a range of impairments, including less visible disabilities. Bidders must commit to involving disabled people in the design and delivery of that training, as part of the franchise tendering process.

49. Develop an accreditation scheme to incentivise operators to use the disability awareness training package, publicly sign up to commitments to improve accessibility, and to become Disability Confident employers.

61. During 2019, publish best practice guidance for delivering training across the bus sector. This guidance will assist operators in complying with the new mandatory disability equality and awareness training requirement which came into force across the sector in March 2018.

62. By end of 2019, publish for consultation revised best practice guidance to support local licensing authorities (LLAs) to use their existing powers more effectively. In particular we will recommend that authorities require taxi and private hire vehicle (PHV) drivers to complete disability awareness and equality training, make it simple to report discrimination and take robust action against drivers alleged to have discriminated against disabled passengers. Consulting on best practice guidance for taxi and PHV licensing, authorities will provide an opportunity to further the discussion with the Local Government Association and other representative organisations around potential approaches for ensuring that licensing authorities use the powers available to them, and take robust action against drivers who have discriminated illegally against disabled passengers.

68. Develop a disability awareness training package that can be made available across modes to all transport operators.

74. Recommend, or where appropriate require, that transport operators and regulators involve disabled people or representative organisations wherever possible in the training received by staff (i.e. transport operators should ensure that the course content is informed by the lived experience of disabled people, relevant to the transport mode concerned).

85. Do everything in our power to ensure that local licensing authorities make full use of their existing powers, including recommending that driver disability equality and awareness training be mandated in licensing policies.

Interactions with other passengers

28. By the end of 2018, after further engagement with affected stakeholders, announce the specific actions we intend to take to secure access to the wheelchair space for those who need it. This follows the Supreme Court's 2017 ruling in the case of First Group PLC vs Paulley, requiring bus drivers to do more than simply request passengers vacate the wheelchair space when it is required by a wheelchair user. An expert stakeholder group was established following the judgement, and advised Ministers that a combined approach, amending legislation and guidance, and seeking to influence passenger behaviour, should be used to secure access to the space for those who need it.

29. Same commitment, but with different emphasis: Following further engagement with affected stakeholders, we will announce later in 2018 how we will seek to prioritise access to the on-board wheelchair space for wheelchair users and other passengers for whom there is no other suitable accommodation on buses.

Passenger rights and entitlements

46. Continue to work with passenger and industry representative bodies and support the work of regulators to encourage greater promotion of information about the rights of disabled travellers and what they are entitled to expect in terms of service and facilities, as well as developing easier ways to register complaints when things go wrong.

50. In 2019, launch a DfT passenger awareness raising campaign, developed jointly with DPTAC and disabled people's organisations aimed at raising awareness of disabled travellers' rights and needs when using the transport system.

51. As part of our 2019 public awareness campaign, increase awareness, with the intention of enabling an increase in take up, of the Disabled Persons Railcard, Passenger Assist and Concessionary Bus Passes.

52. As part of our 2019 public awareness raising campaign, increase disability awareness amongst all transport passengers, highlight that hate crime is a criminal offence and promote how incidences of hate crime can be reported.

60. From summer 2018, work with the Rail Delivery Group (RDG) and DPTAC to review the eligibility criteria for the Disabled Persons Rail Card. We expect this review to be completed by the end of 2019.

75. By 2020, work with the bus industry, the Driver and Vehicle Standards Agency, and passenger representatives to encourage improved promotion of information about the rights of disabled travellers and what they are entitled to expect in terms of service and facilities, as well as developing easier ways to register complaints when things go wrong.

Assistance and facilities

Passenger assistance

14. Support RDG to introduce the new Passenger Assistance application which has been designed to enable customers to book assistance through a single click, and to explore how this can also enable customers arriving at stations to request assistance. A trial of this will be evaluated by autumn 2018.

20. By the end of 2018, use the tendering process for new rail franchises to require a minimum target for the successful completion of booked assistance through the Passenger Assist scheme, to incentivise the provision of a more reliable service. We will ensure that train operators who fail to deliver the assistance booked will provide financial compensation to passengers.

31. From the end of 2018, require through future rail franchises that train operating companies promote greater passenger awareness of the Passenger Assist service. We will also support the RDG's awareness-raising campaign which will be run online and at in-station events.

69. Encourage the greater use of assistance cards, including through our new accreditation scheme for transport providers who are leading the way on disability issues. We will work to develop greater national consistency including by considering a possible Department for Transport endorsed logo for these schemes.

Toilet facilities

18. Work with the RDG to identify what further steps can be taken to improve the provision of toilet facilities by the end of 2018.

37. Provide £2 million of new funding to enable more motorway service area operators to install Changing Places toilets at existing and new facilities in England.

