

**FROM**

**STEP-FREE**

**TO STRESS-FREE**

**ACCESSIBLE AND INCLUSIVE TRANSPORT IN LONDON**



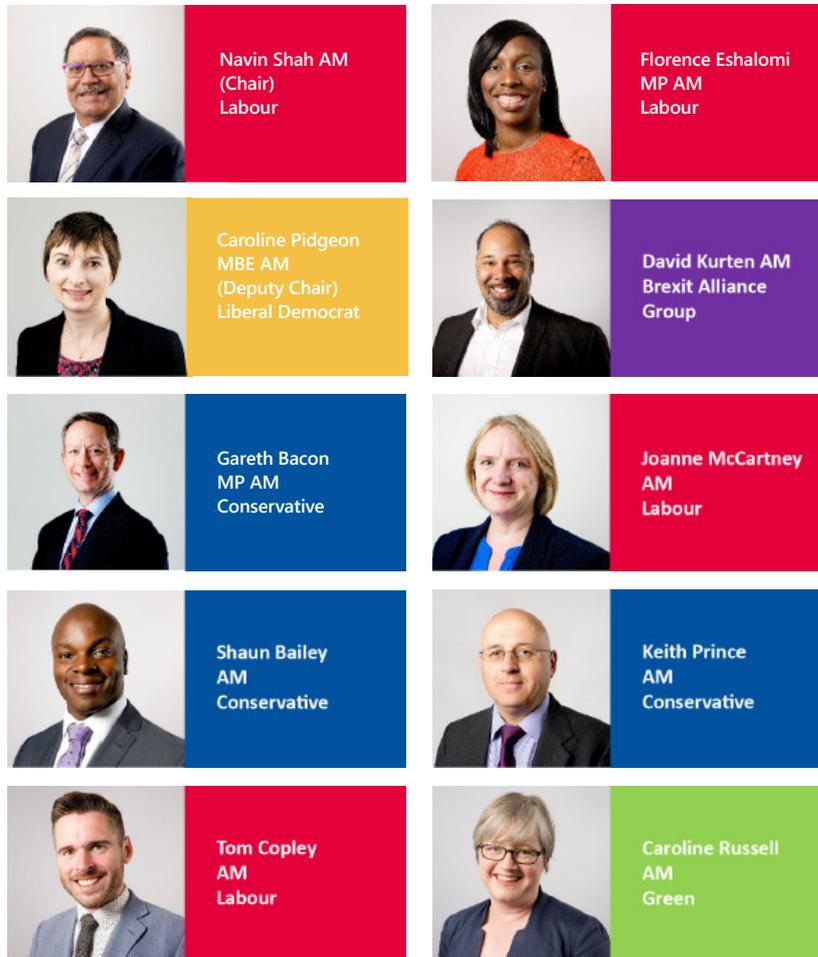
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# Transport Committee



The Transport Committee holds the Mayor and Transport for London to account for their work delivering the capital's transport network. The committee examines all aspects of the transport network and presses for improvements on behalf of Londoners.

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# Chair's Foreword



## **Caroline Pidgeon MBE AM**

### **Deputy Chair (Acting as Chair) of the Transport Committee**

Everyone should be able to access public transport and London's streets easily, comfortably and confidently. Yet we know there are many barriers, visible and invisible, that exclude disabled people, older people and parents with children. This report sets out how we can start to tear down those barriers.

This report is based on hearing directly from disabled people, with extensive written submissions from disability organisations and disabled people, but also from oral evidence given to us.

Practical solutions are available and some can be made very quickly, starting with TfL simply putting the fully accessible Thameslink line on the Tube map. Important changes can also be made through better staff training. And while it will take many years to introduce some infrastructure improvements, we should never settle for delays in schemes that have long been planned.

An accessible and inclusive transport system benefits everyone. This report sets out how we can start to make that a reality.

I would like to take this opportunity to thank those who contributed to our investigation, in particular those members of the public who took the time to attend our open microphone hearing at City Hall.

# Executive Summary

It is essential that everyone can access public transport and London's streets to travel between homes, jobs, education and leisure activities across the city. There remains, however, a range of challenges to everyone moving around the capital comfortably and confidently. London's streets and public transport system can be prohibitively excluding, as they present several visible and invisible barriers to their use for disabled people, people using mobility aids, and older people. People with buggies or passengers with luggage can also find the network difficult to navigate.

An accessible and inclusive transport system creates benefits for everyone. All transport modes should be accessible, navigable and usable to the greatest extent possible by all people regardless of their age, ability or disability. It also gives disabled and older people equal access to economic, professional and social opportunities. To build on the Mayor's Transport Strategy (MTS)<sup>1</sup> and other related strategies, the Mayor and Transport for London (TfL) are planning to publish an Accessibility, Diversity and Inclusion Action Plan (Action Plan) later in 2020.

In October 2019, the Transport Committee began an investigation into the accessibility and inclusivity of London's transport network and streets. The investigation involved two Committee meetings and a call for evidence, for the purpose of:

- challenging the Mayor, TfL and other London transport network operators on current activity to make London's streets and public transport accessible and inclusive;
- raising awareness with these key decision-makers about the barriers and challenges to everyone confidently and flexibly moving around London's streets and on public transport; and
- questioning TfL on the priorities for its forthcoming Action Plan.

The first Committee meeting heard from an expert panel of guests, including representatives from TfL, Network Rail and Transport for All. The second Committee meeting was an 'open-mic' forum, during which 25 representatives, from organisations campaigning for or involved in work on accessible transport, provided invaluable input on their perspectives of barriers to travelling flexibly and confidently around London. In the call for evidence, we received submissions from individual Londoners and a broad range of stakeholders including transport consumer groups, taxi companies and drivers' unions, charities and service providers, residents' associations, and London Borough Councils. This work also provides an evidence base for the Committee's input into TfL's forthcoming Action Plan.

