

Towards Best Practice in Provision of Transport Services for People with Disabilities in Ireland

Foreword

The adequate provision of an integrated accessible public transport service is one of the significant services that impact on the quality of life for people with reduced mobility and sensory impairments.

Towards Best Practice in the provision of public transport is one in a series of reports which presents research commissioned by the NDA to provide baseline evidence on the quantum and range of service provision. In commissioning this work, we found strong concurrence across key policy areas that there were large data gaps. We have established where those gaps are most evident. We hope that it can assist in setting priorities for data strategies, coordinated service delivery and integrated policies in meeting the demands for an integrated accessible public transport service in Ireland.

The timing of this report is opportune given the exciting and challenging developments currently taking place within public transport in Ireland. The Government is committed to further enhancing the accessibility features of our public transport infrastructure and this provides us with a unique opportunity to ensure that the needs of people with disabilities are included. The NDA recommendations are heavily influenced by the shared understanding about 'Transport for All'. This encompasses the whole experience of a journey, from accessible information and infrastructure to disability awareness training for staff and measuring customer satisfaction.

The priorities set out in this document focus on issues where we can make an impact and are set to appear in our policy work over the next three year period under the second strategic Plan 2004-2006-"Progressing the Disability Agenda in Ireland"

I thank each of the researchers who worked on this series and supported the NDA in undertaking this important work.

I would like to acknowledge the support of the Disability Equality Unit in the Department of Justice Equality and Law Reform, without whose support this work would not be possible and the staff of the NDA in progressing this research.

I would also like to mark the encouragement of our Authority members who recognised the value of publishing this important report.

Angela Kerins

Chairperson
National Disability Authority

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Introduction

Background

The National Disability Authority (NDA) was established in June 2000 as a statutory body under the Department of Justice, Equality and Law Reform with the principal function to advise the Minister and keep him or her informed of developments in relation to any disability of persons, which concern issues of policy and practice¹. The NDA Act (1999), which underpins the establishment of the Authority, defines disability as “a *substantial restriction in the capacity of a person to participate in economic, social or cultural life on account of an enduring physical, sensory, learning, mental health or emotional impairment.*”

The Act further outlines the core functions for the Authority, including among these:

1. to act as a central national body which will assist the Minister in the co-ordination of development of policy relating to persons with disabilities;
2. to undertake, commission or collaborate in research projects and activities on issues relating to disability and to assist in the development of statistical information appropriate for the planning, delivery and monitoring of programmes and services for persons with disabilities².

In its first strategic plan “A Matter of Rights” for the period 2001 – 2003, the NDA identified its mission as follows:

“To work on behalf of the State to promote and help to secure the rights of people with disabilities through influencing public policy and legislation and by working to ensure that services to people with disabilities are of the highest standards and quality” (NDA, 2002).

One of the major challenges to the successful achievement of our goals to promote quality in service provision is the lack of data on services presently available to people with disabilities. The Commission on the Status of People with Disabilities (1996) identified a number of difficulties regarding the then level of service provision, including a poor co-ordination of services, lack of information around service provision and entitlements and the absence of an organised and integrated assessment of needs³. Indeed, monitoring the impact of government policy to promote the equal status of people with disabilities is a key challenge for government in the wake of acknowledged data deficit in Ireland.

¹ National Disability Authority Act 1999

² Ibid

³ This finding is reiterated in the recent report of the National Statistics Board Developing Irish Social & Equality Statistics to Meet Policy Needs, (2003) which reported that administrative data sources are limited in usefulness for a range of reasons, including definitional differences and incompleteness.

In light of these concerns and in line with its statutory duties, the NDA identified the following objective as a priority for year 2002:

“[To] develop baseline quantitative and qualitative data to inform and underpin the planning and development of policy and services for people with disabilities in Ireland” (NDA, 2002).

The Authority prioritised five key strategic areas for its work during the life of the first strategic plan⁴. These policy areas include:

- Education
- Health
- Employment and training
- Income adequacy and
- Transport

This report is one in a series of reports, which presents research commissioned by the NDA in 2002. This series contributes to our strategic aims by providing much needed baseline evidence on the quantum and range of service provision in Ireland for people with disabilities and a review of international practice in the field against which to measure Ireland's strengths and weaknesses in the sector. Each report in the series begins by providing an overview of the legislative and policy context for the provision of services and concludes with a discussion regarding gaps in service provision and reflections from the NDA on necessary measures to bring Ireland's service provision in line with best practice.

Importantly, each report identifies the NDA's focus for further policy, research and standards work during the lifetime of our second strategic plan, covering the period 2004 – 2006.

Methodology

Consultants at Booz Allen Hamilton (BAH) were commissioned to undertake a review of transport service provision for the NDA. BAH was supported in this research effort by Taylor Lightfoot Consultants and the TAS Partnership Limited, and we acknowledge their important contribution to our programme of work.

The researchers were asked to identify current and recent research in the field, and collate available information on the quantum and range of services currently available. They also set out to review the literature and survey providers to identify: key policy documents, regulations, statutory and non-statutory codes of practice underpinning development of transport services in Ireland, and as far as possible, the range and quantum of transport services, programmes, and measures available for people with disabilities in

⁴ National Disability Authority (2002) A Matter of Rights: NDA Strategic Plan 2001-2003
NDA: Dublin

Ireland. Finally, the researchers provide a review of international good practice in relation to the quantum and range of service/programme provision for people with disabilities in this sector.

The research involved a range of approaches, including desk research, interviews, surveys and consultation within the sector.

This report explores current transport provision and best practice across land, sea, and air travel. The review found that there is significant progress in many of the areas raised in the 1996 report of The Commission on the Status of People with Disabilities⁵. This progress includes the improved accessibility of buses operating local services in Dublin and other major towns and cities, specific accessibility improvements in other modes of transport, equality/disability training within the transport sector, improved consultation with people with disabilities, improvements to certain bus and rail stations, increases in allowances and use of free travel passes, parking regulations and assistance on school buses for children with disabilities.

The National Development Plan⁶ contains a number of commitments regarding investment in transport infrastructure and facilities. Specifically all new and upgraded rail and bus stations, all light rail vehicles and suburban railcars and all buses financed under the NDP must be accessible to people with mobility and sensory impairments.

The establishment of the Dept. of Transport (DoT) under the current government with responsibility for the national roads programme, aviation and public transport provides a welcome opportunity for more integrated service provision, standard setting and agreed policy and timeframes on accessibility and other targets. The Department's Public Transport Accessibility Committee works to advise the DoT on accessibility policy and implementation. Equally the establishment of the Dublin Transport Office provides an opportunity for integrated transport provision in the largest metropolitan area in the state.

However, serious challenges remain if we are to be confident of a transport system, which provides for "Transport for All".

A large part of existing rail transport infrastructure dates back to the 19th Century and will require substantial investment to make accessible. Accessible long distance coaches are still at the trial stage and will take some years yet before they are introduced as the standard for the coach fleet. The introduction of a fully accessible taxi service still requires developments in design specification and the introduction of standards for

⁵ Commission on the Status of People with Disabilities (1996) A Strategy for Equality: Report of the Commission on the Status of People with Disabilities Government Publications Office: Dublin

⁶ Department of Finance (1999) National Development Plan 2000-2006 Government Publications Office: Dublin

services. Access to the pedestrian and transport infrastructure requires investment and greater cooperation and coordination between transport service providers and local authorities.

Significantly, at present there is no statutory requirement to ensure transport services are accessible, though the pending Disability Bill⁷ may address this. The provisions of Sections 17 and 18 of the Equal Status Act 2000 which refer to accessibility of new road and rail passenger vehicles and bus and rail stations respectively provide a basis for action with agreement from the relevant Minister.

There is also no comprehensive set of agreed national standards and/or codes of practice to cover all aspects of the journey by all modes in Ireland. Transport providers currently use various standards in providing accessible facilities and services. However, there is no process in place to monitor service provision against these standards. At present the NDA is engaged in discussions with Dept. of Transport, and the Dept. of Communications, Marine and Natural Resources to address the development of appropriate standards.

The review revealed significant difficulties in accessing data on the quantum of local transport services accessible to people with disabilities, apart from mainstream, timetabled public transport operated by the CIÉ Group and some private operators.

International evidence outlined within endorses the “Transport for All” concept advocated in the report of The Commission on the Status of People with Disabilities (1996) which provides an approach⁸ in which the design process:

- Accommodates as many people as possible in a mainstream public transport solution;
- Determines how to provide the service for those excluded⁹ from this mainstream process; and
- Works continuously to find and incorporate new ideas, materials, technologies and methods into on-going designs so that more people can be included in the mainstream solution in future.

⁷ In March 2002, a Disability Bill was withdrawn. The Government then made a commitment to an amended Disability Bill in the Programme for Government (June 2002) including provision for rights of assessment, appeals, provision and enforcement. The Bill is due to be published this year (2003) and is a legislative priority for the Department of Justice, Equality and Law Reform.

⁸ Accessibility and the Bus System: from concepts to practice, edited by Nick Tyler, Accessibility Research Group, Centre for Transport Studies, University College London, 2002

⁹ For example, some people have to travel lying down. This requires a personal solution, as it would not be possible on general public transport at present; however, such a personal solution should still be seen as part of the public service offer.

Accessible mainstream public transport is more attractive to all, setting off a 'virtuous circle' where more people use public transport and the resulting additional demand enables even better service provision which is more attractive, so more people switch to public transport from car or door-to-door services.

Local transport is the most important component of an accessible transport system and the travel chain, as it is the most used form of public transport and the initial stage in longer distance journeys (feeder service). Access to it is therefore a key issue and incorporates consideration of the physical environment, including footways and other aspects of the route to and from the first point of use, the rolling stock and vehicles, interchange facilities, information and customer care. Experience in Ireland and elsewhere has shown that this is also the aspect of the public transport system which is hardest to 'get right', requires the most attention from planners and operators, and the most operating funding. Recommendations from the NDA towards the development of "Transport for All" are outlined within.

Chapter 1: Review of Policy, Legislation and Regulatory Framework underpinning Transport Service Provision for People with Disabilities

1.1 Introduction

This chapter identifies and briefly outlines the most relevant policies, regulations and codes of practice, which affect the delivery of transport services for people with disabilities. These include regulations and codes of practice in the transport sector as well as in the wider context of disability.

1.2 Review Of Policies

1.2.1 National Development Plan, 2000 - 2006

The National Development Plan contains a number of commitments with regard to transport for people with disabilities. The following measures on accessibility were included for implementation during the life of the Plan:

- all new and upgraded rail and bus stations financed under this Plan will be accessible to people with mobility and sensory impairments;
- all light rail vehicles and suburban railcars financed under this Plan will also be accessible to people with mobility and sensory impairments;
- all buses purchased by CIÉ from 2000 for use on urban services will be low floor;
- a special provision of £10 million (€13 million) will be available to part-finance accessibility improvements to existing public transport infrastructure and facilities;

- each of the CIÉ operating companies will establish an Accessibility Unit and appoint a full-time Accessibility Officer to provide a focal point for accessibility issues and to review all significant investment proposals from an accessibility perspective;
- the Minister for Public Enterprise will establish a Public Transport Accessibility Committee, including representation from disability bodies, to advise on the accessibility aspects of proposed public transport investment and other public transport accessibility issues.

1.2.2 EC White Paper on European Transport Policy to 2010

The European Commission White Paper on European Transport Policy for 2010¹⁰ establishes the focus of European Transport Policy in the short-to-medium term to 2010. A principal measure proposed in the White Paper adopted by the European Commission on 12 September 2001 involves:

“Placing users at the heart of transport policy by improving road safety, adapting a policy of effective charging for transport, recognising the rights and obligations of users, developing high quality urban transport in response to growing congestion in urban areas and putting research and technology at the service of clean, efficient transport”.

Placing users at the heart of transport policy addresses the needs of people with mobility and sensory impairments; specifically with regard to interchange between modes and in line with the principle of subsidiarity. Aware that most measures will fall within the jurisdiction of the national, regional or local authorities, the Commission intends to promote inter alia the following:

- increased use of clean vehicles and of forms of public transport accessible to all users, including people with mobility and sensory impairments (especially those with disabilities and the elderly);
- identification and dissemination of best urban transport system practice, including urban and regional rail services, and best practice in management of the relevant infrastructure.

1.2.3 Consolidated Resolution No. 2001/3 on accessible transport

This resolution was adopted by the European Council of Ministers of Transport (ECMT) meeting in Lisbon 29/30 May 2001. The aim of the resolution is to provide a new impetus to improving the situation across all countries by consolidating previous ministerial resolutions and other relevant work in a single document.

Resolution 2001/3 makes recommendations to governments in relation to accessible transport across a broad range of areas and issues:

¹⁰ European White Paper on Transport Policy for 2010 – A Time to Decide, EC, 2001

- Training, including equality/disability training and design principles
- Information and Communication – systems, harmonisation, consultation
- Research
- Transport planning – infrastructure, pedestrian facilities and road systems
- Personal vehicles – parking facilities, seat belt wearing, vehicle design, driving licences
- Air Travel, including implementation of the European Civil Aviation Conference guidelines on aviation and airport access
- Rail, Light Rail and Tram systems, including implementation of the COST¹¹ 335 guidelines
- Public Transport, including implementing recommendations of the COST 322 report on low-floor buses, promote the development of demand responsive services and the provision of appropriate specialist door-to-door transport services.
- Taxis, including the implementation of the recommendations agreed by the Joint International Road Transport Union/ECMT Task Force¹² for taxi services.

1.3 Legislative and Regulatory Framework - Ireland

1.3.1 Equal Status Act 2000

The Equal Status Act 2000 passed into law on 25th October 2000. The Act outlaws discrimination in the disposal of goods and delivery of services. The Act complements the Employment Equality Act 1998, which outlawed discrimination in the employment arena.

The Equal Status Act 2000 makes it illegal for people to discriminate when they are providing goods or services to the public, whether for free or where the goods are paid for. The Act makes it illegal to discriminate on the grounds of gender, marital status, family status, sexual orientation, religion, age, disability, race and membership of the traveller community.

The Act defines “service” as:

““service” means a service or facility of any nature which is available to the public generally or a section of the public, and, without prejudice to the generality of the foregoing, includes-

1. access to and the use of any place,
2. facilities for-

¹¹ COST is an intergovernmental framework for European Co-operation in the field of Scientific and Technical Research.

¹² Joint ECMT-IRU study on economic aspects of taxi accessibility:
CEMT/CM(2001)17/FINAL

- a. banking, insurance, grants, loans, credit or financing,
- b. entertainment, recreation or refreshment,
- c. cultural activities, or
- d. transport or travel,”

Furthermore, the Act (sections 17 and 18) enables the sponsoring Minister, with agreement of the Minister for Transport, to make regulations with respect to the accessibility of public transport vehicles (new road and rail passenger vehicles) and with respect to the provision of facilities at stations so that they are *“readily accessible to and usable by persons with a disability.”* Section 18, which relates to station equipment specifically, refers to making *“regulations requiring operators of bus and rail stations to provide facilities so that they are readily accessible to and usable by persons with a disability.”*

1.3.2 Proposed new regulatory framework for land transport

There are current proposals for new regulatory frameworks for public transport in Ireland, which include:

- a new agency for the Greater Dublin Area (GDA) responsible for land use and transport¹³
- new institutional and regulatory arrangements for public transport^{14, 15}
- franchising of parts of the existing bus network and new services in GDA
- a new National Passenger Transport Authority (outside GDA) to -
 - implement Government policy
 - oversee strategic framework and regional passenger transport offices
 - distribute funds: subvention, free travel, fuel duty rebate and school transport
 - inter-regional bus service licensing
- two Regional Passenger Transport Offices, responsible for -
 - network planning and procurement
 - regional service licensing

¹³ “New Institutional Arrangements for Land Use and Transport in the Greater Dublin Area”, Consultation Paper, Department of the Environment and Local Government and Department of Public Enterprise, March 2001.

¹⁴ “A New Institutional and Regulatory Framework for Public Transport”, Department of Public Enterprise, August 2000.

¹⁵ The Minister for Transport, Mr. Séamus Brennan TD, (Thursday, 14th November, 2002), published a consultancy report on the regulation of bus services outside the Greater Dublin Area. The study was commissioned in October 2001 by the then Department of Public Enterprise. It sets out the consultants’ proposals for regulatory reform of the bus market outside the Greater Dublin Area.¹⁶ “Statement on Public Transport Reform” by Seamus Brennan T.D., Minister for Transport, delivered at a Meeting of the Public Transport Partnership Forum, 7 November 2002.

- performance monitoring.

With respect to the new institutional arrangements for land and transport in the Greater Dublin Area, the Minister for Transport recently announced that the following features are being pursued:¹⁶

- Overall regulatory policy and the approval of broad public transport investment will be with the Minister of Transport;
- An independent body will be established to procure public transport services, regulate public transport and allocate current and capital funding for specific purposes from an overall allocation provided by the Exchequer;
- The first phase of franchising 25% of the Dublin bus market in 2004;
- Procurement of long distance bus services serving the Greater Dublin Area which commence/end outside that area, will be procured and regulated by the independent body;
- DART and suburban rail services serving the Greater Dublin Area will be provided subject to multi annual public service contract negotiated by the independent body with Iarnród Éireann;
- LUAS and metro services in the Greater Dublin Area will proceed on a public private partnership basis by the Railway Procurement Agency, with the relevant service contracts requiring the approval of the independent body;
- The independent body will also regulate public transport fares and set and enforce quality standards for public transport services.

1.3.3 Road Transport Act 1932

The Road Transport Act 1932 remains the key piece of legislation governing the provision of bus services outside the Greater Dublin Area. This Act established a licensing system to regulate the level of competition and was also designed to prevent wasteful duplication.

A “passenger road service” is defined primarily in terms that each passenger is carried at a separate fare. Licences cover “omnibus” services, with potential to pick up or set down passengers at various points on the line of route, or “motor coach” services, specified as to whether the services will be operated on a regular or occasional basis. The applicant operator specifies the terminal points and route of the service, details of vehicles and capacity, fare structure and fares to be charged, and these become conditions of any licence granted. Licences were originally issued for a one-year period, but the duration has since been extended.

Criteria for determining whether or not a licence should be granted are specified by the Minister, and applied by the Department of Transport (DoT).

¹⁶ “Statement on Public Transport Reform” by Seamus Brennan T.D., Minister for Transport, delivered at a Meeting of the Public Transport Partnership Forum, 7 November 2002.

Principles applied in the past (with some exceptions) meant that licences would be granted provided there was a gap in departures of more than one hour on an inter-urban service, or of at least 15 minutes on urban services.

The Act provides for revocation, suspension or non-renewal of passenger licences at the discretion of the Minister for Transport if the licensee fails to comply with the conditions of the licence.

1.3.4 Road Transport Act 1933

This Act led to the railways becoming the dominant supplier of bus services throughout Ireland, and these were brought into public sector ownership – as part of Córas Iompair Éireann (CIÉ) – under the **1944 Transport Act**.¹⁷

1.3.5 Transport Act 1958

Under the Transport Act 1958, the position of CIÉ was consolidated, taking on the operations of the Great Northern Railway Board within the State. The 1958 Act also exempted CIÉ (and subsequently Bus Éireann) from the licensing requirements that apply to other operators, but prohibited CIÉ from competing with a licensed service without the consent of the Minister.

1.3.6 Transport (Re-organisation of CIÉ) Act 1986

The Transport (Re-organisation of CIÉ) Act 1986 restructured CIÉ and created its subsidiaries Bus Éireann, Bus Átha Cliath and Iarnród Éireann. The Act provides for the Minister for Transport to provide policy direction to CIÉ and for compliance by the operating subsidiaries with these requirements.

1.3.7 Road Traffic (PSV) Regulations 1963 – 2001

These regulations, which have been partly amended on a number of occasions since 1963, form the basis for the licensing of classes of public service vehicles, for the licensing of drivers of public service vehicles and set out provisions relating to the control and operation of public service vehicles. They also prescribe the duties of drivers and passengers on large (more than 8 passengers) public service vehicles and public hire vehicles (taxis and hackneys).

¹⁷ The earlier Railways (Road Motor Services) Act of 1927 gave the railway companies of Ireland the right to operate road services, subject to ministerial approval of proposed routes and charges. In the Dublin area, the SUTC (Dublin United Tramways Company) obtained 'freedom' to operate buses under another 1927 Act – Dublin United Tramways (Omnibus Services) Act 1927 – again subject to ministerial approval. ("On the Move – Córas Iompair Éireann 1945-95", M Ó Rian, 1995).

1.3.8 Road Traffic (Construction, Equipment and Use of Vehicles) Regulations 1963

These regulations, which have been partly amended on a number of occasions since 1963, prescribe the requirements as to the construction, equipment and use of large (more than 8 passengers) and small (less than 9 passengers) public service vehicles while being used on public roads and, in certain cases, in public places. They also prescribe conditions as to the use of vehicles and their equipment and the duties of drivers and passengers.

1.3.9 Road Traffic (Public Service Vehicles) (Amendment) (No. 3) Regulations, 2000 (SI 367/2000)

These regulations provide for the full resumption of taxi licensing following a High Court decision [High Court Judicial Review Record No. 38 JR/2000] and provide for the revocation of regulatory provisions involving quantitative restrictions on the licensing of taxis and hackneys.

The main provisions of these regulations are:

- (local) licensing authorities will make a conditional offer of a taxi, wheelchair accessible taxi, hackney or limousine licence upon application; these licences to be granted following presentation of a (vehicle) test certificate and certificate of suitability, demonstration of appropriate motor insurance and payment of the appropriate fee;
- revocation of early regulatory provisions involving quantitative licensing restrictions;
- vehicle testing to be carried out both by the Gardaí or the National Car Testing Service (NCTS) for a transitional 6 month period, and thereafter by NCTS only (no direct test fee will be charged to applicants in the transitional period; this is a temporary arrangement and direct charges will be imposed at the end of that period);
- a £5,000 licence fee for the granting of a taxi licence, with a £100 fee for a wheelchair accessible taxi licence and £200 for a hackney or limousine licence. Annual renewal fees (instead of bi-annual at present) of £500 for taxi licences and £100 for other licence categories;
- validation of taxi sharing from specially designated taxi stands;
- from 1 January, 2002, all taximeters to issue automatic taxi receipts; and
- maximum fares to continue to be fixed by local licensing authorities.

At the time these regulations were implemented and referring further to the issue of wheelchair accessibility of taxis, the Minister¹⁸ said:

¹⁸ Minister of State for the Department of the Environment and Local Government today (21 November 2000) announcing that he has made new regulations which allow for the resumption of taxi licensing and end quantitative restrictions on taxi licensing

“It has not been practicable to maintain a universal requirement of wheelchair accessibility in the short term given that early and rapid progress is needed to respond to customer demand for taxis. However, I now put on record my intention that, by end 2003, the process will commence of making all taxi vehicles wheelchair accessible. Taxi service providers should now gear themselves to this requirement.”

1.3.10 Railway Safety Bill 2001

The Railway Safety Bill is due to be enacted in 2004 and is currently being processed in the Dáil. This Bill, when enacted, will lead to the creation of an independent Railway Safety Commission. This will lead to a more formalised approach to railway safety in Ireland. Iarnród Éireann (and other railway undertakings) will, in accordance with this legislation, be required to implement a safety management system and produce a “safety case” describing the components of the safety management system.

The safety case is to assist in achieving the following two objectives:

- It shall demonstrate that the railway undertaking has the ability to properly assess and effectively control risks to the safety of persons,...
- It shall provide a working document by which the railway undertaking and the Railway Safety Commission can ensure that the safety systems described in the safety case are being properly implemented and continue to be maintained.

Whilst the Railway Safety Bill is not designed, *per se*, to promote accessible public transport, for example there is no reference to “accessible transport” within the Bill, the focus on a safer railway may well bring benefits in terms of accessibility. Many factors that make railways a safer environment can also result in enhanced accessibility for people with disabilities. For example, uniform platform heights, gaps between platforms and carriages, audio and visual announcements can all be developed in ways that both meet safety standards and support enhanced accessibility.

1.3.11 Transport (Railway Infrastructure) Act 2001

Under the Transport Act 2001, all new rail schemes that require the construction of a new railway line or spur will require a Railway (Works) Order. The requirements for a Railway Order as stated within the Transport (Railway Infrastructure) Act 2001, Part 3 are as follows:

- a draft of the proposed order;
- a plan of the proposed railway works; highlight areas of concern regarding accessibility.
- In February 2002, the then Minister for Public Enterprise initiated the Transport (Railway Infrastructure) Act 2001 (Additional Functions)

(Integrated Ticketing) Order, 2002¹⁹ which confers an additional function on the Railway Procurement Agency in relation to the procurement plan of any proposed commercial development of land adjacent to the proposed railway works;

- a book of reference to a plan – indicating the identity of the owners and of the occupiers of the lands described in the plan;
- a statement of the likely effects on the environment of the proposed railway works – referred to as an “environmental impact statement” – this Environmental Impact Statement (EIS) is a very comprehensive document and forms a major part of the Railway Order.

Again, as with the Railway Safety Bill, this Act and the associated production of a Railway Order for new rail schemes does not directly dictate or promote accessible rail transport. However, it could provide the opportunity for interested parties (albeit on an *ad-hoc* basis) to inspect the plans for all new rail schemes requiring railway orders and integrated ticketing systems for public transport services by rail or road as may be determined by the Minister for Transport.

1.3.12 Disabled Drivers and Disabled Passengers (Tax Concessions) Regulations 1994

The Tax Relief for Vehicles Purchased for Use by People with Disabilities Scheme provides a range of tax reliefs in connection with the purchase and use of motor vehicles.

The relevant legislation is contained in Section 92 of the Finance Act, 1989 and the Disabled Drivers and Disabled Passengers (Tax Concessions) Regulations, 1994 (S.I. 353 of 1994).

The origin of the scheme is Section 43 of the Finance Act, 1968 (No. 33/1968) which introduced an exemption from road tax for vehicles adapted or constructed for and used by persons with disabilities who were wholly or almost wholly without the use of both legs.

The main provisions of the Scheme are:

- “The Scheme is open to persons who meet the specified medical criteria and have obtained a Primary Medical Certificate to that effect. They can apply for relief either as a driver or a passenger. Alternatively, there is provision for family members to apply.
- Relief in respect of Vehicle Registration Tax (VRT) and Value Added Tax (VAT) may be obtained, subject to a maximum of:
 - €9,525 for a driver
 - €15,875 for a passenger

¹⁹ S.I. No. 84 of 2002. Transport (Railway Infrastructure) Act 2001 (Additional Functions) (Integrated Ticketing) Order, 2002

- €15,875 for a family member.
- Relief is restricted to a vehicle which has been specially constructed or adapted for use by a person with a disability and which has an engine size of less than 2,000cc in the case of a driver and 4,000cc in the case of a passenger.
- A vehicle which has been relieved from tax may not be disposed of for at least two years.
- A person admitted to the Scheme may also apply for a repayment of excise duty on fuel used in the vehicle, for the transport of the person with the disability, up to a maximum of 600 gallons or 2,728 litres per year.
- A vehicle which has been admitted to the Scheme is also exempt from the payment of annual road tax.”²⁰

In a recent investigation²¹, the Ombudsman found that with respect to specific rejections of claims by applicants, the Revenue Commissioners’ decisions not to grant tax relief “*in these cases were unreasonable, unfair and inappropriate*”. The Revenue Commissioners accepted the recommendations of the Ombudsman.

Of relevance, are the Revenue Commissioners responses, in particular:

Revenue stated that it intended approaching the Department of Finance with a view to reviewing the Regulations again and that my Investigation Report would also be brought to the attention of the Department of Justice, Equality and Law Reform, Chair of the inter-departmental group which is currently reviewing the scheme.

A review of the Regulations was completed and forwarded from the Department of Justice, Equality and Law Reform to the Minister for Finance in November 2002. No action has been taken on the report’s findings.

1.3.13 Road Traffic (Traffic and Parking) Regulations, 1997

These Regulations introduced a number of changes to the disabled persons’ parking permit system with effect from 1 October 1997, as follows:

- The permit system was extended to include disabled passengers; the permit is now issued in respect of a named person, for use on any vehicle being used for the transportation of that person.
- The Irish Wheelchair Association and the Disabled Drivers Association may now issue permits, as well as local authorities.

²⁰ Source: “Vehicles for People with Disabilities Tax Relief Scheme”, VRT 7, March 2002, The Revenue Commissioners, Dublin.

²¹ (Passengers with Disabilities”, An investigation by the Ombudsman of complaints against the Revenue Commissioners about the refusal of tax relief for cars adapted or constructed for use by passengers with disabilities. A Report to Dáil and Seanad in accordance with Section 6(7) of the Ombudsman Act, 1980, August 2001. p. 26)

- The permits have national application, whereas under the previous system they only applied in the area of the issuing local authority.
- The new regulations provide for the acceptance of a permit issued by authority of another State once it contains the recognised wheelchair symbol.
- It is now an offence for a vehicle to be parked in a disabled person's parking bay on a public road or in a public car park unless a disabled person's parking permit, issued in accordance with the regulations, is displayed in the vehicle.

The regulations provide for a new type of disabled persons' parking permit, which can be issued by local authorities, the Irish Wheelchair Association and the Disabled Drivers Association. Permits may be granted to all eligible disabled persons, irrespective of whether they are drivers or not and the permits have national application. The new permits are available to any person who is suffering from a disability that prevents that person from walking or causes undue hardship to the person in walking.

Local authorities are empowered to provide disabled persons' parking bays on public roads in their charge. The regulations make it an offence to park in such bays unless a disabled person's parking permit is displayed in the vehicle and it is being parked for the convenience of the holder of the permit. The Road Traffic (Signs) Regulations, 1997 and the Traffic Signs Manual set out the dimensions for parking bays, including disabled persons' parking bays. Local authorities have been requested in the Memorandum for Non-National Road Grants, to consider reserving on-street car parking spaces for drivers with disabilities. Section 36 of the Road Traffic Act, 1994 empowers road authorities to make bye-laws governing the type of paid parking controls to be applied on public roads in their functional areas, including the exemption of specified classes of vehicles from the payment of fees in respect of parking, the conditions under which specified classes of vehicles may be so exempted and the identification of exempted vehicles.

The offence of parking illegally in a disabled person's parking bay now comes within the scope of the on-the-spot fines system, which applies countrywide.

1.3.14 Aer Rianta Bye-Law

In 1999, Aer Rianta introduced a Bye-Law which obliges all service providers at State airports to make available such facilities as are required by passengers with disabilities in order that they may avail themselves of all airport services.

1.3.15 Aran Islands Transport Act, 1946 & The Minister for Arts, Heritage, Gaeltacht and the Islands (Powers and Functions) Act, 1998

These Acts give the Minister for Community, Rural & Gaeltacht Affairs powers with regard to payment of subsidies for ferry services to the offshore islands. The Department has recently been trying to link the subsidised ferry services with subsidised bus services from the mainland ports, but these have been adjudged to be *ultra vires*. The Minister has therefore decided to prepare legislation covering all transport services related to island connections, in order to obtain powers to provide financial subsidies for ferries, air services and the connecting road passenger services.

1.3.16 Taxi Regulation Act 2003

The Taxi Regulation Act 2003 established the Commission for Taxi Regulation. The principal function of the Commission is the development and maintenance of a regulatory framework for the control and operation of small public service vehicles and their drivers.

In exercising its functions the Commission will seek to achieve a range of functions including one to *“promote access to small public service vehicles by persons with disabilities”*.

Part 4 of the Act allows for the establishment of an Advisory Council to the Commission for Taxi Regulation. The Council met for the first time in November 2003. Section 55 (1) of the Act states *“It shall be the duty generally of the Council to advise the Commission or the Minister, as appropriate, in relation to issues relevant to small public service vehicles and their drivers.”* The disability sector is represented on the Council.

It is envisaged that the Commission will tackle issues related to the accessibility of the taxi fleet, equality disability training for drivers and service availability for people with mobility and sensory impairments.

1.4 Legislative and Regulatory Framework – EU

1.4.1 Overview

Jack Short, Deputy Secretary General, European Conference of Ministers of Transport (ECMT), in July 2001²² made the following observations in relation to the legal provisions affecting people with disabilities:

²² “Progress in Europe in Improving Transport for People with Mobility Handicaps”, Jack Short, Deputy Secretary General ECMT at Towards Safety, Independence and Security – TRASED 2001, 9th International Conference on Mobility and Transport for Elderly and Disabled People, Warsaw (Poland), 2-5 July 2001. Jack Short is now Secretary General of ECMT.

- Europe has tended to make progress through voluntary agreements, guidelines and codes of good practice rather than laws and litigation;
- The 1990s, however, saw significant changes across Europe with respect to legal provisions affecting people with disabilities;
- Many countries have enacted anti-discrimination legislation. For example, the UK introduced the Disability Discrimination Act in 1995 that takes a civil rights approach;
- Many countries have introduced specific regulations with respect to transport;
- The key focus and intent of the emerging legislation and specific regulations is achieving full integration of people with disabilities in all aspects of existence.

