

Joined up policies, joined up journeys:

Roadmapping accessible transport in the UK and devolved nations

Full Report, July 2025

This report is part of a series of research conducted by the National Centre for Accessible Transport (ncat) since its launch as an Evidence Centre in early 2023. Whilst this is a standalone report, we would recommend it is considered alongside other ncat research published from late 2024. As ncat progresses further, reports and insights will also be published on our website.

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“Joined up policies, joined up journeys: Roadmapping accessible transport in the UK and devolved nations. Available at www.ncat.uk”

Highlights

Disabled people face a “postcode lottery” in transport. This report recommends joined-up strategies, stronger regulation, and co-produced solutions across the UK to build the foundations for an accessible transport system over the next five years.

This report presents the findings and recommendations of the Accessible Transport Policy Commission's first inquiry, led by the National Centre for Accessible Transport (ncat). The inquiry examined the legislative, regulatory, and policy landscape of transport accessibility across England, Scotland, Wales and Northern Ireland, and the UK as a whole.

Drawing on five policy roundtables, and a call for evidence, with over 700 contributions, the inquiry found that disabled people face a “postcode lottery” in transport accessibility. Transport sectors lack integration, accessible transport design and service standards, and

effective regulation. These gaps hinder seamless journeys, especially for disabled people who live in rural areas, on low incomes, and are from other disadvantaged backgrounds.

The report sets out nation-specific five-year roadmaps for the UK and devolved governments. These include recommendations for inclusive, cross-departmental strategies; UK-wide accessibility standards; stronger equality legislation; and robust regulatory oversight. The inquiry's central finding is that disabled people must be involved in every stage of transport decision making. Co-production is therefore a guiding principle for each of the roadmaps.

Contents

Highlights	2
Contents	3
1 Why did we do this work?	8
2 What did we do, how did we do it, and who did we work with?.....	8
Component 1: Scoping research and policy review	9
Component 2: Call for evidence.....	9
Design:	9
Dissemination:.....	10
Respondents:	10
Analysis	11
Component 3: Policy roundtables	11
Preparation	11
During	12
After	12

Integrating our findings	13
3 What did we find?	14
Finding 1: The UK lacks coherent inclusive transport strategies and coordination across nations	14
Finding 2: Seamless door-to-door journeys are hindered by a lack of integration between different transport modes and services ..	20
Finding 3: Accessible transport standards are fragmented and limited	23
Finding 4: The lack of coproduction in decision making processes often leads to accessibility being treated as an afterthought.....	27
Finding 5: Transport regulators often don't have enough powers, capacity and transparency to fulfil their responsibilities around accessibility.....	30
4 What conclusions did we come to?	35
Conclusion 1: There is a need for integrated cross-modal and cross-departmental inclusive transport strategies across the UK.	36
Conclusion 2: There is a need for UK-wide standards for each mode of transport that are coproduced with disabled people.....	37
Conclusion 3: For standards to be successful, regulation of transport accessibility must be effective through stronger powers, engagement with disabled people, and transparency	37
Conclusion 4: Every stage of policy and project delivery must be co-produced with disabled people	38
5 What should happen next?	39
England: Department for Transport (DfT).....	40
Year 1: Strategy, Foundations, and Co-production	40
Years 2-3: Reform, Standards, and Delivery	41
Years 4-5: Transparency and Evaluation	43
Wales: Welsh Government	43
Year 1: Strategy and Co-production	43
Year 2-3: Standards	44

Year 4-5: Evaluation and Enforcement	45
Scotland: Transport Scotland	46
Year 1: Coordination and Co-production	46
Year 2-3: Standards and Coordination	47
Year 4-5: Evaluation and Enforcement	47
Northern Ireland: Department for Infrastructure (Dfi).....	48
Year 1: Strategy and Co-production	48
Years 2-3: Reform, Standards, and Delivery	49
Years 4-5: Enforcement and Evaluation.....	50
6 How will ncat use these findings to achieve change for disabled people's transport?	50
7 About ncat	51
8 References.....	52
9 Terms used in this report	58
10 Appendices.....	59
Appendix 1: Call for evidence survey questions	59
Appendix 2: Outcome Briefing for the Wales policy roundtable ..	63
Overview	63
Key Findings	64
Appendix 3: Outcome Briefing for the England policy roundtable	70
Overview	70
Key findings.....	71
Appendix 4: Outcome Briefing for the Scotland policy roundtable	77
Overview	77
Key findings.....	78
1) Accessible transport reforms such as the Accessible Transport Framework can only be delivered successfully through coproduction with disabled people.	78

2) Clear, multimodal journey information is critical for disabled passengers to access transport and assistance effectively. Transport providers should provide guidance for disabled passengers on journey information.	79
3) Road, sea, and active travel were highlighted as key modes of travel that need reform.	80
4) Regulation and disability rights must be strengthened through training, transparency, and data collection.	81
5) Inaccessible transport exacerbates other forms inequality such as regional and financial inequalities. Working towards transport accessibility is crucial to ensuring disabled people can travel, and access all parts of society, regardless of their background.	82

Appendix 5: Outcome Briefing for the Northern Ireland policy roundtable83

Overview	83
Key findings.....	84
1) Transport in Northern Ireland lacks strategy and is severely underfunded.	84
2) Infrastructure limitations such as poor connectivity and lack of accessible public transport services force disabled people to rely on more costly and less sustainable modes of transport.	85
3) Taxis are crucial to travel within Northern Ireland. There is an urgent need for radical taxi reform, which requires political commitments, engagement, and funding.....	86
4) Current approach to improving transport accessibility can be improved by perceiving disabled people as a core part of society, unified advocacy, and centring disabled people.....	87
5) Effective regulation is essential for accessibility to be the rule, and not the exception, and be met to the highest standards. Without strong regulation and enforcement, disabled people face continued exclusion from transport services.	

88

Appendix 6: Outcome Briefing for the UK-wide regulation policy roundtable89

Overview	89
Key findings.....	90
1) Regulation is a key part of ensuring accessibility across modes of transport. 90	
2) Regulatory bodies differ in their powers, which can contribute to differing levels of accessibility between modes of transport and operators.	91
3) Data is key to the regulatory processes, such as passenger assistance.	91
4) Regulatory authorities are only as strong as the legislation that underpins their work.	93
5) Lived experience is crucial to evaluating service delivery and the impact of regulation.....	93
6) Regulatory bodies may set guidance for training. However, the training delivered depends on the organisation, the region, and the funding.	94

1 Why did we do this work?

Disabled people make 38% fewer journeys than non-disabled people, a trend that has persisted for over a decade.¹ Research by the National Centre for Accessible Transport (ncat) shows that 92% of disabled people face barriers when using at least one mode of transport.² The UK transport system is failing disabled people.³ Outside England, most of UK transport policymaking is devolved to regional administrations. The characteristics of the different transport systems and the policy and regulatory processes that shape them differ between England, Northern Ireland, Scotland, and Wales. Therefore, while producing a UK-wide overview of the key challenges and opportunities for change, this inquiry addresses each nation separately.