Our deliberations found that:

- the connectivity of infrastructure and services across different transport modes and providers needs to be improved, in order to enhance the journey experience of disabled and older passengers. Engagement with expert stakeholders on accessible and inclusive planning and

design is seen as a critical mechanism to achieve this;

- the limitations of the current system exacerbate the problems experienced by disabled and older people when accessibility features or services break down, prolonging journeys or leaving passengers stranded. Significantly improving communication, in real-time and integrated across different modes, could go some way to minimise the impact of these system failures; and
- the support of well-trained, informed and skilled staff, available and willing to provide assistance, is integral to assisting disabled and older passengers to travel more comfortably.

The key findings presented in this report are drawn from the evidence we reviewed and represent the issues that we heard about repeatedly from different perspectives and often with a variety of solutions proposed. The recommendations target the key areas of action where work is required to improve the inclusivity and accessibility of London's transport network and streets.

## **RECOMMENDATION 1**

### **EMBEDDING INCLUSIVE DESIGN IN PLANNING**

**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.**

## **RECOMMENDATION 2**

### **STAKEHOLDER ENGAGEMENT AND CONSULTATION**

**As part of the release of the Accessibility Diversity and Inclusion Action 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.**

## **RECOMMENDATION 3**

### **COLLABORATION ON MAJOR INFRASTRUCTURE PROJECTS**

**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.**

## **RECOMMENDATION 4**

### **ADDING THAMESLINK TO THE TUBE MAP**

**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.**

## **RECOMMENDATION 5**

### **ACCESSING INTEGRATED INFORMATION IN REAL TIME**

**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 stepfree access, lift operability, availability of staff assistance, and toilets. By August 2020, TfL should report back to the Committee on its plan for development.**

## **RECOMMENDATION 6**

### **DISABILITY INCLUSION AND EQUALITY TRAINING FOR STAFF**

**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.**

## **RECOMMENDATION 7**

### **DIAL-A-RIDE AND TAXICARD SERVICE PROVISION**

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.

## **RECOMMENDATION 8**

### **TfL TRAVEL MENTORING**

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.

## **RECOMMENDATION 9**

### **PUBLIC AWARENESS CAMPAIGNS**

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.

## **RECOMMENDATION 10**

### **'SUNFLOWER LANYARD' SCHEME**

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

# Introduction

“ An inclusive and accessible transport network means that all forms of transport should be available to be used without constraint by, amongst others, transport operatives and, where appropriate, all members of the public. ”

Peter Johns, call for evidence submission

It is estimated that approximately 19 per cent of London’s population have a disability as recognised under the Equality Act 2010.<sup>2</sup> In terms of age, approximately 28 per cent of London’s population are aged over 50 – with 16 per cent aged between 50 to 64, 9 per cent aged between 65 to 79, and 3 per cent aged 80 and older.<sup>3</sup> As London continues to grow – with the population expected to reach 10.4 million by 2040 – it is imperative that the Mayor, TfL, Network Rail and other transport operators ensure that everyone can move freely across all modes of transport, including London’s streets.

London’s extensive transport system is delivered by both public and private services. According to the MTS, 63 per cent of all journeys in London were made on public transport services.<sup>4</sup> The Mayor and TfL are responsible for much of London’s public transport network, alongside key partners such as the Borough Councils and Network Rail. The MTS sets out that “making the public transport system more accessible and inclusive is critical to delivering a better whole journey experience for disabled people and the growing number of older people and will also ensure that public transport is easier to use for all Londoners”.<sup>5</sup>

The Committee adheres to the social model of disability. This means that our investigation has focused on how characteristics of the built environment need to change to remove disabling barriers.



## **Social model of disability**

Disabled people have for over two decades advocated the use of the social model of disability. This model holds that it is barriers to access in the physical, sensory, and social environment that cause disability, where disability is defined as the lack of opportunity to participate in mainstream activities. This is in contrast to the "individual or medical model of disability", which holds that there is a causal link between impairment and disability - that is, someone who has an impairment such as a mobility or visual impairment is necessarily disabled and thus unable to participate in mainstream activities.

The social model holds that people with impairments are disabled when society fails to take account of their needs, so disability is contingent upon an inaccessible environment, not an impairment.<sup>7</sup> For example, under the social model of disability, the inability of wheelchair users to participate in an activity does not result from their use of a wheelchair, but from the activity being held on an upper floor of a building without a lift. Similarly, the inability of someone with a visual impairment to participate in discussions at a meeting does not result from their impairment, but from the briefing paper being tabled, rather than being provided in a timely fashion (i.e. before the meeting) in an accessible format.

## **Key definitions from the Mayor's Transport Strategy:<sup>6</sup>**

**DISABILITY** "As defined by the Equality Act 2010, a physical or mental impairment that has a 'substantial' or 'long-term' negative effect on a person's ability to do normal daily activities."

**ACCESSIBILITY** "...how easy it is for people to use London's streets and public transport to get to places, jobs, homes and services, considering particularly the needs of older and disabled people."

**INCLUSION** "...removing barriers and taking steps to create equality, harness diversity and produce safe, welcoming communities and cultures that encourage fresh ways of thinking and allow people to speak up, especially to suggest where things could be done better."

# 1

## Accessible and Inclusive Design: Enhancing Connectivity of Infrastructure and Services Across All Transport Modes

An accessible and inclusive transport system means that ....

“ ...other transport users [are not prioritised] at the cost of protected groups, other vulnerable pedestrians and users of public transport. ”

Enfield Town Residents Association, call for evidence submission

“ ... blind and partially sighted people, both young and older, disabled, ethnic minority and low-income Londoners are able to travel on the network with ease and comfort whenever and wherever they may choose to do so. ”

London Vision, call for evidence submission

### KEY FINDINGS

- 1** Different levels of accessibility and inconsistency of support services provided across the various transport operators and modes restrict flexibility and mobility of disabled and older passengers.
- 2** A more coordinated approach to transport operators' design and roll-out of infrastructure and service upgrades is needed to enhance connectivity and consistency across different transport modes.
- 3** Design features that were intended to enhance mobility/freedom of movement for one group have inadvertently created barriers for disabled and older people. A holistic approach to planning and design is required to achieve a better quality of design, that removes barriers and delivers intended benefits.
- 4** Attempts to improve accessibility and inclusivity, either through physical upgrades or improving communication platforms, often do not deliver the intended benefits, as the design is not accurately informed by disabled and older passengers.

