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Research report

# Accessible public transport for older and disabled people in Wales

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# Executive summary

One of the priority aims in our strategic plan for 2019-22<sup>1</sup> is to see public transport that is accessible and that supports the inclusion of older and disabled people. As part of the work to support this aim, we explored the extent of equality considerations for older and disabled people in public transport strategies and policies in Wales, such as local and national transport strategies. We also held focus groups with older and disabled people, and their representatives, to explore the impact of these considerations on their experiences of public transport. We finished these activities before the coronavirus pandemic, which transformed the operation and use of public transport, and introduced new barriers to travel for older and disabled people.<sup>2</sup>

Using the Public Sector Equality Duty (PSED) and Wales specific duties as an analysis framework, we found that equality considerations for older and disabled people had not been comprehensively integrated into strategies and policies. This was evident from the lack of objectives, interventions and actions to address the most pressing and persistent inequalities in public transport. This was also reflected in the findings of the focus groups. Older and disabled people told us that they found the public transport system in Wales largely inaccessible. They faced a broad range of barriers to travel within a system that did not conform to the social model of disability,<sup>3</sup> or support their independence. Consequently, they felt their opportunities had been limited, and that they had been left behind.

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<sup>1</sup> See our [strategic plan \(2019-22\)](#) for more information.

<sup>2</sup> Some of the new barriers to travel for older and disabled people are summarised in our [evidence to the Transport Select Committee inquiry on the implications of coronavirus for transport, May 2020](#).

<sup>3</sup> The social model of disability recognises that people are disabled by barriers that exist in society, not by their impairment.

For public transport to become accessible and inclusive, public bodies must develop and deliver actions that respond to the needs of older and disabled people. This research shows that better consideration and integration of equality into transport strategies and policies, using the Wales specific duties as a guide, will ensure that public bodies meet the aims of the PSED, and build an accessible and inclusive public transport system in Wales. At the end of this report, we make recommendations on how public bodies can achieve this when developing new public transport strategies and policies for Wales.

# 1. Background

Public transport should be accessible and inclusive to all. It should support people to participate fully in all aspects of life, such as work, volunteering, socialising and access to services. Travel by public transport should be a safe and pleasant experience, which facilitates the right to independent living and other human rights.<sup>4</sup>

However, evidence from our report ‘Is Wales Fairer?’ (2018) shows that public transport in Wales often does not meet the needs of older and disabled people. Half of rail stations in Wales, for example, are not fully accessible to disabled people, with 34% having no access for wheelchair users. These barriers to independent travel can restrict older and disabled people’s right to participate in aspects of everyday life.

Since April 2011, under the Equality Act (2010), public bodies in Wales have been subject to the Public Sector Equality Duty (PSED), and Wales specific duties.<sup>5</sup> The aim of the PSED is to ensure that public bodies consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities, such as transport policy development and service delivery. The PSED specifically requires public bodies, in the exercise of their functions, to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between people who share a protected characteristic<sup>6</sup> and those who do not

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<sup>4</sup> In its interpretation of Article 9 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), the UNCRPD committee (2014) explains that accessible transport is a precondition for independent living, full inclusion, and enjoyment of all other human rights.

<sup>5</sup> Further information about the PSED and Wales specific duties can be found on [our website](#).

<sup>6</sup> It is against the law to discriminate against someone because of the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

- foster good relations between people who share a protected characteristic and those who do not.

These are sometimes called the three aims of the general duty. The Wales specific duties set out the steps that public bodies in Wales must take to demonstrate that they are paying due regard to these aims.

Welsh Government published the national transport strategy for Wales in 2008, with local or regional transport plans then published every five years by local authorities. The purpose of these plans is to outline Welsh Government and local authorities' aims for improving transport nationally and locally, respectively. With a review of the national transport strategy starting this year, and a review of local transport plans to follow, we undertook this research to explore how equality has been considered in public transport plans to date. We used the PSED and Wales specific duties as a framework and analysed how transport plans impact on older and disabled people's experiences of public transport.

## 2. Methodology

Our strategic plan for 2019-22 prioritises equality and human rights issues that can be best addressed through use of our unique powers.<sup>7</sup> This research supports our second priority aim to ensure public transport is accessible and supports the social and economic inclusion of older and disabled people.

