



Department for Transport Accessibility Action Plan Consultation: A Transport System that is open to everyone

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About Age UK

Age UK is the country's largest charity dedicated to helping everyone make the most of later life. The Age UK network includes around 140 local Age UKs reaching most areas of England. In 2015-16, nearly 5.9 million people were helped by Age UK and our local partners with information and advice on a range of issues influencing later life. We also work closely with our partners Age Cymru, Age NI, Age Scotland and Age International.

INTRODUCTION

The Department of Transport's 'Accessibility Action Plan' (AAP) is partly a response to the House of Lords select committee report 'The Equality Act 2010: the impact on disabled people'. This highlighted areas of concern on accessible transport, where there's been poor progress or where existing regulations have not been implemented. We therefore fully support the stated objectives of the AAP to help deliver improved standards, greater consistency, better monitoring and measures to ensure compliance with regulations. Given some of the difficulties with making progress on accessible transport highlighted by the Lords report, we would also like to see a clearer timescale and statement of priorities, which we hope will be included in the final draft of the plan.

Age UK was pleased to be consulted during the development of the AAP and we back the majority of recommendations and actions set out in the consultation. At the same time we have concerns about some of the contradictions in the AAP relating to wider transport policies. For example, the overall decline in essential bus services to rural places, cuts to transport staff and regulations potentially threatening the viability of some community transport services.

We urge the DfT to include transport to hospital as part of the AAP. Patient transport services or public transport to get to hospital or a medical appointment is a vital issue for many older and disabled people. The AAP should include specific actions to improve the delivery and quality of hospital transport. We have shared evidence with the DfT in our report 'Painful Journeys', explaining the problems and would welcome the opportunity to discuss ways of improving transport to hospital.

(Please note we have only responded to questions where we have evidence or where we support a suggested action.)

KEY POINTS AND RECOMMENDATIONS

- The Government should review transport services to ensure every older person can get to their **hospital appointments** within a reasonable time, in a comfortable, dignified and affordable way, as set out in our recent report 'Painful Journeys' There should be shared responsibility between the DfT and the DH to address the problems and identify solutions to help maximise the impact of the AAP.

- The Government should continue to provide support for **community transport services**, and deliver a fair resolution to EU guidance on licencing that does not undermine their viability.
- The DfT and other Government departments should work together on **planning policies and guidance** affecting the ability of older people to travel to essential services and the obstacles they may encounter in getting to a bus stop or station in the first place.
- The DfT need to promote a consistent approach to **'shared space'** alongside a requirement to consultation with disabled and older people to avoid exclusion as a result of poor design.
- There should be a national policy initiative to **increase crossing times** for older people using pedestrian crossings, assisted by existing sensor technology.
- We support measures to make **cycling safer for older people**, including further investment in separate cycle paths and reducing the cost of adult tricycles and electric bikes.
- There needs to be a timescale and targets for the delivery of **audio-visual information** on buses with stronger powers and resources for the Driver and Standards Agency (DSA) to ensure full implementation.
- We would like to see a more flexible approach to **bus concessions** that makes it easier to use a bus pass for local community transport services, especially in rural places.
- There need to be **common standards of accessibility** for services and equipment across all train operators to help provide a seamless and consistent service that passengers understand.
- We support further progress to improve train services for older people with **dementia and cognitive impairment** both in terms of service design and staff training.
- The Government and train operators need to accept that achieving a 'spontaneous' travel service for older and disabled people requires an **adequate level of staff** on trains and at stations.
- We would like to see an obligation on local authorities to offer alternatives to online applications under the **blue badge parking scheme**.
- We support stronger penalties for **taxis and PHVs** that fail to comply with current accessibility regulations.

- More attention needs to be given to the **risk of trips and falls** at train and bus stations as a result of poor maintenance, location and design, as well as more innovative approaches and the deployment of new technology.
- In addition to the proposed increase in **accessible toilets at stations** there must be stronger obligations to maintain them in working order at all times.
- The lack of accessible toilets on trains is a strong disincentive for older and disabled people to use trains and means lost revenue for train operators. The Government needs to put pressure on train operators to **introduce new rolling stock** that complies with accessibility regulations as soon as possible. Disabled access to transport should be a right that deserves proper investment.
- Where a train breaks down all train operators need to have better systems to ensure that older and disabled people are given priority access to **replacement services**, including accessible coaches.
- The Department for Transport needs to ensure that the **wheelchair accessibility standard** is based on the current standard for wheelchair dimensions (a key issue raised by older people at a recent Age Action Alliance and Age UK consultation meeting with the DfT).
- There should be targets to increase the capacity of trains and buses to carry electric wheelchairs and **mobility scooters**.