## Retrofitting existing infrastructure

London's extensive public transport system is both a connector and a divider. Covering roads, railways, and waterways, the network moves people and goods across the capital; but the Victorian infrastructure, complex urban design, and extensive use of the network and infrastructure, can make travelling through or accessing neighbourhoods difficult. The transport system needs to address all such barriers and cater for journeys made by disabled people and older passengers. These include mental health conditions, long-term health conditions, impaired mobility, and visual or hearing impairments. The Mayor and TfL's ambitions for a more accessible and inclusive transport network include removing these visible barriers for disabled and older people, as well as making it easier to use for all Londoners.

Both visible and invisible barriers impact on the journey of disabled and older passengers. During this investigation, the Committee heard that common challenges include:

- kerbs, street clutter and level or non-tactile paving on pathways near pedestrian crossings, bus stops and surrounding stations;
- inaccessible stations due to no lifts being available between street and platform, and/or gaps between the train and platform, and lack of ramps;
- poor lighting and lack of clear signage at some stations;
- inaudible audio announcements on buses and trains;
- overcrowding on transport services and lack of seating;
- restricted access to toilets (if available at all);
- lack of safe spaces within stations;
- the conflict between wheelchair users and people with prams/buggies to share the designated accessible space on buses;

- insufficient staff at stations or negative interactions with staff or members of the public.

The accessibility of London's public transport system differs significantly between transport modes and operators. As a result, the disconnected nature of the network creates significant inconsistency in how everyone can travel across the network. TfL has been steadily retrofitting transport network infrastructure across the capital to help make it more physically accessible for all. For example, TfL report that 95 per cent of bus stops are now accessible to wheelchair users, and the DLR and Tram network are entirely step-free.<sup>8</sup> There are now around 200 step-free stations across London's transport network, including: 79 step-free Tube stations (29 per cent of the total 270 Tube stations), 60 Overground stations, and 27 TfL Rail stations.<sup>9,10</sup> By spring 2020, TfL had planned to deliver an additional 11 step-free Tube stations, meaning that still only 33 per cent of stations would be step-free.<sup>11</sup> The Committee is disappointed that TfL will not deliver to this timeline, as these 11 stations are expected to become step-free later in 2020.<sup>12</sup>

Step-free upgrades can open up several routes on London's transport network for disabled and older people, broadening their access to various professional, educational and leisure opportunities across the capital. The delays in TfL's step-free programme can therefore have a significant impact on the quality of life for these groups. It is absolutely essential that priority funding for step-free upgrades is maintained to ensure everyone, in particular disabled and older passengers, can access the transport network flexibly and confidently.

Inaccessible infrastructure and services that restrict or exclude disabled and older people are a product of poor design. Without a coordinated approach to the roll-out of structural accessibility improvements across the network, the flexibility and mobility of disabled and older passengers will continue to be severely restricted.



## Planning for the future

While step-free access is a critical upgrade to improve the physical accessibility of London's network, it does not address the various other visible and invisible barriers disabled people and older people face in accessing the capital's transport system. These include barriers for people with developmental, psychological and acquired disabilities, who have a range of physical, sensory, speech, language or cognitive impairments. There are measures in place that are working well within certain modes and by certain operators; but from a system perspective, there is fragmentation of services. For some, the extent to which they make an accessible journey is dependent on "... a postcode lottery, where services are excellent [in some areas] and in other[s] it is completely a disaster."<sup>13</sup>

It is not always necessary to undertake wholesale redesign of a space when simple, light-touch measures may be all that is needed to make a place more functional. For example, the manual boarding ramps

deployed at 16 Tube stations<sup>14</sup> during the 2012 London Olympic Games proved successful as a temporary accessibility improvement to bridge the gap or step between the platform and the train. After strong community campaigning,<sup>15</sup> the manual ramps were subsequently retained and more were introduced at an additional 19 stations.<sup>16</sup> TfL says that it recognises that inclusive design goes beyond step-free access, to wider improvements such as tactile paving<sup>17</sup> and accessible ticket machines.

The DfT has set out that, by 2020, all passenger trains will have to meet modern accessibility standards. The Office of Rail and Road is responsible for enforcing these Rail Vehicle Accessibility Regulations (RVAR),<sup>18</sup> which includes:

- the provision of wheelchair spaces;
- audio visual passenger information systems;
- priority seating; and
- accessible toilets (where toilets are provided).<sup>19</sup>

## CASE STUDY:<sup>35</sup> INFRASTRUCTURE IMPROVEMENTS

“As someone who is blind [what makes a big difference for me on the Tube] is having the announcements off. That totally makes me disabled. Going to the social model of disability, it is the environment that disables me ... On the Victoria line, for example, they not only tell you what station you are getting off at, but they tell you what side the doors are opening on. Just a little thing like that is absolutely amazing. As someone with a disability, I can prepare myself. know which way [to get off]. I do not need to ask. I do not need to fumble around ...

The places where I struggle and the design problems that I have, is when I walk into a station and there is no way for me to know where the platforms are in the station; and there is no way for me to know where the accessibility help point is ... It is really [about] understanding the design challenges and there are solutions to all of this ... understanding collaborative design and not saying, “We have made something accessible here. What do you think?” It is going through the journey, seeing it from an end-to-end perspective, seeing where the pain points are and finding ways to overcome them.”

Adi Latif, AbilityNet

The Committee is aware that TfL received exemptions on the full implementation of the RVAR for the Bakerloo line,<sup>20</sup> Waterloo and City Line,<sup>21</sup> the Central Line,<sup>22</sup> the Piccadilly Line,<sup>23</sup> and the Docklands Light Railway.<sup>24</sup> The TfL Commissioner stated these exemptions were sought due to “a number of factors, most notably the collapse of the [London Underground] Public Private Partnership which led to the fleets on four lines – Bakerloo, Central, Piccadilly and Waterloo and City – not being replaced or refurbished.”<sup>25</sup> Financial constraints then prevented TfL from replacing these trains under its existing upgrade programme, as subsequently planned. While TfL has outlined plans to achieve accessibility compliance on these lines, it is another example whereby the impact of slippage on infrastructure upgrades will be felt most

significantly by disabled and older people. As a result, these groups are again excluded from full and flexible access to London’s transport network.