1.4.2 EC (Road Passenger Transport) Regulations 1991

These regulations, implemented in EC Directive 98/76, govern the licensing of road passenger transport operators and the requirements for successfully obtaining a Road Passenger Transport Operator's License (RPTOL). This includes the need to have a transport manager with a CPC – Certificate of Professional Competence.

However, a Road Passenger Transport Operator's License is not required in the following circumstances, amongst others:

- Where the carriage is of passengers in vehicles constructed and equipped for the carriage of nine people or less, including the driver;
- Where the carriage is of passengers to or from work in vehicles owned by their employers;
- Where the carriage is of persons to or from a school, or in relation to school activities, in vehicles owned by the school;
- Where the carriage is of passengers otherwise than for profit in vehicles owned by a voluntary organisation.

1.4.3 The Rail Vehicle Accessibility Regulations, 1998 (United Kingdom)

Currently there are no regulations governing the accessibility of rail vehicles in Ireland. In the absence of suitable Irish regulations, Iarnród Éireann has voluntarily adopted the UK Rail Vehicle Accessibility Regulations 1998 for the procurement of all new rolling stock. The regulations are quite comprehensive and considered very effective.

The main issues covered in the regulations include doors, door controls, steps, floors, seats, interior transparent surfaces, handrails and handholds, door handles, passenger information and toilets.

Furthermore, with respect to facilities for wheelchairs, the regulations are very specific and include details such as number of and specification for wheelchair spaces and appropriate facilities such as tables, doorways,

toilets, telephones, internal doorways, boarding devices and catering for the wheelchair users.

Wheelchair Space Requirements		
2 to 7 rail carriages	2 wheelchair spaces	Note: where a train has two or more different classes of passenger accommodation then the regulations specify that there shall not be less than one wheelchair space in each class of accommodation. Also, maximum possible length of an Irish train is 10 carriages at present.
8 to 11 rail carriages	3 wheelchair spaces	
12 or more rail carriages	4 wheelchair spaces	

1.4.4 Directive 2001/85/EC

This Directive applies to every single deck, double deck, rigid or articulated vehicle of category M2 (vehicles used for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum weight not exceeding 5 metric tons) or M3 (vehicles used for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum weight exceeding 5 metric tons) as defined in Annex II, Part A, of Council Directive 70/156/EEC.

The following Article is of direct relevance to the design of vehicles accessible to people with mobility and sensory impairments, including wheelchair users.

(11) While the principal aim of this Directive is to guarantee the safety of passengers, it is also necessary to provide technical prescriptions to allow accessibility for persons of reduced mobility to the vehicles covered by the Directive, in accordance with the Community Transport and Social Policies. Every effort must be made to improve access to these vehicles. To this end, accessibility for persons of reduced mobility can be achieved either by technical solutions applied to the vehicle, as covered by this Directive, or by combining them with appropriate local infrastructure to guarantee access for wheelchair users.

1.4.5 Regulations governing financial support for public transport

At present, decisions about local and regional public transport services are taken at national level in most European member states and are governed by national legislation. However, where there are European regulations, these take precedence over national law.

The rules governing payment of financial support in respect of public sector obligations in local transport contracts are currently set out under **Regulation 1191/69/EC**. This stipulates that calls for tender have to be issued for contracts for scheduled public transport services in receipt of public subsidies.

In September 2000, the European Commission submitted a proposal to the European Parliament for a new **Regulation (2000/0212)**, in response to perceived changes in the public passenger transport market and the need to

modernise public transport. This covers the allocation of public sector subvention for secured passenger transport services, or regulated fares and concessions for particular groups of users and, if implemented, would replace Regulation 1191/69. Following a review of amendments proposed by the European Parliament, a revised proposal was issued in February 2002.

Tenders must currently be issued in accordance with **Directive 93/38/EEC**, commonly known as the Utilities Directive. The European Commission recognises a need to simplify the existing legal framework, and adopted proposals for reform in May 2000:

- An Invitation to Tender will normally indicate that the contract will be awarded on the basis of the most economically advantageous tender. **Draft Regulation 2000/0212** sets out the range of evaluation criteria which are expected to be applied. Contracting authorities are expected to take into account a minimum set of factors including accessibility of services, service information provided, level and transparency of tariffs for different user groups, level of integration between different transport services, accessibility for people with mobility and sensory impairments and transport needs of people living in less densely populated areas

There are potential implications for the extension of accessibility in local public transport services, if the phased introduction of accessible vehicles required of CIÉ subsidiaries is replaced by a competitively tendered, franchise-style operation. This aspect may require specific attention in the tender specification process, if momentum is not to be lost in the roll out of accessible buses in Dublin and throughout the country.

1.4.6 Council Regulation (EEC) No. 2408/92

This regulation gives the Minister for Community, Rural & Gaeltacht Affairs powers with regard to payment of subsidies for air services to the offshore islands.

1.4.7 Directive 2003/24/EC

This directive amends Council Directive 98/18/EC of 17th March 1998 on safety rules and standards for passenger ships. It provides a definition of “persons with reduced mobility” and under article 6b(1), safety requirements for persons with reduced mobility, it states:

“Member States shall ensure that appropriate measures are taken, based, where practicable, on the guidelines in Annex 111 to enable persons with reduced mobility to have safe access to all passenger ships of Classes A,B,C and D and to all high speed passenger craft, used for public transport, the keel of which is laid or which are at a similar stage of construction on or after 1 October 2004.”

Annex 111 is titled “Guidelines for safety requirements for passenger ships and high speed passenger craft for persons with reduced mobility”. In

applying the guidelines Member States shall follow the International Maritime Organisation (IMO) circular MSC/735 of 24th June 1996 entitled "Recommendation on the design and operation of passenger ships to respond to elderly and disabled persons' needs".

The Guidelines cover five areas: access to the ship, signs, means to communicate messages, alarm and additional requirements ensuring mobility inside the ship.

1.5 Codes of Practice & Guidelines

1.5.1 Charter on access to transport services & infrastructure

In May 1999, the European Conference of Ministers of Transport (ECMT) adopted the *Charter on Access to Transport Services and Infrastructure*.²³ The aim of the Charter is to underline the political commitment in Europe to ensuring that all new transport infrastructure should be constructed to take into account the needs of people with disabilities.

The key principles or underlying rationale of the Charter are:

- i. The number of people with disabilities people is growing. With an aging population, this number will increase substantially over the next 50 years.
- ii. Everyone must have an opportunity for independent living. To achieve this, public buildings, the transport systems and infrastructure must be barrier-free.
- iii. New infrastructure must take account of the needs of people with disabilities.
- iv. Governments must ensure access. All governments have a clear responsibility to ensure that these (infrastructure) projects are designed and constructed to the highest standards of accessibility.
- v. Accessibility principles must be followed. Fundamental principles applying to any project must include:
 - a. All projects considered for public funding (at national or international level) must, as a condition of this funding, agree to incorporate full accessibility, to approved standards or recognised best practice, into the design and construction
 - b. The design concept....must be vetted and approved by experts in accessibility, including people with disabilities. National governments will propose and approve suitable sources of advice.
 - c. The accessibility requirements must incorporate, as a minimum:

²³ ECMT, "Charter on Access to Transport Services and Infrastructure", Warsaw 19/20 May 1999.

- full access for wheelchair users....
 - features to aid people with difficulties in walking, gripping, reaching or balancing...
 - facilities to assist people with vision impairments....
 - facilities for people who are deaf or hard of hearing....
- vi. Public funding will be conditional. Projects will be monitored for compliance with accessibility principles. Continued funding will be made conditional on achieving satisfactory progress with the inclusion of access features.

1.5.2 COST 335 – Passengers’ accessibility of heavy rail systems

The main objective of the COST 335 initiative²⁴ was to produce guidance for governments and railway operators on best practice in achieving full accessibility for their services and facilities. The initiative was to focus on both technical and economic issues as well as the extent to which totally independent access can be achieved. Secondary objectives were to include the raising of awareness among train operators of the actual and potential size of the market for rail travel among people with disabilities and the elderly, and giving them a clear indication of the wide range of issues involved in realising that market potential.

*COST 335 considered the whole journey from door-to-door. COST 335 focuses on producing clear guidance and good practice aimed at all those involved in building, running and financing Europe’s railways: governments at national and regional levels, operators, manufacturers, designers, architects, station and train staff – all have a part to play in creating a railway system which can offer not only physical access but also the confidence that is essential if people are going to travel.*²⁵

1.5.3 Airport Voluntary Commitment on Air Passenger Service

European airports have developed an Airport Voluntary Commitment on Air Passenger Service²⁶ following extensive consultation with representatives of consumers, European governments, the European Commission and the air transport industry.

²⁴ COST 335 was completed in October 1999 after a 3 year period. 17 countries participated in COST 335 – Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Greece, Ireland, Italy, The Netherlands, Norway, Slovenia, Spain, Sweden, Switzerland and United Kingdom.

²⁵ Ann Fyre, Department of Transport, Environment & the Regions, United Kingdom, at COST 335 Passengers’ accessibility of heavy rail systems, Proceedings of the seminar – Brussels 30-31 October 1997.

²⁶ Airports Council International Europe, “Airport Voluntary Commitment on Air Passenger Service”, Brussels, 10 May 2001.

The Airport Voluntary Commitment on Air Passenger Service contains commitments to deliver a defined quality of service to air travellers. Although the commitments are not legally binding, the signatories to the Airport Voluntary Commitment on Air Passenger Service will continue to strive to meet the needs of customers and achieve the quality set out in this Commitment on a consistent basis. Signatory airports will each develop their own individual service plans incorporating the Airport Voluntary Commitment on Air Passenger Service.

Persons with reduced mobility

Each airport will prominently publicise the services it offers for assisting passengers with reduced mobility (PRMs). Most crucially each airport commits itself to the new special protocol (see APPENDIX 1) on “Special Protocol to Meet The Needs Of People With Reduced Mobility”.

1.5.4 Airline Passenger Service Commitment

Airlines in Europe have developed the Airline Passenger Service Commitment following consultation with representatives of Air Travellers, European Governments and the European Commission.

The Airline Passenger Service Commitment contains non-legally binding commitments to deliver defined standards of service to air travellers. The code covers 14 areas, before travel, during travel and after travel. It describes the level of service air travellers may expect consistently from signatory airlines. It will enable air travellers to make a more informed choice of airline when planning their travel arrangements.

The airlines that are signatories to this Airline Passenger Service Commitment will continue to compete vigorously to meet the needs of customers by offering different products and different levels of customer service. They will endeavour to achieve the standards set out in this Airline Passenger Service Commitment on a consistent basis. Signatory airlines will each develop their own individual service plans incorporating the Airline Passenger Service Commitment.

Signatory airlines will establish staff training programmes and introduce changes to their computer systems to implement the Airline Passenger Service Commitment. During this implementation period, some elements of the Airline Passenger Service Commitment may not be delivered by every airline.

Provide Assistance to Passengers with Reduced Mobility and Passengers with Special Needs

Each airline will publicise the services it offers for handling passengers with special needs and for assisting passengers with reduced mobility in an appropriate manner compatible with applicable safety regulations. For

passengers with reduced mobility the airlines commit themselves to support the attached paper (APPENDIX 2) on “Meeting the Needs of People with Reduced Mobility”.

1.5.5 Ferry travel

With respect to passenger ferry travel, the main guidance that ferry operators have at their disposal is the International Maritime Organisation (IMO) Code and EU Directive 98/18/EC²⁷ and subsequent amendments²⁸ to this directive.

The IMO Maritime Safety Committee at its 66th session in June 1996 approved a recommendation²⁹ regarding the design and operation of passenger ships to respond to the needs of older people and people with disabilities. The recommendations included guidelines for the design and operation of passenger ships to respond to the needs of older people and people with disabilities and cover issues such as terminal access, access to the vessel, availability of facilities on board such as shops, toilets and other facilities.

Following the approval of these guidelines, the Disabled Persons Transport Advisory Committee (DPTAC) in the UK has developed more detailed guidance on meeting the needs of people with disabilities, and these were published in 2000³⁰.

Chapter 2: Quantum and Range of Transport Service Provision for People with Disabilities

2.1 Introduction

This chapter on services for people with disabilities in Ireland relates to the following Terms of Reference for the Review, which defined the key activities to be undertaken. The methodology used is also detailed below.

1. Identify current and recent research in the field, and collate available information on the quantum and range of services currently available.
2. Review of literature/survey of providers.
3. Identify national resources (range of funders, and financial resources).

²⁷ EU Directive 98/18/EC and corrigendum on safety rules and standards for passenger ships.

²⁸ EU Directives 2002/25/EC and 2003/24/EC amending Council Directive 98/18/EC.

²⁹ IMO MSC/735 of 24/6/1996 (Recommendation on the Design and operation of passenger ships to respond to elderly and disabled persons' needs)

³⁰ The design of large passenger ships and passenger infrastructure: Guidance on meeting the needs of disabled people. DPTAC 2000

A notable outcome of the consultation with Health Boards, other state agencies, such as the Department of Education and FÁS and key voluntary organisations, is the lack of information available. It would appear that the relevant data on funding of transport services is rarely kept in ways that allow for analysis and reporting on the availability of transport services for people with disabilities. For example, health boards are known to provide financial assistance to certain voluntary organisations but have been unable to specify how much is spent on the provision of transport services. This means that there are significant gaps and lack of detailed information on such services.

2.2 Financial Assistance

2.2.1 Investment in Accessible Transport Projects

All transport projects funded through the National Development Plan must meet the needs of people with disabilities. In addition, there is a budget to improve the accessibility of public transport, i.e. specific improvements, such as adding lifts at existing stations that would not be included under other infrastructure projects. The overall figure for specific expenditure on accessibility by the CIE Group companies for the years 2000 and 2001 was €3.7 million. A further €5 million was allocated to accessibility projects in 2002. The allocation for 2003 is €6.5 million, and €6.8 million for 2004. There was no specific allocation in 1999 for infrastructure projects; however, an amount of €10 million was expended on the purchase of 40 low floor buses.

2.2.2 Financial support for disabled drivers & passengers

The following sources of financial support are available to disabled drivers:

- Mobility Allowance;
- Motorised Transport Grant; and
- Tax Relief under the Disabled Drivers and Disabled Passengers Scheme.

Mobility Allowance

The Mobility Allowance is a means tested monthly payment by health boards to people aged between 17 and 66 who have a disability and are unable to walk or use public transport (for example, by financing the occasional taxi journey). If an allowance is awarded, it will be continued beyond the age of 66 but may not be applied for if aged 66 or over. In 2002 just over €2.5m was granted.

The following conditions apply:

- the person must be unable to walk, even with the use of artificial limbs or other suitable aids, or the person's health is such that the exertion

- required to walk would be dangerous;
- the inability to walk must be likely to last for at least a year;
- the person must not be medically forbidden to move;
- the person must be in a position to benefit from a change in surroundings;
- the person must be living at home or in a long-term institution; and
- the person must pass a means test.

The decision on whether or not the medical criteria are met is made by the health board's Senior Area Medical Officer. The means test is similar to the means test for the Disability Allowance.

The allowance is paid monthly. A lower rate is payable to people who are availing of the Disabled Drivers and Disabled Passengers Tax Concession:

- higher rate: €126 per month; and
- lower rate: €63 per month.

Motorised Transport Grant

The Motorised Transport Grant is a means tested health board payment for people with disabilities who need to buy a car or have a car or other vehicle adapted in order to enable them to drive and, as a result, earn a living.

Persons wishing to receive the Motorised Transport Grant must:

- be over 17 years and under 66 years;
- have a disability which impedes their use of public transport;
- hold a current driving licence;
- be physically and mentally capable of driving; and
- require a car or other vehicle in order to obtain/retain employment or live in a very isolated location. Where an application is made on the basis of obtaining or retaining employment or self employment, the Health Board must be satisfied that someone is capable of holding down a job.

The grant may also be considered in exceptional circumstances for people with severe disabilities who are over 17 years and under 66 years, who live in remote locations and who are impeded from using public transport.

It may be possible to get a grant if an individual is unemployed, but could take up work if given access to a car. Self-employed people may also be eligible for a grant.

Normally, the grant is payable where someone drives himself or herself. It may be possible to get approval to have a grant paid where they own the car and arrange for its adaptation and another named person drives it because the owner is not physically or medically able to drive.

When a grant has previously been paid towards the purchase of a vehicle, a grant towards the replacement of the car will not normally be paid, unless

due to extenuating circumstances, for **three** years from the date that the previous grant has been paid.

From 1 July 2002, any individual in receipt of the Motorised Transport Grant will no longer be eligible to receive the Mobility Allowance, even if they did so previously. This is because the payment of a Motorised Transport Grant is subject to the condition that the Health Board will not be called upon at any future date to contribute towards the running costs of the vehicle. The person will not be eligible for the Mobility Allowance again for three years after the date of payment of the Motorised Transport Grant.

Qualifying for the Motorised Transport Grant does not guarantee that the individual concerned will qualify for tax exemptions under the Disabled Drivers and Disabled Passengers Scheme, nor does failure to qualify mean that they are not eligible.

The current maximum grant is €4,370. A grant of up to 75% of the cost of motorised transport (purchase price less trade-in price, where appropriate) may be paid, subject to the maximum grant.

Disabled Drivers and Disabled Passengers (Tax Concessions) Regulations 1994

The Disabled Drivers and Disabled Passengers (Tax Concessions) Regulations 1994 (currently under review by Government) provide a range of tax relief linked to the purchase and use of vehicles by disabled drivers and disabled passengers. In 2000, 3,300 people benefited from the Tax Relief on VRT and VAT, which amounted to €28m.

If a person qualifies for tax relief under the scheme, they can also claim repayment of excise duty on fuel used in their vehicle for the transport of a disabled person, up to a maximum of 600 gallons per year. In addition, if they qualify under the scheme, their vehicle may be exempt from the payment of annual road tax on application to a Motor Tax Office. In 2000, 7,000 people benefited from this aspect of the scheme.

In order to qualify for tax relief under the scheme, a valid Primary Medical Certificate must be held. The person must be severely and permanently disabled and:

- be completely or almost completely without the use of both legs;
- be completely without the use of one leg and almost completely without the use of the other leg to the extent that they are severely restricted as regards movement in their legs;
- be without both hands or both arms;
- be without one or both legs;
- be completely or almost completely without the use of both hands or arms and completely or almost completely without the use of one leg; or
- have the medical condition of dwarfism and serious difficulties of movement of the legs.

Disabled Drivers can claim tax relief on a new vehicle or a used vehicle that has been purchased from an authorised dealer and that has not been previously registered in the State. They can also buy a previously registered used vehicle, in which case the amount of the repayment will be the residual tax contained in the value of the vehicle.

If they bought the vehicle before they qualified as a disabled driver, a repayment of VAT and VRT, appropriate to the market value of the vehicle at the time of entry to the scheme, will be made.

Disabled Passengers can claim tax relief on a new vehicle or a used vehicle that has been purchased from an authorised dealer and that has not been previously registered in the State. They can also buy a previously registered used vehicle, in which case the amount of the repayment will be the residual tax contained in the value of the vehicle.

If they bought the vehicle before they qualified as a disabled person, a repayment of VAT and VRT, appropriate to the market value of the vehicle at the time of entry to the scheme, will be made.

The pre-tax cost of adapting the vehicle must amount to at least 10% of its pre-tax cost. A vehicle that has been acquired under a hire-purchase agreement qualifies for tax relief.

A *family member* of a disabled passenger can also qualify for relief provided he/she is living with and responsible for the transport of the disabled person in question and has acquired the vehicle for that purpose.

If the disabled person only stays with a family member on a part-time basis, the residency requirement is not met. However, if the disabled person is a minor who is in residential or medical care on a part-time or occasional basis and who spends a significant part of his/her time at home, e.g., every weekend and holidays, the residency requirement **may** be met. The Revenue Commissioners may, in exceptional circumstances, waive the residency requirement.

VRT on vehicles above 8 seats

Tax Concessions also apply to vehicles operated by voluntary and non profit organisations, whose passengers qualify. However, the Vehicle Registration Tax (VRT) Instruction Manual, as currently worded, discriminates against transport operators trying to provide an integrated approach to the delivery of transport services accessible to wheelchair users.

Clause 1.2.2.1 of the Manual states, *“Quick-release seating does not meet the permanency requirement and should be disregarded for classification purposes”*.

This means that the VRT breakpoint for seating is at 12 permanently fixed seats. This does however allow for tip-up seats to be regarded as permanently fixed seats. Many 16 seat vehicles will go below the 12 seats to

enable wheelchair users to travel. It is worth noting that the breakpoint is 9 passengers as far as large and small PSVs and the need for a D1 category driving licence are concerned.

2.2.3 Free Travel Scheme

The Department of Social and Family Affairs (DSFA) administers a free travel scheme for elderly and disabled persons. Spouses are also entitled to travel free when accompanying the pass holder. Relevant passes have been issued to 583,000 persons but this is believed to include a substantial number of inactive passes.

The scheme is available on all bus services with the exception of peak time urban services, and long distance services on Friday evening. Most licensed local bus services provided by private operators are eligible for payment, with 118 services listed in addition to services provided by Bus Éireann (and other subsidiaries of the CIÉ group) and cross border services by Ulsterbus. The cost of the scheme was €42.8 million in 1999, €44.8 million in 2000 and €46.3 million in 2001. An additional sum of €500,000 has been paid to the Department of Transport to cover the cost of free travel by pass holders carried by operators in the Department of Transport's Rural Transport Initiative.

The major share of revenue is paid to CIÉ subsidiaries for travel within the Republic (85.7% in 2001) under a block grant arrangement. The lump sum payment to CIÉ is adjusted for fare increases sanctioned by the Department of Transport, but not for any change in the level of services. Other increases are paid in respect of new eligibility categories.

Approximately €14 million was paid to Bus Éireann in 2000.

A review of the free schemes operated by the DSFA, carried out by The Policy Institute and reported on in 2000³¹, recommended that the nature and level of compensation should be re-assessed, with the same payment method adopted for both public and private sector transport operators *"in the interests of transparency and public accountability"*.

Persons may be entitled to free travel if they:

- are aged 66 or over and live permanently in the state;
- are receiving a Disability Allowance, a Blind Person's Pension, a Carer's Allowance or an Invalidity Pension from the Department of Social and Family Affairs. (Those who were receiving an Invalidity Pension and changed over to a Retirement Pension or a Widow's/Widower's Pension, retain the entitlement);

³¹ Blue Paper #5, The Policy Institute at Trinity College Dublin, 2000. A Review of the Free Schemes Operated by the Department of Social, Community and Family Affairs by Orlaigh Quinn.

- are in residential care and would be receiving Disability Allowance if they were not in such care;
- have been receiving Unemployability Supplement for at least a year;
- are blind and aged over 18;
- are blind and aged between 16 and 18 and attending a special workshop or training school;
- have been receiving Invalidity Pension or Benefit from another EU member state or from a country with which Ireland has a bilateral social security agreement for at least a year; or
- are a widow or widower aged 60 or over whose late spouse held a Free Travel Pass and who are receiving one of the following payments: Retirement Pension, Widow's/Widower's Pension, Single Parent Family Payment or a similar social security pension/benefit from an EU member state or a country with which Ireland has a bilateral social security agreement or a Garda widow's pension.

Where free travel can be used

Free travel is available on CIÉ road and rail services, the Aran Islands ferry service, certain private services that have opted into the scheme and on public transport between Ireland and Northern Ireland.

Permanent residents of any of the Aran Islands, may get up to 12 air trips each year between the islands and the mainland. People who live permanently on Tory Island (Co. Donegal) are entitled to a number of free journeys on the seasonal helicopter service operating between the island and the mainland.

A number of private bus transport operators throughout Ireland have also opted in to the Free Travel Scheme and accept free travel passes. There is no limit to the amount of free travel, but there are restrictions on the times during which pass holders may use the benefit. There are no time restrictions on train use (including the DART), but eligible persons may not use city bus services at peak travelling times.

There are circumstances in which an unrestricted free travel pass may be issued. In general, the unrestricted pass is given to people with disabilities. In exceptional circumstances, it may be possible to obtain a temporary unrestricted pass for a period of up to six months for people who have unavoidable, early hospital appointments.

Spouses and companions

The spouse of free travel pass holders may travel free of charge. The spouse would also get a travel pass in his/her own right if he/she qualifies.

Some people who are unable to use the pass because they are unable to travel alone may get a Companion Free Travel Pass. This allows the holder to be accompanied by any person over 16 years of age, free of charge.

2.3 Overview of services for disabled drivers

2.3.1 Driver Assessment and Training

The following section presents details on the key agencies providing services to disabled persons with respect to driver assessment and training.

2.3.2 The Irish Wheelchair Association (IWA)

Current Services

The IWA Motoring Advice Assessment and Tuition Service (MAATS) Programme was developed and expanded throughout the late 1990's. The IWA Annual Report for 2001, reports that they provided over 11,000 hours of tuition and over 500 assessments in the year.

MAATS is provided from locations in Clane, Dublin, Kilkenny, Mullingar, Navan, Cork, Limerick, Galway, Ennis, Tralee, Wexford and Letterkenny. All centres have vehicles with automatic transmissions and fitted with push-pull hand controls, left-side accelerator pedals and a variety of interchangeable steering attachments.

The IWA also issues the European Disabled Persons Parking Card and in 2001, they issued in excess of 3,600 badges. At that time, a charge of £10 was levied. In recent months, the charge has increased to €25 due mainly to an expansion in the number of applicants. Although, the IWA received initial funding of £5,000 to set up this service it does not receive ongoing funding for its administration.

Financing the Service

All clients must pay for a driving assessment. In November 2002, this was set at €90, with driving lessons costing €15 per lesson.

Capital funding of €317,500 was received in 2000 from the 'Millennium Fund' to build a new Mobility Centre in Clane, Co. Kildare. In addition to this, the IWA receives €283,000 annually from the Eastern Regional Health Authority to provide assessment and lessons. This figure is to cover vehicle running costs, instructors' salaries, administration, including management of the programme, and premises. They also receive €25,000 annually from the Department of Social & Family Affairs from the 'Back to Work' scheme.

They receive funding from each of the Area Health Boards to purchase cars in different counties. In addition, they receive an annual fee from the Area Health Boards to provide driving lessons to individual clients. The breakdown is as follows:

North Eastern Health Board	€15K
North Western Health Board	€15K
Southern Health Board	€16K

Western Health Board	€16K
Midland Health Board	€16K
Mid Western Health Board	€19K

The total annual health board funds amount to €97,000. This is part of funding under the 'No Policy Change' funding and these amounts are allocated by the IWA to help run the driving school.

It should be noted also, that the IWA benefits from the Tax Concessions to disabled drivers, whereby they are exempt from paying VRT on vehicles, have VAT rebated and are exempt from paying motor tax on their vehicles. They also receive a VAT rebate on fuel used in driving school cars.

Another 'benefit in kind' available to the IWA is the use of demonstrator cars made available to them from Fiat Auto Ireland, Ford Ireland, Opel Ireland and Nissan Ireland. Most adaptation firms provide car conversions either at 'no cost' or at discounted price.

The IWA have recently submitted a report on their services to the Department of Transport requesting additional funding for the driving school service.

2.3.3 The Disabled Drivers Association of Ireland (DDAI)

Current Services

The DDAI is a national charity and provides assessment to people with disabilities at their centre in Ballindine, Co. Mayo, where it has a 'state of the art' driving assessment unit and one full time instructor. Clients have the opportunity to test drive a variety of cars with adaptations fitted at the centre in Ballindine. It also has centres in Dublin and Cork.

The assessment unit in Ballindine provides detailed measurements of a client's steering strength, braking strength, reaction time and decision-making skills. This unit also looks at vision and fields of vision, to ensure a potential driver meets all requirements to drive safely. The DDAI is then in a position to advise clients and adaptation firms on the best adaptive driving equipment suited to an individual's needs.

The centre in Ballindine has residential facilities, where people can stay and take an intensive driving course over a period of two or three weeks. This method proves popular with many people, not least because they can learn quickly, leave, take practice at home in a family car and return to sit their driving test whenever they are ready to do so.

The DDAI have two driving instructors who provide assessment and tuition to their members in the Eastern and Southern Regions. Both are members of the Driving Instructors Register (DIR) and have received certified training in 'Teaching People with Disabilities to Drive'. They also run their own specialised driving schools.

One of the most important issues for many people with disabilities has proven to be the lack of information on all aspects of transport and mobility. For this reason, the DDAI has set up information services at the three centres.

The DDAI also runs a 'ShopMobility' service at their Dublin office based at the Liffey Valley Shopping Centre. This service provides wheelchairs and scooters to enable people with disabilities to move easily around the shopping centre.

The DDAI is also licensed to issue Disabled Persons Parking Cards in Ireland and in 2001 it issued in excess of 3,000 cards.

Financing the Service

The DDAI receives all its funding for the driving service from the Health Boards. The funding covers accommodation, food and tuition to a maximum of 40 hours. This may involve a client starting off at a one hour lesson each morning and each afternoon, increasing to two and then three-hour lessons over the period of a few weeks. Often a client 'holds back ' five or six hours to come back to sit their driving test. On average, approximately 50 people avail of this service on an annual basis. The DDAI does not charge individual clients for lessons; however, if someone attends privately a fee of €15 applies.

The DDAI buys its own cars to teach in, and also has a demonstrator vehicle from Fiat Auto Ireland and from Ford Ireland.

2.3.4 Transport & Mobility Consultants-Ireland (T&MC-I)

TMC-I, a private consultancy, provides driving assessment, and information & advice on all aspects of transport and mobility for people with disabilities. Driving assessments are typically carried out at a client's home, at a rehabilitation hospital or at the car conversion company's premises. Impartial advice is given on vehicles, adaptive driving controls and driver rehabilitation sessions. There is a cost for this service, currently €100.

TMC-I receives no statutory funding but has available an adapted demonstrator car from Fiat Auto Ireland's Autonomy Programme. Clients have the opportunity to test drive this adapted car during their assessment.

TMC-I works closely with the National Rehabilitation Hospital (NRH) in Dún Laoghaire, providing assessment to patients there, and advising staff on a patient's fitness to return to driving after a new or worsening disability.

Clients of the NRH, the DDAI, Motability Ireland and Parfits (vehicle converters) are referred to TMC-I, as they acknowledge that it is the only service providing an impartial 'high-tech driving assessment'. This is aimed at clients with a severe disability, who need to drive with very specialist adaptive equipment, usually driving from their wheelchair in a specially adapted van.

TMC-I also works with a number of GP's, Geriatricians and Gerontologists working with elderly clients, to establish if elderly drivers have the relevant controls and ability to remain driving. This mostly entails working with patients with early dementia.

In addition TMC-I provides certified training, along with the Driving Instructor Register, on 'Teaching people with disabilities to drive' and provides an advisory consultancy to the Board of DIR.

TMC-I provides consultancy on disability to the Fiat Auto Ireland 'Autonomy Programme'.

2.3.5 Driving lessons

All of the above organisations provide driving lessons with adapted cars. Two driving schools in Dublin and one in Cork also provide driving lessons with adapted cars. There is at least one driving instructor in each county trained to give lessons in the disabled person's own car.

2.3.6 Specialist vehicle converters

There are several firms in Ireland which manufacture and install adaptations in vehicles for people with disabilities. These can be simple steering attachments or hand controls for accelerating and braking for disabled drivers, to lower floored vehicles and converted wheelchair passenger vehicles for people who wish to travel in their wheelchair. There are currently eleven converters in the Republic and two in Northern Ireland. Table 2.1 below gives a general guide on the typical cost of converting vehicles.

Table 2.1 General Guide on Price of Conversions

This table aims to provide a general guide only on the typical cost of converting vehicles for people with disabilities to use as a driver or as a passenger. This list is not exhaustive nor does it claim to be definitive. The price guides are approximate and current at the autumn of 2002.	
Equipment:	Typical Cost Range:
Push-pull Hand Controls	€300 - €1,000
Steering Spinners	€25 - €80
Infra-red secondary control systems	€ 700 - €1,500
Servo Clutch Systems	€1,200 - €2,500
Electric Clutch Systems	€1,500 - €3,500
Left side Accelerator Change-over System	€500 - €1,000
Swivel Seats	€1,000 - €3,000
Personal Hoists	€2,000 - €5,000

Wheelchair Stowage Unit in Boot or on Roof-top	€3,500 - €6,000
Converted Mini-buses for private use	€2,500 - €6,500
Converted Mini buses for 'Taxi' Use	€2,500 - €6,500
Converted Vans for Wheelchair Passengers	POA - Individual costs
Lower Floored Vehicles for Wheelchair Passenger	€2,500 - €6,500 (Conversion cost only)
Wheelchair Ramps	€450 - €1,000
Manual Wheelchairs	€200 - €3,000
Special Seats for Disabled Children or People with Restricted Growth	€250 - €750
Wheelchair Lifts	€3,000 - €7,000

2.3.7 Parking

Disabled Person's Parking Card

European Parking Cards are available to people with certain disabilities and people who are registered blind, whether they are drivers or passengers. This includes people in receipt of a Primary Medical Certificate, who have an automatic right to the card. Other people, who have restricted movement, restricted strength or painful movement may apply, though their GP must sign a medical form stating the reasons that the applicant qualifies for the card.