Response to actions and questions

TRIP HAZARDS AND TACTILE SURFACES

Action 1: We will commission a research project to scope the updating of the 'Inclusive Mobility' guidance by the end of summer 2017. As part of this project we will also examine updating our guidance on the use of tactile paving surfaces.

We support proposals to update guidance on tactile paving. As part of this the DfT needs to consider the risk of trip hazards associated with tactile surfaces that can affect certain groups of older people. We agree with the need to look at 'inclusive mobility' in broader terms, taking into account the obstacles faced by older people making the journey from their home to a bus stop or station - which can include uneven pavements, poor lighting, and busy traffic, the location of pedestrian crossings and crossing times, the location of seating and the provision of covered bus shelters. The AAP needs to look at the coordination of these broader aspects of the built environment, across Government departments.

SHARED SPACE

Action 2: We will continue our involvement with CIHT on their work on shared space.

Older and disabled people must be consulted on any proposals for shared spaces. It would be unacceptable for shared spaces to become 'no go' areas for particular groups of older or disabled people. The Government must ensure consistent design standards for shared spaces to make them useable and relatively familiar for a broad range of disabilities, including not just people with impaired sight, but those with disabilities caused by, for example, dementia, Parkinson's, and poor mobility - regardless of location.

However, we do recognise that shared spaces can form part of a traffic calming approach that is beneficial to older pedestrians. Consideration of shared spaces needs to be placed in the broader context of traffic calming measures that can benefit older pedestrians and reduced traffic accidents.

SAFE CYCLING

Action 3: We will refresh our guidance in Local Transport Note 2/08: Cycle Infrastructure Design to ensure that local authorities can continue to design good, safe and inclusive schemes that work for everyone in accordance with legislation.

We support measures that encourage more older people to cycle, but a major deterrent is a justified fear of busy traffic. The development and promotion of safe separated cycle routes to services and places used by older people will help to address this problem. There is scope for the promotion of adult tricycles (including electric tricycles) that give older people improved balance and stability. We would welcome initiatives to discount the cost of both tricycles and electric bikes to make them available to significantly more older people.

AUDIO-VISUAL INFORMATION

Action 4: We will work with disabled people, the bus industry and the devolved administrations, on the Regulations and guidance which will implement the Accessible Information Requirement on local bus services throughout Great Britain, helping disabled passengers to travel by bus with confidence.

We are pleased that there will be a requirement on all bus services to provide audio-visual information. This is an important step forward - but we need clear measures to guarantee these changes are fully implemented, with realistic targets and timescales for all bus operators to make changes. We are also concerned about more basic aspects of bus service information. This includes poor timetable design, for example, when it is in small print, or where it is difficult to read owing to a lack of lighting at bus stops. Progress towards consolidated information for different bus companies online and through apps is extremely welcome, although the AAP still needs to address the requirements of older people who are not online or do not have access to a smart phone. We would like more thought to be given to dementia-friendly design of information and signs on buses and at bus stops - which would probably benefit all

passengers. There should be a consistent approach to accessible design across all bus operators, for example a consistent age-friendly approach to the design of printed timetables.

FLEXIBLE TRAVEL CONCESSIONS

Question 1: How well do you feel the national bus concession in England succeeds in supporting the local transport needs of disabled people, and how might it be improved?

A major concern for Age UK is the overall decline in bus services, particularly in rural areas. Obviously the lack of a local bus service undermines the usefulness of the bus pass. We would like all older people entitled to concessions to be able to use their bus pass for local community transport, while ensuring community service providers are properly reimbursed, especially where they are replacing a commercial service which would have received subsidies.