The evidence we received points to the need for London’s transport system to be designed in a much more holistic manner, whereby an inclusive design approach is embedded as best practice during planning and development. Improving accessibility is not just about physical infrastructure and upgrades; it is about “the design of mainstream products and/or services that are accessible to, and usable by, as many people as reasonably possible ... without the need for special adaptation or specialised design.”<sup>26</sup> These principles also need to be applied when considering people’s journeys to and from stations and stops.<sup>27</sup>

Greater strategic thinking, better coordination, leadership, and partnership with expert groups is needed to ensure that inclusive design is embedded in business practices, not just a 'nice-to-do'. While it may be true that trade-offs will be required when making planning decisions, provision for accessibility and inclusion should not be sacrificed without serious justification. An accessible, affordable, integrated and accountable transport system requires better regulation. Consistent with the 'social model of disability', the social value of transport needs to be explicitly considered in policymaking and in the planning system. More recently, others have argued that a new appraisal methodology should be developed for transport that includes social and environmental outcomes.<sup>28</sup>

### **Co-design with expert stakeholders**

The Committee has heard that, all too often, engagement with disabled and older groups is experienced as an afterthought or a mechanistic process with little effect on the outcome. Engagement and co-design with expert groups is a critical way of ensuring that the needs of all passengers are understood and embedded within transport planning and network design. At the local level, there are good practice examples that demonstrate what can be achieved when disabled people and older people are engaged meaningfully. TfL and Network Rail have established forums<sup>29</sup> through which they consult on business plans. However, concerns were raised during this investigation about the representativeness of these mechanisms, and the extent to which they accurately convey the needs of disabled and older people.<sup>30</sup> Understanding the context, purpose and demands placed on a space can assist transport network operators to understand how best to deliver the right

type and scale of intervention. It is therefore critical to ensure the voices of the 1.8 million disabled Londoners are represented appropriately and accurately.

Within the transport sector, there has long been the understanding of the need to consistently look more widely at the barriers people may face to accessing streets and public transport.<sup>31</sup> It is only when the lived experience of people with temporary, longer-term or permanent accessibility concerns are applied to the design, planning, running and evaluation of services that they will truly work for everyone. Inclusive design emphasises the contribution that understanding user diversity makes to informing these decisions, and thus to including as many people as possible. User diversity covers variation in capabilities, needs and aspirations. For example, people with learning difficulties have different accessibility requirements than a visually-impaired person; or an older person may use transport services in a different way and at different times than an autistic young person commuting to work.

“ We are very good as human beings cranking the handle and turning out the same solutions or variations on the same solutions. We are not so good at coming up with new creative and innovative approaches. ”

Alan Benson, Transport for All<sup>36</sup>

Failure to correctly understand disabled and older people can result in services that cause unnecessary frustration and exclusion. During this investigation, the Committee received evidence regarding key failures with infrastructure and services not delivering the intended benefits for disabled and older passengers. This includes on major infrastructure projects delivered on TfL and Network Rail assets, which despite a significant formal consultation process, did not provide minimum accessibility measures. Failure to consider inclusive design combined with poor planning can have a significant impact on accessibility of the transport network and freedom of movement for many Londoners. For example, not only has the delay to opening the Elizabeth Line impacted disability access across the city, but the Committee was particularly disappointed to learn that toilets had not been built at Bond Street Station as part of the Crossrail upgrades. It is essential that this does not happen again on future major infrastructure projects, including major station upgrades at Camden Town and Holborn. Network Rail has removed charges for toilets at its 11 London stations, and introduced major new facilities in station upgrades, such as at London Bridge. TfL, however, has only made toilets free at Overground and TfL Rail stations (where they exist); toilets at 26 Tube stations charge a fee of 10p to 50p.<sup>32</sup> The Mayor has stated that there are operational considerations, including deterrence of anti-social behaviour, as to why

TfL have not removed these charges.<sup>33</sup> In July 2018, the London Assembly was informed that TfL was undertaking a review of charging for access to toilet facilities at Tube stations,<sup>34</sup> but were not provided with timelines for when this review was to be completed, and the charges at these 26 stations remain.

## **RECOMMENDATION 1**

### **EMBEDDING INCLUSIVE DESIGN IN PLANNING**

**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.**

## **RECOMMENDATION 2**

### **STAKEHOLDER ENGAGEMENT AND CONSULTATION**

**As part of the release of the Accessibility Diversity and Inclusion Action 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.**

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### **COLLABORATION ON MAJOR INFRASTRUCTURE PROJECTS**

**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.**

# 2

## Service Delivery: Operating Resilient Infrastructure and Reliable Services

An accessible and inclusive transport system means that ....

“ ... I can get to and from places just the same as any other person. It means that I do not need to find ‘diversions’ or ‘alternative routes’ and can travel from A to B in the same time as others. I would expect to use various types of transport on each journey. ”

Candy Bolam, Call for evidence submission

### KEY FINDINGS

- 1** Disabled and older passengers experience unexpected visible and invisible barriers due to accessible infrastructure not working or services not being available, prolonging their journey times or severely restricting their freedom to travel across the network. This can be incredibly distressing for some passengers.
- 2** Journeys for disabled and older passengers often take longer and require a significant amount of pre-planning, due to:
  - a.** inconsistencies in accessibility features available and services provided across transport modes; and
  - b.** communication regarding key accessibility information not being provided in real-time, restricting the choice and flexibility for disabled and older passengers.

## Unexpected barriers: the impact of infrastructure and service failures

Some of the visible and invisible barriers that keep people from using the transport network and streets comfortably are highlighted when the system fails. For example:

- booked assistance fails to materialise for passengers upon arrival at a designated station, and they are left stuck on the platform;
- a lift is unexpectedly broken, preventing the person from accessing the station or getting from the platform to street-level;
- a visually-impaired person awaits the arrival of their bus, but six arrive in quick succession without audible announcements to differentiate which bus is the right one to catch; or
- a closed footway for building work might direct someone in a wheelchair to enter the road without a drop kerb or safe crossing; and
- someone cycling who is unable to dismount may be impeded by roadworks that do not take them into consideration.