2 What did we do, how did we do it, and who did we work with?

Our research had three components: a scoping stage, policy roundtables, and a call for evidence. Building on quantitative data and disabled people's ongoing experiences of transport, we sought qualitative data, including from disabled people who are excluded from transport.⁴

¹ [Motability, The Transport Accessibility Report, 2022](#)

² [ncat, Understanding and identifying barriers to accessing transport, 2024](#)

³ [Transport Scotland, Disability and Transport, 2021 & The Transport Accessibility Statistics, Northern Ireland, Are we there yet? Barriers to transport for disabled people in 2023](#)

⁴ [ncat, Understanding and identifying barriers to accessing transport, 2024](#)

The methodology used for each part of the research is discussed below in more detail.

Component 1: Scoping research and policy review

- We reviewed recent UK-wide research, policy, and legislation regarding transport accessibility.
- We engaged with Disabled People's Organisations (DPOs), advisory panels, and transport professionals to guide the inquiry's focus.
- Findings from the scoping research informed the Call for Evidence questions and policy roundtable briefings.
- Due to the changing nature of the policy landscape, policy review was continuous throughout the inquiry process.

Component 2: Call for evidence

Design:

- The survey was designed by Policy Connect, with input from The Research Institute for Disabled Consumers (RiDC; see Appendix 1 for the full survey).
- Nine questions were presented on co-production, cross-government coordination, and underexplored issues within policymaking.
- Respondents could answer about the UK as a whole or specific nations.
- For every question, respondents could give a written response in a text box. The survey allowed respondents to submit photographs, videos, audio files, and documents.

- The survey design was assessed and pre-tested to ensure accessibility.

Dissemination:

- People could respond to the call via an online survey or by phone. A Video Relay Service was also offered.
- It was open to anyone who had an interest in transport accessibility. People could respond as an individual or on behalf of an organisation.
- The call for evidence was shared through RiDC's Community of Accessible Transport Panel, Policy Connect's connections, and LinkedIn.

Respondents:

- 953 people engaged with the survey.
- 346 respondents did not respond to any of the research questions. The demographic data was analysed after clearing the data to include 607 respondents who responded to at least one of the research questions.
- 578 respondents identified as disabled (n= 547) or preferring a different term that indicates having some sort of conditions/disability/impairment (n= 31).

Figure 1: Frequency of responses for each nation

Nation	Frequency
England	464
Scotland	56
Wales	42
Northern Ireland	7
UK-wide	57

Analysis

- To consider each nation equally, the answers to research questions were considered by nation (England, Wales, Scotland, Northern Ireland, UK-wide).
- Through a thematic analysis of the answers to each question, we identified the key problems and solutions put forward by the respondents.
- Examining the key themes under each question, we identified common topics and noted nation-specific problems and solutions.

Component 3: Policy roundtables

The policy roundtables were a series of five evidence sessions chaired by Parliamentarians on the Accessible Transport Policy Commission. These roundtables brought together 78 disabled people, disabled people's organisations, transport professionals and policymakers. Four roundtables addressed key policy challenges in England, Northern Ireland, Scotland and Wales. The fifth roundtable focused on UK transport regulatory bodies.

Preparation

- To help participants prepare, Policy Connect held video calls with panellists to brief them in the lead up to the roundtables.
- Ahead of the sessions, participants were sent briefings that outlined relevant recent research, key legislation, and government policies and programmes.

During

- The first half hour of the two-hour sessions involved presentations from two or three organisations, followed by an open discussion.

After

- Each session was recorded and transcribed.
- Five to six key topics were identified and paired with quotes from participants.
- Findings were circulated among those who registered for the session (Appendices 2-6).

Figure 2: Summary of the policy roundtables: number of attendees, chair, presenters

Policy roundtable	Chair	Date	Panellists	Number of attendees
Wales	Baroness Grey-Thompson	17 September 2024	Disability Rights Taskforce Working Group on Travel; Gig Buddies Cymru; Transport for Wales	8
England	Lord Shinkwin	19 September 2024	Transport for All; Bus Users UK; Chartered Institution of Highways & Transportation (CIHT)	25

Policy roundtable	Chair	Date	Panellists	Number of attendees
Scotland	Richard Baker MP	14 November 2024	Royal National Institute of Blind People Scotland; Lothian Buses	17
Northern Ireland	Sorcha Eastwood MP	21 November 2024	The Inclusive Mobility and Transport Advisory Committee (IMTAC); Disability Action Northern Ireland and Consumer Council	9
UK-wide Regulation	Baroness Brinton	26 November 2024	Office for Road and Rail; Civil Aviation Authority; Maritime and Coastguard Agency	19

Integrating our findings

- Findings from secondary data collection within the scoping research and policy review, the Call for Evidence, and policy roundtables were gathered within each nation.
- Policy themes crossed over across the UK. Therefore, the findings are presented as such, with elements relating to each of the four nations specified when appropriate.

3 What did we find?

In this section, we will outline the findings from our scoping research, policy roundtables, and call for evidence.

Finding 1: The UK lacks coherent inclusive transport strategies and coordination across nations

Transport strategies across the UK are largely supported by accessible transport frameworks to be more inclusive. Inconsistent transport strategies and accessibility frameworks across the UK's four nations have caused disparities in service delivery, support scheme eligibility criteria, and policy priorities. Previous UK Government strategies, such as the Inclusive Transport Strategy, have been superseded by uncoordinated policies like the creation of Great British Railways and the Bus Services Bill, both of which have prominent proposals around accessibility.⁵ The UK Government has yet to make clear how accessibility will fit into its forthcoming Integrated National Transport Strategy for England. Scotland is aligning its Accessible Transport Framework (2016-2026), with their recent National Transport Strategy.⁶ The Welsh government is developing an Accessible Transport Plan to support its transport strategy *Llwybr Newydd*.⁷ Northern Ireland, on the other hand, has not had an accessible transport framework since 2015.⁸

⁵ [Bus Services \(No. 2\) Bill \[HL\], 2025](#), [Passenger Railway Services \(Public Ownership\) Act 2024](#)

⁶ [Scotland's Accessible Travel Framework - Delivery Plan 2024-2026](#)

⁷ [Llwybr Newydd, The Wales Transport Strategy, 2021](#), [Draft Disabled People's Rights Plan: 2025 to 2035](#)

⁸ In the Northern Ireland evidence session, Michael Lorimer, the Executive Secretary of the Inclusive Mobility and Transport Advisory Committee (IMTAC) noted the role of political instability in this gap.