Smart card technology, providing credits that allow older people to take a certain number of taxi journeys, could be particularly helpful in areas without a regular bus service. This approach, or the use of taxi tokens, is already used in some places and is particularly important for travelling to medical appointments for older people who are unable to use public transport. While retaining the principle of free bus travel for all older people, we are interested in how concessions can be used to provide flexible subsidies for different forms of transportation based on the needs and circumstances of the individual.

Older people have raised with us the need for cross border portability for bus passes between England, Wales and Scotland. This is particularly important for older people having to cross borders for medical treatment.

TAXIS

Action 5: We will review and consult on best practice guidance for taxi and PHV licensing authorities, which will include strengthened recommendations on supporting accessible services, including on the action that licensing authorities should take in response to reports of assistance dog refusal.

Action 6: We will seek to increase the number of accessible vehicles through appropriate recommendations to taxi and PHV licensing authorities in our draft revised best practice guidance.

We welcome measures to strengthen the regulations for taxis and PHVs. The Lords Inquiry highlighted the problem as an issue of enforcement. Although there has been further progress on this since the report was published we are still concerned about a lack of accessible taxis in rural places. The AAP needs to consider how to address these service gaps by giving greater support to community transport and volunteer car services in places where there is a clear lack of alternatives.

ACCESSIBLE STATIONS AND PLATFORMS

Action 8: We will continue to roll-out station access improvements for which funding has been allocated, and deliver the Access for All programme in full, building on the significant progress that the programme has already made.

We would like to see further investment in the 'Access to All' programme, which has been subject to cutbacks. This programme has made important advances but adequate levels of funding are needed to make further progress, with common accessibility standards applied to all stations. These measures need to address fall and trip hazards related to the condition of platforms as well as deficiencies in stations, such as a lack of lifts for wheelchair users. Poor maintenance of stations where there are wet or icy platforms is particularly hazardous. We are not convinced there is a correct balance between investment to improve retail spaces and ensuring all platform surfaces are safe for older and disabled people.

AIRPORTS

Question 2: As a passenger or an organisation representing disabled people, what is your experience of and guidance setting out the rights of disabled persons or those with reduced mobility when travelling by air?

Age UK is concerned with the split in responsibility between the airport and the airline, with the airport providing most of the services and the airline the main point of contact with older passengers. Most airports are large and complex places, and most are designed and constructed around the idea that the passengers are fit and nimble. But as more older people are travelling by air, there are more who present with disabilities, and whilst airport staff have procedures to support people who are wheelchair-users, those with more hidden disabilities can receive much less consideration. The passenger neither knows what a reasonable and acceptable request is, nor knows who to complain to when something goes wrong.

It is in everyone's interests that a passenger can negotiate an airport as easily and efficiently as possible. This could be improved if all communications with passengers had a standard and clear message that highlighted that services are available to those with a disability or need for help, and that the airport and the airline were inspected against their procedures to respond to requests for assistance. There are many air passengers who appreciate the speed and independence of guiding themselves through the necessary checks and systems involved in boarding an aeroplane, but those who need the support and service of a human being must still have that option

SUPPORT FOR DISABILITY

Question 6: As a transport user, what has been your experience of using transport services? In particular, how would you assess the levels of understanding of transport providers and staff of the needs of disabled people (i.e. those with cognitive, sensory or physical impairments including dementia, autism or mental health conditions).

Arguably the main issue is still that of inconsistency and reliability – which may relate to more fundamental questions on how transport services are delivered in the UK. Many transport providers offer older people with dementia or a cognitive impairment a helpful service. However, there are still examples of poor treatment reflecting a lack of staff training on how to support and assist vulnerable groups. There is also some evidence that senior managers are not aware of the issues which can in turn hold back staff training and improvements to customer services. The DfT needs to insist that train staff and managers at all levels are working to a common set of quality service standards for vulnerable older people.

We would also like to see a more consistent approach to companion travel for both patient transport and public transport. Often older people with a medical condition appreciate being accompanied by a friend or relative to give them support. This is particularly important for older people with dementia or cognitive impairment. Some local authorities offer schemes that help with this, but there appears to be a degree of inconsistency in policies and approaches. For many older people having at least some initial assistance to use public transport is important. We would like the DfT and DH to give this further consideration.