Unexpected barriers, both visible and invisible, can be highly distressing for disabled and older passengers, and reduce their confidence to use the public transport system independently or with support. In our call for evidence, many passengers voiced feelings of fear and abandonment in unfamiliar places. As a result, some groups avoid certain modes altogether.



“

The impacts of [system breakdowns] are in lack of access for those with physical disabilities to opportunities for employment and leisure. Any journey involves considerable time and research to plan and negotiate and involves difficulties and anxieties that [a non-disabled] person does not have to deal with.”

”

Susan Cowley, call for evidence submission

## CASE STUDY:<sup>37</sup> JOURNEY TIMES

“One of the things that is really key that keeps coming up time and time again when we speak to disabled people is, firstly, that journey times are longer, particularly if you are living with a physical impairment. It requires a lot of planning. ... The little things really matter in that instance because something as small as a lift being out of order and a staff member providing a wrong piece of information can delay your journey by, literally, hours.

Unfortunately, we have many stories where someone has arrived, say, at St Pancras, has tried to get off one of the Thameslink trains and has been unable to and has needed to travel to another accessible station. They have been told that a nearby station is roll-on/roll-off and have then got there to find it is not. They need someone with a ramp but there is not a staff member there to help them and they are trapped. That is an incredibly distressing experience and something that puts one in four disabled Londoners off from traveling at all. It is really important that we bear in mind that, yes, technology is great, information is really key and the ability to communicate online to get live updates is really important, but it also needs to be backed up by on-the-ground information and decent training.”

**Ceri Smith, Scope**

Regarding London’s streets, concerns were raised about changes to the street environment, from approaches like ‘shared space’ or measures used to provide continuous cycleways on streets with bus stops. During the investigation, we heard from disabled and older people who felt their voices on this subject have not been heard. Shared space refers to schemes where demarcation between the footway and carriageway is removed both in physical and visual ways. By removing separation features, such as kerbs and road surface markings, these schemes remove certainty about where different types of road users, such as vehicles and pedestrians, should be. Cycleways can involve the use of bus-stop bypasses and bus boarders, which do involve separation, but then require the crossing of a cycle lane to either access the bus stop or a waiting bus.

Initially, TfL had trialled the addition of a zebra crossing for bus stop bypasses, but now sees them as an integral part of the design. Though this change has been welcomed by some,<sup>38</sup> we received submissions from Londoners who felt these changes created areas in which they did not feel comfortable.

Good practice regarding the design of streets is always evolving. The disabled cycling charity, Wheels for Wellbeing, has outlined in its ‘Guide to Inclusive Cycling’<sup>39</sup> that while it is generally opposed to shared space, such infrastructure need not cause an issue if designed properly. For example, in response to issues raised by the Mayor’s Disability Advisory Group, shared-use proposals for the North and South roundabouts at Lambeth Bridge were reviewed by TfL. As a result, decided on a design change whereby “cyclists will now stay on the carriageway where

it is considered safe to do so.”<sup>40</sup> Meanwhile, the DfT has now recommended that Local Authorities pause the development of shared space schemes incorporating a level surface, while this is reviewed, and guidance is updated. Updated guidance for England on the design of cycle infrastructure is due to be published in the near future.<sup>41</sup> TfL’s own street design toolkit depends upon guidance and regulations set by the DfT. TfL has informed the Committee that it intends to publish an Inclusive Design Framework to consider issues such as these in spring 2020.<sup>42</sup>

The difficulties of negotiating London’s streets are further compounded by the increasing proliferation of dockless bikes, which are frequently arbitrarily discarded on pavements, blocking access and further complicating journeys for blind and partially-sighted pedestrians. The Committee has heard that careless abandonment of dockless bikes can eventually make blind and partially sighted people unwilling to leave their homes for fear of collisions or serious harm.<sup>43</sup> Although

some other forms of micro-mobility, such as e-scooters, are illegal in the UK, the proliferation of these light transportation vehicles in recent years has highlighted the need for Government to work with London Boroughs to implement laws and byelaws to enhance regulation. The London Assembly has long been calling for these stakeholders to ensure sensible and coordinated regulation of micro-mobility, that keeps pace with technological advances and prioritises safety of pedestrians and vulnerable road users.<sup>44</sup>

During this investigation, we heard repeatedly that poorly designed and inaccessible transport can result in the loss of one’s identity and confidence, particularly if a passenger is then unable to continue doing things they enjoy. The lack of access to the transport network, or inability to rely on infrastructure and services, can exacerbate feelings of helplessness and loneliness.



“ ... some [shared space] developments ... have actually made things worse for people with certain disabilities, particularly around, for example, bus stop bike passes. If you are a bus passenger trying to get on and off a bus and you do not know that there is a cyclist coming, that can be very intimidating. Effectively that can make those bus stops, even though they might have the kerb height, inaccessible to you.”

Tim Bellenger, London TravelWatch<sup>45</sup>

### **Communicating accurate information, in real time**

During this investigation, the Committee repeatedly heard that obtaining accurate and timely information about accessible journeys is difficult. There is no central repository for accessibility information on different transport modes, requiring passengers to instead access various platforms to determine what accessible infrastructure and services are available. The TfL Journey Planner can plot journeys across different transport modes and therefore providers. This platform offers information on access, lifts and escalators, and passengers can select options for step-free accessibility preferences (for example, 'use escalators, not stairs', 'step-free to platform only' and 'full step-free access'). It does not, however, provide necessary information, in real-time, about the working condition of these accessibility features or services. For example, passengers cannot be sure if a lift or escalator is broken, if the station is staffed adequately (if at all), or if the toilet is out of order, until they arrive at a station. As

a result, disabled people and older people are required to plan their journeys well in advance. Despite pre-planning their journey, travel is further impacted when the system fails. TfL says it has been working on several projects which aim to improve the accuracy and timeliness of information provided to passengers. TfL has also developed a 'lift out of service' toolkit which provides stations with a tailored pack of posters and advice for customers when step-free routes are out of service.<sup>46</sup> Despite this progress, information not being up to date is still an issue raised by passengers.<sup>47</sup>

## **CASE STUDY:<sup>48</sup> THAMESLINK**

“The [infrastructure] improvements with the biggest impact were the improvements to the Thameslink line through the core, which has enabled level boarding and step-free access throughout key stations in the centre of London. That has been really vital, and it makes a useful point. Often thinking strategically about where you target the improvements can make a really big impact. Improving just a couple of stations sometimes can open up a completely new route.