The lack of cohesion between transport strategies and their accessibility frameworks across the UK is reflected in disabled people's contrasting experiences when they travel to a different nation. A deaf respondent from Scotland referred to rail travel in England as “appalling” in contrast to the “really good” experiences of rail travel in Scotland.⁹ The eligibility criteria and the discounts offered by concessionary schemes differ. For example, a disabled person who receives personal independence payments can be eligible for free Scotland-wide bus travel, whereas if they applied in Northern Ireland they would only be eligible for half-price travel unless they are blind or a war disablement pensioner.¹⁰

Concessionary schemes not being UK-wide also means that when a disabled person leaves the nation that they receive free travel in, they may have to pay full price for the same mode of transport despite still being in the UK.

“Inconsistent application of the law needs to be minimised; each part of the country seems to have different approaches when it comes to taxis and public buses so knowing what one's rights are is impossible. Every region seems to have different approaches to planning legislation.” (A disabled respondent from Wales)

⁹ “Accessibility should be nationwide, not just the devolved parliament in Scotland. The accessibility in my part of Scotland on rail is really good, but when I travel to England it's appalling. I am English and travel back frequently. I have put an official complaint in, fantastic response from Scotland, ignored in England, specifically Crewe which is a rail hub.” (A Deaf respondent from Scotland)

¹⁰ [nidirect, Free and concessionary bus and rail travel](#), [Transport Scotland, Concessionary travel](#), “Concessionary rates should be the same across all nations and regions in the UK. For example, if I lived in Scotland, I would get free transport but in NI I only get half fare. No consistency. In NI if I have to be accompanied, I have to pay 1.5 fare compared to 1 fare for a person without disability. Unfair system.” (A disabled respondent from Northern Ireland)

Inclusive transport strategies must recognise differences in transport needs of different nations. In Scotland, with around 106,500 people living on islands, people disproportionately rely on ferries as a mode of transport.¹¹ Attendees of the Scotland policy roundtable said that ferry travel can often be inaccessible to disabled people who may need a hygienic environment, seats that fully lie down, and step-free access to toilets when there is a shortage of accessible cabins. The shortage is intensified during high tourism seasons, and these cabins are open to be booked by all passengers. People in Northern Ireland disproportionately rely on air travel to access Great Britain.¹² In the Northern Ireland policy roundtable, Michelle Kelly from Consumer Council highlighted that 83% of departures from Northern Ireland airports were domestic, as opposed to 59% of the departures from Glasgow.¹³ Therefore, the unique circumstances within each nation must be considered within accessible transport policy development.

“There needs to be a minimised set of standards for accessible transport and needs to ensure that no matter where you travel to throughout the UK all transport routes and means of transport are accessible.”

¹¹ [Scotland's Census 2011: Inhabited Islands Report, 2015](#), [Scottish islands: data overview 2023](#)

¹² While the Republic of Ireland is outside the scope of this report, cross-border connectivity within the island is a crucial part of the transport of disabled people in Northern Ireland. The Department for Infrastructure and the Republic's Department of Transport are establishing integrated transport through initiatives such as the All-Island Strategic Rail Review.

¹³ “In fact, in 2022, just to put it into context, 83% of all flights from Northern Ireland airports were domestic. And that compares with just 59% from Glasgow. So it follows then, that disabled consumers are also disproportionately and uniquely reliant on air travel than elsewhere in the UK.” (Michelle Kelly, Head of Transport Policy at Consumer Council in Northern Ireland)

(Deborah Preston, Access Advisor at the Liverpool City Region Combined Authority)

Inclusive transport strategies must also consider inequalities within nations. Disabled people in rural areas face higher barriers to transport than those in urban areas. Wales provides a stark example, and some respondents suggested that there is “no public transport” in some parts of rural Wales.¹⁴ Many buses stop running after 5pm, minibuses often do not accept mobility scooters, and trains are unreliable and inconsistent. Participants of our Wales policy roundtable highlighted that when services are inaccessible, the number of people using them decreases which can lead to the services being cut. This creates a cycle of cuts to services and a loss of rural connectivity. Even in England, respondents to the call for evidence described urban centres like London as having “*far better*” services than areas such as Hull or Devon, which are “*starved of investment.*”

Disabled people in rural Northern Ireland have very limited access to public transport. Consumer Council found that 61% of people in Northern Ireland find it difficult to reduce their reliance on cars, which rises to 78% for rural residents.¹⁵ Coaches are largely inaccessible, and especially wheelchair accessible taxis, are limited in their availability. According to Michael Lorimer from the Inclusive Mobility and Transport Advisory Committee (IMTAC), policymakers are in a unique position to achieve effective taxi reform through wider engagement with taxi

¹⁴ “In rural Wales there is no public transport. There are supposed to be minibuses you can contact to transport you, for a fee, but they refuse to take mobility scooters. This means if you are disabled then you have to have your own transport.” (A disabled respondent from Wales)

¹⁵ [Consumer Council, Decarbonisation of transport, 2023](#)

providers and investment. Similarly, crucial community transport schemes, mobility centres, and door-to-door transport programmes suffer from a lack of strategic planning.

