

# MAYOR OF LONDON

**Dr Alison Moore AM**

Chair of London Assembly Transport Committee  
C/o [Haley.Bowcock@london.gov.uk](mailto:Haley.Bowcock@london.gov.uk)

**Our ref:** MGLA180320-5475

**Date:** 26 October 2020

Dear Alison,

I am responding to the Acting Chair of the Transport Committee's letter of 17 March regarding your Committee's investigation into accessible and inclusive transport in London. Please accept this as a joint response from myself and Transport for London (TfL), along with my apologies for the delay in replying. I hope you will understand that we have been working under considerable pressure in recent months and it has not been possible to respond to all correspondence as quickly as we would have liked.

There is clearly a lot of common ground between us in our views about the pivotal role of transport in creating an inclusive city.

No doubt you will be aware that a considerable amount of TfL's time and resources have been and are currently focused on managing its response to the global pandemic and the human and financial impact that it is having on transport. This work has included engagement with stakeholders advocating for greater accessibility and inclusion. Earlier this year, TfL created a new Social Impact Steering Group, a Rapid Equality Impact Assessment process and set up weekly meetings with its Independent Disability Advisory Group, to help deliver a safe and inclusive restart and recovery.

Although huge progress has been made in recent years to improve the accessibility of the transport network, we recognise that some customers with protected characteristics still face a number of barriers when using our services and travelling on London's streets. Despite all of the challenges we face as the situation evolves, we remain committed to delivering a more inclusive transport network where everyone is able to make seamless, safe, affordable and accessible journeys from their front doors to their destination.

By using an inclusive design approach – to put people at the heart of the design process – we will be able to make streets, stations, transport spaces and places more accessible and appealing. This will support our aim to make walking and cycling the preferred choice, especially for shorter trips, and public transport the best option for longer journeys. An inclusive transport network will also support my commitment to social integration; helping to reconnect communities.

# MAYOR OF LONDON

Integral to our success will be our ability to understand the barriers faced by some of London's communities in getting to where they want to go. The 2019 update of the Understanding our Diverse Customers report will help us to do that. This report gives us a rich picture of different travel patterns, behaviours and attitudes towards issues such as accessibility, fares, personal safety, security and customer satisfaction.

Using this data to generate insights, we are able to take an evidence-based approach to decision making. Equality Impact Assessments are the way in which we can identify and support all our customers who use our stations, buildings, interchanges, facilities, open spaces and public places. In this way, we will be able to create environments that everyone can use – confidently, independently and making choices best suited to them.

I would like to assure you that your recommendations have been fully considered and will be taken forward wherever possible. Further detail on TfL's response to the recommendations is attached.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sadiq Khan', with a small '2' written below the name.

**Sadiq Khan**  
Mayor of London

# MAYOR OF LONDON

## RESPONSE TO RECOMMENDATIONS

### **Recommendation 1**

By August 2020, TfL and Network Rail should report back to the Committee on how they plan to further embed inclusive design principles in their business planning. This includes consultation with the major transport operators delivering services on TfL and Network Rail networks.

Inclusive design puts people at the heart of the design process, ensuring they can use the transport network safely, easily and with dignity. It acknowledges diversity and difference and is responsive to people's needs. Transport for London (TfL) must understand the diversity of all transport users so the needs of as many people as possible, including those with non-visible impairments, such as autism and dementia, can be accommodated.

TfL is working to embed inclusive design within its scheme design and development processes. This involves the creation of inclusive design principles, access appraisals on schemes and a new senior level design check. This check will take place at the completion of the design and ensure the scheme still aligns with the Mayor's Transport Strategy objectives.

To achieve inclusive design, designers are needed who understand the diverse requirements of transport users. TfL has already worked in partnership with the Design Council to create a bespoke Inclusive Design training programme, which has been used by more than 200 employees so far. Going forward, TfL will offer training to enable staff members to carry out detailed, independent, Access Appraisals. TfL is leading on the world's first Design for the Mind standard with the British Standards Institution to help inform the way that transport networks and other spaces and places can be more inclusive for people who are neurodivergent.

It is also important that TfL involves potential users in the design process and takes an evidence-based approach to design, evaluating the impact of the scheme with users once it is in place. TfL will continue to do this through its existing consultation and engagement mechanisms. TfL will also work with suppliers and embed inclusive design into its procurement work so that it is built into any relevant work carried out by operators. TfL does of course regularly consult with transport operators and has done so throughout the coronavirus pandemic.

### **Recommendation 2**

As part of the release of the Access and Inclusion Plan in 2020, TfL should include a robust and strategic plan for how the organisation will improve its stakeholder engagement and consultation mechanisms. This should consider how the perspectives of disabled and older people can inform not just the planning and design of infrastructure and services, but the ongoing monitoring of the impact and effectiveness of services.