This research had two key aims:

- analyse the quality of equality considerations in public transport strategies and policies in Wales, and identify where there is room for improvement, and
- explore the impact of these strategies and policies through the experiences of older and disabled passengers.

We carried out the research in two phases: a desk review of key public transport strategies and policies in Wales, and three focus groups with older and disabled people, and their representatives, in Wales.

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### Desk review of strategies and policies

We analysed equality considerations in key public transport strategies or policies in place in 2019. This included Welsh Government's national transport strategy 'One Wales: Connecting the Nation' (2008), the 'Accessible and Inclusive Public Transport Objectives Policy Statement' (2017), and nine local transport plans (LTPs)<sup>8</sup> covering Wales for the period 2015-20.

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<sup>7</sup> See our [strategic plan \(2019-22\)](#) for more information.

<sup>8</sup> Bridgend LTP, Cardiff LTP, Mid Wales joint LTP, Monmouthshire LTP, Newport LTP, North Wales joint LTP, South East Wales valleys LTP, South West Wales LTP, Vale of Glamorgan LTP.

We used an analytical framework based on the PSED and Wales specific duties,<sup>9</sup> since these statutory duties present steps for public bodies to follow to build equality considerations into the design of policies and the delivery of services. We sought to identify good practice in the following areas related to the Wales specific duties: meeting the aims of the general duty, strategic decision-making, engagement with representatives for older and disabled people, evidencing equality information, conducting an equality impact assessment, having a monitoring and evaluation plan, and approach to procurement. We also evaluated the strategies and policies as a whole to identify if they were likely to meet the needs of older and disabled people, such as by identifying any objectives, interventions or proposed actions linked to improving inclusion and accessibility.

Our analysis was limited to the information available to us in the public domain. In some instances, we contacted public bodies for further information, such as their equality impact assessment or stakeholder consultation report, but did not receive responses from all those contacted.

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## Focus groups and surveys

We held three focus groups – one in North Wales and two in South Wales – with older and disabled people, and their representatives. The aim of the focus groups was to understand older and disabled people's experiences of public transport in Wales. In total, we engaged with 28 individuals including older and disabled members of the general public, representatives from local organisations such as disability access groups and over 50's forums, and representatives from national organisations such as Guide Dogs Cymru, Learning Disability Wales and Cymru Older People's Alliance.

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<sup>9</sup> As the National Transport Strategy was published before the PSED and Wales specific duties, we analysed alignment with the duties retrospectively.

### 3. Key findings from the analysis of strategies and policies

Overall, equality considerations were not a central theme in public transport strategies and policies, except for the Welsh Government's 'Accessible and Inclusive Public Transport Objectives' (2017). We found some positive examples of equality considerations. We did not, however, identify a strategy or policy that included equality considerations consistently throughout, despite all but one being published after the introduction of the PSED.

We focused our analysis on identifying good practice in each of the PSED Wales specific duties. These duties are levers that, when implemented well, help public bodies to incorporate equality considerations into strategies and policies so that they meet the aims of the general duty. We found that public bodies demonstrated variable compliance with these duties, from the information available. While several public bodies demonstrated fulfilment of at least some of the duties, improvements were needed by many to demonstrate good practice in important areas such as engagement, evidencing equality information, completing an equality impact assessment, and monitoring and evaluation. As a result, equality considerations were not comprehensively integrated into strategies and policies. Poor level of consideration was also evident from the lack of objectives, interventions and actions to address the most pressing and persistent inequalities in public transport.

Consequently, most of the strategies and policies were not aligned with national policies and legislation to advance equality of opportunity in Wales, such as the Strategy for Older People in Wales (2013-23), or the Wellbeing of Future Generations (Wales) Act (2015). Further, the strategies and policies did not align with the social model of disability, which the National Assembly for Wales (now Senedd Cymru) adopted in 2002, or the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

We did recognise the positive direction of the Welsh Government's 'Accessible and Inclusive Public Transport Objectives' (2017), in using equality evidence and developing equality objectives to meet the aims of the general duty. This demonstrates greater consideration of equality at a national level since the publication of the last national transport strategy.