“Transport plans and all the plans that have been developed, continually and perpetually fail to recognise those who are in rural areas, who through in many instances no choice of their own, are completely isolated and vulnerable. In thinking about investments, if we're serious about regional balance and with regard to those with protected status, we need to see a recalibration.” (Jason Donaghy, Manager at Fermanagh Community Transport)

Transport’s Impact in Every Area of Life

Accessible transport frameworks must reflect the important role transport plays in connecting and facilitating disabled people in every area of life and make sure policymaking is joined up to achieve the best outcomes. Motability Foundation has found that closing the transport gap for disabled people in the UK could generate £72.4 billion per year.¹⁶ Many of our roundtable attendees highlighted the importance of transport in allowing them to access healthcare, education, and their communities. Scottish island residents rely on ferries for medical care, while hospital journeys in rural Northern Ireland can take over five hours.¹⁷

¹⁶ [Motability, The Transport Accessibility Report, 2022](#)

¹⁷ [Five hours and four buses: What it's like accessing healthcare in rural Northern Ireland if you can't drive](#)

Some disabled people said that accessible transport options allowed them to stay in employment.¹⁸ During the COVID-19 pandemic, inaccessible transport led to reduced income for disabled people in Wales.¹⁹ Chatterjee and colleagues' *Access to Transport and Life Opportunities* report's finding that having access to a personal car makes it 3.8 times more likely that someone is employed echoes this finding and highlights the importance of accessible car schemes for disabled people²⁰. However, many of call for evidence respondents highlighted not being able to afford private or even public modes of transport, which then continues to exclude them from the workplace.

Access to transport is also vital in helping disabled people connect with their families, friends and wider communities. Respondents reinforced a previous ncat finding that 45% of disabled people report facing social exclusion because of transport barriers.²¹ Many disabled people, particularly those in rural areas, reported that a lack of transport options outside standard working hours has prevented them from engaging with their communities.

Similarly, transport accessibility has implications for the environment. According to a Transport for All study, 71% of disabled people in England would rather use more environmentally friendly modes of transport,

¹⁸ *"Without my wheelchair accessible car, I would not have been able to gain my master's degree, work within the NHS, or do my current job. These specialised cars can get people to areas where limited access can be had."* (Rochelle Savage, a respondent from Scotland)

¹⁹ [Locked out: liberating disabled people's lives and rights in Wales beyond COVID-19, 2021](#)

²⁰ [Access to Transport and Life Opportunities, 2019](#)

²¹ [ncat, Understanding and identifying barriers to accessing transport, 2024](#)

however, they are restricted in their options due to access barriers.²² As policymakers seek to reduce the impact of transport on climate change, initiatives should ensure the greener transport technologies of the future are inclusive and accessible for disabled people.

“Transport isn’t just transport, it’s the economy, employment, planning, housing, health, the arts and culture - it’s the thread through all” (A disabled respondent)

Finding 2: Seamless door-to-door journeys are hindered by a lack of integration between different transport modes and services

The lack of cohesion between transport modes causes disruption to disabled people’s travel. A previous survey by ncat revealed that 90% of disabled people used more than one mode of transport within a year, and the responses to our call for evidence echoed this finding.²³ One broken link in the chain, such as unclear signage at transport transition points, can make a journey unfeasible. In a survey of over 500 people, Transport for All found that making connections between transport modes were the most difficult stage for disabled people in England.²⁴

When changes are unexpected, the impact of this lack of integration intensifies. Gaye Hampton, a member of the Transport for Wales Access and Inclusion Panel, gave a personal example. If one part of a journey is cancelled, she often needs to book a taxi. However, as a deaf person,

²² [Transport For All, Are we there yet? Barriers to transport for disabled people in 2023](#)

²³ [ncat, Understanding and identifying barriers to accessing transport, 2024](#)

²⁴ [Transport For All, Are we there yet? Barriers to transport for disabled people in 2023](#)

she cannot communicate with taxi companies over the phone, a barrier she stressed would be worse for BSL users who might find it difficult to speak to non-signers. This shows that even if the rail company were to communicate cancellations effectively, finding a suitable alternative transport option can often be challenging.

In their call for evidence contribution for England, the I-Connect project advocated for integrated “multi-modal transport”.²⁵ Department for Transport has plans to make integration a priority in its upcoming “Integrated National Transport Strategy”.²⁶ In Northern Ireland, Translink operates several modes of transport, allowing for the integration of train, bus, and coach services. Recently, Transport for Wales launched a five-year partnership to digitally connect public transport journeys through a single app.²⁷ Transport Scotland’s National Transport Strategy and Strategic Transport Projects Review have prioritised multi-modal integration, with initiatives such as mobility hubs and smart ticketing designed to improve connections between bus, rail, cycling, and walking.²⁸ Schemes that aim to integrate different modes of transport more effectively present significant opportunities to make travel easier for everyone. Our findings show that the design of the journey making apps and other technologies passengers need to use when travelling can be a big factor in determining whether such initiatives are inclusive.

²⁵ [I-Connect: Co-designing Sustainable Communities](#)

²⁶ [Integrated National Transport Strategy for England](#)

²⁷ [Transport for Wales makes Hitachi its ‘Mobility as a Service’ partner](#)

²⁸ [Transport Scotland, National Transport Strategy 2, 2019](#)

The importance of digital inclusion was a key message from the Wales evidence session.

“Policies fail to ensure seamless accessibility across the entire journey, including from home to the station and back again. So, a more holistic approach, like integrating local transport services like buses, taxis, and cycling schemes should be included in accessibility plans.” (Lucy Vallis, CEO of Possability People)

Street spaces are crucial for not only active travel but also accessing public transport. The lack of connectedness between transport modes is often due to inaccessible street spaces. Poor pavement conditions may include broken paving stones, uneven surfaces and clutter such as bins and bike racks, which directly impacts disabled people’s ability to safely transition between modes of transport.²⁹ The more disjointed transport modes are, the more disabled people rely on street spaces and active travel to complete their journeys. In Northern Ireland, the percentage of people who are satisfied with the walkability of street spaces are as low as 54% as opposed to 72% in urban areas.³⁰ A truly inclusive system must plan for end-to-end journeys, where disabled passengers can move seamlessly between bus, train, taxi and pedestrian routes.