The parking card can be used by a person with a disability in any vehicle in which he or she is travelling. This means that a person with a disability who is being driven at different times by different people can bring the parking card and display it in the appropriate vehicle. The parking card is valid for 2 years from date of issue. Generally, the card is not issued to anyone under 5 years of age.

The parking card scheme for drivers and passengers with a disability applies to public car parking areas only. However, the scheme also enables private car parks, supermarkets, etc., to more effectively monitor parking in areas that they have designated for people with disabilities. European Parking Cards can be used by people with disabilities within the 15 member states of the EU and are also recognised in the USA and Canada.

Qualification is automatic if holding a Primary Medical Certificate, though an application for the Parking Card must still be made.

Parking facilities for people with disabilities

There is a range of parking facilities available to people with disabilities in towns and cities throughout Ireland. Disabled parking bays are slightly wider than an average parking space to allow for easy access. They are always located in “prime” parking spots beside building entrances, in city/town centres, etc. These parking bays are clearly marked for use by people with disabilities by both signs and road markings. (Road markings normally consist of the “accessibility” symbol.)

Although local authorities have no legal obligation to provide disabled parking bays, a certain number of spaces are available in all local authority on-street parking, local authority car parks and public building car parks. The location of these spaces will be laid down in local authority bye-laws. Their powers are contained in the Road Traffic (Traffic and Parking) Regulations, 1997.

The disabled parking spaces provided by local authorities are free of charge and no time limits will apply. Some private car parks may charge for use of a disabled parking space, but this will vary depending on the operator.

A valid European Parking Card must be prominently displayed on the windshield to use a disabled parking bay. Disabled parking places can only be used if the card holder (person with a disability) is driving or travelling in the car.

Private car parks will generally have parking spaces available for people with disabilities, as will car parks for shopping centres, supermarkets, universities, hotels and hospitals. To use these spaces, you will need the European Parking Card. If there are time limits imposed in these car parks, they may not apply to people with disabilities. The conditions of parking should be clearly stated on signs.

Commercial premises like supermarkets and shopping centres have no legal obligation to provide parking facilities for their customers with disabilities. Planning permission will not be refused if disabled parking facilities are not included in a planning application. However, local authority planners may recommend that parking spaces for people with disabilities be made available and a condition can be attached to the application requiring the builder and architect to include these facilities.

2.4 Overview of Local Public Transport

Services for passengers with disabilities

This section sets out the local services available for passengers with disabilities and covers land transport provided by rail, bus and taxi services, and ferries to offshore islands.

2.4.1 Accessible bus developments

Low-floor buses

The manufacturers of buses are now only building low floor buses for “stage carriage” services. Such vehicles include double-deckers, single deckers of varying lengths and capacities, articulated buses (“Bendibuses”) and, more recently, minibuses in the 12-16 seat capacity range. Examples of the latter have been around for some time, but only recently has a major bus manufacturer entered this market. Examples of all of these vehicles are in operation in Ireland, the vast majority of them in urban areas.

These vehicles incorporate the following features:

- low floor single step entry;
- “kneeling” suspension, thereby reducing the step height into the bus;
- ramps at the entrance door, which are deployed either manually or automatically;
- high visibility markings on steps;
- priority space for wheelchair users and children in buggies;
- wider gangways;
- increased headroom;
- high quality lighting and heating;
- improved grips on poles, bars and handrails;
- high visibility poles, bars and handrails;
- palm activated bell pushes;
- high visibility electronic destination display on the front of the bus; and
- internal “Bus Stopping” signs.

The buses now in operation in Ireland have been built by Northern Irish and British companies. The design of these buses, which tend to have only one entrance and exit at the front of the vehicle, conform to the operating requirements in Ireland and Britain, where passengers are required to pass the driver on boarding. This differs from the design of buses in operation in other parts of Europe, where boarding and alighting is possible at multiple doors along the length of the bus. This means that operators in Ireland and Britain benefit less from the easier and speedier flow of passengers due to the low floor design features, which reduce dwell times at bus stops.

A particular design feature which can cause problems to wheelchair users is the location of a pole adjacent to the space which they occupy during travel. This has resulted in certain wheelchair users being unable to travel on the new buses as they cannot access the space reserved for them. Two additional issues related to the provision for wheelchair users are: the inability of partners to travel together when both are wheelchair users and the relative priority of wheelchair users and children in buggies to access the space reserved for them.

Bus Átha Cliath/Dublin Bus

By mid 2003, some 40% of the Dublin bus fleet was accessible, comprising a mixture of low floor double-deckers, single-deckers, midis and articulated buses operating on a total of 30 routes on which all vehicles are low floor.

The routes vary considerably in terms of frequency of service. Many new low floor buses are running on other routes, but unless all the fleet on a given route is accessible, it is not advertised as being accessible. For example, the 46A has many accessible buses but as the fleet requirements for this route are very large it has not been confirmed when this route or service will be fully accessible. Full details on accessible routes are available from Dublin Bus.

Dublin Bus reports that the selection of which route is operated by new low-floor buses is generally made on the basis of operational considerations rather than on particular identified user requirements.

Dublin Bus has identified two main obstacles to improving accessibility:

- Poor condition of bus stops and the bus stop environment;
- Difficulties in providing up to date passenger information.

Dublin Bus reports that the lack of appropriate facilities at bus stops to support the new generation of buses is frustrating its efforts to provide a fully accessible public transport service. It is also damaging to the buses, sufficiently so for Dublin Bus to take the initiative to provide remedial measures and the company is preparing a specification for accessible bus stops. Cost estimates for improvements will then be produced with a view to seeking funding from the Department of Transport to enable implementation in 2003. Shelter location and design will be included in the survey, but responsibility for bus shelters is an area of some conjecture involving the local authority, bus operator and the advertising contractor. Improvements to bus stops in the outer area is more of a challenge, due to the effective absence of formed footpaths in many locations.

Bus Éireann

Bus Éireann now uses low-floor single-decker buses on its city services in Cork, Limerick, Galway and Waterford. In Cork, a few (9) older, buses are sometimes used as back-up to the main, accessible fleet. Numerous rural services are also operated with low-floor buses:

- Athlone town service
- Ballybofey - Letterkenny
- Clogherhead - Drogheda + Drogheda town
- Cork - Mallow - Newmarket
- Dundalk - Ardee
- Dundalk - Carlingford (back road)
- Dundalk - Louth Village + Dundalk town

- Dundalk - Newry (back road)
- Galway - Athenry
- Galway - Gort
- Limerick - Ardnacrusha
- Navan - Drogheda (back road) + town
- Sligo - Rosses Point
- Sligo - Strandhill
- Sligo - town services
- Stranorlar - Strabane - Letterkenny
- Stranorlar - Strabane - Ballybofey
- Waterford - Tramore.

Recent investment in accessibility improvements at bus stations (which are not necessarily served by low-floor buses) can be summarised as follows:

- New stations in Athlone, Waterford, Dundalk and Killarney are considered accessible as they were built in accordance with Building Regulations 2000, Part M (Access for People with Disabilities);
- Cavan, Drogheda and Monaghan bus stations have been refurbished and have improved accessibility although the doors are not automatic at Cavan and Monaghan;
- Induction loops, which are not a requirement of the Building Regulations, have been installed at Athlone, Waterford, Dundalk and Dublin (Busáras);
- Accessible toilets have been installed at Dublin (Busáras), Rosslare Harbour, Limerick, Cork, Tralee, Kilkenny, Galway and Sligo.

Signage or pictograms have improved in stations – including the Busáras Solari board (which Bus Éireann acknowledge is not well-designed for people with impaired vision, but benefits many other passengers).

Cavan, Monaghan, Dundalk and Drogheda were all funded through cross-border initiatives.

Bus Stops

Bus Éireann bus stops include no special facilities for people with sensory disabilities; indeed there are few facilities of any description as stops usually have only a pole and occasionally may have a shelter and/or timetable.

2.4.2 Overview of Rail Services

The existing Iarnród Éireann (IÉ) fleet comprises some very old vehicles and some modern vehicles. As shown in Figure 2.1 below, over 50% of the locomotive and carriage fleet are more than 30 years old. The profile of the fleet has been changing in recent years with an increasing number of suburban rail vehicles being purchased. This trend will continue in the short term with the majority of the older vehicles in the fleet gradually being

phased out and replaced with modern rail vehicles by 2007. The programme for acquisition of new vehicles is shown in Table 2.2 below, and Figure 2.2 shows the expected age profile of rolling stock in the year 2007.

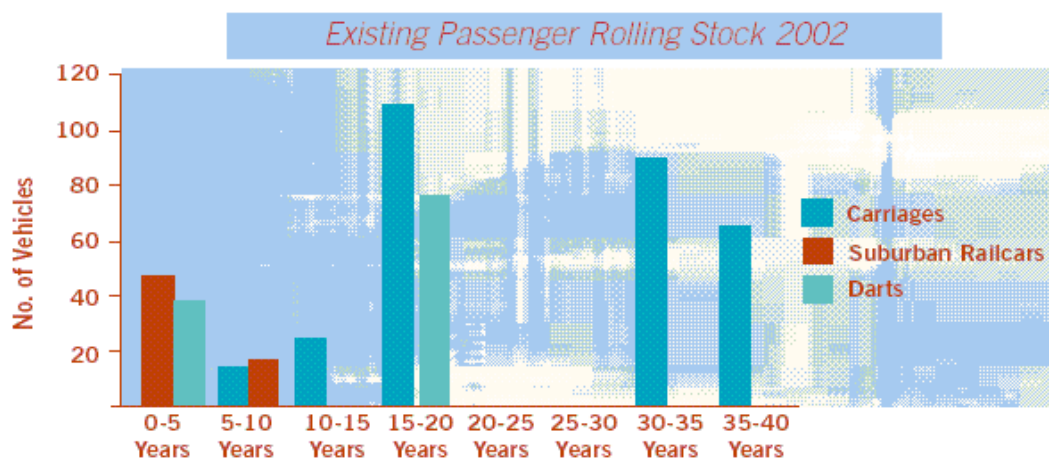


Figure 2.1 Age Profile of existing IÉ Passenger Rolling Stock

Figure 2.1 Age Profile of existing IÉ Passenger Rolling Stock

Table 2.2 Programme for Replacement of Rolling Stock.

Vehicles	Status	Rationale
80 Suburban DMUs* 12 DART cars	Ordered in 2000, delivery 2002	Mix of replacement and additional capacity, resulting in longer trains and some extra services
12 DART cars	Ordered in 2000, delivery 2002	Additional capacity to enable move from 6-car to 8-car services
40 DART cars	Ordered 2002, delivery 2005	Additional capacity to enable move from 6-car to 8-car services
67 Intercity coaches	Ordered 2002, delivery 2005	Replacement of old carriages, also enables 1 additional Cork-Dublin service/day
64 Regional DMUs	Not yet ordered, potential delivery 2006 Ordered 2002, delivery 2005	Replacement of old carriages, mainly on secondary radial routes
60 suburban DMUs	Not yet ordered, potential delivery 2007	Additional capacity particularly on key suburban routes such as Maynooth and Kildare lines
* DMU diesel multiple unit		

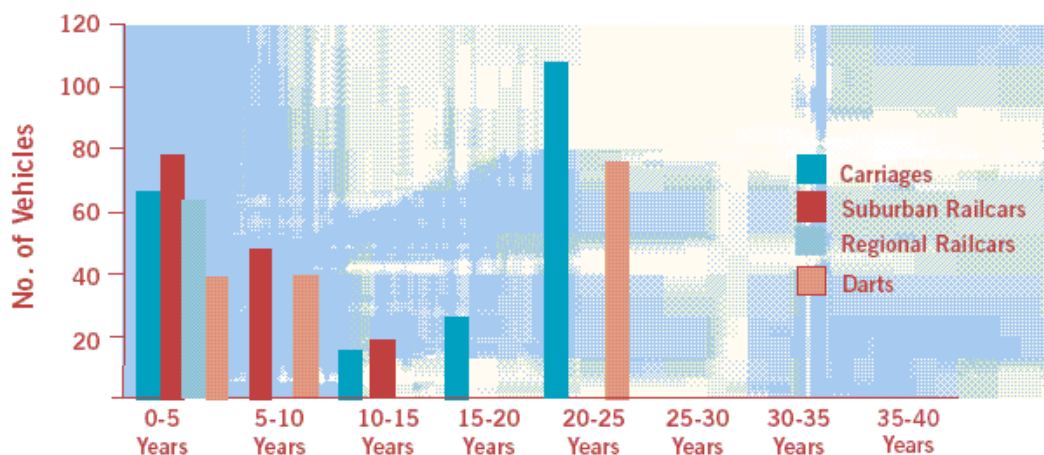


Figure 2.2 Expected Age Profile of IÉ Passenger Rolling Stock in 2007

In general, the older vehicles in the current fleet are less accessible than the new vehicles which, since 1995, have been specified and procured in accordance with the UK Rail Vehicle Accessibility Regulations. While some attempts have been made by IÉ to make the older vehicles more accessible, these efforts have primarily been limited to providing space for wheelchair users. No attempt has been made to convert or refurbish older stock in accordance with the accessibility regulations, in terms of providing accessible toilets or features such as passenger information systems.

Conversion or refurbishment of the older rolling stock in accordance with the accessibility regulations (i.e. in terms of providing accessible toilets or features such as passenger information systems) is not really practical for the older vehicles due to the risks associated with making structural modifications to the vehicle frame.³²

DART – Electrical Multiple Units (EMUs)

There are 114 Dublin Area Rapid Transit (DART) EMU vehicles operating electrified rail services in greater Dublin. As shown in Table 2.3 below, the first generation of DART vehicles comprises a fleet of 76, which is approaching 20 years of age. In general, the carriage floor is level with the platform (i.e. there is no step up, although at some stations there are horizontal and/or vertical gaps). There are no internal doors or toilets.

Table 2.3 Age of Suburban Rail Fleet

Vehicle Types	Number in fleet at end 2002	Age	Main routes / services
DARTs (EMUs)			

³² This is a similar situation to that in the UK rail industry where the majority of the Train Operating Companies (TOCs) have applied for, and received, temporary exemptions from the regulations for older rolling stock.

Vehicle Types	Number in fleet at end 2002	Age	Main routes / services
Class 8100 & 8300 (LHB)	76	19 yrs	Dublin – Suburban
Class 8200 (Alstom)	10	2 yrs	Dublin – Suburban
Class 8500, 8600, 8700	28	1 yr	Dublin – Suburban
ARROWs (DMUs)			
Class 2600	17	8 yrs	Dublin – Outer Suburban, Cork Suburban
Class 2700	27	3-4 yrs	Dublin – Outer Suburban
Class 2800	20	1 yr	Dublin – Outer Suburban

There has been some retrofitting of these vehicles, mainly to accommodate an increase in commuter traffic and seats have been removed and handholds and bars added to accommodate standing passengers. Although these vehicles have power doors they have not been fitted with audible door warning systems or internal passenger information systems. In addition, as and when these older vehicles have been repainted they have had “priority seats” signs fitted throughout.

The newer generation DART vehicles have improved facilities, such as audible door warning systems, automatic on-board announcement systems and passenger information displays (both internal and external).

The colour contrasting inside (doors and floors) for some of these vehicles is acceptable, but the majority of the newer DART vehicles are without adequate internal colour contrasting of floors and doors.

Priority seat signage on DART is not universal and would benefit from a wider description of people deserving priority.

ARROW Railcars – (Outer Suburban Services, Dublin and Cork)

As indicated in Table 2.3, the first order of Diesel Multiple Units (DMUs)³³ was delivered in 1994 with further orders delivered in 1999 and 2001. These vehicles are used on the outer suburban trains (such as Connolly to Drogheda and Heuston to Kildare). Some 22 out of 64 vehicles have wheelchair spaces and wheelchair accessible toilets, and floor levels are at the same level as the platform.

The newer Class 2800 vehicles are excellent in terms of the interior colour contrasting of doorways (floors and doors) and also the wheelchair accessibility features with fully accessible toilet and “Driver Notification Call Buttons” in the wheelchair accessible marked carriages.

³³ The term railcars is also used to describe both EMU and DMU vehicles.

LUAS

The Rail Procurement Agency (RPA) is currently building the LUAS system in Dublin, a modern Light Rail Transit (LRT) system (2 lines, 24 kms in length with 40 vehicles/trams). As a completely new system, LUAS is being designed, constructed and operated so that it is entirely accessible. This includes the depots (Red Cow/M50 and Sandyford), apart from some technical areas.

RPA reports that the following design guidelines were applied in designing LUAS:

- National Disability Authority (NDA) User Interface Guidelines for ticket machines and information systems;
- UK Department of Transport "Guidance on the Use of Tactile Paving Surfaces";
- RSPG Guidelines on Tramways;
- UK Rail Vehicle Accessibility Regulations 1998 for the rolling stock audit;
- Dublin City Council, South Dublin County Council, Dun Laoghaire County Council and Fingal County Council Design Guidelines for linking into and renewing the street system.

The RPA and/or its contractors consulted with the National Council for the Blind of Ireland (NCBI), the National Association of the Deaf (NAD) and the National Disability Authority (NDA). A requirement for Equality/Disability Training is included in the contract with the operator, Connex, which will have to issue a passenger charter and prepare a Safety Case. A representative of Connex will sit on the Public Transport Accessibility Committee.

A qualified, full time Accessibility Officer is to be appointed by the RPA with a background in both technical standards and public relations. Concessions for registered disabled passengers will be incorporated within the proposed ticketing system.

An internal informal review of the LUAS vehicle audit, which also involved some people with disabilities confirmed that the vehicles are highly accessible, with some issues to be resolved regarding colour contrasts internally and externally, the dimensions of the priority seats, the lack of structure to prevent wheelchairs slipping and need for emergency communication for passengers in wheelchairs.

The Chief Architect at RPA, who is a trained accessibility auditor, confirmed that these issues were being addressed, and outlined some areas where the design process involved a trade-off between conflicting requirements. For example, visually impaired people would prefer passenger information to be at a lower level, but then far fewer people would be able to see it; additionally, the size of lettering used is constrained by the size of the drum that in turn is constrained by the width of the platform. Another point is that at two locations the platform gap will be as wide as 150mm, which is allowed

under the guidelines, but only in exceptional circumstances and very much greater than the ideal gap of 50mm. At stops, the automatic station announcements will be visual, but not audible - for noise reasons. There will, however, be automatic audible announcements on board and the ticket machines will have a touch screen facility.

2.4.3 Private Bus Operators

Ten operators provide a total of 22 accessible licensed routes (see Table 2.4 below), only 8 of which are currently served by low floor buses. The remaining vehicles are either equipped with a ramp or a passenger lift. Two of the operators operate routes in the Greater Dublin Area with low floor buses; the rest serve predominantly rural areas or link towns outside the Greater Dublin Area.

Table 2.4 Privately Operated Routes

Routes operated	No. of days/ week	No. of times/day
Nutgrove to Celbridge via Dublin City Centre	5	33
Blackrock to Sandyford via Stillorgan	5	19
Rosenallis to Portlaoise via Mountmellick	6	4
Borrisokane to Portarlinton via Mountrath	6	4
Tullamore to Portarlinton via Kill, Clonaslea, Rosenallis and Mountmellick	6	4
Mountrath to Tullamore via Portarlinton	6	4
Granna to Charleville	1	2
Newmarket to Mallow via Kanturk	7	2

Many private bus operators operate segregated services for people with disabilities under contract to Health Boards and voluntary organisations providing day care and rehabilitation services. These services are not available to the general public and are usually limited to taking people with disabilities to facilities operated by the contracting agency.

Some private operators are also contracted to take students with disabilities to schools and “special schools” and these services too are usually provided on a segregated basis and not available to the general public.

2.4.4 Taxis

Licensed Wheelchair Accessible Taxis

Table 2.5 below shows the number of licensed wheelchair accessible taxis in the country, estimated from a telephone survey conducted by the Department of

Table 2.5 Licensed Wheelchair Accessible Taxis

Licensing Authorities	Total number of taxis licensed (as at 12/11/2002)	Number of wheelchair accessible taxis
Athlone Town Council	91	6
Ballina Town Council	51	3
Bray Town Council	31	8
Carlow Co. Council	3	0
Carlow Town Council	43	3
Castlebar Town Council	84	3
Charleville area	8	4
Cobh Town Council	29	1
Cork City Council	590	27
Donegal Co. Council	19	1
Drogheda Borough Council	143	8
Dublin City Council	8,609	1,343
Dundalk Town Council	78	6
Dungarvan Town Council	20	1
Ennis Town Council (1)	82	2
Galway City Council (2)	386	41
Kilkenny Borough Council	83	3
Killarney Town Council	74	7
Laois Co. Council	46	8
Letterkenny Town Council	107	6
Limerick City Council	434	8
Longford Town Council	34	2
Longford County Council	9	1
Mallow Town Council	26	1
Naas Town Council	51	3
Navan Town Council	116	6
Sligo Borough	80	3
Thurles Town Council	8	0
Tipperary Town Council	3	0
Tralee Town Council	57	4
Waterford City Council	147	9
Westmeath Co. Council	88	10
National Totals	11,630	1,528

Transport. In addition to publicly available services, many taxi companies also have contracts with Health Boards and voluntary organisations to provide segregated transport to their facilities and are also contracted to take disabled students to schools and “special schools” on a segregated basis.

Commission for Taxi Regulation

In November 2002, the Government announced the establishment of the Commission for Taxi Regulation. The aim of the Commission is to provide for full effective control over the promotion of a professional, efficient and customer-friendly service by taxis, hackneys and limousines. The office came into being on a non-statutory basis in February 2003. The Taxi Regulation Act 2003 passed all stages in July 2003. To help advise the Government and the Commission for Taxi Regulation a Taxi Advisory Council has been established. The Council brings together members from various stakeholder groups, including An Garda Síochána, consumer interests, the taxi industry, groups representing people with disabilities and the tourism sector.

Among the various functions of the Commission for Taxi Regulation will be the setting of standards for drivers, driving training, vehicles, requirements for entry, promotion of disability awareness, driver dress codes, customer service as well as the implementation of the proposed wheelchair accessible taxi policy and meeting the needs of people with disabilities.

National Disability Authority (NDA) and Taxis

In April 2002, the NDA prepared a formal response to the Department of the Environment and Local Government with respect to the Department's deliberations with regard to the promotion of a framework for the promotion of qualitative improvements in taxi services and the future regulation of those services.³⁴

In its submission the National Disability Authority recommended:

Accessibility

- To continue with the phased introduction of **accessible vehicles** all new licenses issued should be on the basis that the extra vehicles are accessible to all people with disabilities in accordance with international standards and regulations and best practice. Existing licence holders should at the next vehicle renewal, replace the existing models with accessible vehicles. Appropriate relief from VAT/Excise Duty should be offered to operators to encourage and facilitate the changeover.
- Legislation stipulates that fare cards, licence plate and driver ID should be **easily seen**. However, the specific needs of people with disabilities need to be addressed in order to ensure that a fair service is provided to them. Special arrangements may need to be put in place to particularly address the needs of people with a visual impairment or learning disability.

³⁴ Submission to Department of the Environment and Local Government, Proposals for qualitative improvements in taxi services and the future regulation of those services (Consultation Paper Ref. RST 20/62) 25 April 2002.

Regulatory Framework

- The **National Car Testing Service** should particularly concentrate on the assurance of properly maintained access and safety features for people with disabilities.
- Passengers with disabilities should **not be subject to additional charges** for the transportation of aids to mobility, e.g. wheelchairs, crutches, walking frames etc. nor for any specific assistance or service provided by the driver - e.g. positioning of ramp, fixing restraints etc. Similarly no additional charges should be made for the additional time required in boarding and unloading.
- Consideration should be given to alternative ways of **compensating or subsidising** people with disabilities for the incurred additional costs of transport, in the form of travel vouchers or a taxi card system for example. This will also work as an incentive to taxi drivers. The Goodbody Report (2001, p. 35) indicates that 69% of people with disabilities would welcome a voucher-based scheme/initiative.
- The NDA supports the idea of **rationalisation of the current regulatory regime**. This will hopefully enable people with disabilities to gain better access to all aspects of service delivery, including areas such as policy development and redress, to complaints. An additional requirement should be that not just the taxi drivers but also the civil and public servants working in this area receive equality/disability training.
- In order to create an **integrated accessible transportation system**, the location and design of taxi ranks should be made accessible to people with disabilities, including adequate space for embarking and disembarking and shelters at taxi ranks. The Goodbody Report (2001) argues that 'consideration needs to be given to ensuring that ranks are of sufficient size, visibility and ease of access to ensure that they are fully operational'.

Quality Customer Service

- The National Disability Authority calls for an introduction of a **Charter of Rights** for all customers of taxi services. The Charter of Rights should be clearly visible to all customers and should include the driver's licence number and outline the complaints procedure.
- All people involved in the taxi industry (i.e. licence holders, drivers, base staff, civil and public servants etc.) should be required to undergo equality/disability **training**. This training should be a requirement for new licence holders and existing licence holders who renew their licence.

The establishment of the Commission for Taxi Regulation (and the Taxi Advisory Council) should now provide an appropriate and more effective mechanism for the recommendations put forward by the NDA to receive due consideration; there is a degree of consistency between some of the recommendations of the NDA and the roles outlined for the Commission for Taxi Regulation.

2.4.5 Community & Voluntary Transport Services

In comparison to Northern Ireland, Great Britain and the United States, the community transport sector in Ireland is in its infancy. In fact, the development of community-based transport services operated by non-profit specialist transport operators has only occurred over the past five years or so and there are only a handful of organisations operating in this manner.

The pioneer in this regard is Vantastic Dial A Ride Limited, which operates a call centre booking and scheduling service in Dublin, which is linked to a number of travel clubs providing demand responsive services in the Dublin area. Vantastic is a door-to-door transport service for people with disabilities that was established by the Centre for Independent Living in 1994 as a way of addressing the absence of accessible public transport. The service requires an estimated €450,000 annually to operate. In late 1999, the Taoiseach formally assigned responsibility for dealing with, *inter alia*, the Vantastic operation and service to the Department of Justice, Equality and Law Reform. Core funding for Vantastic comes from the Department of Justice, Equality and Law Reform on an annual basis.³⁵

In announcing the 2002 funding for Vantastic, the Minister of State made the following comments:

“There is a deficit in the provision of public transport services which can accommodate people with physical disabilities. This is a matter of concern to people with disabilities who find that in many cases they are unable to access employment or socialise because they have no adequate means of transport. My upcoming Disabilities Bill will deal with transport issues in a comprehensive way and I very much support initiatives such as Vantastic.” Press Release 9/12/2001

It is understood that an external audit of Vantastic in 2002 undertaken by PricewaterhouseCoopers has resulted in the formulation of various recommendations in relation to the on-going operation of the company.

Travel clubs receive funding under various employment initiatives, such as Community Employment, Jobs Initiative and the Social Economy Programme, and from local development agencies. Additional funding comes from Health Boards and the National Lottery.

The Department of Transport's Rural Transport Initiative (RTI) provides funding to 34 schemes around the country, some of which operate their own accessible minibuses. Most of these schemes however, contract with local private transport operators, and some local voluntary organisations, to operate the services on their behalf. Many of the schemes have had difficulty

³⁵ 35 In late 2001, the Minister of State at the Department of Justice, Equality and Law Reform announced that the Department would provide a commitment of £370,000 (€470,000) in 2002 for the Vantastic-dial-a-ride Ltd transport initiative for people with disabilities.

in providing accessible services, as vehicles accessible to wheelchair users are not always available in their areas.

In addition to funding under the RTI, some of the schemes have received funding under the Social Economy Programme, from Health Boards and other agencies, such as the County Development Board, local development partnerships and groups.

A number of national and local voluntary organisations have fleets of accessible vehicles, which are used to provide transport for their own members mostly in connection with their own activities and to their own facilities. The national organisations include the Irish Wheelchair Association and Enable Ireland and at local level, centres for integrated living for example. These transport services are provided on a segregated basis, whilst enabling people with disabilities to be more integrated.

2.4.6 Ferry travel to offshore islands

Table 2.6 below contains information on ferries to offshore islands subsidised by the State. The only accessibility features are related to access for wheelchair users.

Table 2.6 Ferries to Offshore Islands

Island	Operator	Accessibility features
Inis Earcáin	Vincent O'Driscoll Baltimore Ferry Service	Wheelchair users lifted manually; depends on tide
Béara	Colm Harrington Bere Island Ferries Ltd	Roll on roll off ferry
Faoide	Tim O' Leary Whiddy Island Ferry Service	Not able to obtain information
Fada	John Shelley	No facilities
Inis Uí Dhrisceoil	Daniel & Patrick Murphy	Wheelchair users lifted manually

2.5 Overview of Long Distance Public Transport

2.5.1 Rail

Intercity Carriage Stock

The Intercity carriage stock is by far the least accessible of all the IE rolling stock. Only the recent DeDietrich stock (built in 1996) operating on the Dublin to Belfast service satisfies the majority of the UK Rail Accessibility Regulations. These carriages have wheelchair spaces, wheelchair accessible toilets, audible and visual passenger information displays and power doors.

The remaining carriage stock has had seats removed from the dining cars (apart from the Craven carriages – built in 1963) to accommodate wheelchairs but the vehicles do not have wheelchair accessible toilets nor

any of the other requirements of the Rail Vehicle Accessibility Regulations such as passenger information displays, audible door warning systems (with power doors) nor would they comply in terms of handrails, handholds and internal colour contrasting requirements for floors, doorways and transparent surfaces.

Much of the current IÉ locomotive-hauled passenger carriage fleet of 309 vehicles was acquired second-hand from the UK. As Table 2.7 shows, there are five main types of carriages currently in use across the network:

- 14 De Dietrich carriages built in 1996 to a high comfort specification are deployed on the Enterprise service between Dublin and Belfast
- 134 Mark III carriages of 1984-1989 vintage – some built by IÉ, some rebuilt ex-UK second-hand vehicles – deployed on primary and secondary Intercity routes
- 71 Mark IId carriages of 1972 vintage – purchased second-hand from the UK – deployed on secondary Intercity routes
- 18 Mark IIa carriages of 1969 vintage - purchased second-hand from the UK – deployed on outer Dublin suburban routes
- 64 Craven carriages of 1963 vintage – deployed on secondary Intercity/regional routes.

Table 2.7 Existing Intercity Rolling Stock

Vehicle Type	Number in fleet	Age	Services Operated
Carriages			
DeDietrich	14 ³⁶	6 yrs	Dublin – Belfast only
Mark IIIa	9	16 yrs	Dublin – Galway
Mark III	99	15-18 yrs	Dublin – Cork, Limerick, Westport, Tralee
Mark III Push-Pull	24	13-14 yrs	Dublin – Limerick, Thurles, Waterford
Mark IId	71	30 yrs	Dublin – Cork, Limerick, Sligo, Rosslare, Galway
Mark IIa	18	31-35 yrs	Dublin – Carlow, Portlaoise
Cravens	65	34-38 yrs	Dublin Suburban, Cork Suburban, Limerick - Waterford, Ballina – Manulla Junction

In late 2002, IÉ announced that it had placed an order (€117 million) for 67 Mark IV carriages to be operated on the Dublin – Cork/Galway and Limerick routes. These replacement units are expected to be in service in mid-to-late

³⁶ Translink (Northern Ireland Railways) also own 14 DeDietrich vehicles that are used on the Dublin Belfast service.

2005 (see Table 2.2, page 48) and will replace existing Mark IIa and IIb units as well as the elderly Craven units. Additionally, 64 Regional DMUs are expected to be ordered with delivery for the year 2006 to replace old carriages on the secondary radial routes (see Table 2.2, page 48). Given the age profile of carriages, another key replacement period will emerge around 2010 – 2015 in terms of the Mark III units.

2.5.2 Railway Stations

There are approximately 140 rail stations in Ireland, of which about 50 are used for suburban services in the greater Dublin area.

Accessibility of the IÉ stations is what would normally be expected when examining an old railway. Many of the stations were originally built in the latter part of the 19th century. New stations on the network (e.g., Clontarf Road, Grand Canal Dock, Drumcondra and Monasterevin) and the stations that have had major refurbishment work (Connolly, Heuston, Dún Laoghaire) have been designed and constructed with regard to some accessibility principles. The remaining older stations on the network are accessible to varying degrees or not accessible at all.

Under the National Development Plan, the Department of Transport has been providing funding support to CíE/IÉ to develop access infrastructure at stations, such as lifts, ramps and over-passes.

To-date, seven stations (Athlone, Balbriggan, Portarlinton, Portlaoise, Skerries, Portmarnock and Templemore) have been subject to major refurbishment of this type which cost approximately €800,000 to €1,200,000 per installation.