For example, I live in Reading and I travel into London regularly for work. I come into Paddington, but getting from Paddington to anywhere else in London is quite tricky, certainly from a step-free point of view, because the Bakerloo line is not accessible. Opening up Baker Street or Waterloo would suddenly transform a lot of journeys. It is important to think quite strategically about where the improvements are actually targeted.

It is also important to think about making sure that when improvements are made, there is enough awareness about them. The Thameslink line, for example, is not on the Underground map and so it is often unclear that actually that could be that the most convenient way to get to your destination. Also, if you look at things like the improvements around Bank and Waterloo Stations for the Waterloo and City line, it is technically accessible but because the lifts are out of action during peak hours there, it has been made inaccessible. Technically, it is actually accessible, but it is not being used because of various operational reasons. We seem to have difficulty exactly identifying what the problem is, but it is important that whenever improvements are made people are aware of them and they are actually used as they were intended to be used.”

**Jon Hastie, DMD Pathfinders and Step-free London**

## **RECOMMENDATION 4**

### **ADDING THAMESLINK TO THE TUBE MAP**

**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.**

## **RECOMMENDATION 5**

### **ACCESSING INTEGRATED INFORMATION IN REAL TIME**

**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 stepfree access, lift operability, availability of staff assistance, and toilets. By August 2020, TfL should report back to the Committee on its plan for development.**

# 3

## Person-Centred Transport Policy: Informed Staff and Considerate Passengers

An accessible and inclusive transport system means that ....

“... it is still about people. And it is important to recognise that [these] people [include] staff at train stations, at Tube stations, and on the bus. It is about making sure that those people have a good understanding about how they can support individuals, not just disabled people because at the end of the day it is customer service. It is important to remember that it is having education, disability awareness but customer awareness as well.”

Clive Wood, Guide Dogs UK<sup>49</sup>

### KEY FINDINGS

- 1** Frontline and operational staff can have a significant impact upon the journey experience of disabled and older travellers. This includes both the capacity and availability of staff to assist, but also their understanding of how to provide support for disabled people.
- 2** The general public can have a positive impact on the journey experience of disabled and older travellers.

## Upskilling transport staff

Disabled and older passengers can require additional support to make their journey comfortable. As such, transport staff play a critical role in passengers' journey experience. TfL offers a 'Turn-up-and-go' service on many of its operations, including the Tube, London Overground and some TfL Rail stations (some stations, such as Heathrow Terminal 4, require people to book support in advance as part of the national Passenger Assist service).<sup>50</sup> On the Turn-up-and-go service, staff will accompany someone to the train, help them board, and can arrange for the person to be met at their destination. On buses, the driver can "kneel" the bus, put the wheelchair ramp down and ask passengers to clear the wheelchair space.

For some people, using public transport may be too difficult, and door-to-door transport can be the best option. TfL groups these services under the heading Assisted Transport Services. TfL operates Dial-a-Ride, a bookable door-to-door mini-bus service for people with a permanent or long-term disability which means they are unable to use public transport. Individuals book

specific journeys and are then grouped based on time and location.

The Committee has consistently heard about the challenges of using these services. Since the Committee published its report, 'Door-to-door transport in London: Delivering a user-led service',<sup>51</sup> in April 2017, the complaints regarding consistency and reliability of these services has not abated. Regarding the Dial-a-Ride service, we have heard of journey requests being denied, poor reliability, limitations on journey length and groups being separated.<sup>52</sup> There has been an overall trend of declining journey numbers for Dial-a-Ride. In 2019/20, the number of completed trips across London has fallen by just over six percent (or 145,783 trips) for the year to date, whilst refusals have increased by almost 15 per cent (7,564 refusals) since last year.<sup>53</sup> This is in the context of requests decreasing by over eight per cent (53,628 requests). TfL identified contributing factors for the decline, including "increasing accessibility of the transport network, the growth of online shopping and the closure of day centres."<sup>54</sup>

### CASE STUDY:<sup>55</sup> TURN-UP-AND-GO

"The introduction of the turn-up-and-go system has worked fantastically. It has allowed people to travel independently with confidence – but only when it works. Sometimes staff book assistance and it is not met at the other end and so there are passengers left on the train or on the platform not knowing which way they can go. Sometimes they have booked assistance at the other end and they may be in a wheelchair or have other mobility issues and there is no lift there even though the passenger might have requested that they cannot do steps or anything. I guess there are schemes in place, but it needs to be consistent. Stations need to be [staffed]. Not all stations are, and that reduces a lot of travel independently or travel altogether. Consistency is also a big issue."

**Bhavini Makwana, London Vision**



People with mobility impairments may also be eligible for Taxicard, which subsidises taxi or minicab travel in London.<sup>56</sup> For Taxicard, we have heard about a lack of disability awareness among drivers, and inconsistencies in pricing between Boroughs. Users have also complained about a lack of coordination between services, and having to contact a range of different organisations to book journeys.<sup>57</sup> The distinct difference in the quality of service provision and eligibility criteria across Boroughs is unfair for the individuals relying on this service and the unreliability can be highly frustrating and distressing for passengers. As the Mayor has stated, TfL must increase its engagement with Councils, to dramatically improve the coordination, reliability and consistency of this service across Boroughs.<sup>58</sup>

The Committee is also aware that private hire vehicle drivers, and taxis in some cases, have refused passengers with a guide dog or assistance dogs.<sup>59</sup> We also heard of concerns about the use of other mobility aids, whereby people were either being stopped from using them or they did not fit into vehicles. For example, between February 2015 and November 2017, TfL successfully prosecuted 27 minicab drivers, working with 14 different operators, for refusing to carry passengers

accompanied by assistance dogs.<sup>60</sup> Under the Equality Act 2010, taxi and private hire drivers are obliged to carry guide dogs and assistance dogs at no extra cost to the passenger.<sup>61</sup> Only drivers who have a medical condition that means they are unable to carry dogs in their vehicle may apply for an exemption from these duties. Consideration should be made for the variety of mobility aids that disabled people need to use and how to accommodate them on the transport network, including larger wheelchairs, scooters and cycles. The law is clear on this issue, and it is essential that taxi and private hire vehicle operators' adherence is monitored closely.