Question 7: What additional action could Government, regulators or transport bodies take to ensure that transport providers and staff have a better understanding and awareness of the access and information needs and requirements of passengers or transport users with less visible disabilities (i.e. those with sensory or cognitive impairments including dementia, autism or mental health conditions)?

There may in some places be scope for transport providers to work with local Age UKs and other disability groups with experience of raising awareness of less visible disabilities. Staff training should involve talking directly to disabled people themselves so that staff gain a better understanding and empathy for the day-to-day problems they encounter on the transport system. We would like a requirement on all providers to have a vulnerable customers policy, which is now a requirement for financial services, energy and other essential services.

Question 8: As a passenger or organisation representing disabled people, what is your experience of trying to travel spontaneously?

As previously outlined inconsistency as well as unreliability are key issues. Franchising contracts should be a major policy lever to help address this problem with clear consequences and penalties if operators offer a poor service.

Question 10: As a passenger or organisation representing disabled people, what is your experience of using Passenger Assist? We would welcome ideas on what further developments could be made to the Passenger Assist system to make it more attractive to users with accessibility needs; particularly those who currently choose not to travel by train.

Older people have told us passenger assistance can work very well. However, where it fails it can be inconvenient and stressful. There can be particular problems related

to poor communication and coordination between different operators. Again the delivery of this service requires sufficient trained staff across the network.

Question 11: When you purchase a ticket using a vending machine, what has been your experience of accessibility?

We would like to see a standard age friendly approach to the design of ticket machines given the variation between different operators.

COMPLAINTS

Question 12: We would welcome views, particularly from disabled passengers, on the current systems for resolving transport disputes, and whether processes could be further improved.

We would like stronger signposting to where older people can take complaints and suggestions. We have received feedback that some older people don't bother to make complaints because they think it's a waste of time and they will not receive a response from the operator. We'd like to see more local focus group and proactive community engagement to help determine common problems experienced by older passengers.

NATIONAL ASSISTANCE CARDS

Question 13: As a person with a hidden or less visible disability or impairment, or in an organisation representing people with hidden disabilities, we are keen to receive your views on the desirability and feasibility of introducing a national assistance card.

Generally, we are supportive of this approach. However, Age UK focus groups have told us that they would be concerned if assistance cards stigmatised them in some way. Therefore, there needs to be sensitivity in the design and approach taken with any national scheme. It also obviously needs to work in parallel with staff training to ensure card users receive appropriate assistance.

TOILET FACILITIES

Action 9: Subject to the finalisation of the Statement of Funds Available (in October this year), Government will allocate funding to provide additional accessible toilet facilities at stations as part of the next rail funding period (from 2019 onwards).

As well as capital investment in toilet facilities there needs to be investment in ongoing repairs, maintenance and cleaning. Older people have told us that even though toilets are theoretically available they may be closed or out of order for some time. Accessible toilets are a vital issue for many older and disabled people and need to be given much higher priority.

Action 10: From October 2017, DfT will fund a pilot to explore opportunities to improve train tanking facilities and increase the availability of train toilets. Building on the learning from this and industry-led research in this area, we will consider how best to allocate further investment, beginning with upcoming franchising opportunities.

There are still too many train carriages that do not have accessible toilets, which deters older and disabled people from travelling. There is a recognition that new rolling stock will resolve this issue but we would like to see the Government and industry doing more to speed up the replacement of older inaccessible carriages that often exclude older disabled people. In the meantime, we would like to see a higher priority placed on addressing the immediate needs of disabled people, although we recognise the financial challenges involved.

ALTERNATIVE JOURNEY OPTIONS

Action 12: Department for Transport is exploring with the Rail Delivery Group (RDG) the ability for train operators to provide ‘alternative journey options’ if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.

We support alternative journey options if a train become unsuitable (although this assumes that all trains are suitable in the first place and have accessible toilets). When a train breaks down the operator should have specific plans to help older passengers with restricted mobility or a disability to get to their destination in comfort. We would like clearer guidance to ensure they are given priority assistance to access replacement transport. This includes the use of coaches that provide disabled access and toilets.

ACCESSIBILITY FEATURES

Action 13: We are exploring with RDG the possibility of placing dynamic notifications on the Stations Made Easy web pages, of the availability of accessibility features on trains.