Other investments undertaken by Iarnród Éireann in 2002 include ramp upgrading at Carrick-on-Shannon, provision of accessible toilets in Ballyhaunis and Castlerea and installation of an electric release gate into Sydney Parade in Dublin. Some 200 mobile ramps are provided at stations. Larger stations have one ramp for each platform.

IÉ produced an updated guide to station accessibility in mid-2002. The consultants undertook a desk review of the list of facilities in the guide, such as level access or lifts to ticket offices, platforms, provision of ramps, and on that basis the following stations should be fully accessible to wheelchair users:

- Athlone
- Bray
- Carrick-on-Shannon
- Castlebar
- Claremorris
- Clontarf Road
- Connolly

- Cork
- Drogheda
- Dundalk
- Dún Laoghaire
- Ennis
- Enniscorthy
- Farranfore
- Galway
- Gorey
- Heuston
- Kilkenny
- Killarney
- Limerick
- Limerick Junction
- Mallow
- Monasterevin
- Nenagh
- Pearse
- Portarlinton
- Portlaoise
- Roscommon
- Roscrea
- Rosslare Europort
- Rush & Lusk
- Sandycove
- Sandymount
- Skerries
- Sligo
- Sutton
- Tara Street
- Templemore
- Thurles
- Tralee
- Waterford
- Westport
- Wexford
- Wicklow
- Woodlawn

2.5.3 Procedures for Delivering Accessibility

IE reports that prioritisation between accessibility projects is based on:

- the number of people using the station;
- whether the work may be dealt with under another initiative (e.g. DART stations will be addressed under the DASH project³⁷ (year 2004);
- technical feasibility - feasibility and clearance issues with railway structures present challenges, particularly along the coast where platform widths are limited; and
- planning requirements – either the length of planning process or some planning constraint such as a listed station building.

A Disabled Users Group was established in 1997. This group no longer meets regularly with IE. IE's accessibility officer reported that the members of this group contact her directly with issues as and when they arise. It is unlikely that this system is able to ensure that all concerns can be raised and highlighted in an appropriate manner.

2.5.4 Coaches

Bus Éireann's Expressway (Interurban) fleet is operated with coaches. Bus Éireann is involved with the European research initiative (COST 349) to develop an accessible coach (one is on trial in the UK at present), but widespread availability of an acceptable vehicle for wheelchair users is still probably some way into the future. However, people with other mobility impairments have benefited from other recent improvements. For example, all new buses and coaches purchased since 1998 are fitted with electronic destination systems that are generally compliant with UK DPTAC recommendations (although bilingual requirements impose height restrictions on lettering). All new coaches since 2000 are also fitted with side and rear destination displays. Other improvements include high visibility nosing on steps, handrails, moquette seat covering, high quality internal lighting and heating, public address systems.

The vehicle on trial in the UK measures 12.8m in length and Bus Éireann has stated that Busáras, with its current layout, would not be able to accommodate it. At present, Busáras is not served by any low-floor services apart from buses on the airport routes.

2.5.5 Airports

Aer Rianta Airports

The situation at Airports within the State is set out below.

³⁷ This is a €233 million project that includes, inter alia, the lengthening of station platforms to accommodate longer suburban trains.

In 1999, Aer Rianta introduced a Bye-Law which obliges all service providers at the State airports to make available such facilities, as are required by passengers with disabilities in order that they may avail themselves of all airport services. Aer Rianta also operates a policy of equality/disability training for its entire front line staff.

Aer Rianta reports that its primary design standard (with amendments) is the Building Regulations 2000, Part M People with Disabilities. Aer Rianta also reports reference to other documents, both specialised and generic, and consultation with The Department of Transport and other agencies as required. The guidance document used by Aer Rianta is "Building for Everyone", published by the National Disability Authority.

Dublin

A set down area on the departure road is available for people with disabilities. Easy access car parking spaces are also provided on the ground level of the multi-storey short-term car park for both long and short term stays. The spaces are linked to car park control by an intercom system. In the event of these spaces being full, drivers can park in the nearest available space. Reduced rates apply for long term stays.

Drivers with a disability who wish to take advantage of the reduced rate should phone Aer Rianta at Dublin Airport in advance to check availability. Drivers must ensure that a valid disabled person's parking permit is displayed on their vehicles at all times. In addition, Aer Rianta report that the following facilities are available:

- fully accessible terminal building;
- specially adapted facilities including toilets and lifts, all signposted. New lifts have an inbuilt voiceover and have Braille buttons;
- minicom telephone located at the information desk;
- induction loops to facilitate amplification of announcements for passengers with hearing difficulties;
- a counter loop system at the information desk to facilitate clear communication with the information assistants on duty; and
- a newly installed wheelchair-friendly facility at the Aer Rianta Information Desk in the Arrivals Hall .

Should extra assistance be needed, Greencaps Limited provide wheelchair and portage services for a small fee and may be contacted prior to departure.

Shannon

The following facilities are available at Shannon Airport for customers with special needs:

Special Parking

Two clearly marked spaces for pick-up and set-down are available at the front of the main terminal. Four free spaces for short-term parking are located adjacent to terminal entrances. Six spaces, clearly signposted in the short-term car park close to the terminal, are for use by disabled travellers for long-term parking.

Terminal Facilities

The terminal building at Shannon Airport is easily accessible. Specially adapted facilities include lifts, toilets and telephones. Lifts are fitted with a phone and Braille buttons. All facilities are clearly signposted.

General Assistance

The Ground Services Unit provides wheelchair and portage services and may be contacted prior to arrival at the airport.

Help phones are located in the disability parking areas as well as courtesy phones located at several points throughout the terminal, should any extra assistance be required.

Cork

The facilities available at Cork Airport for customers with special needs are outlined below:

Special Parking

Reserved easy access car parking is available opposite the entrance to the Terminal Building.

Wheelchairs and Porterage

Should extra assistance be needed, it is advised to contact the relevant airline in advance of arrival at Cork Airport.

Airport Facilities

The Terminal Building at Cork Airport is easily accessible. Specially adapted facilities include telephones, toilets and lifts. The lifts are fitted with Braille buttons.

Other airports

All the other airports (Sligo, Knock, Kerry, Waterford, Galway, Caislean, Carrickfinn and the three Aran Islands) in the State provide similar facilities in terms of parking, level access into and within the terminal, audible and visual flight departure announcements (some only provide one of these, e.g. Sligo and Carrickfinn provide audible announcements only and Kerry provides visual announcements only) and assistance to the aircraft.

2.5.6 Airlines

Aer Lingus at Dublin Airport - Case Study

Wheelchair users

Assistance must be requested at the time of booking. There are three categories of wheelchair users:

- those who can walk but not long distances and need assistance;
- those who cannot manage steps; and
- those who cannot walk, and need to be lifted onto the aircraft by ambulance crew.

Wheelchair users can check-in at the designated check-in area or they can check-in at the three desks in Area 5, which are allocated to special assistance. At this point Aer Lingus will supply a wheelchair if it is required. The passenger is then escorted to the boarding gate by a staff member. They are pre-boarded and at this point they are placed in the care of the Cabin Crew. Again at the arrival airport they are looked after by the ground staff.

Passengers with visual or hearing impairment

Assistance must be requested at the time of booking. Passengers with visual or hearing impairment can check-in at the designated check-in area, given they are escorted by a family member/friend. They can also check-in at any of three desks which are allocated to passengers requiring special assistance. These desks are located in Area 5 on the departures level. Once checked-in, they are escorted to the boarding gate by an Aer Lingus staff member.

At the time of boarding, the passenger is pre-boarded and introduced to the Cabin Crew. From there the passenger is looked after by the Cabin Crew. On arrival at their destination, the ground staff will assist the passenger. Accompanying guide dogs are carried free of charge (on Domestic and UK flights), and if they are harnessed they may travel in the passenger cabin with the owner. Passengers with hearing impairment using this facility must produce a medical certificate stating they have a hearing impairment.

Ryanair – Case Study

Wheelchair users

Ryanair provides full assistance to wheelchair users free of charge. Up to four wheelchair users are permitted on any one flight. In order to qualify for assistance, the passenger must be travelling in their own wheelchair. It is imperative that passengers advise of their condition at the point of

reservation as not to do so, due to the above limitation, may result in Ryanair being unable to accept the passenger for the flight reserved.

Passengers requesting assistance, who do not have their own wheelchair, will be directed to the wheelchair service provider at the relevant airport. Any charges for wheelchair services are payable by the passenger to the service provider directly. Ryanair flies to 56 destinations throughout Europe; at 50 of these airports the wheelchair service is provided entirely free of charge. Currently there are only 6 airports (Dublin, Stansted, Gatwick, Luton, Shannon and Leeds/Bradford) that charge for this service.

Charges are: Dublin (€15); Gatwick (£15.55); Leeds/Bradford (£6); Luton (from £12 to £30); Shannon (€20); Stansted (£18).

Passengers with visual impairment

Passengers with visual impairment will be provided with full assistance at no charge, courtesy of Ryanair. Only one guide dog accompanying a passenger is permitted in the cabin on any flight. It is imperative that passengers advise of their condition at the point of reservation as not to do so, due to the above limitation, may result in Ryanair being unable to accept the passenger for the flight reserved.

2.5.7 International Ferry Travel

Terminal Facilities

The main ports for international ferry travel in Ireland are Dublin, Dún Laoghaire, Rosslare and Cork (Ringaskiddy). The ferry terminals at these ports are fully accessible to drivers and passengers with disabilities. Typical facilities are set out below in the examples from Dún Laoghaire and Rosslare.

Dún Laoghaire

Dedicated parking for people with disabilities is available adjacent to the Ferry Terminal. Spaces are closely monitored by the Harbour Police. Entrance to main concourse is accessible via automatic doors.

Foot passengers

The Main Concourse contains the Stena Line Ticket Centre, Tourist Office, Newsagent/Tobacconist, Bureau de Change, Left Luggage facility and Disabled Toilet. All areas are accessible by wheelchair users.

Because of the construction of the Ferry Terminal, access to the ship covers three levels. Each level is accessible by wheelchair by means of elevators. The departure lounge has a toilet facility for people with disabilities. A refreshment area is accessible by elevator.

Telephones are available in all public areas and are fitted with induction couplers.

Both Harbour Company staff and Stena Line staff are on hand at all times to guide people with hearing impairment and people with visual impairment travelling independently.

The ships that sail from the port contain one passenger deck with easy access to all areas by wheelchair.

Disabled Drivers

Requests can be made by disabled drivers to have their vehicle parked adjacent to the car deck elevator giving easy access between the vehicle and the passenger deck.

In addition, Dun Laoghaire Harbour has over 10 kilometres of flat walking areas, suitable for wheelchair use, all with sea views. There are also 26 dedicated disabled parking spaces and all parking is free to drivers with disabilities throughout the Harbour area.

Rosslare

The port at Rosslare has the following facilities:

- ramped access;
- yellow and black signage;
- Braille guide in the booking office;
- designated parking spaces for people with disabilities;
- clearly marked route from car park to ferry;
- accessible telephones and toilets; and
- electronic noticeboard and tannoy system.

Ship Facilities

Below are examples of the practices of some shipping companies, in relation to people with disabilities.

Irish Ferries

This company operates 4 vessels on services between Ireland and UK/France; Dublin – Holyhead, Rosslare – Pembroke, Rosslare – Roscoff and Rosslare – Cherbourg.

The company's literature states that it has in place a system to aid customers with special needs. All intending passengers are asked to notify Irish Ferries of their impending travel 3 days before departure. The firm will then issue an internal memo to both the port involved and the vessel specifying the type of assistance required.

The company will offer assistance in the following ways:

- Positioning one's car to be close to the lift on the car deck;
- Providing use of a wheelchair in the terminal building or on the ship; and
- Provision of reserved area of seating on the ship.

It is also possible to book a special cabin on board. These cabins are specially adapted and doorway access can accommodate a wheelchair; all cabins are close to a lift. These cabins are available on all ships serving Ireland/UK/France except the Dublin Swift operating between Dublin and Holyhead.

Brittany Ferries

Brittany Ferries provides a leaflet entitled "Advice for passengers with special needs". Their leaflet states that they:

- do not believe ferry travel to be the most appropriate for people with severe disabilities;
- think it desirable for people with special needs to be accompanied;
- are unable to promise full assistance on all ships as a result of constraints imposed by ship and terminal design;
- request that any passenger with special needs should contact them well before the date on which they intend to travel; and
- have only limited numbers of wheelchairs for passengers to use in the terminal, and these cannot be pre booked.

In addition, medical services are not always available on board and where they are, there may be a charge for their use. Any special medical needs or boarding arrangements must be clearly specified at the time of booking and again at ticket check-in at the port.

Other facilities made available by Brittany Ferries include special disabled parking areas available at ports.

The crucial issue is how the various facilities on offer measure up to the standards set out in the IMO Code. In this respect, the degree of uncertainty about the availability of wheelchairs could be construed as contravening that part of the code that states that:

"prior to contemplating any journeys it is essential for passengers to be assured that they will be able to complete the trip – to pass successfully along the transport chain".

Stena Line

All Stena Line ships operated to and from Ireland are accessible to people with disabilities, with the exception of the Stena Lynx summer time only service between Rosslare and Fishguard. This service cannot cater for wheelchair users.

2.6 Operators Equality/Disability Training

2.6.1 Bus Átha Cliath – Dublin Bus

Bus Átha Cliath has produced a manual for a training course, which is delivered to “*varying groups of people throughout the company at all levels*”, entitled “Focus on Equality and Customer Care”. The manual has five sections:

- dealing with customers;
- focus on the customer;
- disability awareness;
- equal opportunities;
- stress management.

Specific reference to people with disabilities is made in the Section on dealing with customers under the title “Customers with Special Needs” as well as in the Section on “Disability Awareness”. The latter has been compiled and is delivered by a disability awareness consultant, who is a disabled person and wheelchair user.

A total of 1700 (50%) staff members had been trained by mid 2003. Dublin Bus reports that all staff will attend the customer care training course. The manual is specific to the customer care course, but new drivers will be given an introduction to all the areas as part of the induction – they will, for example, be shown a low floor bus video which highlights the different categories of mobility impaired people actually boarding and alighting the bus.

2.6.2 Bus Éireann

Bus Éireann has produced a manual entitled “Disability Awareness Training Programme” for use in a Disability Awareness Programme. The aim of the programme is as follows:

- to create awareness around disabilities and the challenges people with disabilities face in accessing goods and services;
- to inform staff about the initiatives which Bus Éireann is implementing to become a more disability friendly organisation;
- to provide practical solutions for dealing with customers with disabilities.

The manual is divided into two sections, as follows:

Section A – addresses:

- Disability Awareness
- The Role of the Equality Authority
- Customers with Disabilities
- Station Accessibility
- Low Floor Vehicles

Section B – addresses:

- Customer care with emphasis on social inclusion
- Dealing with difficult customer situations
- Codes of behaviour towards the public and society
- The importance of an integrated public transport system

The manual contains comprehensive information on the topics covered as well as a series of exercises.

The training programme reflects the content of the manual and details a series of learning outcomes for each topic. The outline indicates that the delivery of the training programme ensures that there are several opportunities for interaction between the participants and contains a number of joint and individual exercises. Delivery includes the use of slides and videos as well as reference to the manual and a booklet entitled “Welcoming Customers with Disabilities”.

Bus Éireann reports that some 2,000 staff members out of a proposed number of 2,700 have been trained to date.

2.6.3 Iarnród Éireann

Iarnród Éireann has produced a training information pack, which comprises the following:

- a presentation on disability awareness prepared by the Irish Wheelchair Association, which includes reference to their brochure “Focus on Ability”;
- documents provided by the National Council for the Blind of Ireland including the following:
 - “Visual Impairment and Blindness”;
 - “General Guidelines for People with a Visual Impairment”;
 - “How to guide a blind person safely”;
 - “Ways to make written documents accessible to all”;
- a booklet from the USA entitled “What everyone should know about assisting a wheelchair (non powered) user”.

An Employee Guide to assisting customers with mobility and sensory impairments has also been produced and has been distributed throughout the company.

Training is delivered through a two-day course designed to inform staff of the needs of people with disabilities and the need to remove “communication, attitudinal and physical barriers”.

The current training programme includes one course per month and each course can accommodate 15 people. It is intended to train the “frontline staff” (staff dealing with customers) before starting to train the remaining staff. Some disability training is also included in induction and other courses.

About 600 staff members have some disability/equality training, which constitutes around 10% of all staff.

2.7 Travel information

2.7.1 General overview

The major public transport operators of local and long distance public transport services utilise a range of information media to inform passengers and prospective passengers of their services. These include:

- promotional leaflets, often incorporating timetables and route maps;
- individual route timetables and maps in printed format for individual use and at bus stops, stations and terminals;
- real time passenger information, comprising visual information only, at bus stops, bus and rail stations;
- web sites, which also incorporate booking facilities and features to enable people with visual impairments to read the text only in large format.

The important aspect of any information system for passengers is the ability to have information for the whole journey in advance of making the trip and at various points during the trip. It is worth noting that the only place to be able to obtain all advance information about a trip involving more than one of the CIÉ operating companies is on the CIÉ web site, though even then it is not possible to get information for the whole trip, but on a modal basis only. In order to find out such information by telephone, each of the operating companies has to be contacted separately. In fact there is no single point of travel information for all modes at local, regional or national level in the Republic of Ireland.

2.7.2 Real time passenger information (RTPI)

Traffic congestion in cities makes it difficult for public transport operators to deliver services according to schedules. One solution being deployed in many cities is the provision of electronic information displays at bus stops, which give the customer an estimate of the waiting time for the next bus.

These systems, commonly referred to as Real Time Passenger Information (RTPI) systems, use a variety of technologies to track the location of buses in real time and use this information to generate predictions of the bus arrivals at stops along the route.

Q-time

Q-time is the RTPI system currently being implemented by Bus Átha Cliath. This is a pilot scheme operating on bus routes in the west of the city. The purpose of the pilot scheme is to evaluate RTPI in one sector of the network prior to implementing a citywide RTPI scheme under the NDP, which has

been estimated at €8.13 million. The initial phase of Q-time has been implemented on the Lucan Quality Bus Corridor. Electronic displays are installed at key bus stops on the QBC. The second phase will be installed on the North Clondalkin and South Clondalkin QBCs. Initially it is planned to have ten displays on the Lucan QBC and fifteen on the Clondalkin QBCs.

The customer benefits from the elimination of uncertainty regarding the waiting time for the next bus. The bus stop is equipped with an electronic display unit. The information displayed indicates the route number, the destination and the predicted number of minutes for the bus to arrive at that stop. This information is updated every thirty seconds.

Q-time works as follows:

1. Each bus, using the GPS satellite navigation system, determines its precise location and transmits this to the control centre every thirty seconds.
2. The central computer then compares the actual location of the bus, at a given time, with its scheduled location.
3. The central computer calculates the time for the bus to reach all subsequent stops along the route, bearing in mind the current bus speed and any deviations from the schedule.
4. The central computer transmits to the relevant display units, the predicted arrival times for the bus - Bus due in 4, 6, 10 minutes etc.

The main components of the system are:

An on-bus computer with GPS receiver on each bus central computer system, based at the depot, electronic display units at designated stops;

A VHF radio system to manage communications between the central computer and the buses and display units.

The Q-time system was developed by a French company, GTMH.

2.8 Ongoing research and service developments

2.8.1 Integrated Ticketing and Smartcards

There are general benefits of integrated ticketing, which apply to all existing or potential public transport users, using an electronic “smartcard” system, along with benefits of specific relevance to people with disabilities. These are:

- More people are encouraged to buy tickets in advance, reducing the number of tickets bought on-board buses, therefore reducing dwell time at stops and consequently reducing overall journey time and improving reliability;
- Interchange (a major disincentive to public transport use) is simpler, faster and cheaper for passengers because there is no need to buy separate tickets;

- Specifically, integrated ticketing, especially using a contactless smartcard system, improves the travel experience for people with mobility and sensory impairments by reducing the need to buy tickets, and the inconvenience and discomfort associated with queuing and dealing with ticket sellers. Boarding buses and passing through gates at railway stations will be simpler without the need to handle coins and tickets, and with less general queuing;
- Operationally, integrated ticketing using smartcards makes it easier to administer discounts or concessions, which is an advantage for those mobility and sensory impaired people who qualify for concessions as their smart cards can be specially coded;
- Finally, integrated ticketing using smartcards enables data on travel patterns to be easily collected, and used to make services more responsive. This will benefit all. In addition, particular travel patterns of people holding concessions can be collected, which could help target investment in specific enhancements.

Technically, smart cards could allow access to special facilities, e.g., lifts or wide gates. However, this would exclude people with less severe disabilities or temporary impediments like heavy luggage or buggies. A better use of the investment is probably to ensure that these facilities work for everyone who needs them.

There is clearly a timely opportunity to ensure accessibility benefits from the proposed system are optimised. This is recognised in the Railway Procurement Agency's (RPA) remit for the design stage of the LUAS project, as follows:

- liaison with the Department of Social and Family Affairs on its smartcard initiative to ensure concessions are carried over into the transport smartcard effectively;
- public consultation, including consultation with disability groups;
- establishment of a working party with representatives of disability organisations;
- the NDA Guidelines for User Interfaces would be the main point of reference for design guidance.

The weakness of the above approach, in common with all the other major transport initiatives at present, is that it relies on goodwill and consultation, which is voluntary, to ensure accessibility standards are met. This weakness is difficult to overcome in the absence of legislation, which would lead to statutory design guidelines and a formal audit procedure.

Consultants have been engaged by the Department of Transport through the RPA to produce a plan for the implementation of integrated ticketing, initially in the Greater Dublin Area, but with application throughout the State.

Smartcard Accepting Devices should be positioned and orientated that wheelchair users and people with limited arm and wrist mobility are most able to use them. For those with limited hand dexterity, alternative

contactless smart objects should be made available, e.g. contactless smart wrist bands/watches.

Any new Passenger Operated Machines (apart from automated passenger gates) should provide wheelchair access to the user interface, with the wheelchair user facing towards the machine (so wheels and knees have to be accommodated). Braille is not an imperative but keypads should provide a raised area on the number 5 and shall respect the standard layout found in ATMs. The user interface should be between 1200 and 1800mm from the floor (but recycling coin systems may require a relaxation from this).

The user interface should be simple to use, logical and easy to use by the visually impaired. This means that touch screens need to have a datum point, normally in the upper left corner. It is preferable for an intercom facility or audible helps to be provided.

Wide automated gates should be provided for wheelchair users, people with buggies etc.

Display media should use fonts that are approved by organisations representing the visually impaired. Pictograms should be used wherever possible.

All devices should provide audible feedback (assurance tones) and these should be applied consistently systemwide (OK, not OK).

Passenger gates shall provide a level floor. (Important, e.g. the new gates in London have a slight ramp to provide cable containment; this is not OK for people with certain walking difficulties). Guided walkways to the wide gates are advisable (textured floor tiles etc.).

Passenger operated machines shall be well signposted and identified by illuminated signs above them and secondary signage for wheelchair users.

2.8.2 Passenger Information

The Dublin Transportation Office (DTO) has developed a strategy and has submitted a report to the Minister of Transport on a multi-modal Public Transport Passenger Information system for the Greater Dublin Area. Although this is a relatively long-term initiative, it will address one of the most common causes of dissatisfaction for all public transport passengers, and can be expected to encourage more people to use public transport.

Real Time Passenger Information (RTPI)

It is useful to provide services on mobile media (mobile phones etc.), in text and audible format; these should be free to appropriate people with disabilities.

2.8.3 Dublin Conceptual Station Study

The D.T.O. is currently developing conceptual models for several types of rail stations and their catchment areas. The purpose of the models is to depict options for station area development that promote new urban forms consistent with the objectives of the D.T.O. Strategy. The brief for the study, which is still underway, refers to the inclusion of provision for people with disabilities as a priority.

Chapter 3: International Good Practice in Accessible Transport

3.1 Introduction

This chapter presents an overview of international good practice in delivering more inclusive, accessible and barrier-free mobility.

This chapter does not claim to provide a comprehensive statement on good practice on access and mobility throughout Europe and beyond. The field of interest is far too large and the intention here is to highlight a relatively small number of specific examples of relevance to the Irish situation.

Nevertheless, it has been necessary to put these in context. We have adopted an approach which sets out an outline framework for categorising the topic area, and which includes individual examples, in boxes, throughout the report.

3.1.1 Parallel Activity

The European Conference of Ministers of Transport (ECMT) is in the process of producing a comprehensive report on examples of 'good practice' later this year. As a contribution towards the European Year of People with Disabilities, in conjunction with the European Disability Forum, ECMT recently ran a challenge prize competition amongst European Cities, Transport Authorities and Public Transport Operators. This sought examples of excellence in accessible transport and infrastructure provision. More than 60 entries were received and the international jury has assessed the standard as very high. The first prize was taken jointly by:

- Syndicat Mixte des Transports en Commun de l'Agglomération Grenobloise (SMTC), Grenoble, and
- VAG Verkehrs-Aktiengesellschaft Nürnberg

Grenoble was particularly noteworthy in its successful co-ordination and coherence achieved among stakeholders in the 23 municipalities of the Grenoble region. Also remarkable was its forward-thinking, proactive approach, having, in fact, initiated actions on a local level that pushed forward the national regulatory context.

Nürnberg, on the other hand, demonstrated an exemplary long-standing commitment to fully integrating accessibility considerations into the planning and operation of its transport system. With an Accessibility Commissioner overseeing the accessibility aspects of the transport system, Nürnberg's outstanding achievements in making the system more accessible to users with disabilities – most notably travellers with vision impairments on the system – brought it to the top of the list of candidates.

The ECMT is in the process of updating the *"Improving Transport for People with Mobility Handicaps: A Guide to Good Practice"* booklet, with the intention of publishing in late 2003.

3.1.2 Methodology

This report has been compiled from:

- a) existing reports on accessible and unconventional transport in other European countries;
- b) discussion with some European institutions including:
 - European Commission
 - European Conference of Ministers of Transport
 - European Disability Forum;
- c) web search and review of literature and research databases;
- d) discussion with colleagues from research organisations outside Ireland;
- e) during this exercise material was examined from research institutes, universities, government departments, voluntary and statutory bodies, organisations of and for people with disabilities in 13 European countries, Australia, Canada, New Zealand and the USA.

3.1.3 Structure of this chapter

The subject of accessible transport provision is extremely wide-ranging and difficult to synthesise. The chapter is divided into three sections:

- General issues
- Demand-side approaches
- Supply-side approaches

This division also reflects our view³⁸ of the priority for consideration, which is the reverse of what usually happens. The vast majority of international discussion and conference exchanges tends to be concerned with technical detail of development in particular modes. This is certainly true at a European level. We felt that it would be more appropriate to consider:

- a) the general principles on which action may be based – for example, human rights or social inclusion principles

³⁸ The view of the consultants who authored this report.

- b) empowering people who might otherwise be disadvantaged
 - financial support
 - information provision
 - organisational structures
- c) breaking down the barriers in practice
 - by systems
 - by modes.

3.2 General Legislative Principles

3.2.1 Background, USA, UK And EU Experience

The approach to transport and mobility for people with disabilities from a human rights perspective has its origins in the United States, in the 1960s³⁹. This was connected to three key changes in society:

- firstly, the end of post-war economic constraints and the massive growth in attendance at universities and other further educational institutions;
- secondly, there was the example and experience of the black civil rights movement;
- finally, the Vietnam war was pivotal.

The initial Americans with Disabilities Act stemmed from this era.

At the same time as principles of equity were being articulated and implemented, the 'normalisation' principle, first articulated by Bengt Nirje of Sweden, was also being developed. This held that people with disabilities should be empowered to maintain a pattern of living and a lifestyle approximating to the norm associated with a given culture. In a transportation framework this had two implications:

1. people with disabilities should be assured a level of mobility consistent with that achieved by equivalent sections of the population
2. transport provision should support people with disabilities' desire to live independently, at home, away from an institutional context.

Equity considerations, combined with the first of these considerations and no doubt propelled by the sight, on live TV, of paraplegic war veterans chaining themselves to bus garage doors, trains and subway entrances in protest at

³⁹ In case the above appears like a suggestion that the disability movement or disability activism generally started in the US, this is not the case. For example, activists in the States cite the Disability Income Group (DIG), started in the UK in the late 1960s by two women, Megan Duboisson and Berit Moore, who were concerned about broad social rights of people with disabilities and the way disabled 'housewives' were ineligible for any of the current disability benefits (although this degenerated into a narrow parliamentary lobby group). At that time, people in the UK probably would have cited the Scandinavian countries, and Sweden in particular, as having a very effective approach to social welfare provision which supported a better quality of life for people with disabilities.

their exclusion, led to the first significant transport-related legislation – the 1970 amendment to the Urban Mass Transportation Act of 1964 (s.16a):

“It is hereby declared to be the national policy that elderly and handicapped persons have the same right as other persons to utilize mass transportation facilities and services; that special efforts shall be made in the planning and design of mass transportation facilities and services so that the availability to elderly and handicapped persons of mass transportation which they can effectively utilize shall be assured.”

This instantly created some of the practical implementation problems that are still with us, whilst also raising many of the issues of principle that are still in discussion today.

The practical problems included:

1. the time gap between giving people rights to access facilities and the facilities becoming accessible. What is a reasonable timescale for removing the barriers? What separate provision should be made in the meantime?
2. rights to access a facility do not provide any guarantee that the facility will be provided;
3. removing barriers does require resources, which need to be made available in an appropriate manner and at an appropriate scale.
4. rights may run ahead of technology and design.

Some of the principle issues included:

- the linkage between elderly people and people with disabilities.
- the reference to mass transportation;
- the focus of responsibility onto transportation professionals, as contrasted with social welfare professionals;
- the focus on collective transportation as contrasted with the provision of adapted cars (or equivalent);
- the focus on transportation facilities and services i.e. removing barriers throughout the entire transport system;
- total v partial system access – is it necessary to make 100% of the system accessible if enough of it is accessible to enable, in practice, people with disabilities to travel?
- recognition of the need to intervene on the supply-side, in contrast to providing user-side subsidies and anticipating that the market will respond with accessible provision;
- broad v narrow definitions of eligibility for specialised or parallel transport services.

There is no doubt that the practical problems experienced in the US and well-publicised at the very influential regular International Conferences on Mobility and Transport for Elderly and Disabled Persons, affected what happened in Europe. In the UK, for example, it meant that the approach

towards transport contained in the Disability Discrimination Act 1995 leant much more towards the pragmatic than towards access rights.⁴⁰

There is no doubt also that the balance of effort between making the entire transport system accessible and the provision of alternative services has been materially affected by national concepts of human rights. In countries such as the United States, and, to a lesser extent, Canada or France, there was a substantial view that universal accessibility was a human right. With such beliefs, the problem of cost effectiveness can be ignored, and the matter must be resolved as a civil rights issue. There is also a measure of pragmatic support for this view as parallel systems are vulnerable in times of financial constraint and do not therefore represent a reasonable long term solution. Furthermore, this approach guarantees that effective pressure can be maintained on system providers because of the possibility of litigation.

Others recommended approaching the problem from the viewpoint of cost-effectiveness, even though this might not lead to a fully accessible system. To many, the objective of fully accessible systems is even now illusory, due to the many problems of access outside the transport system or to the problems of cost (e.g. the older Metro systems in Paris, London or Madrid). In countries such as the United Kingdom, Holland or Sweden, the approach was much more towards favouring a 'reasonable' right to mobility, providing this in the most cost-effective manner.

Many of the outcome analyses of the US 'mainstreaming'⁴¹ supported the general mobility approach. Whilst acknowledging the difficulty of calculating the benefits involved in full accessibility, the results of mainstreaming did not appear to deliver the claimed benefits:

- expanded quality of service for people with disabilities;
- reduced demand for specialised transportation services;
- benefits of conscience due to social equity;
- benefits of productivity to the economy;
- operating cost savings in transit operation.

Some of those arguing for the general mobility approach disagreed with the 'mainstreaming' model in principle. They pointed out that making a poor transport service fully accessible may achieve an equal opportunities result, but it does not actually guarantee people with disabilities the effective access and mobility they need to live full and independent lives.

Others, however, were in principle supportive of 'mainstreaming', but felt that the technical and financial difficulties were such as to require pragmatic

⁴⁰ See, for instance, the response of the Disability Rights Commission to the government's consultation paper on extending the DDA's coverage further into transport

⁴¹ See the papers from US delegates to the 2nd, 3rd and 4th International Conferences on Mobility and Transport for Elderly and Disabled Persons

improvements to be made on the basis of best value rather than a predetermined principle.