Some of our key observations from the analysis included:

- Public bodies did not use the Wales specific duties as levers to incorporate equality considerations into strategies and policies.
- National and local transport strategies did not recognise accessibility and inclusivity as a key issue and opportunity in the public transport system, particularly for older and disabled people. Identification of issues and opportunities typically leads to the inclusion of appropriate objectives, interventions, and key performance indicators in strategies to address these. Therefore, there was little evidence of objectives and interventions to address the most pressing inequalities in public transport for older and disabled people.
- There was a lack of engagement with representatives for or with older and disabled people, who are experts by experience, in the development of strategies and policies. Engagement is required to align with legislation and conventions such as [The Wellbeing of Future Generations \(Wales\) Act \(2015\)](#) and [UNCRPD Article 4.3](#). Where engagement was evident, there was no clear demonstration of how it had informed the equality impact assessment, or equality considerations in the strategy overall.
- Several public bodies stated that they had not carried out an equality impact assessment. Of those that had, there was variable compliance with elements of good practice, such as providing a rationale for expected impacts, providing action plans to mitigate negative impacts, and specifying how the findings had informed the final strategy or policy.
- Evidence supplied to identify the key equality themes for the equality impact assessment, and to incorporate into the strategy or policy, varied in depth and quality. Gathering this evidence is one way of aligning with [UNCRPD Article 9](#). It was not always clear how this evidence had informed the development of the strategy or policy. We acknowledge that, particularly at a local and regional level, there may be gaps in available data to support equality evidence and monitoring and evaluation.
- Each national and local transport strategy had a monitoring and evaluation plan but no clear equality indicators, visible plans to monitor outcomes by protected characteristic, or visible plans to monitor the anticipated impact of the equality impact assessment against actual impact.
- None of the strategies or policies referred to the approach to procurement, or how public bodies intended to build equality considerations into the procurement process, so that processes and services procured meet the aims of the general duty.

At the end of this report we make recommendations on how public bodies can demonstrate good practice in the fulfilment of the PSED and Wales specific duties, when developing public transport strategies and policies. This will help them to meet the aims of the general duty and result in a more accessible and inclusive public transport system.

## 4. Key findings from the focus groups

The aim of the focus groups was to understand the impact of public transport strategies and policies, by exploring older and disabled people's everyday experience of using public transport in Wales. We found that the lack of focus on addressing persistent inequalities for older and disabled people in strategies and policies was reflected through people's experiences.

Older and disabled people told us that they perceived public transport as largely inaccessible. They faced a broad range of barriers to travelling independently in a system that did not conform to the social model of disability. These barriers affected their access to employment, services and opportunities to socialise with others, and consequently negatively affected their physical and mental health. Therefore, public transport did not support inclusion and independent living. Due to inadequate accessibility, older and disabled people told us that they could not travel with the confidence that they would have a successful journey, and in some instances, they found it easier not to travel at all. From their experiences, public transport in Wales was not meeting the three aims of the general duty.

At the end of this report, we make recommendations based on the key barriers to accessible and inclusive public transport identified in the focus groups. Public bodies should develop their objectives, interventions and actions in future strategies and policies around these recommendations.

### Engagement with older and disabled people

Older and disabled people told us that they did not feel public bodies were going far enough to engage with people who share certain protected characteristics, such as older age and disability, in the development of public transport. Many felt that they were unlikely to come across opportunities such as public consultations, unless they were actively searching for them. They questioned the extent to which public consultations had been accessible and had reached those who faced the most pressing inequalities in the public transport system.

People would like to feel that they have been given the opportunity to have their say regarding public transport.

(A representative for older and disabled transport users)

Those who had engaged with public bodies and transport operators in the past described their invitation and involvement as a ‘tick-box exercise’ to fulfil a statutory duty. They did not feel listened to, or that their feedback had been consciously considered. They thought that those developing strategies, policies and services had instead relied on written guidance and presumptions of what works well for older and disabled people, which they felt had led to the continued development of inaccessible public transport. These findings were consistent with our conclusions on the strategies and policies that we analysed. There was a desire among everyone in the focus groups to have the opportunity to give their feedback on public transport at an early stage, and some thought that at least one external stakeholder should sit on a public transport planning committee, to represent their views.