The 'Access and Inclusion Plan' will be published as TfL's new equality, diversity and inclusion strategy. Work on the strategy has restarted following a pause of six months while TfL responded to the global pandemic.

TfL will only achieve the aims of the Mayor's Transport Strategy if it makes London's transport network accessible and inclusive to all Londoners. It is therefore vital that TfL continues to engage with stakeholders and customers to better understand what they want and need, the challenges

# MAYOR OF LONDON

they face and their ideas for future transport schemes and services. By learning from their experiences, and working with them to develop solutions, TfL can deliver the best transport system for all of London's diverse communities.

TfL has a number of mechanisms for engaging with disabled and older stakeholders. As part of the Equality Impact Assessment process (EqIA), TfL engages with stakeholders early on, as well as throughout project and programme delivery. This process can also flag the need to engage with specific groups such as the valuing people network and the stakeholder accessibility forum.

TfL's Independent Disability Advisory Group (IDAG) provides strategic and practical recommendations, which are based on best practice for inclusion and accessibility, informed by evidence and supported by lived experience. The 10 paid members of the group have a variety of professional expertise and lived experience of disability, including expertise in access or disability issues, transport, policy, customer experience and marketing. The members are not employed by TfL or the Greater London Authority to ensure the group's independence.

In 2019, IDAG reviewed a number of projects and programmes, such as:

- station upgrades;
- technology-based projects;
- changes to ticketing systems;
- the redesign of TfL's disability equality training;
- the Access All Areas event;
- TfL's EqIA process;
- uniform changes and signage; and
- step-free criteria and cycling infrastructure.

TfL's Valuing People group was established in February 2007 and has been funded by TfL since April 2011. The group has representation from most of London's boroughs and a high level of membership of people with learning disabilities. In 2019, the group provided feedback on TfL's Deep Tube Upgrade Programme; the Easy Read version of the Accessible Travel leaflet; Vision Zero bus driver training; continuous footways; and the trial of blue warning lights at Baker Street. The group also participated in smaller consultation sessions and site visits with TfL roadworks teams and construction partners, in order to ensure that construction projects have safe and inclusive routes for pedestrians that may have to re-route their journey.

TfL established its quarterly Accessibility Stakeholder Forum in August 2018, to deepen its engagement with older and disabled people. The forum invites over 20 different organisations representing disabled and older people to discuss issues with TfL's senior team and is led by the chair of IDAG. This ensures there is a critical link between these two key advisory groups for the organisation. The Forum last met in July 2020, when TfL ran an inclusive Streetspace event.

Established in 2009, TfL's Youth Panel consists of around 25 volunteers, aged 16 to 25, who regularly travel in London. The elected executive committee of the Youth Panel includes officers responsible for diversity and inclusion, and engagement.

The Youth Panel is now involved in policy development, working together to support TfL in its understanding of the impact of the global pandemic on young people.

# MAYOR OF LONDON

As part of TfL's consultation process, its EqlAs ensure TfL identifies and contacts local groups who represent people who fall under the nine protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation). The EqlA demonstrates how TfL will consider these groups in the design of schemes, construction and post construction.

TfL has various mechanisms for engaging with disabled and older stakeholders by monitoring the ongoing impact and effectiveness of its highway schemes post implementation. Monitoring strategies may include activities such as collision data analysis (continuous, for at least three years to establish the full impact of a scheme); CCTV traffic monitoring; traffic and pedestrian surveys; parking and loading reviews; bus surveys; review of reports of crime and petty theft; and regular liaison meetings with amenity and resident groups and key stakeholders. A Stage 4 Road Safety Audit may also be carried out, using 12 months of collision data following completion of a scheme. The Audit identifies any road safety problems and proposes recommendations for remedial action. TfL will explore how it can improve its monitoring of the accessibility and inclusion impacts and will engage with IDAG and other stakeholders.

## **Recommendation 3**

To ensure accessibility upgrade failures from the past are not repeated, all future major infrastructure projects by TfL and Network Rail should have dedicated specialist access and inclusion representation on the project boards.

Making the public transport network more accessible is a top priority for TfL and the Mayor, and TfL has worked hard to update its infrastructure where it has been feasible to do so. That is why TfL has invested significantly to make more than two thirds of its trains fully accessible and more than 200 Tube and rail stations step-free.

Over the last decade, TfL has introduced new trains on the Circle, District, Hammersmith & City and Metropolitan lines and replaced the trains on the Victoria line. When fully open, the Elizabeth line will completely transform the accessibility of the transport network for passengers across London and the South East.