Further differences arose in practice between those pursuing a broad definition of what, for a time, was called 'mobility handicap', and those pursuing a more narrow focus. This particularly concerned the question of eligibility for and design of specialist transport services. In the UK, for example, many of the dial-a-rides (door to door, minibus-based, services) were established by local coalitions of people with disabilities who were pursuing the 'Independent Living' model allied to the development of the social model of disability by activists and polemicists such as Vic Finkelstein. In practice, no age restrictions were placed on access to such services and, for obvious reasons, no reference was made to a requirement for the user to be registered as a person with disabilities. The vast majority of use has come to be by people aged 65 or over and this defines the way resources are scheduled and, therefore, the possible journeys that can be made. These services are not, therefore, very helpful to 'younger' people with disabilities who have complained about 'their' services being 'swamped' by pensioners. For example, few of these services offer the facility for regular journeys to work or college. It is noticeable that very few of these services are now run by groups of people with disabilities – as the services grew, they became 'professionalised'. By contrast, the French equivalent services, run by various local GIHP (Groupement pour l'Insertion des Personnes Handicapées Physiques) groups across France, have remained much more focused on the needs of younger (i.e. below pensionable age) people with disabilities, with a core provision of educational and work journeys. For many GIHP transport facilities, eligibility depends upon the possession of a 'carte d'invalidité de 80%', i.e. formal (medical) assessment of an 80% disability level. Older people with restricted mobility are less likely to apply for such a card as they perceive this restriction as relating to the ageing process and they may not want to identify themselves, both to themselves and others, as "disabled".

This debate also reflects the question of whether accessible transport is perceived primarily as a disability issue or as a transport issue. In the UK, the latter is now the case, with a shift in funding for general purpose accessible demand-responsive services away from social services departments and towards passenger transport authorities, and a strong pressure for integration with all other forms of collective transport. There is almost no reference in the UK community or public transport sectors to non-transport legislation from e.g. the health, social welfare, social policy, integration or employment sectors. Again, this contrasts strongly with the situation in France or Germany, where considerable reference is made to separate pieces of legislation in these fields, which require that people with impaired mobility can get access to those services and therefore require the provision of transport.

Indeed, in the EU it appeared at one point (end of 1980s) that the critical factor in stimulating the provision of accessible mainstream transport services was to be an Employment Directive, which would require accessible transport for journeys to work to be provided.

Despite the divergences in principle, in practice the totality of all systems in the different western countries is coming to look more and more like each other. The important distinction appears now not which principles are being pursued, but what resources are being put into the necessary changes. Common themes now include:

- a) a broad definition of the beneficiaries of specific action in the accessible transport and mobility field. This includes not only all forms of disability, including impaired sensory and intellectual function, and other 'hidden' disabilities, but also:
 - people whose mobility is constrained by the normal ageing process;
 - people experiencing temporary difficulties e.g. pregnancy or a broken limb;
 - people who are encumbered with shopping or luggage;
 - people accompanying small children, including those in prams and buggies.
- b) introduction of mandatory accessibility to meet agreed national technical standards (in the case of buses, these have mostly been developed in advance of the European Bus Directive), including:
 - a move towards low floor buses on all urban services, together with improved equipment (visual and audible information, colour contrast, appropriate handles and stanchions) and infrastructure (raised kerbs, kassel kerbs or equivalent, tactile paving, seating, shelter, etc.);
 - new light rail transit/trams plus infrastructure to be low floor;
 - new railway rolling stock and infrastructure to meet modern accessibility standards, with some element of retrofit adaptation to infrastructure and phasing out of older inaccessible rolling stock;
 - timetable for introduction of wheelchair access and other accessibility improvements on rural and interurban bus and coach services;
- c) significant concessions/discounts on mainstream public transport use for a broad range of people with disabilities;
- d) driving and technical aids assessment centres;
- e) specialist disability awareness and passenger assistance training for transport operating staff and, to a lesser extent, management and planners;
- f) significantly improved consultation arrangements with or involvement of people with disabilities in establishing or confirming the technical standards.

The areas where there is most variation are:

- a) **taxi accessibility.** The UK is the world leader in taxi accessibility, through its establishment of wheelchair access standards for the London-type 'black cab', and the fact that wheelchair access is a mandatory requirement in an increasing number of licensing authority areas. However, the development has not been problem-free as:
- many people with disabilities find a saloon car with wide and high rear or front door access easier to get into and more comfortable to travel in than a black cab
 - there is concern that the additional cost of a purpose-built black cab will lead providers to delicense as taxis and relicense as private hire (hackney in Irish terms), to avoid the mandatory requirement, thus leading to a serious shortage of taxis at key locations. It is for this reason that the proposed taxi accessibility regulations to be made under the DDA have never been finalised.
- b) **taxi subsidy / concession systems.** Whilst it might seem again that the UK is a leader in this field with taxicard operating in London and a number of other locations, the fact is that taxis tend to be integrated into more advanced paratransit systems elsewhere. For example, saloon car taxis are a major component of the Swedish STS. However, the distinction appears to be that in the UK, the taxicard holder books directly with the taxi provider of their choice – thus queueing like non-taxicard holders; in the other systems, the holder who is eligible for paratransit books through a travel centre which routes the booking through to a suitable provider. In the latter system, the effective fare paid is likely to be of the same order as in the UK taxicard, so one could argue that it constitutes an effective taxi concession system.
- c) **a greater or lesser provision of demand-responsive paratransit services.** Comparing this is complicated by differences in national approaches to the provision of transport to enable people with disabilities to attend statutorily provided services such as schools, colleges, welfare centres, training institutes, hospitals and other health centres, as well as work and recreation. In some cases, this is done by the department or local authority that is responsible for the service; in others it is externalised to separate transport providers; in some cases it is linked into public transport provision; in some it is done by community-based organisations. For example, a significant part of the transport work of GIHP in France involves taking young people with disabilities to school or college. In Great Britain this is undertaken by education authorities directly or by contractors on their behalf. The GIHP provision is likely to get counted in to statistics on paratransit capacity – the GB provision is not. Similar differences apply, for example, to non-emergency patient transport services and to trips to welfare centres. In the latter case, this may depend upon whether the welfare centre is provided directly by the statutory authority or they simply support it financially. Coverage varies substantially across Europe, with only Sweden having a fully comprehensive and mature geographical and cross-functional

provision. In other countries, rural coverage is patchy and the urban capacity is generally inadequate to meet demand.

- d) **the inclusion of non-public transport (for example, school buses, ambulances, car hire, breakdown services) within systems guaranteeing mandatory accessibility.** Even in Sweden, there is no requirement for school buses to be accessible – thus the Kuxxabus service (see later) which is a good example of integration between education, social services and public transport, is not accessible. Again, school buses and, indeed, non-public community transport services, have been exempted from the application of the 2002 Disability Standards for Accessible Public Transport in Australia.

Nevertheless, the importance of core legislation setting out anti-discrimination principles, to which resort can, ultimately, be made has been underlined by commentators comparing the progress of accessible transport in Canada unfavourably with that in the US.

In the U.S., the legislative framework is far more demanding than in Canada and there is a strong policy pledge to reaffirm the Americans with Disabilities Act (ADA). The Canadian transport legislation pertains only to the federally regulated public transportation modes, unlike the U.S, whose ADA provisions also include urban transit. The regulatory mechanism in Canada is mostly based on voluntary codes of practice. After the 1991-1996 National Strategy Programs, there has been no funding for implementation. Without a strong legislative mandate for universal system accessibility, the speed for implementation for all modes, mostly based on voluntary compliance, is expected to be slower than in the U.S.⁴²

3.2.2 Human Rights – Anti-Discrimination Legislation

European Level

There is, at present, no general European anti-discrimination legislation relating to people with disabilities. There has been specific action in certain priority fields, for example, in the areas of employment and occupation. On the basis of Article 13 of the EC Treaty, which enables the Community to take initiatives to combat discrimination on the grounds of disability, the Council adopted on 27 November 2000 Directive 2000/78/EC “Establishing a general framework for equal treatment in employment and occupation”. The Directive prohibits any discrimination, be it direct or indirect, on the grounds of religion or belief, disability, age or sexual orientation.

A proposal for a European Union law which for the first time prohibits discrimination against people with disabilities in housing, education,

⁴² Inclusive Design & Universally Accessible Transport: Progress In North America - S. Ling Suen, Meera Ashtakala Varigonda, Luc Ouellet, International Centre for Accessible Transportation, Canada

transport and all its other forms, was unveiled at the European Parliament in Strasbourg on Wednesday 12 March 2003. This is in the form of a 'Shadow Directive' (i.e. a draft) that has been prepared by the European Disability Forum (EDF) over the last two years, as a response to the disappointment they felt with the limited recognition that people with disabilities and people with reduced mobility are given in the White Paper on a Common Transport Policy⁴³. It also builds on the fact that agreement was made to pass an EU Race Discrimination Directive in 1997.

The proposed Article 5: "Access to buildings, telecommunication, transport modes and other public spaces and facilities" contains the key application of the legislation to transport. Relevant paragraphs include:

2. Insofar as the following areas fall within the scope of this Directive and Directive 2000/78/EC, Member States shall introduce such measures as are necessary to ensure that:
 - a. all forms of public transport and all buildings and structures providing access to public transport, whether provided by the public or private sector, are accessible to persons with disabilities. Member States shall require that all new and, wherever possible, re-fitted transportation vehicles and buildings are accessible and shall set appropriate deadlines for providers of public transport with regard to achieving accessibility for existing vehicles, buildings and structures, subject to the following maximum deadlines:
 - [5 years after the publication of this Directive in the Official Journal (OJ)] for taxis and hackney cabs
 - [10 years after the publication of this Directive in the OJ] for road and rail transport
 - [10 years after the publication of this Directive in the OJ] for air and sea carriers
 - [10 years after the publication of this Directive in the OJ] for buildings and structures providing access to public transport
3. Member States shall ensure the access of guide and service dogs where needed in order to provide equal access of people with disabilities.
4. Member States shall ensure that representative non-governmental organisations of persons with disabilities and parents, guardians or designated advocates of persons with disabilities unable to represent themselves are involved in the setting of appropriate accessibility standards.
5. Member States shall provide for an independent body to monitor compliance with the requirements established in this Article.

It should be noted that this exclusively focuses on core public transport. The UK experience is that this is not enough – the transport network is much broader than this, including much statutory or quasi-statutory provision, and

⁴³ European transport policy for 2010 – time to decide European Commission White Paper

yet does contain discrimination⁴⁴. Consequently, the Disability Rights Commission in the UK has recently lobbied⁴⁵ for the transport section of the Disability Discrimination Act 1995 to be extended so that it covers the full range of transport services, including school buses, ambulances, community-based transport, charitable transport and so on.

Whilst a number of countries have now enacted anti-discrimination legislation, there is a distinction to be made between outlawing discrimination and providing for positive rights. The former has the danger that it can be allowed to encourage a 'do-minimum to avoid prosecution' mentality. Consideration of the legal cases that have been brought under the UK's Disability Discrimination Act 1995⁴⁶ suggests that there is a long way to go before such legislation has a fundamental impact on cultural and behavioural norms.

National Level: UK – Disability Discrimination Act 1995

Whilst providing a framework for the general outlawing of discrimination, the UK Disability Discrimination Act 1995 is divided up into three sections:

- access to employment
- access to goods, facilities and services
- access to education

each of which is treated differently.

Transport comes within Part III of the DDA, which deals with access to goods, facilities and services. The Act imposes specific duties on service providers and these duties have been introduced incrementally since 1996, with virtually all the remainder to come into force in 2004. Transport infrastructure (bus stations, railway stations, airports and ports) is already covered by these provisions. There is however a specific exemption for any service *"so far as it consists of the use of a means of transport"*.

- Since December 1996 it has been unlawful for service providers to discriminate against a disabled person in refusing to provide, or deliberately not providing, a service which is provided to other members of the public. It has also been unlawful to provide a service of a lower standard, or on less good terms than that available to other members of the public.

⁴⁴ For example, Royal Clitheroe Grammar School was recently successfully sued under the Disability Discrimination Act 1995 for unfairly barring a child with diabetes from travelling on school trips

⁴⁵ Response from the Disability Rights Commission to the Consultation on the Government's proposal to lift the exemption for transport services from some of the civil rights duties in Part III of the Disability Discrimination Act

⁴⁶ A summary of each of the 132 cases of interest to the Disability Rights Commission can be found on their website

- Since 1 October 1999 service providers have been required to take reasonable steps to change practices, policies or procedures that make it impossible or unreasonably difficult for disabled people to use a service. Also, where a physical feature makes it impossible or unreasonably difficult for a disabled person to use a service, the provider has been under a duty to - provide a reasonable alternative way of making the service available.
- From 1 October 2004 service providers will have to take reasonable steps to remove, alter or provide means of avoiding physical features that make it impossible or unreasonably difficult for disabled people to use a service.

Part V of the Act deals with public transport vehicles. It provides for accessibility regulations to be made for public service vehicles (buses and coaches), rail vehicles (trains – including light rail, underground and trams) and taxis. The regulations set minimum technical requirements to ensure that, in future, public transport is accessible to people with disabilities, including those who need to travel in a wheelchair. Regulations have already been introduced for buses and coaches, and for rail vehicles. A package of proposals is being developed for taxis. Outline proposals on taxis were first published in 1997, and have not been progressed since due to opposition within the industry. Work has recently begun to provide a design specification for a fully accessible taxi. This work is due for completion in 2005. Manufacturers will then have five years to prepare for producing vehicles to this specification.

The UK Government is now proposing to extend the Part III civil rights provisions of the DDA to include the following services:

- Rail vehicles (including trains, trams and light rail)
- Buses and coaches
- Taxis

In addition, they propose to extend the Part III provisions to the following services:

- Private hire vehicles
- Aviation
- Shipping
- Car hire services
- Breakdown services

However, they do not propose to make these services subject to the 2004 duties. Nor do they propose to apply the 1999 duty requiring operators to provide a reasonable alternative method of making the service available to those passenger transport services listed above – where that service consists of the use of a vehicle.

There is no doubt that the DDA has had an impact on reducing barriers to the core public transport modes. Its greatest achievement is to consolidate

the introduction of low floor buses throughout the system. Some may argue about the timetable, but that has been set with reference to a detailed Regulatory Impact Assessment which balances the need for haste, with consideration of realistic replacement cycles for the hardware.

There has also been progress on design standards for infrastructure, which comes within the standard Part III provision, i.e. it has not been subject to the Part V exemption. Like any such legislation this lays emphasis on reasonableness⁴⁷ in terms of the adjustments or modifications that the service provider/facility owner needs to make. This seems a sensible way to proceed, as what is 'reasonable' will change over time as technical knowledge is improved and expectations grow. This can be reflected in changing court judgements. Thus far, the court cases do not provide significant guidance because they have mostly covered completely obvious and unreasonable discrimination (*"you can't come in here with a guide dog"*, etc.), but there is no doubt that this will change as the number of cases builds up.

The DDA structure in the UK now incorporates statutory representation of people with disabilities themselves, in the form of the Disability Rights Commission (DRC). The DRC was created by the Disability Rights Commission Act 1999. Section II of the Act imposes the following duties on the Commission:

- To work towards the elimination of discrimination against disabled persons;
- To promote the equalisation of opportunities for disabled persons;
- To take such steps as are considered appropriate with a view to encouraging good practice in the treatment of disabled persons;
- To keep under review the workings of the Disability Discrimination Act (DDA) 1995 and this Act.

The Commission has given itself the mission of seeking to achieve a society in which all people with disabilities can participate fully as equal citizens. It has produced a policy statement on transport and travel.

Their general view of the position of people with disabilities in respect of transport was set out in recent consultation in respect of a report on transport published by the Government's Social Exclusion Unit:

- One in seven people in Britain has a disability, making a total of 8.6 million disabled people.
- The vast majority of disabled people experience significant levels of social exclusion because the design and operation of Britain's transport system has failed to deliver an appropriate and accessible service.

⁴⁷ For example, the Australian Disability Standards for Accessible Public Transport 2002 allows for exemption from compliance on the basis of 'unjustifiable hardship' – a concept first introduced in their Disability Discrimination Act 1992

- The income of disabled people is on average lower than that of non-disabled people.
- Transport costs are usually higher because of a high dependence on expensive modes such as taxis.
- Disabled people are only half as likely as non-disabled people to be in employment. There are over 6.6 million disabled people of working age in Great Britain, but only around 3 million of these are currently in employment.
- Providing effective accessible transport services to work would make a positive contribution towards addressing this imbalance.
- Disabled people do not generally travel through choice, and make only those journeys that they consider essential.
- Prolonged negative experience causes disabled people to continually re-evaluate what is an essential journey and contributes to shrinking journey patterns and social isolation.
- Most disabled people have had poor experiences of public transport and an exposure to unequal levels of risk much of which has led to personal injury. This has caused a dramatic reduction in their confidence in using public transport again.
- Disabled people are known to under-report incidents and injury incurred whilst travelling or raise complaints about their journey experience.

In a recent consultation, the DRC made the points:

- The United Kingdom has recently introduced two comprehensive sets of access regulations under Part 5 of the DDA 1995. These are progressive but do not apply to all modes of transport and so can have a limited impact in isolation.
- Australia, the United States of America and other countries have disability discrimination laws though these do not necessarily form part of an explicit social inclusion agenda.

The DRC is responsible for researching, consulting on and then publishing Codes of Practice to provide guidance on complying with the DDA. It has produced a general Part III Code and also specific Codes for schools and colleges in respect of access to education. These have been very well received and make compliance with the DDA much easier to realise – they provide some guidance as to what might be considered reasonable and how to keep up to date with this concept. They are to be asked by the Department for Transport to produce an equivalent Code of Practice for Transport.

National Level: Germany - The Disability Discrimination Act 2002 (Creation of equal opportunities for people with disabilities)

The Disability Discrimination Act entered into force on 1 May 2002. Following the Act on Combating Unemployment among People with Severe

Disabilities and Book IX of the Social Code, it represents the third significant act in the field of disability policy adopted in the years 2000-2002.

The Act serves to implement for people with disabilities the ban on discrimination laid down in Article 3 para. 3 of the Basic Law of the Federal Republic of Germany (*"No people shall be disadvantaged because of disability"*). The objective is to establish equal opportunities and barrier-free access in fields covered by public law. At the core of the Act is the creation of 'areas of life' that are accessible without barriers. People with disabilities are to be given broad access to all areas of life and they are to be able to use them without any restrictions.

In the future, target agreements aimed at the establishment of barrier-free access will play an important role. Enterprises and recognised associations are to be given the opportunity to conclude, on their own authority, agreements stipulating how and by when barrier-free access will be implemented. Target agreements will be suitable instruments whenever there are no general legal provisions governing barrier-free access and whenever it is not possible to adequately regulate barrier-free access by means of such general provisions.

The transport sector is a main focus of the Disability Discrimination Act. Progress on access is not new to the Federal Ministry of Transport, Building and Housing, which has already led to amended laws, so the principle of barrier-free access is seen as synonymous with quality improvement for all citizens. One background issue cited is a concern with Germany's rapidly ageing population, and the need to enable senior citizens to retain their independence.

Consequently, the new approach goes beyond those who are 'officially recognised people with severe disablement' so that consideration is also given to people with a level of disability below 50%. The same applies to other mobility-impaired people such as the elderly, small children, expectant mothers, mothers or fathers with prams and pushchairs or people carrying heavy luggage.

The Act has a rather complex structure and has been the target of much criticism both for going too far and for not going far enough. The Federal Ministry itself admits that *"Many people who have not studied the - admittedly quite complicated - structure of the act believe that the establishment of barrier freedom will require investments in the order of one billion Euros or more."* The Ministry then points out that:

- Measures to create barrier-free access will in general only be realized in the case of the purchase of new assets or major new construction or conversion work;
- The structure chosen for the Act ensures that the relevant decision-makers can make provisions on their own authority regarding the specific conditions for the establishment of barrier-free access in each individual case;

- The Local Authority Transport Infrastructure Financing Act and the Local Public Transport Regionalization Act ensure funding of local public transport from the federal budget. In 2001, these funds amounted to around €8 billion;
- Moreover, people with severe disabilities are entitled to use local public transport free of charge. Here, too, the Federal Government spends around €140 million per year;
- Another argument against exaggerated statements about costs is the way in which European law has developed. It shows that something that has become standard practice in Germany, namely the purchase of low-floor buses (currently approx. 90% throughout Germany) has developed into a mandatory standard in Europe. In November 2001, the European Parliament adopted the so-called "Bus and Coach Directive" which stipulates that urban buses (Class I) must be equipped with kneeling systems and ramps or lifts.

The interests of people with disabilities are taken into account by giving them the right to participate directly. It had become apparent that, very often, ignorance and heedlessness lead to planning deficiencies. The early involvement of these "experts through their own experience" is said to ensure transparency but also avoid high costs that would otherwise have to be paid for remedying deficiencies in planning and construction.

With regard to establishing barrier-free access, airport operators and airlines have to take special account of the interests of people with disabilities. This objective is to be achieved primarily by means of the conclusion of target agreements. (Civil Aviation Act, sections 19d and 20b)

As regards the construction and maintenance of federal trunk roads, the interests of people with disabilities should be taken into account with the aim of ensuring the largest possible degree of barrier freedom as long as this does not conflict with overriding public interests, in particular those of road safety. (Federal Trunk Roads Act, sections 3 and 8)

Financial assistance from the Federal Government for investments to improve the transport position in municipalities is only to be provided for barrier-free projects. Here too, representatives of people with disabilities' interest groups are to be consulted. (Local Authority Transport Infrastructure Financing Act, sections 3 and 8)

The Carriage of Passengers Act (sections 8, 12 and 13) contains special provisions on barrier-free access to local public transport. It should be noted that, in general, it is the Federal States that are responsible for organising and delivering local public transport. Therefore, it was been particularly important for the Germans to find a solution that is both reasonable and takes into account the specific conditions in each individual local case.

The provisions in local transport plans contained in section 8 para. 3 of the Carriage of Passengers Act provide the basis for this. According to these provisions, the federal states are entitled to regulate the drawing up of local

transport plans and to identify the authority responsible for local public transport who - within the framework of the government's obligation to provide the services necessary for public welfare - will also have the financial responsibility for ensuring that sufficient transport services are provided for the general public. So far, fifteen Federal States have made use of this right and have adopted State Acts on local public transport (Hamburg being the exception). In the majority of cases, the authorities responsible for local public transport - normally districts or municipalities - are obliged to draw up local transport plans. In the remaining cases, they are at least required to carry out a due assessment of the circumstances before deciding whether to draw up local transport plans.

The local transport plan, which is adopted by the representative body of the authority responsible for local public transport, as a comprehensive master plan for the development of local public transport, is thus the right location for a formal statement about how to introduce the greatest possible accessibility regarding the use of local public transport.

The new provisions introduced as a result of the Disability Discrimination Act contain requirements, under federal law, for the contents of local transport plans. The effect is to give a specific emphasis to the interests of people with disabilities or other mobility problems within the overall process of weighing up different aspects in the drawing up of local transport plans. The provisions stipulate that, with a view to the objective of ensuring extensive barrier-free access to local public transport for this group of people, their interests must be taken into consideration. Local transport plans contain statements on the measures envisaged and the time required for their implementation.

This legal structure ensures that it will be the local decision-makers who decide, on their own authority, the conditions for the establishment of barrier-free access in each individual case. They also determine the scale and nature of the financial implications.

It is worth making the comparison between the approach in Germany where the requirement has resulted from the DDA, and the position in the UK where the general requirement on passenger transport authorities to take account of the needs of elderly people and people with disabilities in drawing up their plans was introduced in the Transport Act 1985, but never really supported by detailed guidance. Notably, no-one has ever challenged a local authority in the court on the basis of possible failures to properly take account of the needs of people with disabilities. The Local Transport Planning regime was introduced into the UK in the 1990s. Here there has been more specific guidance from central government, and the ability to refer authorities to the Department's own development work through its Mobility and Social Inclusion Unit. The Department is just about to research authority performance in planning for the needs of people with disabilities in their capital infrastructure investment.

In order to ensure that the interests of people with disabilities, and existing knowledge of low-cost solutions for the elimination of access barriers, are taken into account in drawing up local transport plans, a right to be consulted is introduced for two groups:

- the disability rights commissioners
- the disabled people's advisory committees of the authorities responsible for local public transport.

They are given the possibility of influencing both the process and the outcomes. Local authorities drawing up local transport plans must give serious consideration to the opinions presented by these groups. They must guarantee that the most important results of consultation get translated into objectives and that decisions take adequate account of them.

The above-mentioned provisions on local public transport have been incorporated in the procedure for issuing authorisations for the carriage of passengers under the Carriage of Passengers Act. The request filed by the operator for authorisation to operate services for the carriage of passengers has to include details of how the operator intends to meet the requirements of the local transport plan, for the achievement of extensive barrier-free access regarding the service for which authorisation has been requested.

The authority may refuse to grant authorisation on the grounds that the proposed service is not consistent with the statements in the local transport plan with regard to the achievement of extensive barrier-free access. This has also been made clear by inserting a relevant paragraph in the Disability Discrimination Act.

In terms of rail transport, the legal provisions on railways apply. An amendment to the Construction and Operation of Railways Regulations (Section 2) obliges the railways to draw up programs concerning the design of infrastructure, rolling stock and operational measures with the aim of achieving extensive barrier-free access. The programs are drawn up after consultation with the associations which, in connection with the Disability Discrimination Act, have been recognised by the Federal Ministry of Labour and Social Affairs.

The Act does not require the programs to be authorised by the competent supervisory authority. On the one hand this is to ensure that railway operators' scope for action is not restricted; on the other hand there is already the potential for the rail supervisory authority to intervene if the legal requirements are not fulfilled. To support this, the second Act on the amendment of the legal regulations governing rail transport introduces the possibility of levying an administrative fine of up to 0.5 million Euros. (In particularly serious cases, the operating license of the railway undertaking may be withdrawn.)

This means that the legal system used for railways is the same as that for buses, i.e. it is up to the decision-makers locally to make provisions under their own authority in order to create the preconditions for extensive barrier-

free access. As in the case of the Carriage of Passengers Act, the main results of any consultation must find their way into the process of formulating objectives for the railways and decisions so that they must take adequate account of them.

It would appear to be the case that the German approach to barrier-free transport also contains the same gaps the UK approach does, and which have been identified, firstly by the Disability Rights Task Force (DRTF) and latterly by the Disability Rights Commission. The Government set up the DRTF in 1997, bringing together industry and disability interests under the chairmanship of the Minister for Disabled People. The DRTF was charged with bringing forward proposals to create a Disability Rights Commission (DRC) and with reviewing the existing legislative provision in the Disability Discrimination Act 1995 (DDA) with a view to making recommendations on future action. On the latter task the DRTF submitted a report to the Government, "From Exclusion to Inclusion", at the end of 1999 which, whilst acknowledging the progress made in respect of buses and trains and, to some extent, taxis, considered that *"there are a number of omissions, and areas where further refinement of the legislation would be necessary to achieve the fully accessible transport system to which the Government is committed."*

The DRTF and the DRC have both identified the breadth of the vision of an integrated, fully accessible transport system. Integrated means that all modes are included, not merely the principle ones. The DRC has been particularly strong in championing the needs of disabled drivers and seeking to exclude them from general measures designed to restrict car-borne mobility, at the least until fully accessible and appropriate alternatives are available.

Other Countries in Europe: Overview

The European Conference of Ministers of Transport (ECMT) undertakes a regular review of accessibility and non-discrimination legislation. The last one was published in 2000⁴⁸, and contains information on 27 countries.

From the information received, the following general comments can be made:

- differences between national policies, vary substantially from a highly proactive policy in favour of the mobility-handicapped, to countries where few measures have been introduced;
- in some countries transport accessibility policy is undertaken at regional level;
- in some countries, the basis for a policy for people with disabilities is enshrined in their constitutions. However, the precise implications of this

⁴⁸ Legislation to Improve Access – ECMT 2000 – Doc:

are not always clear, for a variety of reasons (set out below);.

- quite a few countries formally set out the basic rights of people with disabilities, notably in respect of mobility and the use of different modes of transport, in accordance with the concept of non-discrimination or equality between all citizens. In most countries, this non-discriminatory legislative framework gives the persons concerned or the associations that represent them the right to take legal action for non-compliance with regulations;
- with a few exceptions, all the laws and regulations in force in Member countries date from the 1990s, or at least their provisions have been given greater legal force in the last few years;
- the binding nature of provisions introduced at national or regional level is strengthened in some countries by enforcement mechanisms and penalties. These include: withholding an operating licence, legal action by the persons concerned, possible criminal penalties. In general, enforcement practices vary greatly between countries.

In commentary, ECMT makes six points:

1. legislative 'cultures' differ across the EU, in terms of how strictly the laws are interpreted and enforced
2. legislation is by itself not enough to guarantee improved accessibility. It needs to be supported by detailed regulations
3. there is a careful balance to be struck between laws being too general to be effective and too detailed to prevent or deter natural progress and innovation
4. there is little point in introducing legislation that does not have the support of the groups and industries concerned
5. legislation needs to be enforced. This is easier, the more specific the regulations are, but time-consuming and not always focused with general anti-discrimination laws
6. legislation needs to be regularly reviewed and evaluated

Australia – A Brief Note

The legal basis for action in respect of accessible transport in Australia is the Disability Discrimination Act 1992. In October 2002, the Australian parliament approved a set of standards (the Disability Standards for Accessible Public Transport 2002) which specify how the objects of the DDA 1992 are to be achieved in the provision of public transport services.

In many ways these standards illustrate how even though general anti-discrimination legislation has been passed, it is still necessary to adopt a pragmatic approach to implementation. Points in this direction include:

- the length of time between the passing of the DDA and the enacting of the standards;
- the lengthy lead-in times (5 to 30 years);

- exclusion of certain services
 - non-public community transport services
 - school buses
 - hire cars
 - charter boats
 - small aircraft (less than 30 seats);
- cross-referencing to other technical standards e.g. Australian Standards under the ‘Design for Access and Mobility’ programme;
- explicit acceptance that achieving agreed access standards for vehicles, premises and infrastructure will not, of itself, guarantee that discrimination will be removed;
- a specific stated assumption that passengers will accept the constraints that are part of the safe and effective operation of public transport services and will accept that there are limits on what may be practicable for providers and operators to supply in some circumstances (see Guidelines 1.16);
- an assumption that “*passengers have the capacity to use a mass transit system*” (Guidelines 1.18);
- an acknowledgement that further research is needed before standards can be made for some items – such as hearing augmentation – listening systems for vehicles.

3.2.3 Universal Design Principles

The most recent concept has been developed in the US under the title “Universal Design”. It has been developed to contrast with older concepts such as “Barrier-free Design” and “Inclusive Design”.

Proponents of Universal Design suggest that the commonly-used term “barrier-free design” has often been interpreted as being about the removal of physical obstacles that prevent the free movement of people with disabilities, and therefore has ignored:

- the needs of people with sensory or cognitive impairments
- the need for fundamental attitudinal change within society.

The removal of barriers in transport systems was often targeted to existing barriers, taking a reactive rather than a proactive stance.

The term “inclusive design” is often used interchangeably with “universal design” but is less well defined in the literature. Inclusiveness means right to access, right to use and enjoy without special status or burden. It embodies the process of inclusion: that is, bringing different user groups into the fold. It does not necessarily require uniform treatment, and allows for viable options with choice, e.g. complementary paratransit provisions under the Americans with Disabilities Act (ADA).

Recently, transport professionals have gone beyond just removing obstacles in tackling accessibility issues, by applying the concept of “universal design”. Borrowed from the designer community, it aims at ‘designing products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design’⁴⁹. The intent of universal design is to simplify life for everyone by making products, communications, and the built environment more usable by as many people as possible at little or no extra cost.

The differences within the three approaches can be illustrated by the design of the urban bus:

- a lift-equipped bus is a barrier-free design
- a low-floor bus with ramp is an inclusive design
- a low-floor bus with level entry infrastructure is a universal design.

Universality is an approach that removes the differences between groups, intent upon levelling the playing field. It removes the notion of separate requirements and may not tolerate alternative solutions if a narrow definition of having the same product and services for everyone is adopted. Of course, universal design can be just as one dimensional as other approaches, if it only addresses design aspects, while neglecting procedural/ operational matters. When listing the Principles of Universal Design (see Table 3.1 below), the Centre for Universal Design adds a cautionary note to professionals that they must also incorporate other considerations such as economic, engineering, cultural, gender, and environmental concerns in their design processes.

The development of the Universal Design approach also reflects the fact that at the same time as disability rights legislation was being promulgated and barriers were being eliminated or reduced, substantial advances were being made in rehabilitation engineering and assistive technology. Rehabilitation engineering became a specialty that applied scientific principles and engineering methodologies to these problems. The label, “assistive technology,” was applied to devices for personal use created specifically to enhance the physical, sensory, and cognitive abilities of people with disabilities and to help them function more independently in environments oblivious to their needs.