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## Planning journeys by public transport

Older and disabled people felt that they had to spend a disproportionate amount of time and effort planning their journeys by public transport, with no guarantee that they would successfully complete their journey without encountering problems or barriers of some kind. This included all activities involved in planning how to get from A to B, such as: searching for journey routes, timetables, and ticket information; identifying the availability and accessibility of facilities and services; and making arrangements for passenger assistance. Older and disabled people wanted to plan their journeys to the same extent that everybody else did, but so far the process had been a difficult and time-consuming barrier to spontaneous travel and independent living. Sometimes, barriers in the journey planning stage resulted in older and disabled people choosing not to travel at all.

One of the key barriers for some older and disabled people had been the transition of journey planning from a predominantly offline to an online activity. They noted that some people could not afford access to the internet and smart devices, nor did everyone want to use them, or know how to use them. Older people, in particular, felt that reasonable adjustments were not in place for those without internet access, with a lack of accessible, easily available offline resources. They also felt an element of discrimination, if those able to access the internet could take advantage of reduced price fares.

In another 15, 20 years it'll be a totally different generation, everybody will be 'au fait' with technology, but we're in a transition period at the moment and they haven't addressed that.

(A representative for older and disabled transport users)

Older and disabled people also discussed some of the difficulties they had experienced finding information online and offline, and how accessible the information had been. They felt the availability and accessibility of information had varied across local areas, transport modes and transport operators. Examples included there often being no printed resources available (e.g. timetable posters at bus stops or booklets available), the accessibility of resources (e.g. the small font size of printed and online timetables), and the compatibility of journey planning apps and websites with assistive technologies, such as screen readers. Some also noted that information about accessibility arrangements, such as the availability of lifts and ramps, provided over the telephone or on websites had often been inaccurate and out-of-date. Some people only realised this during their journey, such as when they arrived at a rail station that did not have a ramp for them to alight from the train. Due to the various barriers experienced, older and disabled people expressed a desire for journey planning information to be available online and offline, for it to be up-to-date and accurate, and for it to conform to an accessibility standard.

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## Staff behaviour and training

When a public transport system is not fully accessible and inclusive, staff support is important to enable older and disabled people to travel. While older and disabled people did report some positive experiences, overall they felt they had not received any consistency in experience or assistance from frontline staff when travelling by public transport. It was apparent that while interactions and incidents may appear forgettable to staff, every negative experience can leave a lasting memory and impact on older and disabled people's self-worth and confidence to use public transport in the future.

I know people who don't get on buses, don't get on trains or taxis because they get the tut, the sigh, [the] knock on [effect] causing mental health issues ... You feel worthless and useless and unwanted.

(A representative for older and disabled transport users)

Older and disabled people felt that while some staff members had provided an inclusive experience, overall, they required better disability awareness, equality and assistance training. They felt that staff required more support to identify less visibly disabled people, and to know how to support people with different types of impairments. They also felt that frontline staff needed to be more aware of their duties under transport operators' policies and the Equality Act, such as to provide assistance, and to fulfil these duties respectfully. However, they recognised that even with training, staff could only offer so much support in an inaccessible environment.

You might get a very supportive member of staff who was ten for their niceness and being nice to you to your face, but they're a one for inclusivity and accessibility because they can't control the system they're working in.

(A representative for older and disabled transport users)

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## Rail services

Older and disabled people's experiences clearly demonstrated that rail services and associated infrastructures had not been working to the social model of disability. Older and disabled people regularly encountered barriers that disrupted their travel and consequently their plans for the day. Participants had often had to spend disproportionate amounts of time and effort to overcome barriers to travel by train. Some older and disabled people wanted to travel by train more, but all of the barriers they had regularly faced had led to frustration or poor confidence in the rail system, or an acknowledgement that the system was inaccessible to them. Consequently, some older and disabled people had turned to other forms of transport such as taxis, or had chosen not to travel at all. They were concerned that past lessons had not been learned, evidenced by the development of new infrastructure and services that continued to be inaccessible.