“There is a missing link between pedestrian infrastructure and accessible transport. Almost no public transport journey starts from outside anyone’s dwelling. Focusing accessibility solely on the vehicle,

²⁹ [RNIB Scotland: Street Credibility, Making Scotland's streets accessible for people with sight loss](#)

³⁰ [Walking and Cycling in Northern Ireland 2022/23](#)

the stops or the terminals does not address the whole problem of inaccessible pavements.” (Claire Walters, CEO at Bus Users UK)

Finding 3: Accessible transport standards are fragmented and limited

Accessibility guidance establishes good practices for infrastructure and transport delivery. While the Office for Road and Rail (ORR) and the Civil Aviation Authority (CAA) have clear guidelines for train stations and airports, the bus sector, on the other hand, does not have a similar set of standards for bus stops.³¹ The Chartered Institute of Highways and Transportation has highlighted that barely any guidance is available for infrastructure accessibility.³² Where guidelines are available, regulators assess compliance through audits and surveys. For example, every year, the CAA ranks airports from “poor” to “very good” in line with their Airport Accessibility Framework.³³ These assessments have led to significant improvements. Following a “needs improvement” rating, London Stansted Airport invested resources into areas such as arrival routes for passenger assistance, toilets, and lifts.³⁴ Its investments led to a “good” rating in the airport's next CAA assessment. In the most recent assessments, no UK airport received a “poor” rating for the first time

³¹ [Office of Rail and Road, Accessible Travel Policy, 2020; Civil Aviation Authority, Airline Accessibility Guidance, 2024](#)

³² As highlighted by Antoinette Horbury, the Director of Policy and Technical Affairs at CIHT, in the England roundtable

³³ [Civil Aviation Authority, Performance framework for airline accessibility, 2023](#)

³⁴ [London Stansted improves services to passengers with disabilities or reduced mobility to achieve CAA 'good' rating, 2019](#)

since 2020.³⁵ Therefore, guidelines can result in improvements to accessibility practices.

"I believe there is a strong relationship between the railway and the ORR. They do hold us to account but also work with us, in providing a better industry for all passengers." (Tom Law, GWR Accessibility Manager)

A lack of accessibility standards can cause differing practices among transport providers within the same sector as they are left to set their own policies. For example, the fact that each train company can set its policies on mobility scooters places the burden on disabled passengers to research and adapt to each provider. Training is a key area that requires standards. Across our evidence sessions, we heard from transport providers who found disability awareness training they received to be beneficial, and disabled people who repeatedly highlighted the importance of training. Similarly, in our call for evidence, training was identified 130 times as a key area for improvement. Without standards and effective enforcement, it is up to the operators to strive for best practices. While drivers in Great Britain are mandated to undertake disability awareness training, Bus Users UK found that despite 99% of operators reporting enforcing training, only 89% of drivers confirmed having received training.³⁶ Such information on the uptake of training is not available in other parts of Great Britain. Many disabled respondents reported being treated like a burden or inconvenience by transport staff, often receiving poor treatment or inadequate assistance. For example, a

³⁵ [Civil Aviation Authority, Airport accessibility performance report, 2024](#)

³⁶ [Bus Users Accessibility Audit 2023](#)

respondent from England shared that bus drivers had refused to lower the bus for them. This is in line with ncat's previous findings of 31% of disabled people reporting that they are negatively affected by staff attitudes while travelling.³⁷ It is crucial for guidance to be set and regularly enforced to improve transport accessibility across the UK. Funding is also important to enable provision across the UK.³⁸

“Support and services vary between operators. Staff should receive adequate training as some people seem to be oblivious that we may need help even when booking assistance.” (A disabled respondent from Wales)

Without formal accessibility standards, accessibility can often be an afterthought, and transport providers may have to set their own direction. When problems arise due to inaccessibility, retrofitting becomes necessary, which can be more costly. For example, retrofitting step-free access at a single station can cost upwards of £1 million, compared to designing it in from the outset at a fraction of the cost.³⁹ A disabled respondent from Scotland compared the Grahamston Railway station in Falkirk, which has a steep ramp labelled as “step-free”, with Edinburgh’s coproduced tram system which has flat access, wide doors, and clear

³⁷ [ncat, Understanding and identifying barriers to accessing transport, 2024](#)

³⁸ *“More funding needs to be available to these organisations to invest in dedicated disability-trained staff. Staff that understands and can push for things like adaptations needed for disabled accessibility.” (A disabled respondent from Wales)*

³⁹ [Independent Living Institute, A brief survey of studies on costs and benefits of non-handicapping environments, 1994](#)

announcements.⁴⁰ In Northern Ireland, Goldline Coaches were awarded an eight-year contract, despite their fleet being inaccessible to many disabled people due to high-floor designs, limited wheelchair spaces, and inconsistent accessible bus stop infrastructure. In contrast, the Glider Rapid Transit, which was coproduced with disabled people, and has level boarding and multiple entrances for priority spaces. Long-term standards and coproduction can also prevent the undoing of positive practices. CIHT stated that after maintenance works, often the accessibility of infrastructure is impaired.⁴¹

“What we don’t have at the moment is a national framework or guidance for local authorities to follow, setting out what is required to make a bus stop accessible and a national register of accessible bus stops.

Improving infrastructure isn’t something that requires a lot of funding because year on year lots of bus stops are getting upgraded allowing for a gradual roll out.” (Ed Wills, Managing Director of Brighton & Hove Bus and Coach Company Ltd)

⁴⁰ “Bring disabled people in at the planning and early discussion stages; let them help make the decisions rather than making them and then testing them later, only to find they are not right. One example of an unsuccessful approach - access to Grahamston Railway Station in Falkirk. The station is advertised as 'step free' which it is, but the ramps are so steep they would be impossible to use if you were pushing a large wheelchair with a heavy passenger. The ticket office at that station is on one side only, so to buy a ticket without crossing the bridge (stairs) you would need to go back out to the main street, up a steep hill, follow the road around and over a bridge, down another steep ramp and into the ticket office. And then back again to get to your original platform. Impossible if you have any mobility issues. This work was undertaken without any consultation with disabled people. An example of a successful approach - Edinburgh tram system; designed to be accessible following consultation with disabled people, the trams have flat access from all stops, wider doors, dedicated wheelchair spaces, accessible seats in every carriage, clear announcements throughout the journey, both audio and visual, and a 'let us help' policy that encourages the staff and other passengers to be respectful of those with disability or impairment. First class service, designed by those who need it most.” (A disabled respondent from Scotland)

⁴¹ Highlighted in the England policy roundtable.

Finding 4: The lack of coproduction in decision making processes often leads to accessibility being treated as an afterthought.

The effectiveness of coproduction depends not only on engagement but also on the formal structures that underpin it. Tokenistic consultations contribute to this exclusion. Respondents said that consultations often lead to little real-world change without disabled people being central to funding decisions. Many disabled people have been contributing to consultations for years without observing change.⁴² Respondents emphasised that progress has often relied on disabled people's persistence, not policy. Without stronger mandates, secure funding, and formal decision-making roles for disabled people, progress will remain piecemeal and fragile.