TfL has delivered a range of staff training activities around disability awareness. Disability equality training is being delivered to 1,000 professional service staff and 450 London Underground frontline staff. TfL has developed online inclusive design training, with the Design Council, available to TfL staff. TfL has also developed 'dementia friends' online training in partnership with the Alzheimer's Society, to deliver to staff.<sup>62</sup> Given the difference in experience across modes and transport providers, however, it is critical that staff training is standardised across the network to aid consistency in passengers'

journey experience. TfL also offers a free travel mentoring service, to support eligible passengers to start using the transport network independently.<sup>63</sup> Support includes providing advice on planning a journey using an accessible route, providing a mentor to go out with individuals to practice a journey a few times to help them gain confidence and provide the knowledge to become an independent passenger across the TfL network.

The provision of disability equality training, that is informed and delivered by disability and inclusion experts, to staff can have a demonstrably positive impact on the journey experience for disabled and older passengers. This is not just related to the individual assistance which skilled staff can provide to passengers requiring support, but also the need for trained personnel to facilitate disabled and older people's use of accessible infrastructure.

For example, the Committee heard repeatedly during the investigation about how critical lifts at stations are to ensure access to London's rail network. However, even though lifts are available and in working condition, at some stations they are closed because there are no trained staff on hand to operate them.<sup>64</sup> Though there has been some progress on this issue,<sup>65</sup> TfL must monitor this carefully, and instances when lifts are out of service due to an absence of trained staff must be kept to an absolute minimum.

### **CASE STUDY:<sup>66</sup> SKILLED STAFF**

"The point I want to make about service [provision] is that 'understanding' is absolutely key. In particular, what autistic people are telling us is the understanding of staff members and of the public about how, in certain situations, autistic people may need more time, more space or whatever it is [they need]. If you think about making a journey, it is quite stressful, especially in London, and so you are more likely to perhaps need a bit of support.

Schemes like the Sunflower Lanyard, which seems to have really taken off in the last couple of years, can be hugely beneficial, but they are part of the solution. They are not a solution in and of themselves ... they [need to be] backed up with a programme of staff training, which is absolutely key. When someone presents to a member of staff saying, "I need help. I am autistic", the member of staff needs to know what to do and so it can only be part of the bigger jigsaw puzzle. What we need to do is to really look at this in the round and take a really strategic approach to it."

**Tim Nicholls, National Autistic Society**

## Raising public awareness

While the general public can oblige requests for assistance by disabled and older people, public stigma and discrimination experienced by these groups while using public transport can act as a deterrent to using services. To address this issue, and also to encourage positive passenger behaviour, TfL and the DfT have a range of awareness raising initiatives. In April 2017, TfL launched the 'please offer me a seat' badge initiative, with more than 44,000 badges distributed since.<sup>67</sup> In July 2018, TfL announced its support for the 'Look Up' customer campaign, which encouraged passengers to see if others needed a seat. This involved adding 'Look Up' messaging to a range of station and train announcements, and promotional measures to raise awareness such as posters in station halls, messages on digital advertisements and social media activity. This supports TfL's existing 'Travel Kind' campaign, launched in November 2017, which encouraged customers to be considerate of one another when using public transport. Building on the Inclusive Transport Strategy, the DfT launched the 'It's Everyone's Journey' campaign

in October 2019, which seeks to champion equal access on public transport.<sup>68</sup> It is unclear, however, how effective these campaigns have been on improving the journey experience of disabled and older people.

In an effort to support passengers who have hidden conditions or disabilities, some private transport operators (such as Southeastern) and all major airports have introduced the Sunflower Lanyard Scheme.<sup>69</sup> Under this scheme, passengers who choose to wear a Sunflower Lanyard can discreetly let staff and the general public know they may have autism, ADHD, dementia, a visual impairment, or other invisible condition without having to disclose this to staff verbally. The Hidden Disabilities Sunflower was first launched at Gatwick Airport in May 2016; it is now recognised by the NHS and is starting to be recognised globally. As raised during this investigation, such schemes must, however, be delivered in conjunction with training, to ensure staff are equipped with the necessary skills to meet the support needs of individuals wearing the sunflower lanyard.



## **RECOMMENDATION 6**

### **DISABILITY INCLUSION AND EQUALITY TRAINING FOR STAFF**

**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.**

## **RECOMMENDATION 7**

### **DIAL-A-RIDE AND TAXICARD SERVICE PROVISION**

**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.**

## **RECOMMENDATION 8**

### **TfL TRAVEL MENTORING**

**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.**

## **RECOMMENDATION 9**

### **PUBLIC AWARENESS CAMPAIGNS**

**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.**

## **RECOMMENDATION 10**

### **'SUNFLOWER LANYARD' SCHEME**

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

# Thank You

At its public evidence sessions, the committee took oral evidence from the following guests:

- AbilityNet
- Alzheimer's Society
- Disability Rights UK
- Guide Dogs
- London Vision
- London TravelWatch
- Michael Lloyd, Accessible Transport campaigner
- MS Society
- National Autistic Society
- Network Rail
- Rail Delivery Group
- Scope
- Step-free London
- Transport for All
- Transport for London (TfL)
- University of Westminster
- Wheels for Wellbeing
- Whizz Kidz

During the investigation, the committee also received written submissions from the following organisations:

- Age UK
- Alzheimer's Society
- Centre for London
- Councillor Janice Long – Brent Council
- Enfield Town Resident's Association
- Harrow MenCap
- Independent Taxi Alliance
- London Chamber of Commerce and Industry
- Licensed Taxi Drivers' Association
- London Cab Drivers Club
- London TravelWatch
- London Vision
- Mums4Lungs
- National Autistic Society
- RMT London Taxi Branch
- Royal National Institute of Blind People (RNIB)
- Kelly Executive
- UK Association for Accessible Formats
- Unite the Union
- Waltham Forest – Streets 4 All
- Winchmore Hill Residents' Association