⁴⁹ (2000). Center for Universal Design – What is Universal Design? [on-line]. Available http://www.design.ncsu.edu:8120/cud/univ_design/princ_overview.htm

Table 3.1: The Seven Principles of Universal Design

<p>1. Equitable use</p> <p>The design application should be widespread and should reach out to as many people as possible in:</p> <ul style="list-style-type: none">• providing the same means of use for all users; identical whenever possible; equivalent when not.• having provisions for privacy, security, and safety should be equally available to all users.• not having constraints that can stigmatise or segregate users.
<p>2. Flexibility in use</p> <p>The design should accommodate a wide range of individual preferences and abilities in:</p> <ul style="list-style-type: none">• allowing for choice in methods of use.• accommodating right- or left-handed access and use.• facilitating the user's accuracy and precision.• providing adaptability to the user's pace.
<p>3. Simple and intuitive</p> <p>Use of the design should be easy to understand, regardless of the user's experience, knowledge, language skills, or current concentration level by:</p> <ul style="list-style-type: none">• eliminating unnecessary complexity.• being consistent with user expectations and intuition.• accommodating a wide range of literacy and language skills.• arranging information consistent with its importance.• providing effective prompting and feedback during and after task completion.
<p>4. Perceptible information</p> <p>The design should communicate necessary information effectively to the user taking into account their special needs and requirements in:</p> <ul style="list-style-type: none">• employing different modes (pictorial, verbal, tactile) for redundant presentation of essential information.• providing adequate contrast between essential information and its surroundings.• maximising "legibility" of essential information.• differentiating elements in ways that can be described (i.e., make it easy to give instructions or directions).• providing compatibility with a variety of techniques or devices used by people with sensory limitations.

5. Tolerance for error

The design should minimize hazards, and other limiting consequences of accidental or unconscious actions by:

- arranging elements to minimize hazards and errors: most used elements, most accessible; hazardous elements eliminated, isolated, or shielded.
- providing warnings of hazards and errors.
- providing fail-safe features.
- discouraging unconscious action in tasks that require vigilance.

6. Low physical effort

The design must be used efficiently and comfortably and with a minimum of actions and manipulations by:

- allowing user to maintain a neutral body position.
- using reasonable operating forces.
- minimizing repetitive actions.
- minimizing sustained physical effort.

7. Size and space for approach and use

Appropriate allowance for approach, reach, manipulation should be integrated into the design specifications so as to be universally applicable, by

- providing a clear line of sight to important elements for any seated or standing user.
- making reach to all components comfortable for any seated or standing user.
- accommodating variations in hand and grip size.
- providing adequate space for the use of support devices or personal assistance

At various points the two paths of Universal Design and Assistive Technology intersect – with crossovers occurring in both directions. For example:

- kitchen utensils with thicker, non-slip grips started as assistive devices but have now become a mainstream product.
- voice recognition software was developed for general niche markets, but has found a new application in the rehabilitation arena.

Proponents of Universal Design are optimistic that demographic and medical developments, which have resulted in an increasingly ageing population and an improved survival rate for people with a host of different conditions, such as spinal injuries, make the logic of the principle become more and more obvious.

The Modern Journey

A parallel to the US development of Universal Design has recently been seen in Scandinavia with the Modern Journey design competition.

The Nordic Council on Disability Policy ran the competition during 2001-2002 in co-operation with the ministries of transport in Denmark, Finland, Norway and Sweden. Two other bodies were of crucial importance for the realization of the project: Vinnova (Swedish Agency for Innovation Systems) which provided much of the funding for the work of the project manager, and The Swedish Industrial Design Foundation (SVID), which acted as the secretary for the competition.

The Modern Journey was aimed at all design colleges and professional designers across the Nordic countries. The aim was partly to raise awareness and commitment within colleges and among professional designers of the importance of a public transport system that works for everyone, and partly to elicit proposed solutions for some of the many problems that arise within the entire travel process which under the present conditions result in “disability situations”.

A final report from the project: “The Modern Journey - From Start to Finish”, including presentations of winning projects, was published in January 2003. The report is in Scandinavian and English, and is free of charge. You can order it from nsh@nsh.se

3.2.4 Process Principles

Two authorities in the UK, Hampshire County Council⁵⁰ and Merseytravel⁵¹, have adopted a similar set of “principles” or common themes when developing their local Accessible Transport Strategies. These involve recognition of the need for:

- Integration and Equality of Opportunity
- Targeting to Maximise Benefit
- Consultation
- Education
- Public Accountability
- Research
- Partnership

Integration and Equality of Opportunity

The policies and initiatives adopted by the various stakeholders involved in delivering public transport should aim to include as many different groups of

⁵⁰ Available on-line at <http://ctweb.hants.gov.uk/strategy/atsindex.asp>

⁵¹ Merseytravel have since 1999 merged the separate Access Strategy into their general performance strategies which can be accessed at www.merseytravel.gov.uks

passengers as possible within the core public transport network. The challenge should be to continually increase the proportion of the population which can travel easily on the core system.

However, it is recognised that for the foreseeable future, this proportion will not reach 100%. Therefore, alternative transport systems should be developed to meet the needs of people who cannot use the core bus and rail network and who may, for example, need a door to door or a kerb to kerb service, or personal support to travel. The key principle for developing alternative services should be that people using them should be able to reach key facilities just as easily as people using the core network.

These alternative transport systems should be conceived of, organised, operated and marketed as part of the overall public transport network and should be integrated wherever possible within the core network, including utilising common interchange points.

Targeting to Maximise Benefit

Expenditure should be targeted towards services which will provide the greatest benefit, and which are affordable. This requires examination of the costs and benefits of all the potential developments to the transport system. To do this, it is necessary to consider:

- how many people will benefit?
- to what extent will they benefit?
- will they be denied access to transport if these actions are not taken?
- how will existing transport users benefit from access improvements?

Expenditure should be planned so that new development is co-ordinated to achieve the maximum impact. This requires planning on both a local (the most important journeys are local) but also on a national basis, so that more accessible longer distance services are introduced on the basis that there are accessible local services at either end of the journeys covered. To obtain the most cost-effective intervention will require cross-sectoral planning, e.g. land-use planning or health provision location. Systems must be established to enable this to take place.

Consultation

Consultation with users and potential users of transport services is a fundamental requirement of ensuring that appropriate transport development takes place. This needs to cover both the development of policies at a strategic level as well as the practical implementation of new services.

Such consultation should be inherent within the service planning process, and should include both individuals and groups who are concerned with accessibility issues. This is the basis for ensuring that actions are kept in line with public demands wherever possible.

Education

The key stakeholders should provide information to ensure:

- that all public transport users understand the access policies
- that the public understand the travel needs of those who could not previously get to public transport
- that, as soon as improvements are made, the people who will benefit most get to learn about them
- that car users get to know about the higher quality services being developed.

Use of the transport network should be monitored and there should be continuing research into unmet needs. In this way, the understanding of access issues will continue to develop.

The information should be made available in an appropriate format (Braille, large print, etc.) to anyone interested in improving access to public transport.

Relevant information should be provided to operators, local authorities, statutory and other agencies, as well as to civil servants in the relevant departments. This will ensure:

- a wider awareness of the need for improved access
- a wider awareness of improvements that could be made.

Public Accountability

There should be public accountability and openness in all matters concerning access. The public should be kept informed of how effective the access improvements have been. This requires that information is sent out regularly, in the appropriate formats, through the general distribution network both at a national and a local (community) level. In addition, relevant information should also be sent to specific national and community-based groups which have a direct interest in the issue of mobility and access.

Research

There should be continuing research into:

- existing barriers to access in the core public transport network
- the economics of sustainable, affordable, accessible public transport
- the benefits that sustainable, affordable, accessible public transport will bring
- ways in which technology can help to make public transport more accessible
- ways of delivering transport information more effectively to potential users.

Partnership

For effective progress to be made, there needs to be partnership working between:

- central government
- operators of all transport modes
- regulatory agencies
- voluntary organisations
- local authorities
- statutory agencies

and others, to develop designs and practices that will meet the needs of all public transport users. This needs to include the pedestrian environment and local development planning.

3.3 Other General Issues

3.3.1 Participation by and Consultation with People with Disabilities

One interesting feature of the German system is the formalisation of the mandatory consultation with people with disabilities, both at national and local level. Again, this can be contrasted with the UK position, which is strong at national level, with a statutory commission in place in the Disability Rights Commission and a specialist, quasi-statutory organisation, DPTAC (Disabled Persons Transport Advisory Committee) established under the Transport Act 1985, with its own secretariat and a requirement of majority control by people with disabilities. There is a statutory equivalent to DPTAC in Scotland – Mobility and Access Committee for Scotland (MACS)⁵², a voluntary Transport Advisory Committee (TAC) in Northern Ireland, which is, in practice, rather weak, and nothing separate in Wales. There is not, however, a standard arrangement at local level, and the effectiveness of representation by people with disabilities varies enormously from area to area. There are consumer representative structures in respect of the railways, which do manage to include some representation of people with disabilities, but no such structures in respect of buses. Consultation by authorities, therefore, tends to be a somewhat hit and miss affair.

This contrasts strongly with the views expressed at the Madrid Conference, in respect of the aspirations for 2003 – the European Year of People with Disabilities – summarised by the phrase:

Nothing about disabled people without disabled people

The Year must be an opportunity to grant disabled people, their families, their advocates and their associations a new and expanded political and

⁵² Set up under section 72(1) of the Transport (Scotland) Act 2001

social scope, at all levels of society, in order to engage governments in dialogue, decision-making and progress around the goals for equality and inclusion.

All actions should be undertaken in dialogue and co-operation with the relevant representative disability organisations. Such participation should not only be limited to receiving information or endorsing decisions. Rather, at all levels of decision-making, governments must put in place or strengthen regular mechanisms for consultation and dialogue enabling disabled people through their disability organisations to contribute to the planning, implementation, monitoring and evaluation of all the actions.

A strong alliance between Governments and disability organisations is the basic requisite to progress most effectively the equal opportunities and social participation of disabled people.

In order to facilitate this process, the capacity of disability organisations should be enhanced through greater resource allocation to allow them to improve their management and campaigning capacities. This also implies the responsibility on the part of the disability organisations to continuously improve their levels of governance and representation.

A critical issue for useful participation is technical capacity. Otherwise, consultation with people with disabilities on transport issues can be characterised as an unequal exchange – a token gesture. The exchange can involve a group of people who continue to have low status in practice (hence the need for the legislation), who may be poorly organised and under-resourced, and who would not normally be conversant with the discourse of transport service specification, facing highly technically qualified professionals who have an understanding of the legal, structural and funding context and who control the resources. Positive action needs to be taken to even up the interaction in order that people with disabilities can put greater and more focused pressure on those who plan, specify, procure or operate transport to alter their approach.

Whilst there are many examples of lobby/representative/consultative groups of people with disabilities that are funded to operate on a national basis, including groups specifically concerned with transport (e.g. DPTAC in the UK) or even a single mode, there are fewer examples of organisations which are established at a local level and which have sufficient status and technical clout to make a practical impact. One of these is Consorti de Recursos per a la Integració de la Diversitat (CRID) in Barcelona.

CRID, Barcelona

CRID is a community technical aid centre focusing on access. Its primary objective is to improve the quality of life of people with limited mobility by ensuring that the environment is appropriately adapted to make it accessible to the whole population. It does this by working with statutory authorities, companies and user associations. In particular, CRID analyses, drafts and

manages municipal accessibility plans as well as town planning and architectural projects.

In addition to this, it assesses accessibility in public transport. CRID provides a variety of services: advice, access reports (with recommended technical solutions), thematic access studies (e.g. of open spaces), monitoring of building work for acceptable access, checking of building project drafts, support during the building phase of new developments, participation in planning and related inquiries as a technical advisor, training, technical courses, dissemination of technical information and good practice, promotion of the concept of accessibility and participation in access networks.

The basis of access legislation is Act 20 of the 25th of November 1991 on the promotion of accessibility and the elimination of architectural barriers. Under this Act, city councils are responsible for access improvement in their localities, and they have a duty to produce Accessibility Plans, which set out a costed and prioritised programme for progressive elimination of barriers within public highways, buildings and public transport facilities. The ultimate goal is to achieve an accessible city for all. This requires each municipality to undertake a comprehensive and detailed analysis of the physical space and transport facilities in their area.

CRID is member of “EIDD” (European Institute for Design and Disability), a European organisation that aims to promote accessibility and design for everyone in Europe. It is also member of the Spanish Organization “Coordinadora del diseño para todas las personas” (Co-ordination of Design for All) that promotes barrier-free environments, products and services.

3.3.2 European Union Policies

Accessible Transport Policies

The European Commission White Paper on European Transport Policy for 2010⁵³ established the focus of European Transport Policy in the short-to-medium term to 2010. However, it must be stated that the document is extremely disappointing for people with disabilities as, despite it having a Chapter entitled “Placing Users at the Heart of Transport Policy”, there is only one mention of the needs of people with disabilities in the entire document and even then it is in a technical context.

As the European Disability Forum (EDF) puts it:

The White Paper has given no recognition to the proposals and commitments presented in the recent European Commission communication on ‘Towards a Barrier Free Europe for People with Disabilities’ and the subsequent European Parliament Resolution which presents a number of

⁵³ European White Paper on Transport Policy for 2010 – A Time to Decide, EC, 2001

European initiatives and proposals for progressing access to transport for persons with disabilities and reduced mobility.

In fact, DG TREN (The Commission Directorate for Energy and Transport) does have a number of initiatives under way to progress access for people with mobility and sensory impairments in the field of urban transport, air passenger rights, rail transport, maritime transport and bus and coach transport, but these are not referred to in the White Paper.

In considering urban transport, the White Paper places an emphasis on sustainable development. However, it seems that the concept of sustainability, used by the Commission is limited to resource sustainability, i.e. with the stress on environmental, energy and living space congestion. Many people now use the phrase 'sustainability' in a more holistic sense to include the concept of social sustainability. Inherent in that is full inclusion. There is no cross-reference from the White Paper to the new social inclusion agenda.

In considering rural transport, inadequate consideration is given to the impact that the scarcity of rural transport can have on the lifestyle of people with disabilities who may not be able to walk or cycle to reach the mainstream public transport. This group is also affected by the lower staffing ratios (e.g. at unstaffed rural stations) where personal assistance may not be forthcoming when required and the whole journey, therefore, becomes too risky to undertake.

The EDF takes the view that the Commission has missed an opportunity to influence the removal of barriers by building requirements on access for people with mobility and sensory impairments into the criteria it uses to allocate Community funding, such as European Regional Development Fund structural funds, and into the common public procurement regulations.

At an individual mode level, there is plenty of scope for improving the approach set out in the White Paper, not least by taking forward work which the Commission has already undertaken, such as COST reports. More importantly, the White Paper talks about an integrated transport system but does not really cover the additional effort that is required to ensure a seamless journey for people with disabilities, which requires particular consideration regarding:

- access to the built environment (such as to the train station, bus stop, airport) and to associated systems (e.g. access to ticketing systems which is currently very poor);
- access to transport vehicles (buses, trains, coaches, taxis, airplanes);
- information provided in accessible formats relating to timetables and interlinking connections;
- the provision of assistance to travellers with disabilities (which reflects very varied staff training).

The information point is particularly important in that accessible travel information at railway stations, bus stations and bus stops varies from the inadequate to the non-existent, and on-vehicle information, whilst slightly better, is still not adequate.

The one good thing about the Transport White Paper is the continuing emphasis which DG TREN places as a matter of course on consultation with organisations of, and/or representing people, with disabilities.

The Commission on its website legitimately makes a number of points summarising its current activities in this field.

Introduction

The disabled and elderly people represent the main part of the “reduced mobility” citizens (about 25% of the EU population). In order to ensure their inclusion and participation in social-economical life, it is important to improve the current level of accessibility of those people to the various urban transport modes considering their different access requirements. In order to allow for a maximum access level for all, a door-to-door approach needs to be followed.

Support to knowledge

In order to evaluate the current EU situation and future perspectives of accessibility to public transport modes, the European Commission has launched a comprehensive study (started in November 2001 for a one year period) gathering expertise on the 15 EU Member States as regards statistical data and the assessment of the factors affecting the accessibility to various modes.

Benchmarking/exchange of best practices

As an extension of the previous “Citizens’ Network Benchmarking Initiative (1998-99)”, the new one has opened participation to 45 EU Cities/regions under six Working Groups. One of those Working Groups has been dealing with “*Accessibility to transport by reduced mobility people*” aiming to assess the strengths and weaknesses of transport systems and to set up indicators comparing and evaluating the effectiveness of policies and measures to improve the accessibility.

LEGISLATION

Rail sector

The Directive on the interoperability of the trans-European conventional rail system sets out to establish the conditions to be met to achieve interoperability within the Community territory of the trans-European conventional rail system. The conditions concern notably, the rail infrastructures and rolling stock, and do cover core accessibility. The

Passengers' Accessibility to Heavy Rail Systems (COST 335), guidance on best practice in meeting the needs of rail travellers with mobility and sensory impairments concerning rolling stock design, infrastructure, information and training.

Road sector

The Directive on the special provisions for vehicles used for the carriage of passengers comprising more than eight seats in addition to the driver's seat (Bus - Coach Directive, Dir. 2001/85/EC - 20 November 2001 - published in OJ/LNo 42 of 13/2/2002). Annex VII of the directive establishes technical requirements to facilitate the accessibility of buses/coaches. The Low Floor Buses (COST 322) programme gives guidance on design features (bus and infrastructures), safety issues, information to the users, training requirements, marketing and information.

The European Commission produced a proposal for a regulation on public service contracts for passenger transport (COM(2000)7 final) on 26 July 2000. This draft regulation establishes for the first time an explicit obligation for authorities to pursue adequate public transport services. The draft Directive specifies that in the assessment of the adequacy of public transport services and in the awarding of public service contracts, competent authorities shall take into account criteria relating to accessibility for people with mobility and sensory impairments (Article 4.2(d)). Although most of the debate concerning this draft Directive is currently concerned with its deregulation implications, this Directive will potentially be an important instrument to ensure adequate service provision is made for people with disabilities in public passenger transport.

This draft Directive is currently being examined by the European Parliament and the Council. EDF is lobbying to make the definition of 'persons with reduced mobility' more transparent in the draft regulation and is campaigning for a clearer statement as to exactly how public transport operators will be required to provide accessible services, taking a broad view of the meaning, e.g. including access to information.

3.3.3 Urban Transport Study

The European Disability Forum has been working closely with the urban transport unit of the European Commission presenting the concerns and priorities of the disability movement in relation to advancing accessible and seamless urban transport systems across the EU. As part of this co-operation, EDF has been consulted in the work underway on a European Commission study which is investigating the status of accessibility of urban transport for persons with mobility and sensory impairments.

3.3.4 Policy and Practice Review in Scotland

A Policy and Practice Review was undertaken in 1999 for the Central Research Unit of the Scottish Executive. It consisted of a conventional all-modes review of policy and practice into transport provision for people with disabilities in Scotland. The work coincided with the move towards greater legislative and executive autonomy for Scotland and followed the Government's White Paper, "Travel Choices for Scotland", in which it reiterated its commitment to the implementation of the Disability Discrimination Act with its provisions for minimum standards of access to new public transport vehicles - a statutory requirement that some forms of transport and associated infrastructure are accessible within the framework of integrated and accessible public transport in Scotland.

As is now the common approach in the UK, Nordic countries and the USA, for the purpose of the study, disability was defined as any substantial, long-term physical or sensory condition which renders it difficult, if not impossible, to access mainstream transport; transport was defined as any form of public or voluntary transport, other than the private car, which is used by travellers in Scotland.

A wide range of recommendations were made by the study authors including the following:

- A national group comprising transport providers, disabled people and policy makers should be established to develop a strategy, objectives and priorities for the development of accessible public transport across Scotland;
- At a local level, strategies reflecting local needs should be developed to encourage the co-ordination and development of public transport in a way which ensures that disabled people can travel independently, at the times and using the modes of transport of their choice;
- Transport providers are encouraged to adopt an audit based approach to assessing the accessibility of their facilities, and to develop action plans which have, as their objective, the development of full accessibility, meeting the needs of the widest possible range of disabled people;
- General awareness relating to transport and disability issues should be developed through the use of a range of media and organisations, and transport and infrastructure providers should identify the appropriate training needs of their staff;
- Multi-modal information systems should be developed at a national and local level, providing information relating to the accessibility of a range of forms of transport;
- Mechanisms should be identified for regular consultation with disabled people in the formulation of national and local transport policy.

The authors conclude that, through all of these means, a framework for the development of a system of public transport in Scotland, which recognises and meets the needs of disabled people, can be developed.

It is interesting to note that the authors' recommendations are more about the structural arrangements required to make progress than about the technical detail of the transport itself.

3.4 Demand-Side Approaches

3.4.1 Introduction

Demand-side approaches are those which focus on the individual or group to provide them with resources (finance, information, communications or other technology) that enable them to access transport more effectively. Thus the provision attempts to compensate for (some of) the barriers inherent for people with disabilities in the transport system, rather than tackle the system itself. Of course, the two approaches may run in parallel.

A classic example of a change from a supply-side to a demand-side approach occurred in the UK in 1976 with the introduction of Mobility Allowance, a cash benefit for people with severely restricted mobility. This replaced the provision by the Department of Health & Social Security of the infamous "blue trikes" – lightweight three wheeled cars with a two stroke engine and a GRP body with a sliding door, enabling a wheelchair user with enough upper body capacity to transfer and pull their folded chair in behind them. A variety of adapted controls were available for these machines, following assessment. The trikes had a number of disadvantages:

- there was only one basic model – if the individual was assessed as not being able to use them, then no alternative was available;
- they were a very basic design which was of fundamentally low quality – reflecting the finance available for design and the limited market;
- very little investment was made into research and development;
- there was no element of consumer choice, e.g. colour, power, etc.;
- the vehicles identified the user – there were cases where trike drivers were assaulted. People with disabilities made it clear that they felt stigmatised;
- the provision of trikes reduced the market capacity for conventional adapted cars, and therefore constrained investment in development in that field;
- trikes' design did not keep up with contemporary safety standards – in the mid-1970s research had shown that they could be characterised as 'dangerous';
- trikes were single-seaters – disabled drivers could not take anyone else with them;
- trikes were of no use to non-drivers with disabilities.

By contrast, the provision of a significant cash benefit which the individual can spend as they like has been universally welcomed, despite some

commentators' views that it should in some way be restricted to expenditure on mobility. This approach:

- provides wide consumer choice;
- has stimulated the motor trade to provide for this sector;
- has resulted in significant investment in product development;
- enables some high quality solutions to be offered;
- enables passengers to be carried;
- could benefit a non-driver with disabilities;
- is a non-stigmatising solution.

The extent of the preference for a demand-side approach can be seen from the fact that only 600 of the 25,000 people applying for mobility help in 1976 chose the tricycle as an alternative to Mobility Allowance (the two approaches were twin-tracked for a couple of years as part of the 5 year phase-out of trikes).

Nevertheless, it soon became clear that people with disabilities did not, in practice, have the effective consumer power that was needed to deliver the products required. Consequently, within two years it became necessary to intervene with a 'supply-side' solution in the form of Motability – a national state supported charity that provided a vehicle leasing package specifically tailored towards the needs of people with disabilities. This continues to this day.

3.4.2 Compensating People With Disabilities For Extra Costs That They Face

There is general recognition that because the social environment is not accessible in the widest sense, people with disabilities face a significantly enhanced cost of living. This occurs across the board, ranging from increased costs for standard items (e.g. insurance), to increased frequency of use (e.g. washing) or the fact that a specially adapted item costs more than its standard equivalent.

Research into this additional cost burden has underpinned the lobby for an adequate disability income in many countries throughout Europe. In the UK it was studied in detail by the Office of Population Censuses and Surveys⁵⁴ during the mid to late 1980s and in Northern Ireland in the early 1990s⁵⁵. Since then it has been a regular issue for analysis in General Household Expenditure surveys.

⁵⁴ OPCS surveys of disability in Great Britain: Report 2 – The financial circumstances of disabled adults living in private households, Martin, J. & White, A.: HMSO, 1988

⁵⁵ PPRU (Policy Planning and Research Unit) Surveys of Disability in Northern Ireland: Report 6 – The Financial Circumstances of Disabled People in Northern Ireland, Zard, G. & Maher, L.: NISRA (Northern Ireland Statistics & Research Agency), 1997

Part of this additional cost burden is made up of above average costs of transport and mobility, such as:

- the cost of fitting adaptations to a standard car;
- the additional cost of getting a car (or converted van) large enough to accommodate the individual, particularly if they travel in their wheelchair;
- additional fares for companions if assistance is required;
- the cost of additional journeys made because of the person's disability – for example to rehabilitation or therapy sessions;
- the additional cost of having to use a higher cost mode because a lower cost mode is inaccessible – e.g. having to use a taxi because it is too difficult to board and alight from a bus;
- the fact that the person may need to make longer journeys because the local facility is inaccessible;
- the fact that the person may ultimately be incapable of travelling to some or all preferred destinations, and may, therefore, have to pay more for products (e.g. catalogue shopping) or services (e.g. physiotherapy) to be delivered to their home.

The Financial Circumstances Of Disabled People In Northern Ireland (Gerry Zard, Lydia Maher (1997))

Whilst there have been many changes to the structure and level of benefits since this report was written, recent work by, for example, the Disablement Income Group (DIG) suggest that the underlying pattern of results in this research remains valid.

In order to understand the relative effect of disability on people's financial circumstances, it is initially necessary to understand the population characteristics. Thus:

- there was a high correlation between disability and age – over half the sample were aged 65 or over
- a significantly higher proportion of disabled people were women (58%) than were men (42%)
- pensioner households were the most likely household type – a relatively small proportion of disabled people were within a 'couple with children' household
- only 24% of disabled adults under retirement age were in paid or full time education.

Overall, disabled adults earnings were around 30% lower than those of equivalent groups in the general population. As might be expected, disabled adults derived a far higher proportion of their income from benefits compared with equivalent groups in the general population. Both of these figures correlated strongly with severity of disability. Thus the average earnings of people in severity categories 9-10 were 35% less than those in severity categories 1-2.

This needs to be taken into account when considering transport costs which, as is shown later in this report, are greater for disabled people generally, and increase with the severity of disability.

Whilst a 30% differential might seem high, it is far less than might be expected precisely because of the high proportion of disabled people who are pensioners. The contrast is much more marked when one focuses on adults under pensionable age who have earned income from employment. For this group, family incomes were almost 70% lower than for their equivalent groups in the general population. This is a group who will mostly not benefit from concessionary fares on conventional public transport, as they currently stand.

Thus the net effect is significantly lower disposable incomes. Against this must be set the additional expenditure necessary to overcome the particular practical barriers that individuals face as the result of the way society is organised. This covers:

- necessary aids and adaptations, including mobility-related equipment
- health-related expenditure
- additional expenditure on routine items, including travel and transport.

General mobility costs

The primary tool in compensation for general additional costs of mobility, such as those identified above, is via the social welfare benefit system that exists to a greater or lesser extent throughout Europe.

MOBILITY ALLOWANCE, UK

The UK government introduced a weekly mobility allowance - initially of £5, then rapidly increased to £7 – in 1976. This followed lobbying from the Disability Income Group, as well as research which showed that the blue invalid tricycles that had been the chosen form of mobility support, did not provide adequate levels of safety.

This has now been consolidated as a component within an overall Disability Living Allowance. Disability Living Allowance (DLA) replaced and extended Attendance Allowance and Mobility Allowance in April 1992 for people who became disabled before the age of 65.

DLA is payable to people who are disabled and who have personal care needs, mobility needs, or both. DLA consists of two components:

- the care component for people who need help with personal care (paid at one of three rates)
- the mobility component for people who need help with getting around. This component is not available to children under 3 and has been restructured to allow for two levels: Lower Rate and Higher Rate Mobility Supplement. Higher Rate Mobility Supplement is now worth £39.95 per week.

The most important thing to be aware of is that DLA is only payable to people who became disabled before the age of 65. As far as mobility is concerned, there is a very strong correlation between locomotor disability and age. A significant proportion of people with a locomotor disability at a level that would qualify them for DLA reach that severity level after the age of 65. In cash terms, the benefit has been increased faster than the rate of inflation, i.e. a 72% real increase between 1976 and 2003, as shown in Figure 3.1. More significantly for the government has been the growth in the take-up rate, which has exceeded forecasts.

For example, the take-up rate for DLA with a mobility component in Northern Ireland was 73,583 in 1995 and since then has been rising steadily, year on year, as shown in the Figure below. Thus from November 2000 to November 2001, the number of recipients of DLA with a mobility component rose by 6.1%. The incidence rate now averages around 7.2% of the total population of Northern Ireland (was 6.9% last year).

However, this mirrors mobility benefits experience in Scandinavia and subsequent research (for example the OPCS studies) suggested that it was the original forecasts that were wrong, not a growth in 'marginal' claims.

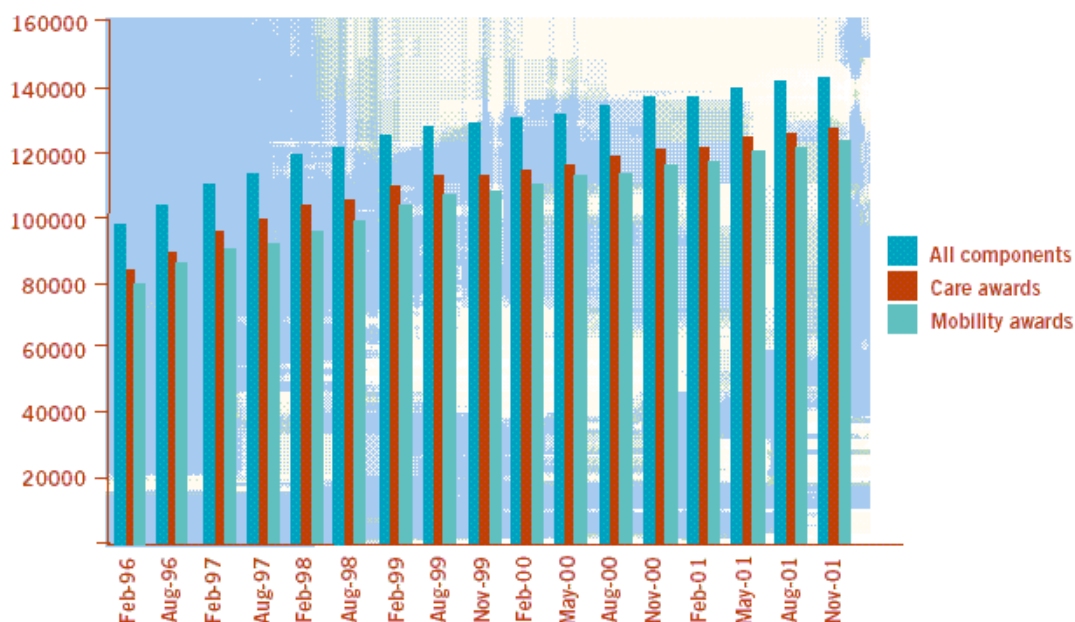


Figure 3.1: DLA Allowances Current

Figure 3.1: DLA Allowances Current

Beyond the general provision of mobility benefits, a number of European countries identify certain sub-groups as being particularly in need of assistance. The most common of these is ex-servicemen whose disablement is due to or has been made worse by service in the Armed

Forces. This group is followed by civilians wounded in wars. In the UK, for example, War Pensioner's Mobility Supplement is payable at £43.85, a premium over the standard Higher Rate Mobility Supplement.

In France, this approach of identifying certain priority groups not only applies to benefits, but even extends to access to priority seating on public transport.

Access to benefits generally requires some form of objective external assessment, normally with a strong medical component.

An increased choice for consumers with disabilities can be achieved by having a voucher/grant approach to wheelchair provision

3.4.3 Intervention to Create a More Effective Marketplace

People with disabilities have difficulty achieving consumer effectiveness because they have requirements which are often perceived as specialist and individual. Consequently it has been difficult for them to obtain the benefits of mass consumption – for example in accessible cars – without some form of organisation.

This was recognised in the UK following the introduction of Mobility Allowance, when it became clear that the retail automobile market was exploiting the position of a relatively dependent group. Consequently, an initiative was taken to influence the supply-side by providing for collective purchasing for drivers with disabilities (and passengers), thus:

- delivering reduced cost/easy term accessible vehicles;
- creating better products, arising from the more effective competitive marketplace.

MOTABILITY, UK

Motability is an independent charity set up in the 1970s as a unique partnership between the Government, charitable and private sectors to help disabled people become mobile by offering contract hire or hire purchase facilities on cars and wheelchairs.

There are two schemes available:-

- Contract Hire: Customers can get a new vehicle from a wide-ranging list of approved dealers. All maintenance and servicing costs are covered, together with comprehensive insurance and a recovery service membership. There is also a 'loss of use' insurance scheme, which provides a weekly payment equivalent to the allowance if the car is off the road for more than one week (this does not include cases of insurance write off). The customer is responsible for the cost of petrol and oil. There is a mileage limit of 12,000 per annum and mileage charges are levied should this limit be exceeded by the customer. The customer has to agree to pay a proportion, or all of their allowance for the

duration of the three year agreement, depending on the model chosen. An advance payment may also be required.