"We keep talking about 'nothing about us without us' but everything seems to happen without us half the time, and we only find out afterwards. We need to have a statutory right to information at the early stage rather than a consultation once they have made up their mind about what it is they want to do and are just ticking the box" (Claire Walters, Bus Users UK)

Across the UK, there is a notable inconsistency in how disabled people's voices are embedded in transport governance. Current statutory transport accessibility advisory committees are Disabled Persons

⁴² "I've been giving my views for years, as have many other disabled people, and here I am, still struggling with transport which seems to be getting worse, and being asked what I think. Again. At what point does the easier stuff, like surveys, focus groups etc actually translate into practical improvements? Stop wasting money on the endless surveys and spend it on improving transport." (A disabled respondent from Wales)

Transport Advisory Committee (DPTAC) and the Mobility and Access Committee for Scotland (MACS).⁴³ While DPTAC advises the Department for Transport (DfT), it also has representatives from Wales.⁴⁴ This is because the UK Government is responsible for equal access to transport in Wales.⁴⁵ The Welsh Government temporarily had the Disability Rights Taskforce Working Group on Travel to advise their accessible travel plan. Scotland is the only devolved nation with a statutory advisory committee. In Northern Ireland, the Inclusive Mobility and Transport Advisory Committee (IMTAC) is supported by the Department for Infrastructure to advise them. However, without statutory footing, IMTAC lacks guaranteed permanent status or influence. Local access groups across the UK provide crucial insights, however, they have even fewer powers as they are often voluntary and under-resourced.⁴⁶ The differences between the operation, funding, and powers between these groups create uneven levels of influence, institutional accountability, and permanence across the UK.

“It’s important to utilise disabled people who have very high-level skills (such as researchers, academics, civil engineers, professional experts) in the process of designing accessible transport and the systems surrounding it. This will ensure accessibility is embedded at all levels.” (A disabled respondent from England)

⁴³ DPTAC established by the Transport Act 1985, MACS established by Transport (Scotland) Act 2001.

⁴⁴ [Disabled Persons Transport Advisory Committee \(DPTAC\)](#)

⁴⁵ [LawWales, Transport - what is devolved?](#)

⁴⁶ “Access panels such as Living Streets Edinburgh perform a valuable role in Scotland but they are entirely voluntary and get very little support. Many can’t even maintain a website.” (A disabled respondent from Scotland)

Some transport bodies run their own access panels and coproduce schemes with Disabled People's Organisations (DPOs). Among the responses to our call for evidence, a widely praised example of coproduction was Transport for London's Independent Disability Advisory Group (IDAG).⁴⁷ IDAG has helped shape important accessibility features such as platform-train alignment, step-free access and inclusive design in London's transport system.⁴⁸ Transport for Greater Manchester receives input from its Disability Design Reference Group, a pan-disability advisory body that informs the planning of interchanges and new transit schemes. In Edinburgh, RNIB Scotland and Lothian Buses have coproduced training schemes and co-designed vehicles.⁴⁹ In East Sussex, Brighton and Hove Buses, with Sight Loss Councils, co-designed and delivered training which was endorsed by the Confederation of Passenger Transport and the Driver and Vehicle Standards Agency.⁵⁰

"They need to listen to what disabled people require. I would love to have my voice heard on the trauma that any journey on public transport causes. We all need to have our voices heard." (Jacky Woods, a disabled respondent.)

Co-production must include disabled people from a variety of backgrounds, including disabilities, genders, geography, socioeconomic status, and whether they undertake transport. Transport inaccessibility disproportionately impacts disabled people depending on their

⁴⁷ IDAG is a paid panel of transport experts with lived experience of disability.

⁴⁸ [Made by Transport for London blog, Independent Disability Advisory Group](#)

⁴⁹ As presented by Lothian Buses and RNIB Scotland in our Scotland policy roundtable.

⁵⁰ [Brighton & Hove Buses Highlighted as Accessibility Example](#)

background. A respondent from Wales reported feeling vulnerable both as a disabled person and a woman, when stranded at stations and on trains due to service cancellations without assistance.⁵¹ Respondents emphasised that non-users of transport and those unaware of coproduction opportunities are often excluded. To improve inclusion, outreach should use diverse channels like TV, social media, and community forums. Crucially, the more operators and policymakers engage directly within disabled communities, the more representative and effective co-production efforts will become.

“Meet people where they are. You will find communities by being a part of those communities, which is why it’s so important for leadership to have direct lived experience with marginalisation” (Founder of Mutual Aid Inverness)

Finding 5: Transport regulators often don't have enough powers, capacity and transparency to fulfil their responsibilities around accessibility

Regulation of transport across the UK is patchy. Rail travel is regulated by the Office of Rail and Road (ORR) in Great Britain and the Department for Infrastructure (DfI) in Northern Ireland.⁵² Bus and local transport regulation is entirely devolved.⁵³ Vehicle accessibility standards are regulated by the Driver and Vehicle Standards Agency (DVSA) in Great Britain, and the Driver and Vehicle Agency (DVA) in Northern

⁵¹ “Safety. I have been left on platforms, on the train unable to exit, on a station with no lift at night alone, having to walk around town to get to my car on the platform on the other side. Absolutely outrageous for a single young woman.” (Disabled respondent from Wales)

⁵² [Office of Rail and Road website](#)

⁵³ Regulated by DfI, Transport for Wales, Transport Scotland.

Ireland.⁵⁴ Road regulation varies vastly across the UK. In Scotland, roadworks is regulated by the Independent Scottish Road Works Commissioner alongside Local Roads Authorities.⁵⁵ In Northern Ireland, the DfI holds direct regulatory responsibility. In England and Wales, Local Highway Authorities regulate roadworks under the respective policy guidance of the UK Government and the Welsh Government. Across the UK, taxis are regulated by local authorities; air travel is regulated by the independent Civil Aviation Authority (CAA); and sea travel is regulated by the UK Government's Maritime and Coastguard Agency (MCA).⁵⁶

Enforcement powers are asymmetrical. Like training, without enforcement, standards often do not work. The strength of regulatory powers varies between nations. For example, in Northern Ireland, DfI has the unique role of being the main regulator and funding body.⁵⁷ This dual role gives DfI significant influence over the delivery and accessibility of transport. Enforcement powers are also asymmetrical between sectors. Where bodies have more powers, there are more opportunities for enforcing standards. For example, unlike the ORR, the CAA cannot issue financial penalties. A few respondents indicated that they had only heard of regulation of transport accessibility due to fines given by the

⁵⁴ [Driver & Vehicle Standards Agency \(DVLA\) website](#), [Northern Ireland, Department for Infrastructure website](#), [Driver & Vehicle Agency \(DVA\) Northern Ireland](#)

⁵⁵ [The Scottish Road Works Commissioner website](#)

⁵⁶ [Civil Aviation Authority: The UK's aviation regulator website](#), [Maritime & Coastguard Agency website](#)

⁵⁷ DfI is the main regulatory and funding body for transport. It directly oversees public transport services, including bus, rail, and coach services operated by Translink, and is responsible for both the development of transport policy and the provision of infrastructure.