In January 2020, TfL's Piccadilly line upgrade team engaged with IDAG stakeholders to share the latest design concept of the new Siemens trains. IDAG members gave constructive and helpful feedback from a range of perspectives on key design features of the new Piccadilly line trains including grab-pole positioning and colour contrasting; positioning of pictograms to better demarcate the wheelchair positions; and emergency alarm signage.

TfL also engaged with the TfL Accessibility Forum to discuss the trains, and members of the forum provided valuable insight into the accessibility needs of visually impaired people. The project team committed to further engagement later this year with forum members to review full-size mock-ups of parts of the train interior layout.

TfL also proactively engaged with IDAG about the train design for the new DLR rolling stock. These comments have changed various elements, such as the seat layout and design of the wheelchair area. TfL is confident that engagement like this, as well as the introduction of Access Appraisals for major projects, will go some way to tackling the issues raised in the Assembly's review.

# MAYOR OF LONDON

## **Recommendation 4**

By August 2020, TfL should add Thameslink to the Tube Map. Thameslink offers fully accessible and frequent rail journeys, and raising awareness of the availability of this service will open up a significant part of the transport network for everyone, in particular for disabled and older passengers.

London's Rail and Tube services map, which can be found at most Tube and rail stations across London as well as online, shows all rail services in London, including Thameslink. This is jointly developed by TfL and the Rail Delivery Group and helps to preserve the iconic Tube map. Rail services are also included in TfL's Journey Planner tool.

The Tube map only shows all services operated by TfL, including the London Overground and DLR. These TfL services, that will also include the Elizabeth line, accept pay as you go with Oyster and Contactless payments along their entire routes, and are all 'turn up and go' services for customers with accessibility needs. Assembly Member Caroline Pidgeon has raised this issue with the Deputy Mayor for Transport, who is looking at this suggestion further with TfL.

## **Recommendation 5**

TfL and Network Rail should collaborate to develop a mechanism through which people can access integrated information about accessible journeys across all transport modes, in real time. This must include detail regarding the status of accessibility features, such as step-free access, lift operability, availability of staff assistance, and toilets. By August 2020, TfL should report back to the Committee on its plan for development.

TfL will continue to look for opportunities to work with Network Rail and other transport providers to provide joined up information to customers.

TfL provides a range of Tube, rail, river and accessibility guides in a variety of formats, including paper. TfL staff continue to offer help and advice, as well as printed customer information, including the Accessible Travel in London leaflet and accessibility guides to Tube and London Overground stations, and London boroughs.

Showing step-free access to every platform on TfL's paper maps is complicated, given the amount of information that needs to be conveyed. TfL's Step-Free Tube Guide, available on the TfL website and at stations, shows the accessibility of individual platforms. This is reviewed regularly to ensure accuracy and TfL will continue to look at ways to present this information in an accessible way.

TfL currently has near to real-time updates on the status of its lifts for the Tube. Underground station staff record any changes in the status of their lifts using the staff Real-Time Information app, which TfL provides as open data. TfL is working to make this available to TfL Rail, London Overground and DLR staff as soon as they are able.

TfL also has a range of digital channels to communicate with customers in real time. These include its website, Journey Planner, the TfL Go app, Facebook and Twitter TravelBot, social media and open data feed, which powers hundreds of third-party apps. Its accessibility dataset, made available to app developers and third-party websites, enables people to plan step-free and accessible journeys. TfL has been auditing, testing and updating its webpages and apps to comply

# MAYOR OF LONDON

with Government accessibility regulations. To help improve the digital products it produces, TfL's Technology and Data team has set up a Digital Accessibility lab, equipped with assistive technologies, for its teams to test the products they are developing and ensure they are more accessible in terms of design and information.

## **Recommendation 6**

TfL, Network Rail and other major transport operators delivering services on TfL and Network Rail networks (including taxis and private hire vehicles) should work together to develop standardised disability equality and inclusive transport training, that can be rolled out across transport providers. This will enhance the consistency of service delivery across modes

TfL has been sharing its award-winning Disability Equality Training programme with colleagues from other organisations including the Department for Transport (DfT). As members of the DfT's Inclusive Transport Network, TfL has also been sharing the principles of good training with other national providers as part of the DfT's commitment to creating minimum standards in this area.

TfL also leads the way in developing and delivering training in EqlAs and Inclusive Design. TfL will seek to build on the 1,300 people who have been trained in 2019/20 on Inclusive Design and Disability Equality, as well as the 700 dementia friends, once London safely emerges from the lockdown.

## **Recommendation 7**

Considering the consistently poor statistics on Dial-a-ride and Taxicard service provision:

TfL should conduct a review into the Dial-a-ride service, to identify key areas of improvement and develop a strategy to address the issues related to inconsistent and unreliable service provision; and

TfL's Taxi and Private Hire Directorate should work with London Councils to review how the Dial-a-ride and Taxicard services can be better coordinated across Boroughs, including considering whether they can have common eligibility criteria.