It actually makes it really terrifying to travel on my own [by train]. I do it, but I have not had a completely secure journey in nine months ... I don't do that many journeys and every single one has a problem. It really makes it quite frightening for me, maybe it shouldn't be, but it is. And that's why I come to these things, to speak up for people who may be sitting in their houses, no longer able to go out because actually it's really too difficult.

(A wheelchair user)

The key barriers that older and disabled people told us they faced in and around train stations included: the extent to which stations had been step-free and had necessary tactile paving, the availability of accessible facilities such as changing places toilets, and the ill-thought-out design and location of street furniture, such as large planters. They felt there was too much variability in accessibility between stations, which complicated journey planning by having to research what to expect at each station. In their experience, it had often been argued that accessibility barriers were inherent to stations being built decades ago, yet they felt that new stations built in the last decade were equally inaccessible.

The key barriers that older and disabled people told us they faced when boarding and travelling on trains included: the reliability and flexibility of passenger assistance and the requirement to book ahead, the disproportionate impact of disruption to services and the impact on onwards travel, the ability to board crowded services and access priority seating, the accessibility of aisles and toilets on-board services, and the lack of audio-visual information.

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## Bus services

Older and disabled people felt their opportunities had been restricted because of barriers to travel by bus. They perceived travel by bus as often being difficult and unpredictable because of these barriers, which had limited the ability of working-age disabled people to access employment, and the ability of all older and disabled people to access services, leisure and social opportunities and more.

Older and disabled people thought there was too much variability in the design and quality of bus shelters across local areas (i.e. provision of shelter, suitable seating, and delivery of real time information), and that bus stops were often in inappropriate locations. Cars parking in bus stops had been a frequent problem, and this had prevented safe level boarding and alighting. They had also found it increasingly difficult to find accessible public toilets, if any at all, in and around bus stations and bus stops.

When travelling on-board buses, they noted a lack of enforcement of priority seating<sup>10</sup> and use of audio-visual information, the latter being a particular barrier for people with visual impairments. Assistance dog owners and wheelchair users told us that bus drivers refusing to stop for them was still a problem. Several people also spoke about the impact of infrequent bus services, particularly in rural areas. When buses were infrequent, or only operated between certain hours, people felt it had restricted their access to services, employment, and social opportunities. It had also created an inequality for those without access to a private car, and for those who could not afford to travel by taxi.

Everybody wants to get out and have a life. No matter how old you are or how disabled you are. And when transport isn't there, what do you do?

(A representative for older and disabled transport users)

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## Taxis and private hire vehicles

Due to low confidence in other modes of public transport, many older and disabled people told us they had turned to taxis and private hire vehicles, at an additional economic cost. However, for disabled people, this had not been an easy alternative, complicated by a lack accessible vehicles across Wales. Further to this, assistance dog owners told us that they had continued to experience access refusals at the point of pick-up. The rise in popularity of mobile applications for private hire bookings had brought some advantages to disabled people. However, key barriers persisted for assistance dog owners because there was still the potential for drivers not to accept bookings where an assistance dog was noted.

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<sup>10</sup> In the appeal of FirstGroup Plc v Paulley (2017), the [Supreme Court](#) ruled that bus companies must end 'first come, first served' policies in regard to priority seating, meaning that wheelchair users should be given priority for wheelchair spaces on buses.

It knocks your confidence [access refusals], and you just think that it keeps happening. I'm quite a confident person. You see us three here are visually impaired, don't think that's what everybody's like, because we're all very confident people, and really it's the difference between leaving your house and not.

(An assistance dog owner speaking about access refusals)

Disabled people told us they had mixed experiences of safety when travelling by taxi or private hire vehicle. Their concerns specifically related to the safe use of ramps, and the correct positioning of wheelchairs inside vehicles. Overall, they felt that taxi and private hire vehicle drivers required more disability awareness, equality and assistance training, to better support older and disabled people to travel.

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## Leadership

Older and disabled people communicated a range of views about senior leaders from public bodies and transport operators. There was a perceived lack of representation of older and disabled people among senior leadership, and they perceived lack of lived experiences as contributing to their approach to fulfilling the Wales specific duties, and the development of inaccessible transport. They noted a need for better representation, and for senior leaders to receive more and better disability awareness and equality training, including a better understanding of the PSED and Wales specific duties, and other national policies and legislation related to advancing equality in Wales. They thought Welsh Government had recently demonstrated good aspirations for accessible and inclusive public transport, but that the implementation thus far had been poor.

