

Mobility and Access Committee for
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Disability Advice (post DPTAC)
Department for Transport
Sustainable Travel and Equalities
Zone 2/24
Great Minster House
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Dear Mr Baker

Public Bodies Bill – Disabled Persons Transport Advisory Committee (DPTAC): Seeking views and evidence to inform the Department for Transport of possible successor arrangements

The Mobility and Access Committee for Scotland (MACS) welcomes the opportunity to offer its views on the options which are being considered in relation to possible successor arrangements for DPTAC.

As a general observation, our view is that despite undoubted improvements to our transport system and infrastructure, disabled people still experience considerable difficulty in going about their daily lives. Households with disabled members tend to have lower incomes than other households and this affects their mobility and their access to transport options. Disabled people account for about 15 to 20 per cent of the population so we are not talking about small numbers.

You requested views on some of the questions which were being discussed at the workshops and our responses to these are as follows:

What disability advice does the Department need?

Providing for the transport needs of disabled people involves a substantial element of physical work such as changes to vehicle design and to transport infrastructure. This requires consideration of the whole journey from door to door and the creation of a fully inclusive society where disabled people are able to travel as readily as anyone else. Ministers need advice on the effectiveness of existing policies and provisions as they relate to the transport interests of disabled people, on the need for change in policies and provisions and on the likely effect of proposed policies and provisions.

Could this advice be delivered solely through stakeholder bodies?

No. Although there is a role for stakeholder bodies when it comes to consideration of specific proposals such as a change in Blue Badge regulations. Stakeholder bodies are less appropriate when it comes to advising on the need for change or on the effectiveness of existing provisions. A stakeholder body needs to be large enough to be representative and this makes it difficult to take decisions and creates the risk that the body will be a talking shop. It is also not clear how the members of the stakeholder body would be chosen.

Can you give examples where DPTAC has either provided good or poor advice or failed to act?

DPTAC has contributed to Government advice on matters such as the Blue Badge Scheme, street design, personal mobility, mobility scooters, the design and use of buses, taxis and rail vehicles, and EU legislation on maritime and aviation issues on many of which MACS and DPTAC have co-operated as there are many cross-border issues. DPTAC has been instrumental in promoting the accessibility strategy for the London Olympics and even planning guidance on inclusive design. DPTAC has provided enhanced credibility for the Department on disability issues and has enabled the Department to justify its decisions to the disabled community as DPTAC has credibility and respect within that community. DPTAC is highly respected by stakeholder groups and taking its advice allows the Department and Ministers to speak with confidence on disability issues. It is inconceivable that DPTAC will have failed to act where the Minister asked for advice but its ability to respond depends on the demands placed on it, and on the resources and time available to its members.

Are there different areas of advice needed to ensure mode specific transport is addressed? For example are disability issues in the aviation context substantially different from railways or from street design?

Each mode of transport provides different challenges and has to be separately considered and each issue looked at within its particular context. Each mode also operates within different legislative and operational frameworks. Aviation and shipping are governed by international laws and standards including specific requirements with regard to the interests of disabled passengers. There is a difference between the design of aircraft on

the one hand where the issues are very specific and the design of the check in facilities and shops where the issues are more general and similar to those associated with other modes of transport. There are many issues which cut across modes of transport such as staff training and travel concessions.

Does the Department require specific i.e. technical advice or does it need further general disability awareness advice? Are the means of obtaining this advice different –for example would only general policy advice be able from representative bodies or would they be able to provide technical advice?

The Department needs technical advice and general and specific disability advice. Some representative organisations are able to provide excellent disability awareness training or representative advice - DPTAC is able to provide both. DPTAC was also able to produce specific guidance on ferry design. There is a need for a body which can embrace cross-cutting issues such as local bus service provision and community transport providers.

Would the Department receive better disability advice if it procured it from consultants? Could examples be provided? How much would you estimated procuring advice would cost?

It is difficult to see how consultancy could be more effective than the DPTAC model. Some DPTAC publications were based on work carried out by Consultants commissioned by the Department on behalf of DPTAC. Nevertheless, it was the approval of DPTAC which gave the resulting advice status amongst disabled groups and within the transport industry. Consultants operate to a brief and their work depends on the quality of the brief. The advice given by DPTAC although sometimes based on the work of consultants was subsequently seen as being both fair and independent. The cost of consultancy varies widely. A daily rate for a consultant could be between £350 and £1,100 per day. It is unlikely that any one consultant would have knowledge of all the issues and how they interlink together.

MACS would like to offer the following views on the Options which are being proposed:

Option 1 (in-house advice) would not provide independent advice and would not be respected by the disabled community. Staff do not have the same daily exposure to the issues as disabled people themselves. Consultancy advice would be expensive and internal staff do not have the knowledge and expertise to know what to specify in a brief.

Option 2 (the stakeholder forum) is not an Option but could be used to complement other groups such as when seeking guidance on practical matters such as the administration of the Blue Badge Scheme.

Option 3 (the cross government body) refers to Equality 2025 which has a broad remit and only 10 members. It can only deal with a limited range of issues and then only at a strategic level. Dealing with issues in more depth requires more members. Membership of Equality 2025 is limited to disabled people and there are advantages in a membership which includes disabled and non-disabled people. DPTAC has a membership drawn from a broad

cross-section of disabled people and others and as a result the advice given to Ministers and the Department was consistently balanced well informed and practical.

A statutory body would be preferable to a non-statutory body but if Ministers are determined that there is to be no statutory body then **Option 4** (the non-statutory body) is the best available Option.

Option 5 could not work on its own but a combination of Options 4 and 5 could build on the strengths whilst creating an Option which is more flexible, cost effective and accountable to Ministers. If a non-statutory body is created there should be an obligation placed on Ministers to consult it. The best Option would be a body with a membership of 15 people with a majority of disabled people but including some non-disabled people. They would meet formally as a body at least twice a year but at other times the members of the body would be expected to liaise and work informally in groups.

There is a continuing need for a United Kingdom wide pan disability body which is independent and impartial and capable of offering good advice to Ministers on a range of cross-border and international issues. MACS would wish to continue to be represented on such a body and stresses the importance of such a body being as effective and well respected as DPTAC currently is.

I hope that you will find these comments useful.

Yours sincerely



Anne MacLean OBE
Convener

P.P.