ORR. The inability to fine the aviation sector due to accessibility failures contrasts with aviation regulators in the EU, Australia, and the United States.⁵⁸ When regulatory bodies lack enforcement powers, they may rely on reputational pressures to drive improvements. This can be less effective for companies with limited exposure to the public.

“The CAA relies heavily on reputational levers, such as naming and shaming. We could deliver even more for consumers if we were able to directly enforce the law with financial penalties, like our EU colleagues and UK counterparts in other sectors.” (James Fremantle, Senior Manager of Consumer Policy and Enforcement, Civil Aviation Authority)

Regulation is largely viewed as ineffective by disabled people. This may be related to a lack of visibility. Several respondents were unaware of the existence of the regulatory bodies’ existence and names, or how to contact these organisations. It is important for regulatory bodies to be transparent in their work. For example, every year the CAA publishes a report on the number of disabled air passengers, their satisfaction levels and the performance of individual airports.⁵⁹ Another factor is repeated dissatisfaction with regulator actions. Some disabled people said they distrusted regulatory bodies, questioning whether regulatory bodies prioritise accessibility sufficiently over the perceived interests transport organisations.⁶⁰ A respondent from England has called a regulatory body a “part of the problem rather than the solution”. Other respondents

⁵⁸ For example, Civil Aviation Authority in Australia: www.casa.gov.au

⁵⁹ [Civil Aviation Authority, Airport accessibility reports](#)

⁶⁰ Quotes include “I don’t think accessibility is top of the list for enforcers.”; “Not great! It is like every public body is never held accountable and should be protecting the public, not the organisations!”

attributed the lack of compliance to regulators lacking powers to hold transport providers to account, even as they persist in “cutting corners”.⁶¹

“When accessibility is not prioritised, it sends a message that disabled people’s needs are secondary. Regular accessibility audits can allow for HR to identify gaps and make transport safer and equitable.” (Spencer Collins, Disability Inclusion Consultant)

Regulatory effectiveness is constrained by underlying equality legislation. Protections for disabled people are also asymmetrical depending on whether they live in Great Britain or Northern Ireland, the mode of transport they use, and whether they travel with public or private companies. In Great Britain, the Equality Act 2010 requires that those with protected characteristics, including disabled people, must not be discriminated against, and transport companies must provide them with reasonable adjustments.⁶² The Act covers all protected characteristics, in theory allowing for an intersectional approach to accessible transport. Public Sector Equality Duty (PSED) supports the Equality Act’s protections by requiring public authorities and transport operators to be proactive in their accessibility work in order to receive public funding.⁶³

⁶¹ Quotes include “Regulators have no teeth to actually make a difference. I personally don’t see the point in wasting funds better directed elsewhere.”; “Air travel is horrific in a wheelchair, the impetus is not there, and the airlines cannot be bothered. Legislation demanding they do something with sanctions if they don’t do what is needed”

⁶² [Equality Act 2010, Part 12, Disabled persons: transport](#), overseen by Equality and Human Rights Commission.

⁶³ [The Public Sector Equality Duty \(PSED\), 2022](#)

In Northern Ireland, the Disability Discrimination Act 1995 sets out disabled people's rights.⁶⁴ Since the implementation of the Disability Discrimination Regulation 2009, transport providers also have a duty to provide disabled people with reasonable adjustments.⁶⁵ Unlike the law in Great Britain, the Act does not protect disabled people from indirect discrimination nor does it put anticipatory duties on providers beyond bus and rail vehicles regulations.⁶⁶ The equality laws in Northern Ireland only cover road and road services, leaving air and sea travel outside of the scope of the key legislation designed to protect disabled people's rights. Instead, the aviation and maritime sectors are governed by EU regulation and regulator guidance.⁶⁷

“Disabled people in Northern Ireland have fewer rights than disabled people in the rest of the UK. For example, there's no protection against indirect disability discrimination and discrimination arising from disability in Northern Ireland. This is because it hasn't kept speed with the Equality law in other areas of the UK and Ireland.” (Brian Drury, Policy Officer at Equality Commission Northern Ireland)

Regulatory effectiveness is also constrained by capacity. For example, the MCA only has five employees dedicated to regulating the accessibility of the whole of the UK's maritime sector. Limited

⁶⁴ [Disability Discrimination Act 1995](#), overseen by Equality Commission Northern Ireland

⁶⁵ [The Disability Discrimination \(Transport Vehicles\) Regulations \(Northern Ireland\) 2009](#)

⁶⁶ [Public Passenger Vehicles Accessibility Regulations \(Northern Ireland\) 2003](#), [Rail Vehicle Accessibility Regulations 1998](#)

⁶⁷ [Regulation \(EC\) No 1107/2006 of the European Parliament and of the Council of 5 July 2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air \(Text with EEA relevance\)](#), [REGULATION \(EU\) No 1177/2010 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#)

investigation can lead to crucial issues going unnoticed. For example, the ORR's survey collects data on booked assistance, but does not monitor the provision of turn-up-and-go, despite concerns about the performance of the 19% of stations that are known to be unstaffed or partially staffed.⁶⁸ By improving their visibility to disabled people, regulators can improve their capacity. Lived experience is crucial to evaluating service delivery and regulation. The ORR, CAA, and MCA gather insights through surveys, consultations, engagement with disability organisations, and conferences.

“Regulators need to work more closely with those affected. It should be a requirement that providers hold access panels and request feedback from various groups, and that this evidence is shared with the regulatory bodies themselves.” (Matt Harrison, Thomas Pocklington Trust)

4 What conclusions did we come to?

Strategy, funding, standards, enforcement, coproduction, coordination, and integration are all crucial elements of accessible transport. Without one, the others cannot achieve transport accessibility.