## 5. Conclusion and recommendations

Overall, we found inadequate equality considerations for older and disabled people in public transport strategies and policies in Wales. The lack of focus on addressing persistent inequalities for older and disabled people was reflected in our findings from the focus groups. Older and disabled people told us that they found the public transport system in Wales largely inaccessible. They had faced a broad range of barriers to travel in a system that did not conform to the social model of disability or support their independence. Consequently, they felt their opportunities had been limited, leaving them left behind.

For public transport to become accessible and inclusive, public bodies must better respond to the needs of older and disabled people. This research has identified that better consideration and integration of equality into transport strategies and policies, using the Wales specific duties as a guide, will ensure that public bodies meet the aims of the PSED. This includes duties such as engaging with older and disabled people, conducting an equality impact assessment, and having a monitoring and evaluation plan. Alongside this, public bodies should consider the key barriers to accessible transport, such as accessible information, services and staff support, and develop SMART,<sup>11</sup> outcome-focused objectives, interventions and actions around these barriers. We believe this would support the development of an accessible and inclusive public transport system in Wales.

Therefore, when public bodies develop or update public transport strategies and policies, we would expect to see:

- SMART, outcome-focused objectives, and interventions to address the most pressing and persistent inequalities in public transport and to create an inclusive and accessible public transport network
- evidence of meaningful early engagement with representatives for and with older and disabled people, in the spirit of co-production, and demonstration of how this has informed decision-making in the equality impact assessment, and equality considerations in the strategy or policy

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<sup>11</sup> Stands for Specific, Measureable, Achievable, Realistic, Time-bound.

- demonstration of how equality evidence has been used to identify the key equality themes to consider in the equality impact assessment, and to incorporate into the strategy or policy
- completion and publication of an equality impact assessment, and demonstration of how this has informed the final strategy or policy, and what steps will be taken to overcome any negative impacts
- a monitoring and evaluation framework that includes SMART, outcome-focused equality indicators, and monitors the expected impacts from the equality impact assessment, and
- use of procurement powers to acquire public transport services that are accessible and inclusive.

Furthermore, public bodies should consider the following recommendations based on the key barriers to accessible and inclusive public transport identified in the focus groups, and develop SMART, outcome-focused objectives, interventions and actions around these issues and opportunities:

- Public bodies and transport operators should ensure that all people involved in the planning and development of public transport policies, strategies or services receive disability awareness and equality training, and are aware of relevant statutory obligations.
- Public bodies and transport operators should ensure that resources for journey planning are accessible, and are available online and off-line, in a variety of accessible formats. To support this, Welsh Government should consider introducing a voluntary standard for accessibility of public transport information, co-developed with groups including older and disabled people.
- Frontline staff working in public transport should receive mandatory disability awareness, equality and assistance training that is delivered to a minimum standard, and on a regular ‘refresher’ basis, as part of a programme of positive and supportive staff engagement and development. They must uphold their responsibilities under transport operator policies, and the Equality Act (2010), which enable older and disabled people to travel.
- Public bodies should only procure public transport services and infrastructures that are accessible and inclusive, meeting modern accessibility standards.

- New and existing bus and rail vehicles must meet modern accessibility standards, such as 'PSVAR'<sup>12</sup> and 'PRM TSI'.<sup>13</sup>
- New and existing bus and rail infrastructures including stops, stations and transport hubs should be accessible and inclusive, meeting minimum standards and guidelines for accessibility of public facilities and services. Infrastructures that are not fully accessible should have an improvement action plan.
- Welsh Government, local authorities and transport operators should work in partnership, where applicable, to ensure that all components of the public transport system are accessible and compatible with one another.
- Train operators must provide guaranteed passenger assistance when it is requested by 10pm the day before travel, and with no more than six hours' notice from April 2021, and no more than two hours' notice from April 2022.<sup>14</sup> Steps should be taken towards offering 'turn up and go' (passenger assistance without the need for advance booking) as standard in all mainline rail stations.
- To meet demand for accessible vehicles, local authorities should use their powers under the Equality Act to incentivise a proportion of taxi and private hire vehicles licensed to be accessible, and then publish a list of these designated vehicles.