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- 2 London Datastore, London's diverse population, 2019. <https://data.london.gov.uk/dataset/london-s-diverse-population->. Note that this data is from a 2017 source.
- 3 Ibid. The Mayor's Equality, Diversity and Inclusion Strategy ('Inclusive London', <https://www.london.gov.uk/sites/default/files/mayors-equality-diversity-inclusion-strategy.pdf>, pg. 159) defines older people as those over 50 years of age, but recognises that those above retirement age and those over 70 may have certain requirements.
- 4 Greater London Authority (GLA), 'Mayor's Transport Strategy' (March 2018), pg. 21.
- 5 Ibid., pg.143
- 6 GLA, Mayor's Transport Strategy (2018)
- 7 The Brexit Alliance Group does not agree that there is a conflict between the individual model of disability and the social model of disability. It is obvious that impairments cause disability, as it is obvious that making the transport system more accessible will make life easier for disabled people.
- 8 TfL, 'Step-free Tube guide', <http://content.tfl.gov.uk/step-free-tube-guide-map.pdf>.
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- 10 TfL, 'Press release: Step-free access now available at four western TfL Rail stations' (12 March 2020), <https://tfl.gov.uk/info-for/media/press-releases/2020/march/step-free-access-now-available-at-four-western-tfl-rail-stations>.
- 11 TfL Customer Service and Operational Performance Panel (13 June 2019), 'Customer Accessibility Programme – 2018/19 Delivery Update', <http://content.tfl.gov.uk/csopp-20190613-public-agenda-and-papers.pdf>.
- 12 TfL, 'Step-free access', <https://tfl.gov.uk/travel-information/improvements-and-projects/step-free-access>.
- 13 London Assembly Transport Committee (8 January 2020), 'Transcript of Item 4 – Accessible and Inclusive Transport', pg. 14.
- 14 Including: Hammersmith (H&C), King's Cross St. Pancras, West Ham, Westminster, Southfields, Wimbledon, Earl's Court, Fulham Broadway, Stratford, Woodford, Oxford Circus, Queen's Park, Edgware, Morden, Finchley Central and Stockwell. To note, manual boarding amps are no longer needed at Edgware, Morden, Finchley Central and Stockwell stations, as they now have permanent raised platform sections.
- 15 See for example, Letter from Transport for All to the former Mayor of London, Boris Johnson (29 August 2012), <https://www.transportforall.org.uk/files/lettertomayor.pdf>.
- 16 Caledonian Road, East Ham, Elm Park, Epping, Farringdon, Hainault, Hillingdon, Hounslow East, Kew Gardens, Mile End, Richmond, Rickmansworth, Roding Valley, South Woodford, Theydon Bois, Upney, Uxbridge, West Finchley and Wood Lane.
- 17 Also called 'detectable warning surface', tactile paving is a system of textured ground surface found on footpaths, stairs, and station platforms to warn pedestrians who are visually-impaired.
- 18 Office of Rail and Road, 'Rail vehicle accessibility', <https://orr.gov.uk/rail/health-and-safety/passenger-safety/rail-vehicle-accessibility>.
- 19 Department for Transport, 'The inclusive transport strategy: achieving equal access for disabled people' (July 2018), [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728547/inclusive-transport-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728547/inclusive-transport-strategy.pdf).
- 20 The Department for Transport, 'Consultation Outcome - RVAR exemption: London Underground Limited — Bakerloo Line' (3 October 2019), <https://www.gov.uk/government/consultations/rvar-exemption-london-underground-limited-bakerloo-line>.
- 21 The Department for Transport, 'Consultation Outcome - RVAR exemption: London Underground Limited — Waterloo and City Line' (3 October 2019), <https://www.gov.uk/government/consultations/rvar-exemption-london-underground-limited-waterloo-and-city-line>

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25 TfL, Letter from the TfL Commissioner, Mike Brown MVO, to the Parliamentary Under Secretary of State for Transport, Paul Maynard MP (7 August 2019), pg. 1, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835723/Letter\\_from\\_Mike\\_Brown\\_MVO\\_TfL\\_to\\_Paul\\_Maynard\\_MP\\_DfT.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835723/Letter_from_Mike_Brown_MVO_TfL_to_Paul_Maynard_MP_DfT.pdf).

26 The British Standards Institute, 'Inclusive Design Toolkit', <http://www.inclusivedesigntoolkit.com/whatis/whatis.html>.

27 The Mayor of London, 'Inclusive London: the Mayor's equality, diversity and inclusion strategy', May 2018: <https://www.london.gov.uk/sites/default/files/mayors-equality-diversity-inclusion-strategy.pdf>

28 Unite, Call for Evidence submission.

29 At TfL, the Independent Disability Advisory Group meet quarterly (<http://content.tfl.gov.uk/independent-disability-advisory-group-november-2019.pdf>).

30 London Assembly Transport Committee (9 October 2019), 'Transcript of Item 6 – Accessible and Inclusive Transport', pg. 5-6.

31 See for example: (1) the former Mayor of London, Ken Livingstone's statement announcing free door-to-door services for older and disabled Londoners, <https://tfl.gov.uk/info-for/media/press-releases/2007/october/mayor-announces-free-doortodoor-service-for-older-and-disabled-londoners>, and the release of T2025 Report, the 20-year programme for "sustained investment in efficient, reliable and accessible public transport", <https://tfl.gov.uk/info-for/media/press-releases/2006/november/mayor-and-transport-for-london-outline-importance-of-transport-for-the-future-of-london-and-the-uk>; (2) former Mayor Boris Johnson's plan for an accessible transport system, 'Taking forward the Mayor's Transport Strategy Accessibility Implementation Plan', <http://bailey.persona-pi.com/Public-Inquiries/Barking%20Riverside/B-Core%20Documents/Category%20D%20National,%20London%20and%20Local%20Policy%20and%20Guidanc%20Documents/D27%20-%20taking-forward-the-mts-accessibility-implementation-plan-march-2012.pdf>; (3) 'The Mayor's Transport Strategy', 2018, p.142.

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## Other Formats and Languages

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