- Hire purchase: New or used cars or electric wheelchairs can be bought under a hire purchase scheme offered by Motability. This provides finance in return for all or part of the customer's allowance over a 4-5 year period in the case of new vehicles and 2-3 years in the case of used vehicles, subject to a satisfactory AA inspection. Number plates, delivery charges, maintenance, repairs and fully comprehensive insurance are all extra costs that have to be paid under the hire purchase scheme.

Any person who is in receipt of the higher rate of Disability Living Allowance mobility component or War Pensioner's Mobility Supplement is entitled to use the Motability service. They do not need to drive themselves – someone else can drive for them.

If the applicant cannot meet the full cost of putting the car on the road, then Motability also operates a charitable fund which may be able to help meet the initial payment. However, there is currently a long waiting list for this.

Motability reported in November 2001 that it had 22,000 customers in Northern Ireland.

3.4.4 Reducing the Cost of Travel by People with Disabilities

This section outlines a number of methods in use to reduce costs of travel.

Concessionary Fares For Disabled People, Merseytravel, UK

In the Merseytravel area, people with disabilities who are eligible for concessionary fares are issued with a 'Trio' ticket, which permits free travel throughout the Merseytravel PTE area on buses, trains and ferries at any time of day. This is however linked to a thorough assessment procedure. Persons are only eligible for the concession if they also live within Merseyside.

The example shown below gives a flavour of the requirements of Merseytravel for determining eligibility. Those people who have a disability which seriously affects their ability to walk are:

- required to obtain an application form from Merseytravel, and complete the form giving details of the disability
- required to attend an appointment for a medical examination if this is deemed necessary
- required to provide proof that their permanent address is within Merseyside

Similar requirements are made in relation to those with other categories of disabilities, and some people require a letter from their GP to confirm that they do indeed suffer from a particular condition where this may not be immediately obvious (e.g. those suffering from epilepsy).

Taxicard/Taxitokens

Urban

TAXICARD, LONDON, UK

This scheme allows Londoners with permanent disabilities which prevent them from using buses or trains to travel in London's licensed black cabs for a maximum £1.50 per fare with the rest met by a subsidy to the operator from the local council.

Eligibility depends upon each London Borough's criteria, but a reasonably common standard now applies across the board. Because of the potential value of a Taxicard, all require some formal assessment. Typically, persons are automatically eligible for a taxicard if they are in receipt of the higher rate mobility component of the disability living allowance, a war pensioner's mobility supplement or are registered blind. Otherwise the application must be supported by a doctor.

Taxicards are renewed every two years on the 1st of April. In most boroughs, there is no membership fee.

The issue arises whether people should hold Taxicards as well as Freedom Passes (which allow for off-peak free travel on conventional transport). The Borough of Wandsworth has a two tier system. Residents with Freedom Passes are entitled to 60 taxicard trips per financial year whilst residents without Freedom Passes are entitled to 120 trips per year. Trips are allocated pro rata for people joining during the year.

Rural

TANDRIDGE TAXI VOUCHERS

This is an example of original thinking which also utilises taxis as a means of transport for those who are unable to use public transport.

Tandridge is a district of Surrey which, in the north, adjoins the Greater London boundary but, south of the A25, becomes increasingly rural. With both London and Gatwick Airport within easy reach and major centres, like Caterham, Crawley, East Grinstead and Sevenoaks, close by, this is a popular area for commuters with good rail connections and high car ownership. But for those who don't have a car and have difficulty using public transport, it can prove very difficult to get around.

The service

People wishing to use the scheme complete an application form which asks them about their problems using public transport and about the benefits they receive and mobility aids they use. There are no automatic eligibility criteria, but the staff use their experience to understand the needs of the individual,

sometimes consulting with professional colleagues who may have referred the person.

Once accepted on to the scheme, users receive a book of 60 £2 vouchers for a year which they can use to pay or part pay for taxi travel with any of the operators participating in the scheme. As there are no fixed standing charges on the meter at the pick up, users get the full value of taxi travel. The vouchers are security printed by a specialist company. Taxi drivers redeem the vouchers for cash by presenting them to the District Council. 20 taxi operators, who are on the approved list of either Tandridge or a neighbouring district council, participate in the scheme.

The users

There are no restrictions on journey type or length. A user can eke out the vouchers over the whole year to partially subsidise a lot of short trips or use them all up for two or three long journeys.

Nearly half the trips are for shopping and just over a quarter for health purposes. A user, who described the scheme as 'absolutely wonderful', explained how important it was to be able to do her own shopping, to connect with the mainline railway to visit her family and make occasional visits to hospital and the dentist.

There are over 2,500 users across the whole of Tandridge. The vast majority of these are elderly and many depend on the scheme. The local Community Mental Health team has purchased books of vouchers to enable 45 of its clients to travel to day care facilities. In a similar arrangement, the District's Independent Living Support Worker has purchased a small number of books for volunteers who support her clients in their own homes.

Funding

The pilot in South Tandridge was originally financed by £10,000 from Surrey County Council's community transport budget to provide vouchers to 100 people. Having demonstrated the value of the scheme, including the significant use for medical trips, the County successfully approached the local Health Authority to provide match funding through Joint Finance, creating an annual budget of £21,500 for 3 years to support 150 members. Subsequently, various parish councils have also helped to fund the scheme.

With the clear success of the scheme, in South Tandridge, Surrey County Council adopted the same funding strategy in North Tandridge, funding a six month pilot, then successfully applying for Joint Finance from June 1998.

Reduced/free car licensing

Vehicle Excise Duty is remitted in the UK for recipients of Higher Rate Mobility Supplement, as well as War Pensioner's Mobility Supplement. This approach is common throughout Europe. However, in addition, a nil-cost

vehicle licence is available for vehicles owned or operated by charitable agencies for the benefit of people with disabilities.

Reduced/free parking

Full or partial exemption from parking charges is common across Europe. This is an area where there have been a number of initiatives to establish a European inter-country agreement on reciprocal recognition of blue badges (standard European colour) issued under each country's national scheme, as set out in the European Reciprocal Parking Arrangements document.

Reduced/free tolls and congestion charges

Full or partial exemption of tolls on tunnels, bridges and motorways is again common throughout Europe for people who are recognised as having a high level of mobility restriction. In London and in Oslo this also extends to the cordon Congestion Charge.

Specialist services provided for the cost of the basic service

A good example of this approach is contained in Sweden in respect of both local and long-distance travel. In essence, when one is assessed as eligible for the STS (Special Transport Service) which provides a door to door facility, a decision is made as to what form of service is needed; for example, a saloon car taxi or an accessible minibus, with or without certain levels of care during the journey. The fare paid, however, remains the same.

The same system applies to long-distance travel. This is organised via the railway network, which it is assumed will be the first mode to be used (with linked STS journeys at either end of the trip to enable it to be fully door to door). However, if some other mode is deemed more appropriate because of the particular individual's circumstances, then this is organised, but the individual will only pay the standard class rail fare for the journey. In some cases, this can mean that the individual travels by air at standard rail fare.

3.4.5 Reducing Travel Demand

This is achieved through a range of initiatives such as

- Provision of specialist housing in central locations with easy access to facilities;
- Home delivery services for example shopping, meals, domiciliary health and care;
- Improved communication facilities: free phones and internet access;
- Support for individual travellers through travel training programmes, use of innovative communications technologies and availability of mobility officers.

3.5 Supply-Side Approaches

3.5.1 Self-power

Recent developments in this area that are now common throughout Europe include:

- Improved pedestrian environments – tactiles, dropped kerbs, etc;
- Barrier removal – low floor buses, sliding doors, ramps etc;
- Provision of aids and housing modifications;
- Buddy systems/assistants.

Mobility for All – Geneva, Switzerland

This service is run by the public transport company – Transports Publics Genevois. It provides free assistance for “*persons with impaired mobility or requiring a wheelchair*”. A specially trained attendant will meet the traveller at their door at the agreed time, help them to purchase a ticket and assist them on a door-to-door basis throughout the planned journey. There is no restriction on journey purpose or time, providing public transport is used. The service must be booked the previous weekday.

Electronic guidance systems for blind people. For further information see TIDE Projects and Cost 219/219bis and successors – Telematics for Disabled and Elderly people

3.5.2 Wheelchairs/buggies, etc

1. General quality/professionalism of assessment and provision
 - Scandinavia, especially Sweden, has generally led this field;
2. Provision of powered chairs
 - a. less common in Europe than manual chair provision;
3. Temporary/short-term loan
 - shopmobility
 - see the National Federation of Shopmobilities website;
4. mobile shopmobility
 - Preston Community Transport is a good example of an integrated Shopmobility and accessible transport service;
 - wheelchair holiday loans
 - common throughout Europe;
5. Pushers/assistants
 - common throughout Europe.

3.5.3 Cycling

There is a growing interest in and provision of specialist tandems, tricycles, hand-powered and wheelchair bikes. Much of the available information comes from cyclists with disabilities' lobby groups.

3.5.4 Ferries

International standards are driving recent improvements in quality and accessibility of passenger ship services. There is a growing commercial recognition of the need to plan for the needs of the growing numbers of ageing people with varying mobility and sensory impairments.

Many of the outstanding problems are related to the condition of existing ships, access to piers with the consequent problems of embarkation/disembarkation.

3.5.5 Air

All international airlines and airports now recognise and implement international standards that improve accessibility of services.

3.5.6 Individual Motoring

There is a growing range of services available including:

- Technical assessment and advice often provided from mobility centres;
- Technologically advanced high quality driving aids and equipment;
- Driving lessons;
- Hire car availability that includes basic adapted cars, complex adapted cars and cars for family plus wheelchair user.

All of these issues are to be tackled in the UK under the recent Disability Discrimination Act extension proposals, which apply to car rentals. The British Vehicle and Rental Association has been consulting its members on the relevant issues.

3.5.7 Light Rail

The basic standard for low floor accessible vehicles boarded from platforms giving level access is now common throughout Europe. There is growing availability of easy use ticketing and information systems to cover all forms of communication, at stops and on vehicles. Equality disability training for staff is being implemented in many countries.

3.5.8 Heavy Rail

There have been many significant advances in the accessibility of heavy rail systems with manufacturers and operators now implementing standards that

support travel by people with disabilities. A good example of best practice is a recent experience of the Netherlands Railways.

THE NETHERLANDS – IMPROVING THE PUBLIC IMAGE OF THE RAIL INDUSTRY BY CREATING AN ACCESSIBLE RAIL NETWORK

Over the past six years, the Netherlands Railways has developed a unique accessibility policy for the visually impaired that can serve as an example for other transport companies. Firstly, a test track was laid in Utrecht, where representatives of the SBBS (the joint interest group for people with vision impairments) approved six guideways tiles. At the same time, the vision impaired were involved in locating the guideways in existing stations.

NS Rail Infrastructure took the initiative in carrying out tests with the 'Smart Signs' concept. A Smart Sign is a system that can be operated from a distance, providing the individual user with the desired information at any given moment. These systems are designed such that every potential user should be able to receive the information easily.

They consist of a series of beacons (transmitters) to be located at central points and receivers that are worn by the users. The beacons broadcast a message that is pre-recorded in the form of modulated infra-red signals. The messages are recorded on tape and transmitted in digital format. The signal is received within the infra-red beam, but nothing can be heard outside this. The beacons can be linked to each other via a computer network. It is also possible to link the beacons with information panels.

NS Rail Infrastructure – Accessibility Policies

NS Rail Infrastructure is responsible for the construction, maintenance and management of the infrastructure of the Netherlands Railways (NS). The commercial organisations, NS Passengers and NS Stations, are directly involved in policy making. As a rail operator, NS Passengers has a vested interest in good accessibility at stations and, as station operator, NS Stations has a vested interest in facilitating the management of these areas. One example of progress has been the introduction of double handrails in stairways to help people of varying heights

The NS also takes part in structural consultations about its accessibility policies with users representing the Dutch Council for the Disabled. NS Rail Infrastructure, NS Passengers and NS Stations are represented at these meetings. This serves to ensure that both the parties directly involved in the implementation of the policies and the parties that will use the facilities can input their views.

Standards for the accessibility of station buildings have been set out in the NS standard "Station complex accessibility". This standard stems from agreements between the Ministry of Transport, Public Works and Water Management, the Dutch Council for the Disabled and the NS as long ago as 1991. The agreements made then were prompted by the recommendations

of the Steering Committee on the Mobility of the Handicapped and the Elderly which had been instituted by the then Minister of Transport.

The NS also has a special ruling which allows disabled travellers who have been unable to purchase a ticket from a ticket window or a machine, and who are travelling unaccompanied and without the assistance of an NS Travel helper, to buy a ticket from the conductor on the train at the ticket window tariff by means of a deferred direct debit.

The "Combi-card" is a special arrangement provided by the local councils which gives people with disabilities the opportunity to travel from their homes to their destination by a combination of train-taxi, train and train-taxi. The taxi driver ensures that the passenger is helped to board the train, and on reaching his destination station, the other taxi driver helps him or her off the train.

The vision impaired traveller

Before NS Rail Infrastructure set about improving information for the vision impaired, improved guideways were put in place. A guideway test route in what had previously served as the concourse of a freight transporter in Utrecht. This is an example of NS Rail Infrastructure's collaboration with future users: the ribbed tiles used at NS stations were first tried and tested with the help of representatives of the SBBS, the Dutch joint interest group for people with vision impairments. The tiles now in use were given their seal of approval.

In addition regular visits have been arranged to stations with vision impaired travellers. These have been instructive and useful days as many applications which can now be found at stations can be traced back to comments made by vision impaired visitors during such days.

The representatives of people with vision impairments, the SBBS, play an important role in promoting the use of the guideways. It will be obvious that this policy can only be considered a success if the provisions are really used by the people for whom they are intended.

In larger, more complicated station complexes the guideways do not provide sufficient information to enable vision impaired travellers to use the facilities unaccompanied. This applies to the four mega-stations (with more than 50,000 passengers per day) and the three underground stations. For these stations other arrangements have been made: the spoken information system for people with vision impairments.

Experiments with spoken information systems

Most spoken information systems work with infrared light. The user carries a receiver which he or she directs to transmitters fixed at high points within the station so as to avoid the possibility of there being any obstacle or clusters of

people between the transmitter and receiver which would interfere with the system's operation.

An initial experiment with spoken information was carried out in 1995 at Duivendrecht station, a rail intersection just south of Amsterdam. Together with SBBS, NS Rail Infrastructure conducted a trial of two types of systems: the Route Information System (RIS) and the Blind Orientation System (BOS). The trial period covered a couple of months, but as the operational trials only lasted for a single day it was very difficult to draw any definite conclusions. Nonetheless, the users' reactions were very positive, especially with regard to the BOS system.

The next step was the Rotterdam Blaak OPEN Project during the summer of 1997. In July 1996, together with RET (Rotterdam's public transport company) and SBBS, NS Rail Infrastructure set up the OPEN project. A group of public transport companies, industry, academics and interest groups collaborated to develop an electronic navigation system. The OPEN project was carried out under the auspices of the European Commission and its objective was to help vision impaired travellers to find their orientation and to move around railway stations more easily, both above and below ground.

The system was in fact an attempt to create an advanced version of BOS. The OPEN system was subjected to simultaneous testing in Paris, London and Rotterdam.

The OPEN system only met with any success at Rotterdam Blaak station. The RATP, the public transport company in Paris, specifically wanted to use it as an independent system, i.e. without guideways; however that proved impossible, as the testers got lost.

The experience in London was that the technology left a lot to be desired. In Rotterdam, on the other hand, there were few problems. In fact, it provided a lot of positive publicity for both NS Rail Infrastructure and for the RET: national television, radio stations and newspapers all carried announcements about the test, but even more important was the fact that the potential users and their representatives, the SBBS, were very enthusiastic.

3.5.9 Long-Distance Coaches

Mandatory accessibility is not common – subject to the EU harmonisation directive.

3.5.10 Hackneys, Taxis, etc. (small vehicle with driver) (kerb to kerb)

Requirement for wheelchair accessible taxis

Taxi driver training

TOTAL MOBILITY, NEW ZEALAND

In the mid 1980's, a national co-ordinated transport system was set up for people with disabilities known as 'Total Mobility'. A needs assessment of people with disabilities was undertaken, and it was found that the best way to meet their needs was to have a single co-ordinated fleet of vehicles. Consultation with the taxi industry confirmed that they could meet the need for this type of service. It could provide co-ordinated running, professional administration and a demand responsive pool of vehicles. With some additional training for drivers, and a means of assisting people with disabilities, there was the makings of a scheme that could operate in every town in New Zealand. In the Total Mobility project, 'maxi taxis' with a hoist, seatbelts and folding seats were provided to accommodate wheelchair users. Taxi companies purchased the vehicles as part of their business, but the Disabled Persons Assembly (DPA) co-ordinates payment for the various fittings with the assistance of local authorities, service clubs, disability organisations and the Urban Transport Council. The taxi owner must agree to provide transport to people with disabilities as a priority, but they are free to do other work for the rest of the time.

DPA also co-ordinates a voucher scheme which gives people with disabilities a reduced taxi fare. Regardless of the nature of their disability, people who are unable to use conventional bus and train services can apply to receive the vouchers. DPA also distributes vouchers to authorised agencies who will then issue them to eligible clients.

MANDATORY TAXI ACCESSIBILITY, EDINBURGH, UK

The city of Edinburgh is the licensing authority for taxis and private hire vehicles. The city can determine the quantity and quality of the vehicles to be licensed. The licensing of accessible taxis by the city contributes to the general policy of improving transport options for people with disabilities, which originated with the former Lothian Regional Council.

The approach taken in Edinburgh has now been adopted for UK- wide regulations made under the national "Disability Discrimination Act 1995". These require that from January 2002, any newly licensed taxis must be accessible to wheelchair users, and from January 2012, all taxis must be wheelchair accessible.

These measures are also an integral part of the City Council "Moving Forward" transport policy. This policy seeks to promote improved

accessibility of transport for all groups in society whilst encouraging the development and use of more environmentally sustainable modes in the city.

Making taxis more accessible for people with disabilities fits closely with a whole range of transport accessibility measures. Taxis have benefited from changes made to traffic priority in 1996. For example, taxis are allowed to use the new "Greenways" network of road lanes. This network is being progressively phased in across the city, linking the suburbs to the city centre and granting traffic priorities to buses, cyclist and taxis. Taxi use is increasing across all groups of population.

The key ingredients that made the accessible taxi licensing a success in Edinburgh were:

- a vibrant taxi trade in the city, with a good history of vehicle investment and of delivering service quality;
- a strong local political will to improve access to transport for disabled people;
- an active disability sector with an history of strong partnership with the city council and direct engagement with the taxi trade;
- legal power to set local taxi licensing conditions;
- good consultation with taxi operators and key user groups at all phases of the policy implementation;
- positive involvement of all stakeholders at all stages of the project;
- active enforcement procedures carried out by the police;
- a concessionary fares scheme for people with disabilities using taxis;
- the importance of taxis in a package of measures to promote more sustainable transport use in the city and to improve the accessibility opportunities for all groups in the community .

The measure was relatively easy to introduce, as UK taxi legislation permits local authorities to set local conditions for taxis.

3.5.11 Door to Door Services

Examples of comprehensive coverage

Urban

TRANSPORT FOR PEOPLE WITH DISABILITIES, COPENHAGEN, DENMARK

Since 1979 Greater Copenhagen has provided a door to door alternative to mainstream public transport for those with disabilities. The people with disabilities who are eligible receive 24 hour, door-to-door transport in specially designed vehicles. Users are guaranteed to be collected no more than 15 minutes before or after their booking time.

The automated booking and planning system takes account of:

- the time needed for the pick-up and drop off;
- the number of stairs in shopping centres, theatres and other public places;
- information about customer disabilities;
- the required driving time – a map holds all the relevant information about speed limits, road layouts and addresses in the Greater Copenhagen area;
- traffic intensity depending on time of day and week;
- the potential for vehicle to carry more than one passenger.

A route is then produced for each vehicle and itineraries forwarded to drivers, together with instruction on the needs of individual passengers.

FLEXLINE, GOTHENBURG, SWEDEN

Flexline is a demand responsive bus service with drop-off points at shopping centres, hospitals and other important destinations for elderly and disabled people. It operates using small, fully accessible buses, which depart at half-hourly intervals from the end stops and collect passengers from designated meeting points within the service area. These points are generously distributed within the area served so that 90 per cent of the residents live within 150 metres of a meeting point. Journey must be booked at least 15 minutes before the bus is scheduled to leave. Times are confirmed 15 minutes prior to arrival at the meeting point through an automated call back function once a computer has determined the optimum route.

Users perceive an important improvement in their mobility and activity as a result of the service, which is continuing to expand. There are currently 14 mini buses in six service areas.

AIX-EN-PROVENCE, FRANCE

This service is run by Aix en Bus – the public transport franchise company. It consists of a standard demand-responsive service – Proxibus and a special demand-responsive service for people with limited mobility – Proxibus Plus. It is typical for non-metropolitan France.

Proxibus applies to people living in certain suburbs who either want to travel in their own suburb or into the centre of town. The service runs from 06:30 to 20:30 every day except Sundays and public holidays. A minimum one-hour booking period is required for one-off journeys and 24 hours for regular journeys which can be booked for a month in advance. Booking is via a freephone number. Fares are equivalent to standard bus fares.

The Proxibus Plus service is available to residents throughout Aix who are deemed eligible by the Direction de l'Action Sociale (applications taken Tuesday, Wednesday and Thursday mornings only). Again, booking is via a free telephone number, which allows for choice between 4 types of transport provision:

- a regular trip (fitting in with the pre-established time and route schedule). It must be a periodic trip and at least weekly;
- an occasional journey. Bookings can be taken up to 1 hour before travel, but to guarantee a trip, the booking must be made before 12:30 on the previous day;
- an occasional group journey. Booking must be made at least a week in advance and a confirmation telephone call must be made the day before travelling;
- a night time trip. Booking must be made at least 48 hours before travel, with a confirmation. call the previous day before 12:30.

The principles of the service include the fact that the driver is trained to provide appropriate care and assistance to the person with a mobility difficulty on a door-to-door basis. This service is available all year (except May 1st), and is provided from 07:00 to 20:30 (standard service) and from 20:30 until 24:00 (night service).

Daytime fares within Aix are the same as for buses. The night service attracts a 100% premium.

TRANSPORT FOR PEOPLE WITH REDUCED MOBILITY: BARCELONA, SPAIN

In Barcelona, since the mid 70's, a service of adapted minibuses has been available, providing a door-to-door service. It is intended for use either by disabled people with mobility problems or by those who are otherwise unable to use public transport. Around two thirds of trips could be described as 'fixed' in nature, with the remainder being 'sporadic'.

The Municipal Institute for Disabled People of Barcelona (IMD) is the organisation which interfaces with the users and potential users of the service. All users need to have a 'disabled recognition certificate', and must be resident in Barcelona. In 1992, an important jump in service quality took place with the introduction of new vehicles, specially designed, and with a management more attuned to the needs of the user. The service made more than 300,000 kms per year, and provided more than 60,000 journeys to the users.

Although the main objectives of the service had been achieved it was considered that there was still progress to be made, in particular:

- to improve the efficacy of the service and to make it possible to assist more passengers within the existing resources employed;
- to improve the economic efficiency of the service by providing it at a lower cost. This would be brought about primarily by a new method of managing and providing the service.

In 1992, Barcelona received its first tranche of 20 low floor buses which were incorporated into the regular bus network. Since then, the progressive upgrading of the network with low-floor buses means that accessible vehicles now cover at least 35% of the regular bus service. In the same way,

line 2 of the underground is now fully accessible and enhances the opportunities available to people with reduced mobility to use the transport system.

New objectives

It was also at around this time that a change in management took place. The objectives of the new management were as follows:

- to achieve a reduction in overall administration costs of the service
- to establish which journeys could be made by, or connected to the mainstream transport network
- to make the service more flexible to those users who are still unable to use the mainstream transport network, despite its improved accessibility

Implementation

A change in the management of the service was planned when there was a change in the administrative concession, and this occurred in March 1998. This brought about some changes in operating practices. Chief among these has been the introduction of a Geographic Information System (GIS). This enables the schedulers to work out the best and most economical routing for particular journeys. Once the user, date and hour of the service required is entered, the software works out the best route to take.

Barcelona is also fortunate in that it has a 'public way database' which shows the characteristics of the kerbs, sidewalks and furnishings etc. This is useful for the service planners and routers as it allows them to determine which roads are accessible to the vehicles. Up to date information is also kept about timetable changes on the regular public transport network. The software shows the possible routing solutions and the operator takes the decisions about service scheduling and routing, and logs each journey together with any incidents and special circumstances relating to it.

In addition, the 'citizen participation commission' of the IMD has enabled the management of the service to be audited and adapted to the needs and wishes of service users, so that the project is better suited to the end user.

Evaluation

After eight months of new management of the service, improvements had been observed in two areas:

- a reduction in the number of 'service denials', where the organisation is unable to provide transport;
- the number of journeys undertaken had increased – use of the service had risen from 1,000 trips in March or April to 2,000 in recent months. There was a low usage in the months of August and September due to the holiday period.

In the first months after the changes, there was also a significant amount of 'modal shift' from specialist transport to regular transport provision. For many people, this has meant the first use of regular public transport services for

many years. This has been made possible by the increased availability of low floor accessible bus services and the integration of the booking system for specialist transport services with the information line for regular transport services.

The feedback from those who have switched to regular public transport use shows that those who have done so now enjoy a greater degree of personal autonomy than when they used specialist transport, and many users have now lost their fear of using the regular network.

Conclusions

The four main objectives of the new management (cost reduction, adjustment to the changing levels of accessibility to the city, redirecting journeys to the regular transport network, and making the service more flexible) have been reached with the changes. Feedback from the users has also been encouraging. In summary:

- the service management is integrated with the information system for regular public transport in Barcelona, so passengers can readily be directed to the means of transport which suits them
- an increase in the use of the regular transportation network by people with disabilities has been observed
- a much improved service can now be provided to those who are still unable to use the conventional regular public transport system

Rural

BELBUS MEETJESLAND, BELGIUM

Description of services

The scheme serves the municipalities of St-Laureins, Kaprijke, Assenede, and Eeklo in the west of the country near the Dutch border – an area of 225 sq km having a population of 45,000 inhabitants. The scheme commenced in June 1997.

Main features of the service

The service runs hourly, seven days a week, from approximately 06:30 to 21:00. It operates between recognised stops (there is no door-to-door service), but routes are flexible, and are adjusted as appropriate.

Reservations are made by telephone (open 12 hours per day on weekdays, 8 hours on Saturdays, closed on Sundays). The vehicle used is a wheelchair accessible midibus. There are three full time drivers and 1.5 full time operators taking telephone reservations.

The publicly owned public transport company, De Lijn, has a monopoly of urban and local public transport within the region. In Meetjesland the operation of the Belbus is sub-contracted to a private bus operator. The contract was granted for an unlimited period with a 5 year term of notice. However the process is to be opened to competitive bidding. Recently, five

years advance notice was given of the termination of the contract and De Lijn will issue a call for tenders calling for competitive bids. The new contracts will be valid for a fixed period of 5 years.

Operational information

Most passengers (80%) travel to and from Eeklo, the main local town and transport hub for train and bus services. There are 13 journeys scheduled every day in each direction, but in reality only about 70% of these services run (Sundays 40%), since the bus only makes a journey when a reservation has been made. Use of the service is still rising, with the average number of passengers per day standing at about 55 (weekdays).

Costs per year are $\text{€}217,000$, whilst revenues are $\text{€}9,300$. To cover this area using conventional bus services would require three separate lines and three drivers at an estimated cost of $\text{€}0.61/\text{km}$. The existing scheme, utilising one vehicle, and including the cost of reservation staff, costs $\text{€}0.38/\text{km}$.

Use of technology

Telephone calls to make reservations are answered manually, but once details of the requested journey have been entered, routing and other functions are handled automatically by software known as Ring, developed for the purpose by De Lijn. Vehicle position is monitored using GPS, and mobile telephone contact with drivers allows routes to be diverted if last minute reservations are received. There is no real time information system for customers.

Ticket issue uses the Prodata system, in common with all bus services in the area. Fares are calculated on a zonal basis.

Unusual approaches to urban/rural/deep rural

METRO PARCEL BUS SERVICE, UK

The Metro Parcel Bus scheme operates on six separate routes in rural West Yorkshire. It provides both passenger and light goods transport in areas with little pre-existing public transport service.

Although the county of West Yorkshire has a number of large conurbations, the greater part of its area is rural. Much of the landscape is hilly, with villages and small towns located in the valley bottoms, and smaller settlements on the open moorland above. The more remote areas have a disproportionately high number of elderly residents.

The majority of public transport services connect the larger villages and towns. Outlying areas have generally been less well served, and the Parcel Bus services were set up out of a concern that a large number of residents without access to a car were experiencing real hardship in gaining access to key facilities. A second aim was to assist people in rural communities to send and receive small goods or messages where they did not have easy access to Post Offices, Shops, Chemists etc. The services were designed in

consultation with user groups and local councils. The first service started on 1st March 1999.

Main features of the current service

The services are run by a number of different private operators, under contract to Metro (The West Yorkshire Passenger Transport Executive). All services use wheelchair accessible minibus vehicles staffed by a single driver. The service makes use of 6 wheelchair accessible minibuses operating on six different routes linking small rural settlements.

The most frequent of the services (Route 934) operates for 19 hours daily, the least frequent (Route 937) for 6 1/2. Most services operate 6 days per week, although 934 has a limited service on Sundays, and two others run on only three days per week.

Some services run to fixed schedules, some are hail-and-ride, and some are demand responsive. Where bookings are made, these are placed directly with the driver via a hands-free mobile phone, so no extra staff are needed to cover booking operations. Users can also telephone drivers directly to check on a vehicle's ETA, or on the availability of space in a vehicle.

At present the integration of passenger and freight transport is only being carried out on a small scale, in the form of delivery of parcels, messages, and prescriptions. Metro are currently in the process of investigating the transfer of other community goods such as newspapers. Bookings for the collection and delivery of parcels are made in the same way as those for passengers. All parcels are charged at 50p per delivery, and must be handed to and collected from the driver in person. Guidelines for parcels have been produced for passengers and staff alike and cover such issues as wrapping, contents and non-delivery.

Although the service is in its early stages, and some routes have only been operating for a matter of months, it is regularly used by a significant number of people. Where routes have been in operation for long enough, and meaningful figures are available, services are carrying between 35 and 65 passengers per day on average. The parcel service is currently underused however, but this is regarded as a marketing, not a demand issue. It is hoped that new marketing measures, and the possibility of broadening the remit for delivery of goods will increase the utilisation of this service.

ACCESSIBLE TAXIBUS - REGIOTAXI ACHTERHOEK

This is an accessible taxibus service run on a 'many to many' basis in the region of Achterhoek, a rural area in the eastern part of Gelderland province in the Netherlands. The service is provided using 12 wheelchair accessible eight-seat minibuses. It provides 17.5 hours of coverage each day.

This service was developed by combining three previous services:

- a segregated dial-a-ride service for disabled people
- "line taxis" – taxis which run to a fixed itinerary and timetable, but only

when prebooked

- 'buurtbus' – a volunteer driven scheduled bus service in the deeper rural area using an 8 seater minibus (not accessible)

Reservations are made by phoning the Travel Dispatch Centre (TDC), an organisation of regional taxi companies. This uses PlanVision software that automatically creates clusters of individual bookings and allocates these to vehicles. The system is very flexible, but known regular rides are booked and clustered in advance. Connections to other bus and rail services are guaranteed provided the booking is made at least two hours in advance. All vehicles are fitted with on-board computers that communicate with the software at the TDC, link to a GPS navigation and vehicle location system and can tell the driver (speech synthesiser) the shortest or fastest route.

Although the service is open to the general public, the majority of users have some degree of physical disability. This partly reflects its origins and partly legislation in the early 1990s that made it clear that older people with mobility difficulties were entitled to use services developed for people with disabilities. Specific marketing has been carried out to increase the level of use by people without a disability and this is working.

The operation was competitively tendered. Annual fare revenue of €273,000 (2001) covers about 9% of the €3,000,000 costs (€8.20 per passenger trip). Every municipality in the region supports the service with about €11 per inhabitant, and central government provides some match funding to Gelderland.

3.5.12 Bus (stop to stop)

1. Mandatory accessibility regulations are being introduced throughout Europe – see EU harmonised bus construction regulations;
2. Semi-scheduled/divert on demand. See 3.5.11 Flexline Gothenburg example;
3. Infrastructure.

PRAGUE ACOUSTIC BUS STOP, CZECH REPUBLIC

This scheme is aimed at improving the accessibility of bus services for people with vision impairments. It works by delivering information to the user audibly via a handset. The user activates the requirement for information by pressing one of several buttons available on the handset.