We support measures to provide this online information to give us a clearer picture of the features offered by different operators. This will also make it easier to identify areas for further action on accessibility features. It would be useful if consumers could have the opportunity to confirm whether or not these features are available in practice and flag up where services are not working as described. We would also like to see this information made available offline for older people who are unable to access the internet.

Action 14: We are also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.

Action 15: We are working with the Rail Safety and Standards Board (RSSB) to launch an innovation competition in September 2017, which will find solutions to reducing the cost of accessibility improvements at stations, including the availability of accessible toilets. This competition will also focus on making improvements aimed at those with hidden disabilities.

Action 16: We are also investing in a new rail innovation accelerator which will look at how the availability of facilities can be improved.

We support this work but would like to see more fundamental issues addressed on routine maintenance to keep facilities well maintained and in good working order. The

usefulness of innovative approaches will be limited if there is insufficient ongoing investment to maintain services to an agreed standard over the longer term.

STORING MOBILITY SCOOTERS

Action 17: We will commission research, which will be published by 2018, to measure the impact for passengers of work to improve rail vehicle accessibility since the introduction of Rail Vehicle Accessibility Regulations (RVAR) and the introduction of the Persons of Reduced Mobility Technical Specification for Interoperability (PRM TSI).

We would like to see greater capacity on trains for older people to store electric wheelchairs and mobility scooters. As the availability of these vehicles increases, allowing more older people to travel from their home to a station or stop, focus needs to be placed on better storage in carriages.

More generally there needs to be greater coordination between bus services and drop off points at railway stations. This means offering a short distance between the bus stop and station platform with covered areas to prevent slipping on wet or icy surfaces.

Action 18: By the end of 2017, we will publish performance data on accessible features on trains, and details of any remedial action necessary to improve both the quality of the data reported and any areas of poor performance.

We support measures to make this information publically available. This could help to promote greater accountability, leading to further improvements. It is important to have shared data on performance such as the reliability of passenger assistance or the availability of accessible toilets. Again, this should be accompanied by measures to allow passengers to flag up difficulties and concerns which could be incorporated into reporting.

Action 19: We will also share the performance data reported to us with ORR, to inform any action they take to ensure operators are meeting their legal requirements to comply with accessible rail vehicle standards. We would welcome your feedback.

We believe the indicators should include any failure to provide staff assistance at stations and there should be a clear protocol for passengers to register when assistance has failed.

INFORMATION SERVICES AND EQUIPMENT

Question 5: When you use a train, what has been your experience of accessibility equipment, such as the passenger announcements (either audible or visual), accessible toilets or manual boarding ramps, or other accessibility features)? For example, do you find this equipment reliable, and if not, how could train operators better ensure reliability or assist you?

The feedback we have received from older people relates to the quality and consistency of information services and equipment. For example:

- Older people with hearing impairments (and others) can struggle with unclear or muffled announcements.
- Where there is a platform alteration people with restricted mobility need to be given sufficient time and assistance to catch their train.
- toilets being out of order,
- boarding ramps not be available as arranged or,
- generally poor passenger assistance.

Although there have been significant improvements in the accessibility of the rail network, further measures are required to address weak links in the chain. We believe further cuts to transport staff will undermine efforts to improve the support offered on the rail network. Having trained staff on trains and at all station is vital for enabling disabled older people to travel anywhere on the rail network. We are generally concerned that advances in technology, although welcome in themselves, should not be used as an excuse for cutting other important services.

Action 20: We will support the DVSA in its activities to communicate with operators on, and incentivise prompt compliance with, PSVAR, and to take decisive action where this does not happen. We will expect the DVSA to report annually on the action taken.

We agree there needs to be stronger measures to ensure that operators are complying with their obligations under the PSVAR.

Action 21: We will review, with Government partners and stakeholders, the reasons why some taxi and PHV drivers refuse to transport assistance dogs, and identify key actions for local or central government to improve compliance with drivers' legal duties.

We support further action.

BLUE BADGES

Action 7: We will review, in co-operation with DPTAC and others, Blue Badge eligibility for people with non-physical disabilities. This will include considering the link to disability benefits.

We strongly support extension of the Blue Badge scheme to non-physical disabilities.