Accessible infrastructure

Accessible vehicles

47. From autumn 2019 publish on an annual basis a list of those authorities which we know to have issued a list of taxis and PHVs designated as being wheelchair accessible in accordance with Section 167 of the Equality Act 2010.

86. Continue to encourage local licensing authorities, which have not already done so, to publish lists of taxis and PHVs designated as wheelchair accessible under Section 167 of the Equality Act 2010, and to inform the Department that they have done so.

92. Examine how aircraft manufacturers can improve the design of aircraft to make them more accessible – for example by removing seats to better accommodate folding wheelchairs and prioritising wheelchair storage for quick access on arrival.

77. We also understand that the needs of disabled people change over time and that in the years since the internationally recognised reference wheelchair specification was adopted to provide the basis for vehicle layouts across the transport system, the size and nature of mobility equipment used by many people has changed significantly. We will therefore review our use of the reference wheelchair standard,and will make recommendations by 2023 on its continued use or the use of an alternative specification.

81. Undertake by 2028 a review of the continued efficacy of the Public Service Vehicles Accessibility Regulations (PSVAR) and consider how the future needs of disabled people travelling by local and road based public transport, regardless of their journey's purpose, should be met in the future.

Accessible train stations and bus stops

34. Seek industry nominations for additional 'Access for All' projects in 2018 and announce the next tranche of stations in April 2019.

40. Deliver the 'Access for All' rail accessibility programme to the stations which were deferred in 2015 following Sir Peter Hendy's review of Network Rail's investment programme, with work to start as soon as possible after 1 April 2019.

78. Provide up to £300 million of funding to extend the programme to improve the accessibility of the railway until at least 2024.

79. Make a proportion of the next tranche of Access for All funding available for a new round of 'Access for All' Mid-Tier funding which will support station accessibility projects requiring between £250,000 and £1m of Government support. Previous projects included additional accessible toilets, platform humps to aid boarding and better customer information systems.

63. During 2019, commission research to identify a standard for accessible bus stations and stops, benchmark a sample of existing facilities against it, and develop a toolkit to assist local authorities in improving the accessibility of such roadside infrastructure.

Complaints

Enforcement of passenger rights

19. By the end of 2018, support the establishment of a Rail Ombudsman to investigate and rule on unresolved customer complaints (including on the provision of assistance and access to advertised accessibility facilities), with the power to issue decisions that are binding on the industry.

42. By spring 2019, develop a monitoring and enforcement framework for mandatory bus driver disability awareness training, which will include identifying a body to ensure compliance by bus operators with legal requirements.

56. By 2019, review the powers the Civil Aviation Authority (CAA) has to enforce regulations and strengthen them if evidence suggests this is required.

62. By end of 2019, publish for consultation revised best practice guidance to support local licensing authorities (LLAs) to use their existing powers more effectively. In particular we will recommend that authorities require taxi and private hire vehicle (PHV) drivers to complete disability awareness and equality training, make it simple to report discrimination and take robust action against drivers alleged to have discriminated against disabled passengers. Consulting on best practice guidance for taxi and PHV licensing, authorities will provide an opportunity to further the discussion with the Local Government Association and other representative organisations around potential approaches for ensuring that licensing authorities use the powers available to them and take robust action against drivers who have discriminated illegally against disabled passengers.

85. Do everything in our power to ensure that local licensing authorities make full use of their existing powers, including recommending that driver disability equality and awareness training be mandated in licensing policies.

Promotion of passenger rights

24. Publish an Aviation Strategy consultation at the end of 2018, which will contain policy proposals to improving disabled people's access to, and experience of, using aviation. These proposals were outlined in our 'Next Steps Towards an Aviation Strategy' report published on 7 April 2018.

46. Continue to work with passenger and industry representative bodies and support the work of regulators to encourage greater promotion of information about the rights of disabled travellers and what they are entitled to expect in terms of service and facilities, as well as developing easier ways to register complaints when things go wrong.

57. By 2019, work with industry to improve the information and advice available to disabled adults and children travelling by air. This will include enhancing the distribution of free information about flying as a disabled person, raising awareness of the special assistance service, and ensuring disabled people are aware of opportunities for air cabin assessments which will enable more informed choices about flying.

Complaints processes

41. By spring 2019, release the first iteration of an online tool to assist disabled people in reporting issues they encounter when travelling by bus. This will initially focus on passengers who use ramps and lifts when boarding buses but may be capable of being extended to cover other categories of access issue or transport mode, depending upon the impact of this pilot project. Enforcement action will be taken by the Driver and Vehicle Standards Agency (DVSA) and, where appropriate, the Office for the Traffic Commissioner against non-compliant bus operators.