We also recommend that, in the next national transport strategy, Welsh Government:

- demonstrates leadership to other public bodies, by showing due regard to the PSED and Wales specific duties, and applying these effectively (due regard should also be extended to other important legislation and conventions such as the UNCRPD).

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<sup>12</sup> [The Public Service Vehicles Accessibility Regulations 2000 \(PSVAR\)](#) – all buses had to be accessible by 1 January 2017.

<sup>13</sup> [Commission Regulation \(EU\) No 1300/2014 \('PRM TSI'\)](#) – mainline trains built from 2010, and all trains built earlier, had to comply with these standards by 1 January 2020.

<sup>14</sup> [Office of Rail and Road \(2020\), 'Accessible travel policy guidance for train and station operators: September 2020 edition.'](#)

- aligns equality considerations with the social model of disability, which the National Assembly for Wales (now Senedd Cymru) adopted in 2002<sup>15</sup>, and
- sets key equality outcomes that local transport authorities must integrate and work towards in local transport strategies, setting a framework for delivery of accessible public transport across Wales.

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<sup>15</sup> The Welsh Government has recently renewed its commitment to the Social model, through its [Action on Disability: The right to independent living framework and action plan](#) and seeks to embed it in all its work and encourage Welsh public services to do the same.

# Bibliography

Anglesey, Conwy, Denbighshire, Gwynedd (Arfon and Dwyfor), Flintshire, and Wrexham Local Authorities (2015), 'The North Wales joint local transport plan.' [accessed: 25 September 2019]

Blaenau Gwent, Caerphilly, Merthyr Tydfil, Rhondda Cynon Taf, Torfaen local authorities (2015), 'The South East Wales local transport plan.' [accessed: 25 September 2019]

Bridgend County Borough Council (2015), 'Local transport plan.' [accessed: 25 September 2019]

Carmarthenshire County Council, City and County of Swansea, Neath Port Talbot County Borough Council and Pembrokeshire County Council (2015), 'The South West Wales local transport plan.' [accessed: 25 September 2019]

Ceredigion, Gwynedd (Meirionnydd), and Powys Local Authorities (2015), 'The Mid Wales local transport plan.' [accessed: 25 September 2019]

City of Cardiff Council (2015), 'City of Cardiff council local transport plan.' [accessed: 25 September 2019]

Equality Act 2010, s.149. [accessed: 25 September 2019]

Equality and Human Rights Commission (2018), 'Is Wales fairer?' [accessed: 25 September 2019]

Monmouthshire County Council (2015), 'Monmouthshire county council local transport plan.' [accessed: 25 September 2019]

Newport City Council (2015), 'Newport City council local transport plan.' [accessed: 25 September 2019]

The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. [accessed: 25 September 2019]

United Nations (2006), 'Convention on the rights of persons with disabilities and optional protocol.' [accessed 25 September 2019]

Vale of Glamorgan Council (2015), 'Vale of Glamorgan local transport plan.' [accessed: 25 September 2019]

Wellbeing of Future Generations (Wales) Act 2015. [accessed: 25 September 2019]

Welsh Assembly Government (2008), 'One Wales: connecting the nation - the Wales transport strategy.' [accessed: 25 September 2019]

Welsh Government (2013), 'The strategy for older people in Wales 2013-2023.'  
[accessed: 25 September 2019]

Welsh Government (2017), 'Policy statement – accessible and inclusive public transport objectives.' [accessed: 25 September 2019]

# Contacts

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Questions and comments regarding this publication may be addressed to: [correspondence@equalityhumanrights.com](mailto:correspondence@equalityhumanrights.com). We welcome your feedback.

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## EASS

For advice, information or guidance on equality, discrimination or human rights issues, please contact the [Equality Advisory and Support Service](#), a free and independent service.

Telephone 0808 800 0082

Textphone 0808 800 0084

Hours 09:00 to 19:00 (Monday to Friday)

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