Action 22: We have begun publishing enforcement newsletters aimed at local authorities (i.e. all Blue Badge teams and parking teams) to promote enforcement success stories and good practice, in order to help encourage better enforcement of disabled parking spaces. We will also continue our regional engagement workshops with local authorities and will work with DPTAC on both initiatives.

We would like the blue badge application process given further attention. Older people have told us they can experience serious difficulties making online applications and feel the renewal process is onerous for those with chronic conditions. The DfT issues guidance on the blue badge scheme but gives discretion to local authorities on how they administer it. We would like to see stronger guidance to ensure where an older

or disabled person is unable to apply online they are still able to make an application over the phone or can meet with an official to help them complete the form.

One specific issue with disabled parking we would like to raise is that blue badge holders have told us they need sufficient parking located close to their GP or the entrance of the local hospital.

STRENGTHENING OBLIGATIONS TO WHEELCHAIR USERS

Action 23: We will work with the bus industry, DPTAC, Driver Certificate of Professional Competence (Driver CPC) training accreditors and the DVSA to seek to ensure that the training of bus drivers in disability awareness and equality reflects the Department's recently developed best practice guidance, and that appropriate arrangements are in place before such training becomes mandatory in March 2018.

This is very welcome. Higher national standards for training would help to improve assistance to older and disabled people, regardless of where they live. The attitude and approach of drivers often has a critical impact on the confidence of an older person to use a bus. As part of this we would like to see drivers given stronger instructions\powers to ensure that wheelchair users are able to access designated spaces on a bus. This needs to happen in parallel with a longer term objective to design buses that have increased capacity to accommodate both wheelchairs and buggies.

Action 24: We will support the Office of Rail and Road (ORR) in its monitoring of disability equality and awareness training undertaken by train and station operators.

We think it is important to monitor this and to challenge operators where it is not happening.

Action 25: We will encourage taxi and private hire licensing authorities to promote disability awareness and equality training for licensed taxi and private hire drivers, and recommend, in our draft best practice guidance, that such training be mandated in their licensing policies.

We fully support this action.

Action 26: ORR will publish the results of its large programme of research looking in depth at accessibility and assistance in 2017. We would welcome your feedback.

We welcome research that gives us a better understanding of current barriers to older people using train services.

Action 27: We will report on the progress of its joint research with Transport Focus, to identify the challenges inhibiting passengers from travelling, by the end of 2017.

Research should include getting a better understanding of obstacles faced by older people registering problem with service providers and how operators respond to issues raised.

Action 28: DfT is exploring with RDG the ability for train operators to provide ‘alternative journey options’ if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.

Action 29: DfT is also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.

See response to Action 12

Action 30: We will work with representative bodies (e.g. the Confederation of Passenger Transport (CPT) and the Rail Delivery Group (RDG)), and will support the work of regulators (such as the Office of Rail and Road), to encourage greater promotion of information about the rights of disabled travellers and what they are entitled to expect in terms of service and facilities, as well as developing easier ways to register complaints when things go wrong.

See previous answers

MOBILITY CENTRES

Action 34: We will highlight and promote the work of Mobility Centres, and identify ways to support the ambition of the Driving Mobility network to increase the services it provides in response to the growing ageing population and become community style ‘hubs’ for older and disabled people.

Mobility centres play an increasingly important role in helping older people to continue driving safely while retaining their independence. We would like to see better promotion of their services so more older people are aware of the help and support they can provide. We welcome their expansion into ‘community hubs’ as part of broader measures to help older people retain their independence. We also support the need to highlight the benefits of driver assessments and encouragement to older drivers to review and improve their driving skills.

OLDER DRIVERS TASKFORCE RECOMMENDATIONS

Action 36: By the end of 2018, Driving Mobility will produce guidance to support families concerned about an older person’s driving ability, along with information on alternatives to self-driving.

This would be extremely helpful and we agree on the need to link older people into other transport options where they are no longer able to continue driving. However, this also necessitates ensuring that those alternatives are available, especially in rural places. More generally we would like to see the DFT taking up the recommendations the Older Drivers Task Force and the Road Safety Foundation to promote improvements in the safety of older drivers, other road users and pedestrians.

SUPPORTING COMMUNITY TRANSPORT SERVICES

Question 15: How can the Department for Transport support Community Transport Operators further?