The main objective has been to improve the opportunities for people with vision impairments to use surface public transport in Prague. To fulfil this objective the following requirements were specified:

- design of a simple command set for people with vision impairments (composed of a public transport vehicle command set and a command transmitter) by means of which information on approaching public transport vehicles is provided to people with vision impairments and the

- driver is informed about their possible intention to get on;
- command set to be universal in nature enabling its use in other cities or countries
- equipment to be compatible with all vehicles of surface public transport in Prague
- providing people with vision impairments with command transmitters that are easy to operate, small-sized, light and affordable

The system started operation in 1996, following several months of trials. Several vehicles from each mode of public transport in Prague were fitted with the relevant equipment, and designated employees at depots were provided with command transmitters.

The person with a vision impairment is equipped either with a manual command transmitter with 6 buttons or with a command transmitter installed in a stick for the blind with 3 buttons. Both have a range of about 30m. The people with vision impairments can activate the system by pressing a button on the transmitter. This is picked up by a receiver which will announce via a loudspeaker system at the bus stop when the bus is expected to arrive, and when it is ready to board etc. Other functions on the handset enable the user to activate an audible signal to indicate when it is safe to cross the road at crossing points.

So far, the scheme has proved popular with users in Prague, and over 2,000 command sets have been fitted to public transport vehicles, and over 300 command transmitters have been distributed to people with vision impairments. It has now been extended to other cities in the Czech Republic.

4. Information

ANNOUNCE PROJECT, UK

In March 2001 audible and visual next stop equipment was fitted to buses on the 110 service which operates between Hall Green and Leeds via Wakefield.

The buses are equipped with speakers and passenger displays in both upper and lower saloons linked to the ticket machine and to a GPS navigation system to provide automated next stop information. Additionally an external facing speaker has been fitted to each bus to announce the service number and destination to intending passengers at bus stops.

Extensive pre scheme questionnaires were conducted which revealed that a large proportion of passengers (approximately 80%) viewed such a system as being potentially helpful. After the scheme was introduced a similar questionnaire was undertaken to evaluate the Announce system. Almost two thirds of passengers rated the on board audio and visual next stop announcements on the 110 service as helpful with nearly one half rating the boarding announcement as helpful.

Subsequent analysis of patronage figures indicated that patronage on the 110 service had not declined as rapidly as on other services operated from the same depot.

This analysis does not conclusively prove patronage generation or improved retention as a result of introducing Announce as it could not rule out other influences over the year, such as local rail strikes, abstraction resulting from the introduction of a new limited stop service, and the greater economic prosperity in Leeds. However when compared to other services the greater retention of elderly and disabled passengers on the 110 service and the greater increase in patronage on weekday evenings and Sundays, indicative of occasional usage rather than commuter journeys, suggests that the Announce system may have been a contributing factor.

3.5.13 Local Co-ordination

a) Statutory service co-ordination

Devon TRANSPORT Co-ordination Centre (TCC)

Devon County Council established its TCC in 1986 as a focal point for all its activities relating to the transport of passengers, meals, goods, vehicle hire and local bus and rail services. The TCC is fully part of Devon County Council, despite being a cost centre in its own right. Most of its users are internal, but they are not obliged to use the TCC for their needs, so as to maintain pressure on the organisation to be efficient.

The TCC has four distinct functions:

- Client services – organises home to school transport, social services journeys, school trips, meals on wheels as well as transport for some voluntary agencies
- Public transport – manages around 180 bus services supported by the county, also responsible for the county wide concessionary fares scheme, information and publicity and support for community transport projects and rail links
- Fleet management – responsible for 1,500 vehicles and plant, vehicle specification, design, driver testing, repair and maintenance etc
- Support services – provides support for the other three activities

Examples of activities supported by TCC include:

- 6 community buses
- 14 voluntary car schemes
- 11 ring and ride schemes
- Production of the Devon Accessibility Guide
- Community Transport Action pack
- Network of Rural Transport Forums

The TCC helps to provide transport co-ordination across a range of activities both within Devon County Council itself and also supports a wide variety of external organisations.

b) Community-based

ADAPT, TYNEDALE, UK

ADAPT is Action for Differently Abled People in Tynedale. This is an organisation of disabled people in Tynedale, which is a sparsely populated part of rural Northumberland.

In the mid 1990's, the organisation began to provide transport by undertaking a regular contract for the local authority to provide transport for people with learning disabilities to and from a workshop in Hexham. From this, a brokerage scheme gradually came into being, and in 1996/97, ADAPT was offered a second vehicle by a residential home which did not want to bear the responsibility for its operation. Following shortly after the award of this second contract was funding for the appointment of a transport co-ordinator. During the following years, the transport co-ordinator persuaded another 2 organisations to make their vehicles available to the scheme. A successful bid was then made to the Countryside Agency for the purchase of a new vehicle. The level of contract work was now such that it justified the employment of a scheduler, an administrator, two drivers and two drivers' assistants by the end of 1999.

The project currently provides:

- vehicles to community groups to use themselves with their own driver;
- transport services to voluntary and statutory groups under service level agreements;
- scheduled community bus services and small number of commercial services (provided under the section 22 permit regime). Profits from this contribute towards the cost of operating the community bus service;
- pre booked transport for individuals and groups registered with the scheme;
- driver training.

By 1999/2000, expenditure on the transport project had risen to £80,000 and by 2000/01 was approaching £100,000. In 1999/2000, the project undertook 1,128 vehicle journeys, providing 15,530 passenger journeys.

Chapter 4: Discussion

4.1 General Issues

One of the key responsibilities for government is to ensure that individuals can move around freely to the best of their abilities and be able to engage in life in a meaningful way. A major component to this is the adequate provision

of an integrated accessible public transport service which enables older and ageing people and people with disabilities to fully participate in society.

Lack of access to public transport for people with physical disabilities means that they are unable to leave their immediate environs without arranging for private transport or having to pay for a taxi.

The lack of provision of an appropriate and adequate level of public transport significantly diminishes the quality of life for people who are heavily dependent on it. This impacts on their ability to pursue education, attend training courses, work outside the home or live in the area of their choice. They cannot participate in social activities on the same basis as their non-disabled peers. They are prevented from going into the city to window-shop or browse. It also deprives people with disabilities of the right to spontaneous action.

This can be particularly acute in rural areas of Ireland where no public transport service is available and where there is a need for further support in the development of innovative initiatives, within rural communities, to provide local accessible transport.

Public transport accessibility issues go beyond the needs of people with disabilities. They also involve the transport needs of the wider community, who at some time in their lives have some form of impairment which makes travelling difficult, if not impossible, if the mode of transport or the built and external environment is not accessible.

The concept of "Transport for All" is now generally accepted within the EU and the European Council of Ministers for Transport (ECMT). The Department of Transport has also embraced this concept. Such a concept includes a broad proportion of the population and not just people with disabilities. Thus it removes the notion that "special" provision needs to be made for people with disabilities.

Mobility is the key to equal citizenship in a society which sets a high value on personal independence and freedom to move around. Accessibility to transport modes enable people to access and avail of goods, services, employment and other activities.

4.2 Specific Issues

While acknowledging the progress to date there are a number of challenges still to be met. In summary these are:

4.2.1 National Policy

In order to build on the progress to date regarding the provision of accessible public transport, there is a need to develop an accessible integrated transport policy for mobility and sensory impaired people. Such a policy needs to be applied not only within the Department of Transport but

across all other agencies and departments with responsibility for transport. In this context the lead role of the Department of Transport is critical.

The development of such a policy would include, inter alia

- The adoption and implementation of a “Transport for All” policy;
- The integration of transport policy with other policies, e.g. in the area of social inclusion;
- Accessibility planning;
- The development of transport infrastructure and pedestrian environment;
- The development of guidelines and Codes of Practice for Quality Customer Services for Transport Operators which should include, inter alia, provision for Equality/Disability Training, training in accessibility, etc.;
- The coordination and integration of the provision of all public transport including data collection on all publicly funded accessible transport;
- Integration across and within transport modes;
- Integration of Real Time Passenger Information and Passenger Information needed to avail of public transport services;
- Development of local integrated transport services including demand responsive and flexibly routed services;
- The introduction of accessible coaches on a route by route basis especially those linked to major centres of population and key services routes such as ferry and airport terminals;
- Agreed timeframe for roll out of accessible vehicles and monitoring of same.

4.2.2 Legislation and Regulation

There is a need for specific legislation to be enacted to ensure the comprehensive delivery of accessible public transport. While there is some provision under the Equal Status Act 2000 (sections 17 & 18) for the Minister for Justice, Equality and Law Reform, in consultation with the Minister for Transport, to make regulations regarding accessibility of new vehicles and bus and rail stations, this provision has not been enacted. Similarly, the former Disability Bill 2001 made provision regarding access and accessibility in transport and it may be assumed that some provision will also be contained in the forthcoming disability legislation.

However, it is critical that transport legislation per se should contain specific requirements to ensure accessibility for people with disabilities. It is vital that transport legislation does this to ensure coordination and harmonisation within the broader transport legislative and regulatory framework. This is important given the range of regulation and legislation that is and will be emerging within the Transport area, e.g.

- the recent Taxi Regulation Act 2003;
- the proposed restructuring of Aer Rianta and CIÉ;

- the proposed Railway Safety Act and establishment of Rail Safety Commission;
- the opening up and licensing of transport services to private operators;
- the proposed establishment of a Greater Dublin Transport Authority etc.

Such an approach would ensure that the Department of Transport would take a lead role in adopting a mainstream approach in relation to public transport accessibility and in making provision in an integrated fashion for all transport users.

4.2.3 Investment

Investment in accessible transport should be a major infrastructural priority. Over the years there has not been significant investment in public transport and it is only in recent years of economic growth that such investment by the State has been made.

An integrated accessible public transport service will make large demands on the exchequer. It will also involve a range of stakeholders (e.g. private coach/bus operators currently operate approximately 8,000 vehicles most of which are inaccessible) and investments in the built and external environment through which transport operates.

The protracted economic life of transport stock presents barriers. For example, if the State-funded public transport operators are to continue with the current rate of replacement of vehicles and rolling stock and the introduction of new vehicles, one could be faced with the following possible scenario

- Dublin Bus has a policy of replacing buses after a 12 year life span, thus replacing approximately 85 buses per year and this would mean that it would be 2011 before all non accessible buses are replaced. However, the current level of profitability within this company may not allow for this timescale and one could be faced with it being deferred by 5-10 years;
- Bus Éireann has converted all its urban services to low floor buses. However, none of its coaches providing inter-urban, suburban and rural services is accessible. The difficulty is that there is no safe, universally accepted, wheelchair accessible coach in manufacture. While some progress has been made under EU initiatives and piloting of prototypes are currently taking place, one could be faced with the situation that it could take years before a suitable vehicle begins to come on stream and then the phasing in process only begins and may not be completed until 2022;
- DART and suburban rolling stock should be fully accessible by 2005;
- LUAS will be a fully accessible system when it comes on stream;
- Inter city rail rolling stock should be fully accessible by 2012.

The current level of investment in replacement vehicles and rolling stock is a minimum requirement based primarily on safety replacement issues. Given

the under funding over the years this minimum investment is constantly in a “catch up” situation and is particularly vulnerable in a climate where the slower pace of economic growth impacts on public expenditure, and where there are competing priorities both within Government Departments and within the Department of Transport itself (for example investment in roads versus investment in public transport infrastructure).

The challenge is to secure a firm Government commitment to the provision of an integrated accessible transport service and that investment in accessible public transport services continues.

4.2.4 Research Data and Information

Research

There is a need for research that supports the development and implementation of an integrated accessible public transport policy.

In addition there are specific issues within transport requiring research and analysis, for example

- the evaluation of transport provision by voluntary organisations; health boards; schools and rural transport initiatives;
- analysis of transport trends;
- evaluation of Equality/Disability training provided to staff working within transport services etc.

Data

There is a need for a comprehensive integrated strategy for data and statistics in relation to public transport. Currently such data is collected in an ad hoc fashion by a variety of stakeholders, e.g. transport operators, a number of Government Departments, Health Boards, Local Authorities etc. As a result it is very difficult to get a clear picture on data regarding funding and provision of local transport for people with disabilities.

Primary data collection is critical for the development of an integrated accessible public transport service and for its implementation and monitoring.

The Department of Transport should have oversight in the development and maintenance of a centralised database. This would facilitate inter alia the coordination of transport provision, public funding allocations on transport provision and the integration of local service provision.

Information

People need timely, accurate, reliable information on all travel choices available to them. If public transport is to be used by people with disabilities,

people must become familiar with it and be satisfied with using it. For a person intending to travel they need to know

- Routes;
- Stops and interchanges;
- Timetables;
- How modes and services connect with each other.

In addition a person with a disability may need to know to what extent the particular modes and/or interchanges are accessible.

There is a need for a single travel information source. The Dublin Transportation Office (DTO) has submitted a report, *A Strategy for Integrated Public Transport Information, including Real Time, in the Greater Dublin Area* to the Minister for Transport. This could be a useful model for the development of this important service.

4.2.5 Standards and Guidelines

The development of guidelines, codes of practice and the implementation of standards are key factors in delivering integrated and quality transport services to everyone.

There is a need for a consistent and coordinated approach, thus ensuring that all modes of transport and all transport operators deliver quality customer service.

There are a number of opportunities within current developments in transport to ensure an agreed set of guidelines and standards for all aspects of travel, for example

- The adoption of the Voluntary Airline and Airport Passenger Service Commitments by all airports and airlines in Ireland;
- Accessibility proofing to an agreed standard of the current proposals regarding safety both in the Review of Domestic Passenger Ship Legislation and the Railway Safety Legislation;
- Ensuring the most up to date accessibility standards in the purchasing contracts for replacement of vehicles, rolling stock and equipment such as the integrated ticketing system;
- Delivering on quality standards within the Taxi service as provided for in the Taxi Regulation Bill 2003. This provides for the Commission to make regulations with regard to, among other things, the making of standards for the access and carriage of people with mobility and sensory impairments, including wheelchair users, and to set requirements and conditions with regard to the knowledge and ability of drivers to meet the needs of people with disabilities.

4.2.6 Equality/Disability Training

Transport accessibility depends on the awareness and positive attitude of the whole community - in particular transport staff. All staff working within a travel chain should have equality/disability awareness.

Progress has been made in this area with certain transport operators, for example, Dublin Bus and Bus Éireann have provided training for many staff, appointed Equality Officers etc.

There is a need to effectively monitor the effectiveness and impact of such training and the benefits to passengers with disabilities. Similarly some training has been carried out within Aer Rianta. The Taxi Regulation Act 2003 specifically provides for mandatory training in this area and for regulations regarding the conduct and duties of drivers of small public service vehicles, including those that relate to the facilitation of the needs of passengers with disabilities.

There is a need to have this regulated in a coordinated and consistent fashion across all modes of transport and for all transport operators. Equality/disability training should be mandatory for all staff who work in transport services.

4.2.7 Universal Access – Transport for All

The implementation of a “Transport for All” policy requires an integrated planning approach to transport accessibility within which the needs of people with disabilities are included.

A good example of a coordinated approach to providing accessibility is the development of Quality Bus Corridors in the Dublin Area. This involved a range of different statutory agencies and Government Departments, resulting in the provision of accessible paving, bus stops and external built environment interacting effectively with low floor accessible buses. Bus stops are the responsibility of local authorities and, therefore, fall outside the remit of the Department of Transport.

In line with the Government’s commitment to mainstreaming, the Department of Transport should take a lead role in bringing together the different government departments and statutory agencies in order to provide an integrated planning and implementation approach to accessible public transport. A key feature should be accessibility planning and would include such measures as

- Improving physical access through accessible vehicles and stations and improvements to the pedestrian environment;
- Making good deficiencies in the provision of services through the land use planning process;
- Increasing the provision or improving journey times, service frequency and reliability of accessible public transport;

- Providing accessible travel information;
- Making travel affordable.

In applying the principles of “Transport for All” the Government would improve transport services and make them available, accessible, affordable and reliable for all the public to use.

Chapter 5: Conclusions and Recommendations

The NDA has identified Transport as a key strategic policy area in its Strategic Plan 2004 – 2006. The delivery of an accessible public transport service and the planning for and development of the necessary infrastructure, however, is of its nature long term.

The NDA is committed to addressing the issues that impact on the lives of people with disabilities and, in particular, to maximising opportunities to influence the mainstream public transport agenda.

Priorities for NDA

Within the next three years NDA will work with the Department of Transport and other relevant stakeholders in the following areas:

5.1 National Policy

Recommendation 1: Transport Policy for People with Mobility Impairments

The Department of Transport should consult with the NDA in the development of an accessible, integrated transport policy for people with mobility and sensory impairments that would include developing standards for all conveyances, staff training and services. In line with the Department's Statement of Strategy 2003 – 2005, this policy would transfer to other agencies and government departments responsible for the delivery of transport services to the mobility impaired.

5.2 Legislation and Regulation

Recommendation 2: Implementation of Primary Legislation

The provisions in Sections 17 and 18 of the Equal Status Act 2000 should be taken up and the appropriate regulations made as soon as possible. This would enable action to be taken in advance of any elements relating to transport, which might be contained in the forthcoming Disability Bill, being enacted.

Recommendation 3: Regulatory framework for passenger transport services

The NDA should liaise with the Department of Transport on the proposals for changes in the regulatory framework and the administration of the proposed framework governing road passenger transport. In particular the NDA should advise on the development of demand-responsive and flexibly-routed services, and the involvement of voluntary or community-based organisations and taxis/hackneys in the delivery of local public transport services. These proposals and the development of such services will require changes to road service licensing and the definition of what constitutes a route.

Recommendation 4: Continued introduction of low floor buses in the Greater Dublin Area

1. The programme of replacing older buses operated in the Greater Dublin area by Bus Átha Cliath with low floor buses should continue until all routes have been converted. The NDA should review the Department of Transport monitoring of this programme.
2. Given that there are likely to be changes to the way in which services in the Greater Dublin Area are to be provided in future, it is essential that all routes operated as public services by all operators are served by low floor buses.

Recommendation 5: Level of Taxi Provision

In light of the decision by the Department of Transport to no longer require that all taxis should be accessible to wheelchair users remaining in their wheelchairs for the journey, the NDA should liaise closely with the Department, the Taxi Regulator and the representatives of the taxi trade in order to ensure that an agreed minimum level of provision in each licensing area is accessible to wheelchair users remaining in their wheelchairs for the journey and that any level agreed is enforced effectively.

5.3 Investment

Recommendation 6: Advising on Progress

The NDA should monitor expenditure and timescale for the required accessibility improvements. The NDA within its statutory remit should advise the Minister with regard to progress.

Recommendation 7: Continuation of investment in rail as the key to interurban accessibility

Most interurban road passenger services are operated by coaches, which have poor accessibility and will continue to do so for some time. There is, therefore, a need for the Department of Transport to prioritise investment in station improvements and rolling stock replacement as rail offers the only practical option at present for interurban travel by people with mobility and sensory impairments. The NDA should review the Department of Transport's monitoring of progress, expenditure and timescale for the required accessibility improvements.

5.4 Research Data and Information

Recommendation 8: Primary Data Collection

Detailed reporting and monitoring of expenditure on transport by purchasers, ideally relating which aspects relate to different users, is needed. Primary, local-level research, leading to the setting up of templates for reporting money spent on transport services at local level will enable better data collection and monitoring. This will improve service provision and planning, and achieve greater transparency in financial support. It would also enable the validation process recommended in Section 3.3.

The collection of data on the funding and provision of local transport for people with disabilities should be dealt with as a mainstream issue. The NDA should advise the Department of Transport⁵⁶ in relation to the collection of this data which might be undertaken by ADM (Area Development Management) or the City/County Development Boards.

Recommendation 9: Accessible Mainstream Vehicles

An effective system of data collection in relation to the roll-out of accessible mainstream vehicles is required. The Department of Transport would be best placed to establish this system, with the NDA in an advisory role. The NDA should monitor the data received.

Recommendation 10: Passenger information

A single travel information source, with various media, is required. Whether an accessible mainstream service or a specialised service gives a better service to people with disabilities is debatable. There are advantages in having both. By analogy with the general provision of public transport services, a single travel information source would be of great assistance to

⁵⁶ The Department of Transport is suggested as the most suitable lead agency, although presently most of the local services do not come under its remit.

the general public as well as to people with disabilities, and would allow a complementary information service to people with disabilities to be provided most efficiently.

A report entitled “*Strategy for Integrated Public Transport Information, including Real Time, in the Greater Dublin Area*” is currently before the Minister for Transport. This report is the work of the PTI/RTPI committee of the Dublin Transportation Office. The NDA was represented on this committee and should continue to engage with the initiative through the design, implementation and operation phases.

With regard to provision of travel information nationally, the NDA should liaise with Government Departments and operators on options for establishing a national single information source, and act as an advisory body to future initiatives.

In the interim, the NDA should liaise with operators on the current information provided (e.g. websites, Iarnród Éireann’s Guide to Stations and bus and rail timetables) to ensure it best meets the needs of people with disabilities.

Recommendation 11: Local transport research

Local level practical research should be undertaken into the reorganisation and co-ordination at local level of paratransit services, in order to redefine public passenger transport services.

Recommendation 12: Quality of Service – equality/disability training

NDA should carry out research in relation to the effectiveness of equality/disability training provided to transport operators.

5.5 Standards and Guidelines

Recommendation 13: Design of large passenger ships

Guidelines published by the International Maritime Organisation, EU Directive 98/18 and subsequent amendments, the UK DPTAC Guidance would provide a suitable basis to meet the needs of people with disabilities in the design of large passenger ships and passenger infrastructure.

Recommendation 14: Voluntary Airline and Airport Passenger Service Commitments.

The NDA should liaise with the Department of Transport to ensure the promotion and the adoption in Ireland, by all airlines and airports, of the Voluntary Airline and Airport Passenger Service Commitments. The NDA could also play an advisory role to the Department of Transport in the implementation of the disability specific sections in the commitments.

Recommendation 15: Information for transport providers

A library of information (for example, developments in vehicle design, ticketing, information provision) should be available for transport providers. The NDA should promote with relevant stakeholders the establishment and maintenance of such a resource.

Recommendation 16: Integrated Ticketing

The Railway Procurement Agency is presently leading the development of an electronic “smart card” based integrated ticketing system for the Greater Dublin Area. As with passenger information, the NDA should liaise fully with the initiative and review and comment on all proposals in its advisory capacity.

Recommendation 17: Developments in vehicle design

The NDA should ensure that the design standards and any timetable for implementation of the standards adopted continue to support the developments in vehicle design and build, which have taken place over the past few years.

Recommendation 18: Development of national guidelines - Taxis

The NDA should be involved in the development of national guidelines for access to taxis for wheelchair users, which would build upon the existing vehicle accessibility specification and draw from the experience of the EU ‘Taxis for All’ project.

5.6 Equality/Disability Training

Recommendation 19: Passenger information

The NDA should liaise with operators on the current information provided (e.g. websites, Iarnród Éireann’s Guide to Stations and bus and rail timetables) to ensure it best meets the needs of people with disabilities.

Recommendation 20: Quality of Service – equality/disability training

The Department of Transport should liaise with the NDA in monitoring operators’ equality/disability training programmes, which should be reviewed as new developments take place (i.e. introduction of new technology such as new vehicles or information systems).

In this respect, the NDA should prepare a code of practice for trainers.

5.7 Universal Access - Transport for All

Recommendation 21: Transport for All

The benefits of moving away from the provision of special services to “Transport for All” public transport system should be promoted by the NDA, which should advise and liaise with relevant bodies, including but not limited to the Department of Transport, the CIÉ Group, private operators, the Railway Procurement Agency, the Taxi Regulator and representatives of the taxi industry, to ensure this policy is adopted.

Recommendation 22: Infrastructure improvements associated with low floor bus routes

Improvements to the bus stop environment and the areas adjacent to bus routes are a key element in ensuring that the full benefits of investment in low floor buses will be captured. A programme of improvements associated with the rollout of low floor buses is, therefore, essential. These improvements also need to be included in the development and upgrading of bus stations and interchanges.

The example of Quality Bus Corridors illustrates a partnership approach. This approach generally involved the key stakeholders in the implementation of local accessible transport services, namely the bus operators, the local authorities and the users. The NDA should ensure that it is represented on such partnerships.

Recommendation 23: Planning of new infrastructure

The requirements of accessible rolling stock, low floor buses and accessible coaches (currently being researched and tested elsewhere in Europe) must be taken into consideration in the planning of new supporting infrastructure. The commissioning authorities should work closely with the NDA to ensure that requirements for accessible conveyances are met.

Recommendation 24: Introduction of accessible coaches

As accessible coaches become more available, the NDA should liaise with the Department of Transport to ensure they are introduced on a route by route basis, especially those which link up with local accessible services and those which serve major centres of population or interchanges between modes, such as air and sea ports.

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Appendix 1

Special Protocol to Meet the Needs of People with Reduced Mobility

The purpose of this document is to improve the accessibility of air travel to people with reduced mobility by ensuring that their needs are understood and provided for, and that their safety and dignity are respected. It forms the basis on which a voluntary Code (or Codes) of Practice may be prepared by airports. When preparing Codes, the appropriate provisions of the European Civil Aviation Conference (ECAC) Document 30 (Section 5), and the International Civil Aviation Organisation (ICAO Annex 9) will be incorporated.

Definition of a person with reduced mobility (PRM)

A person with reduced mobility (PRM) is understood to mean any person whose mobility is reduced due to any physical disability (sensory or locomotory), an intellectual impairment, age, or any other cause of disability when using transport, and whose situation needs special attention or adaptation of services ordinarily made available to all passengers.

Basic assumptions

- PRMs have the same rights as other citizens to freedom of movement and freedom of choice. This applies to air travel as to all other areas in life.
- Airports and related service providers have a responsibility to meet the needs of PRMs. PRMs also have a responsibility to identify their needs to the proper channels at the proper time.
- Information, using accessible formats, must be made available to enable PRMs to plan and make their journey.
- Disability should not be equated with illness and therefore PRMs must not be required to make medical declarations about their disability as a condition of travel.
- Organisations representing PRMs will be consulted on all issues relevant to PRMs.
- Staff will be given appropriate training in understanding and meeting the needs of PRMs.
- Control and security checks will be undertaken in a manner that respects the dignity of PRMs.
- PRMs must be enabled to remain independent to the greatest possible

extent.

- The cost of providing for the needs of PRMs must not be passed directly to PRMs.

Provision of Infrastructure

Each airport will ensure that its infrastructure is compatible with the needs of people with reduced mobility and that this part of the service is provided in an efficient manner. This will include access to landside and airside ground transport; parking, pick-up, drop-off and transfer arrangements; and information should be provided both audibly and visually.

Appendix 2

Meeting the Needs of People with Reduced Mobility

The purpose of this document is to improve the accessibility of air travel to people with reduced mobility by ensuring their needs are understood and provided for, and their safety and dignity are respected. It is aimed at airlines providing services and facilities at airports and on aircraft, and forms the basis on which a voluntary Code (or Codes) of Practice may be prepared. When preparing Codes, the appropriate provisions of the European Civil Aviation Conference (ECAC) Document 30 (Section 5), and the International Civil Aviation Organisation (ICAO Annex 9) will be considered. These documents provide technical information and are produced, following consultation with the airline industry, by governmental agencies concerned with establishing standards and recommended practices.

Definition

A person with reduced mobility (PRM) is understood to mean any person whose mobility is reduced due to any physical disability (sensory or locomotory), an intellectual impairment, age, or any other cause of disability when using transport and whose situation needs special attention and the adaptation to the person's needs of the services made available to all passengers.

Basic assumptions

1. PRMs have the same rights as other citizens to freedom of movement and freedom of choice. This applies to air travel as to all other areas in life.
2. Airlines, airports and related service providers have a responsibility to meet the needs of PRMs. PRMs also have a responsibility to identify their needs to the proper channels at the proper time.
3. Information must be made available to enable PRMs to plan and make their journey.

4. The cost of providing for the needs of PRMs must not be passed directly to the PRMs.
5. Disability should not be equated with illness and therefore PRMs must not be required to make medical declarations about their disability as a condition of travel.
6. Organisations representing PRMs will be consulted on issues relevant to PRMs.
7. Staff will be given appropriate training in understanding and meeting the needs of PRMs.
8. Control and security checks should be undertaken in a manner which respects the dignity of PRMs.
9. PRMs must be enabled to remain independent to the greatest possible extent.

Airline Practices

No carrier will refuse a PRM except where he/she cannot safely be carried or cannot physically be accommodated. When the carriage of a PRM is refused, carriers will explain clearly and explicitly the reasons for refusal.

When a PRM declares that he/she is self-reliant (self-sufficient and capable of taking care of all of his/her physical needs independently in flight), the airline should accept that declaration. The airline should then be under no obligation to provide on-board assistance which contravenes health, safety or hygiene requirements where such declaration has been made.

Airlines will pursue technical and operational options for improving access and facilities on aircraft of all sizes, particularly when major refurbishment is undertaken.

Where a direct route is not possible for a PRM, (e.g. because of small aircraft), airlines will endeavour to suggest an acceptable alternative.

Regardless of the size of airport and aircraft, arrangements for embarkation and disembarkation should respect the dignity of PRMs.

Airlines will, where space permits, provide on-board equipment/ facilities to aid the self-reliance of PRMs within limits of health, safety and hygiene.

PRMs will have equal choice of seat allocation, subject to safety requirements. Airlines will explain clearly and explicitly the reasons for not allocating a specific seat when the request is not met for safety reasons.

Certified Service Dogs will be carried in the cabin, subject to national importation and airline regulations. Where they are carried, there will be no charge.

PRMs will not be charged for the carriage of basic mobility equipment or other essential disability assistive devices.

Airlines must take all reasonable steps to avoid loss or damage to mobility equipment or other disability assistive devices. Where loss or damage occurs, airlines will make appropriate arrangements to meet the individual's immediate mobility needs.

Glossary

ATM

Automatic Teller Machines

ADA

Americans with Disabilities Act

BAH

Booz Allen Hamilton

CIE

Córas Iompar Éireann

COP

Code of Practice

COST

European Cooperation in the field of Scientific and Technical Research

CPC

Certificate of Professional Competence

CRID

Consorci de Recursos per a la Integració de la Diversitat

DART

Dublin Area Rapid Transit

DASH

Dublin Area Suburban Enhancement

DDA

Disability Discrimination Act 1995

DDAI

Disabled Drivers Association of Ireland

DG TREN

The European Commission Directorate for Energy and Transport

DLA

	Disability Living Allowance
DMU	
	Diesel Multiple Unit
DOT	
	Department of Transport
DPA	
	Disabled Persons Assembly
DPTAC	
	Disabled Persons Transport Accessibility Committee
DRC	
	Disability Rights Commission
DRTF	
	Disability Rights Task Force
DSFA	
	Department of Social and Family Affairs
DTO	
	Dublin Transportation Office
ECAC	
	European Civil Aviation Conference
EDF	
	European Disability Federation
EEC	
	European Economic Community
EIDD	
	European Institute for Design and Disability
EIS	
	Environmental Impact Statement
ECMT	
	European Conference of Ministers of Transport
EMU	
	Electrical Multiple Units
ETA	
	Estimated Time of Arrival

EU

European Union

GDA

Greater Dublin Area

GIS

Geographic Information System

GPS

Global Positioning System

ICAO

International Civil Aviation Organisation

IE

Iarnród Éireann

IMO

International Maritime Organisation

IRU

International Road Transport Union

IWA

Irish Wheelchair Association

LRT

Light Rail Transit

LUAS

Speed in the Irish language

MACS

Mobility and Access Committee for Scotland

NAD

National Association of the Deaf

NCBI

National Council for the Blind of Ireland

NDA

National Disability Authority

NDP

National Development Plan

NRH

	National Rehabilitation Hospital
NS	
	Nederlandse Spoorwegen
ONTR	
	Office of the National Taxi Regulator
OJ	
	Official Journal
PRM	
	Person with Reduced Mobility
PTAC	
	Public Transport Accessibility Committee
PSV	
	Public Service Vehicle
QBC	
	Quality Bus Corridor
RPA	
	Railway Procurement Agency
RPTOL	
	Road Passenger Transport Operator's Licence
RSPG	
	Railway Safety Principles and Guidance
RTI	
	Rural Transport Initiative
RTPI	
	Real Time Passenger Information
SBBS	
	Samenwerkende Belangenorganisaties van Blinden en Slechtzienden
STS	
	Special Transport Services
SVID	
	Swedish Industrial design Institute
TAC	

	Transport Advisory Committee in Northern Ireland
<u>TCC</u>	
	Transport Co-ordination Centre
<u>TDC</u>	
	Travel Despatch Centre
<u>TIDE</u>	
	Telematics for Disabled and Elderly People
<u>TMC-I</u>	
	Transport and Mobility Consultants - Ireland
<u>UK</u>	
	United Kingdom
<u>USA</u>	
	United States of America
<u>VAT</u>	
	Value Added Tax
<u>VRT</u>	
	Vehicle Registration Tax
<u>VHF</u>	
	Very High Frequency