As part of the Assisted Transport Services Roadmap, TfL is working to bring door-to-door services such as Dial-a-Ride into the 21st Century, while retaining an ongoing focus on day-to-day performance. There were notable performance improvements with Dial-a-Ride in the last financial year, with the service exceeding its target of 90 per cent of trip requests scheduled by four percentage points. These performance improvements have, in part, been achieved through working in close partnership with delivery partners such as Community Transport Groups and TfL's taxi consolidator, City Fleet (who deliver Taxicard under contract to London Councils), to improve scheduling efficiency. TfL is also beginning the process of procuring a new booking and scheduling system, which will bring further benefits to scheduling efficiency as well as the option of web and smartphone-based bookings for customers.

TfL and London Councils have been working together to improve the contract management regime underpinning the Taxicard service over the last year, and these efforts have resulted in considerable improvements to the performance of that service as well. In June 2020, it exceeded its performance target by one percentage point, with 96 per cent of bookings delivered within the

# MAYOR OF LONDON

Service Level Agreement. TfL is also working closely with London Councils to ensure better co-ordination of Dial-a-Ride and Taxicard services across London and to promote the objectives of the Assisted Transport Services Roadmap. The TfL Assisted Transport team hold monthly meetings with colleagues at London Councils where opportunities for joint projects, for example, the TfL procurement of the new booking and scheduling system (highlighted above) are identified and progressed.

TfL Assisted Transport representatives attend regular meetings, chaired by London Councils, that bring together the borough officers responsible for local Taxicard arrangements; officers are working as part of this group to promote greater co-ordination across London's door-to-door services. Through this group, it is hoped that a common position may be developed over time that may enable greater consistency over Taxicard eligibility criteria, which is a feature of the scheme that is determined at a borough level under the legal arrangements upon which Taxicard is operated.

Regular meetings are also being held between TfL Assisted Transport, the TfL Taxi and Private Hire Directorate, London Councils, City Fleet and representatives of the taxi trade in London, in order to identify ways to improve the supply of drivers to Taxicard and to cover Dial-a-Ride journeys where a taxi is more efficient to use than a multi-occupancy bus. Recent discussions at this forum have contributed to the development and piloting of a new 'driver app'. This has allowed Taxicard and Dial-a-Ride journeys to be offered to a greater number of London taxi drivers than was previously the case.

## **Recommendation 8**

TfL should expand its travel mentoring programme, to increase the number of disabled passengers using the transport network independently and with confidence. By August 2020, TfL should report back to the Committee on its plan to expand the TfL travel mentoring scheme.

TfL has a team of Travel Mentors who offer journey planning support and advice to customers. In addition, they accompany customers on practice journeys to help them gain confidence and knowledge so that they can travel independently across the network.

Due to COVID-19, TfL's planned review of its travel mentoring programme was paused. An interim review was carried out to identify new objectives and safe systems of work for the Travel Mentors in light of the need for social distancing when delivering any mentoring activities. The travel mentor team are now working fully, having made the necessary adjustments to comply with government COVID guidelines.

## **Recommendation 9**

By August 2020, TfL should report back to the Committee regarding the impact of its public awareness campaigns, including 'Travel Kind' and support for 'Look Up', and update on any future plans.

TfL has launched several campaigns to increase awareness of the needs of disabled passengers and to encourage more considerate behaviour by others. This includes the Please offer me a seat badge, annual Priority Seat Week (which sadly did not run this year), and the regular Look Up campaign – asking customers to look up to see if anyone needs their seat. This activity was supported by research TfL commissioned that showed one in four people feel uncomfortable offering a seat to someone who might need it more and almost a third of passengers believe they should offer their seat only if they are in a priority seat.



# MAYOR OF LONDON

TfL continues to provide Baby on Board badges for pregnant women, to make it easier for other passengers to know they may need a seat. Messages on buses also ask customers to move to the back of the bus or upper deck, enabling more space on the lower deck for customers with accessibility needs.

TfL will continue to educate passengers about how they can help people with accessibility needs, such as leaving priority seats free, looking up to see if another customer requires their seat or moving to the back or upper deck on buses. Following the Government's guidance on face coverings, TfL is mindful that a number of disabled people and those with breathing difficulties may not be able to wear them. These customers can print a face covering exemption card from the TfL website or order a free face covering exemption badge from TfL to let staff, British Transport Police and other customers know that they are exempt.

## **Recommendation 10**

By December 2020, TfL and Network Rail should roll out the sunflower lanyard scheme to eligible passengers, for use on London's transport network.

TfL now formally recognises the sunflower lanyard and is a partner of the scheme. TfL staff are trained to recognise and assist customers who choose to wear the sunflower lanyard.