

**Mobility and Access Committee
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**Advising Scottish Ministers
on Accessible Travel**

EHRC Strategic Plan Consultation
Equality and Human Rights Commission
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Our ref:
2019/01

Date:
7 Jan 2019

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Good morning,

MACS RESPONSE TO THE EQUALITY HUMAN RIGHTS STRATEGY CONSULTATION

Please see below a response to the strategy consultation submitted by the Mobility and Access Committee for Scotland (MACS).

Yours sincerely,

Kind regards,
Aga Lysak

MACS Secretary

Mobility and Access Committee for Scotland (MACS) response to EHRC Strategy Consultation

MACS welcomes the emphasis in the proposed EHRC strategy on tackling inequality in disabled people's access public transport, the built environment and to services in general.

In particular, we therefore welcome 'Priority aim' number 4 and 5 in the draft strategic plan.

We are also pleased that the importance of the built environment - including pavements, road crossings, ports, stations, etcetera - is given equal recognition to public transport itself, as this is vital to the door-to-door journey chain for disabled people and can be the 'weakest link' rather than the vehicle.

Adopting an 'inclusive design' approach to public transport and the built environment benefits not only disabled people, but other people with protected characteristics, such as older people, children, parents with small children (disproportionately women) and pregnant women.

We support all the interventions suggested by EHRC in 'Priority Aim 4' including:

- undertaking compliance and enforcement activity;
- influencing laws and policies;
- influencing planning and standards;
- supporting individuals who are excluded.

We also note that the EHRC is minded to conduct one or more inquiries into access to essential services, and again would encourage EHRC to do this. Such inquiries may be important and influential interventions, which can help break down many barriers, which are often persistent and have regrettably become 'normalised'.

We would like to use this opportunity to suggest a number of specific topics in the realm of access and mobility which EHRC may wish to consider. While we appreciate that its resources are limited and will be unable to intervene in all of these areas, we hope that these suggestions are helpful for EHRC to set its priorities in its future work programme.

Access to Health Care

One of the most persistent problems which come to MACS' attention is in accessing health care, such as hospitals, doctors appointments, local community based healthcare services etcetera in a timely and dignified fashion. We believe that this is especially problematic for disabled people compared to the general population, and especially severe in rural areas or out with areas where specialised healthcare provision has been centralised to "Centres of Excellence".

In essence, there appears to be no agency, which takes responsibility for ensuring that disabled people can attend healthcare services they need as a basic human right and also to ensure equity of access to healthcare.

The onus on arranging transport is put on the patient. Disabled patients frequently have fewer travel options and face more barriers than non-disabled patients and are therefore put at a disadvantage and disproportionately affected by the lack of public and community transport available to allow them to access lifeline health services. This is further impacted by the fact that disabled people are more likely to need to access health services.

We would draw attention also to the recent [survey by Disability Equality Scotland](#)¹, in which 66% of respondents said they had trouble with transport to medical appointments. Although this is not a scientific sample, the stories that respondents describe illustrate the kind of problems encountered.

Disabled people are calling for Health Boards, Integrated Joint Boards, Local Authorities and/or the Scottish Ambulance Service to take responsibility for transport and work more collaboratively to ensure a joined up, planned approach to enable disabled people to access health services locally, regionally and nationally.

Buses and coaches

Although the Public Service Vehicle Access Regulations (PSVAR) are now in force for all types of vehicles apart from coaches (to commence on 1 January 2020), there are still many problems with vehicle access, especially in rural areas. This is partly because coaches are used in many such routes as registered local services, especially if also used to provide school transport.

Even when coaches comply with PSVAR, access will continue to be problematic for many disabled people, as coach lifts can only be used to assist wheelchair users and cause great difficulties for people with reduced mobility, preventing them from accessing coaches.

Taxis

Despite provision in legislation over ten years ago, in most parts of Scotland, there is a little choice of vehicles providing taxi services. In particular, many areas have no taxis, which can be used by a disabled person who wishes or needs to remain in their wheelchair while travelling.

The pedestrian environment

This is often very hostile to disabled people, with poorly designed and maintained pavements, a profusion of street clutter and inadequate opportunities to cross roads safely. MACS is very concerned that the UK guidance on accessible public realm (Inclusive Mobility) has not been updated since 2005.

Roadworks

MACS gave evidence recently to the Rural Economy and Connectivity Committee of the Scottish Parliament on the particular topic of roadworks (part of the draft Scottish Transport Bill), which often cause particular problems for disabled people. It was instructive to hear the Scottish Road Works Commissioner say that such issues are rarely brought to his attention.

Low Emission Zones and similar

Many European and UK cities (including Glasgow, Edinburgh, Aberdeen and Dundee) are aiming to improve air quality and reduce congestion. We are concerned that, unless planned carefully with full involvement of disabled people, reductions in vehicular traffic may inadvertently disadvantage disabled people, who are more reliant on cars (as either driver or passenger) than other road users.

Parking Policy

¹ Available at: <http://yoursayondisability.scot/weekly-poll-results-patient-transport-week-beginning-26-november/>

There are a number of aspects of parking policy which affect disabled people particularly, including the need for effective enforcement of Blue Badge provisions and discouraging or eliminating pavement parking.

Longer term developments

There is currently much innovation in transport, such as investment in driverless cars, 'Mobility as a Service' and electric vehicles. The drivers for such developments often appear to be technology, data and finance, rather than social and public policy. It is essential that impacts (both opportunities and challenges) on disabled people are established at the earliest possible stage, with proper engagement by disabled people themselves.

Priority aim 3

We agree that it is important for EHRC to address the impacts of new technology and digital services. While there are undoubtedly many benefits of progress in such fields, it must always be borne in mind that:

- digital accessibility must be maximised; and
- those people who are 'non-digital' should not be disadvantaged.

To take a simple example, if 'taxi' fares are reduced through the introduction of Uber-type services, which require a smartphone, then those who do not have access to smartphones may lose out and be dependent on more expensive services.

Much governance of web accessibility is, by its nature, international/global. EHRC will want to consider how best it can influence standards, which may not be set at UK (or devolved administration) levels.

Priority Aim 5

Transport and the built environment are, of course, vital to access public services. As noted above, MACS is particularly concerned at the difficulty that disabled people have in accessing health care facilities.

We also would like to suggest two changes under "How we will know that the strategy is effective":

- the second bullet point should read "Meaningful/tangible reduction in barriers to disabled people accessing appropriate education, housing, healthcare and employment"
- after "transgender" add "disabled, older".