We welcome the backing the Government has given to community transport, including schemes operated by local Age UKs through capital grants for minibuses. It is apparent the Government generally understands the vital role of the community transport sector. Our immediate concern is to resolve the issue of licencing for community mini-buses which could threaten the viability of this sector. We share the concerns of the Community Transport Association, that forcing community buses to comply with commercial licencing requirements, include disproportionate qualification requirements for volunteer drivers, would undermine the sector. Many older people rely on community transport to get to hospital and other key services. These services have limited funding and often rely on the support of volunteers. Given this the DfT must find a solution to address EU regulations in a way that does not undermine the viability of community minibuses or lead to their withdrawal. As part of our 'Painful Journeys' campaign to improve transport to hospital we believe that community transport services should be directly involved in the commissioning of NHS patient transport to take some of the pressure off the NHS.

Action 37: We will work with Mobility Centres and the British Healthcare Trades Association (BHTA) on promoting the need for training of scooter users and providing facilities for such training.

We support action to offer older people training on the safe use of scooters. It might be helpful to give further consideration to the question of whether to make safety training mandatory for all users of scooters. We also have concerns about retailers selling mobility scooters to older people that are unsuitable for their needs. We would like retailers to automatically offer information on where customers can obtain an independent assessment from an occupational therapist, before making a purchase.

Action 38: We will identify and promote pushchairs, prams and scooters most appropriate for public transport, working closely with the British Healthcare Trades Association and transport providers, by 2018.

We support this approach which needs to work in parallel with improvements to the design of public transport to accommodate smaller scooters.

Action 39: We will begin a survey to gather evidence and identify examples of improvements that could be made to the wider process for making Traffic Regulation Orders, by autumn 2017. This evidence will help inform our approach to tackling pavement parking.

It is important to make further progress on this matter given the inconvenience and dangers of pavement parking for users of wheelchairs and scooters.

Action 40: In 2017, we will commission research to further understand the barriers to travel for individuals with cognitive, behavioural and mental health impairments, to help us to develop potential measures to improve accessibility.

We support research on this topic to develop practical improvements for people with impairments. We would also like a focus on how travelling to healthcare impacts on these groups given how important it is for them to receive help.

RESEARCH ON TRANSPORT AND HEALTHCARE

Action 41: By 2018, we will commission research quantifying the economic, social and commercial benefits of making passenger transport more accessible.

It would be helpful to get a broader picture of the benefits of accessible transport, for example, the role of public transport in helping older people to obtain regular preventative healthcare that helps to relieve pressure on the NHS and social services. It would also be useful to get a more detailed understanding of the economic and social benefits in terms of travel for shopping and spending by older and disabled people - as well as the contribution of accessible transport to remaining active and healthy.

Action 43: We are also investing in a new rail innovation accelerator which will look at how the availability of accessible facilities can be improved.

Action 44: We will ensure that DfT innovation competitions highlight the need for prospective funding recipients to consider accessibility within their project proposals, where projects impact on transport users.

We support this – all funded projects need to take an age friendly approach and address accessibility.

Action 45: We will develop and deliver (with input from DPTAC) training for civil servants in the Department to include the law and good practice with respect to disability awareness and equality issues.

Action 46: We will work with the Welsh Government and the Minister for Equalities to understand the impact of the introduction of these new powers in Wales, and their potential applicability to the English jurisdiction.

Action 47: We will support work with local authorities to raise their awareness of the Public Sector Equality Duty under the Equality Act 2010 in relation to local transport and transport facilities.

This is particularly important in relation to travel services that require online access (including online applications for blue badge parking). Under the PSED there need to be alternative forms of support and advice for older people without access to the internet who may be disadvantaged by new technology.

HIDDEN CONDITIONS

Action 48: We will develop, in consultation with DPTAC, effective ways of measuring travel patterns and trends among disabled and older people over time as a basis for targeted policy initiatives.

We support these proposals, but we need to ensure they address the needs of older people who may not define themselves as 'disabled' but still struggle due to a hidden condition or restricted mobility. Research needs to cover vulnerable older people who

do not currently use public transport because of concerns over access, comfort and safety. We would particularly welcome tracking travel patterns for travelling to hospital appointments, given how little information we have about these types of journey.