72. Work with the CAA to review performance standards for airports and airlines, such as the length of time taken for a passenger to receive assistance boarding and leaving aircraft. By 2020, we intend to put in place a robust framework for measuring airlines' provision of assistance services, and to have strengthened the current performance standards for airports.

Community transport

96. Community transport operators provide vital services that link people and communities to services including hospital appointments. In March 2019, the Department announced that we would carry out a review of the current domestic permit regime in 2019 to see if the Transport Act 1985 is still fit for purpose.

Appendix C: ITS logic model (2018)

Figure 12: ITS logic model as it was originally formatted by the DfT in 2018
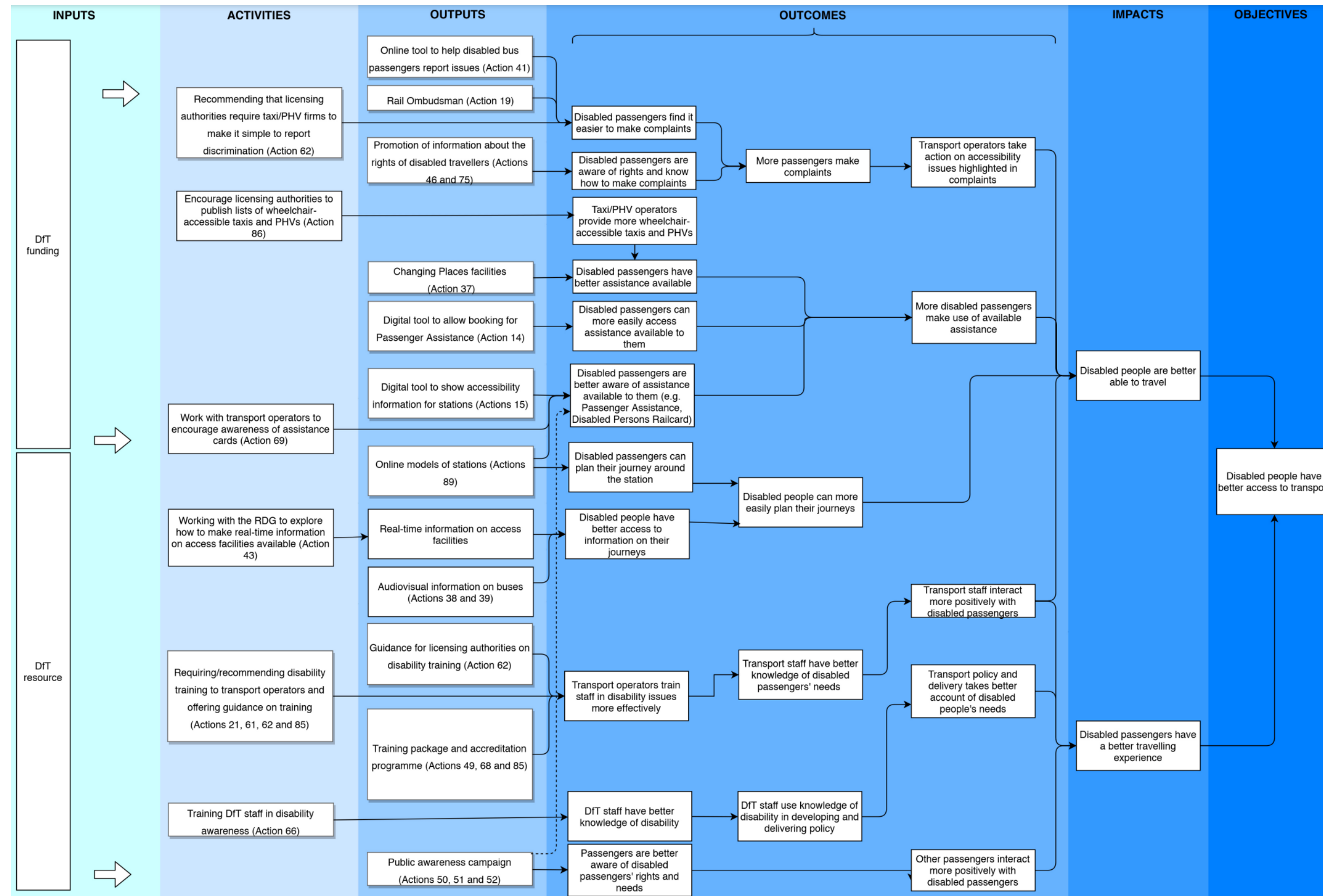
[i] ONS. Outcomes for disabled people in the UK: 2021

[ii] On 17 November 2023 – after the fieldwork had concluded – the final version of the Best Practice Guidance, which included recommendations for all licensing authorities to require drivers to undergo disability awareness training and to make use of the the REAL disability training.

[iii] The Magenta Book discusses why comprehensive programme theory is necessary for good policy-making in more detail.