⁶⁸ “Compared to the monitoring of passenger assistance, turn-up-and-go monitoring is not much from the operators or the ORR, even though it is a similarly non-negotiable condition of the accessible transport policies. From anecdotal evidence, our membership, and the recent audit by the ORR on help points, 19% of stations are either unstaffed or partially staffed and have their help point broken. This would indicate that turn-up-and-go is functionally impossible.” (Ezra Johnson, Campaigns and Public Affairs Officer, Transport for All)

Conclusion 1: There is a need for integrated cross-modal and cross-departmental inclusive transport strategies across the UK.

A finding across all nations was that disabled people often experience a “postcode lottery” of rights, options, and outcomes. This inconsistency is prevalent within and between the four nations of the UK. Disabled people’s access fundamentally changes depending on where they live, particularly whether they are in a rural or urban area. We also found that disabled people can be further impacted by inaccessible transport due to cost and their gender. Establishing transport strategies within the UK can be a crucial step for equality in accessible transport policymaking.

For equitable access to transport, local needs must be integral to the development of transport strategies. To ensure consistency and integration, departments overseeing transport across the four nations should coordinate and share best practices through a UK-wide taskforce.

Where transport is considered as policy, in most cases, there is a lack of a shared strategic vision across departments, with the importance of transport being undermined. Each strategy within the four nations must be developed and delivered cross-departmentally through ministerial taskforces.

Each nation of the UK is at a different point in forming and implementing inclusive transport strategies. England is planning a cross-modal transport strategy, but the accessibility framework within is unannounced. Wales is about to publish their Disability Strategy where there is a clear focus on travel, supporting their transport strategy.

Scotland is in the process of aligning its Accessible Travel Framework with its new transport strategy. Northern Ireland has not had an inclusive transport strategy that considers accessibility since 2016. Therefore, the next steps to improve accessible transport differ by nation.

Conclusion 2: There is a need for UK-wide standards for each mode of transport that are coproduced with disabled people

The current patchwork of transport accessibility standards across the UK results in inconsistent service delivery and a lack of clear direction for transport providers. There is an urgent need for clear, enforceable UK-wide standards that cover all modes of transport. A standards review should look into all areas of transport, including street spaces, seamless journeys, training, and journey information. Following a review, standards must be coproduced between the four nations of the UK, and with disabled people. Such standards would ensure a baseline of accessibility, reduce regional disparities, and support a seamless travel experience for disabled people.

Conclusion 3: For standards to be successful, regulation of transport accessibility must be effective through stronger powers, engagement with disabled people, and transparency

Regulators vary in their powers, resources, and how they involve disabled people. This leads to patchy compliance and limited accountability. Many regulators cannot issue fines, which weakens

enforcement. Where fines are possible, the money could be reinvested into accessibility improvements.⁶⁹

Regulators should improve their visibility and the public's trust in them. They should mandate all transport providers to publish simple accessibility reports on failures, complaints, and actions taken. Regulators would then publish annual enforcement reports on their websites. To enhance regulation further, departments overseeing transport should centrally make these reports available. Regulators can also further engage disabled people through access boards and hiring them in *Mystery Travellers Programmes* to test accessibility compliance.

Disability legislation should provide protections for all disabled people regardless of the mode of transport they take, or where in the UK they are. Currently, disabled people in Northern Ireland have fewer rights than disabled people in Great Britain.

Disability equality legislation in Northern Ireland must be reformed to consider indirect discrimination, anticipatory duties, intersectionality, and reasonable adjustments. The incorporation of maritime and aviation sectors must also be considered for each Act.

Conclusion 4: Every stage of policy and project delivery must be co-produced with disabled people

This inquiry highlighted the critical importance of co-production, not as a consultation tool, but as a structural principle. Disabled people who had been involved in planning described more effective, inclusive systems.

⁶⁹ As previously recommended by [ncat's Working Together report](#)

Several examples showed how inaccessible designs, such as steep ramps, high-floor buses, inaccessible toilets, resulted from decision-making that excluded disabled people. In many of these cases, retrofitting accessibility features cost far more than building them in from the outset.

Co-production is most effective when it happens at the earliest stages of decision making and is continuous and properly resourced. Disabled people must be compensated for their time, and recognised as experts with technical and lived experience. Coproduction must also include pan-disability and intersectional perspectives, and non-users of transport. Finally, coproduction must be embedded into formal institutions and policy processes.

PSED sets an important expectation on public authorities to be proactive in their provision of accessibility. National transport accessibility groups and local access and inclusion panels could be enforced through PSED. In Northern Ireland, such anticipatory duties must be put on public bodies to give disabled people equal opportunities.

5 What should happen next?

This section sets out nation-specific 5-year roadmaps for improving accessible transport policy and regulation across the UK. The roadmaps reflect the current strategies and needs of England, Northern Ireland, Scotland, and Wales, and builds on recent developments in respective nations. Each roadmap builds on the findings of this inquiry and responds to current policy gaps, regional inequalities, and the need for a more joined-up national approach to accessibility. The roadmaps would be delivered from mid-2025.

England: Department for Transport (DfT)

This roadmap recommends a five-year set of actions for the Department for Transport (DfT) to make transport more accessible in England. Key priorities include collaboration for integrated transport networks and accessibility standards, legislative reform, and regulation. The roadmap recognises the statutory advisory role of the Disabled Persons Transport Advisory Committee (DPTAC), the input of the Accessible Transport Policy Commission, and the contribution of disabled people's organisations.

Year 1: Strategy, Foundations, and Co-production

- The forthcoming Integrated National Transport Strategy should announce a plan to develop an accessible transport framework, to be delivered as part of the Strategy. The framework should be:
 - Coproduced with DPTAC and Disabled People's Organisations representing a variety of disability groups through the advisory committee.
 - Informed by the findings of the Transport Select Committee's *Access Denied* report and the Accessible Transport Policy Commission.
- Form a Ministerial Taskforce across departments (health, housing, employment) to deliver the strategy in England.
- Commission a review of accessible transport standards on design and service.
 - Identify where existing standards need to be updated, and where new standards need to be created.
 - The review should develop a list of 5-10 high-priority standards to be produced within the next 5 years.

- Work with the local government sector to develop a local accessible transport charter, that commits local authorities to:⁷⁰
 - Appointing a disabled people's champion to key transport public decision-making bodies.
 - Establishing an advisory accessibility panel, chaired by a councillor, and composed of disabled people and DPOs to advise local authorities and transport operators.
 - Embedding technical and service standards produced by the proposed Accessible Transport Standards Commission.

Years 2-3: Reform, Standards, and Delivery

- Set up an Accessible Transport Standards Commission to update and create standards in the priority areas identified by the review in the first year by 2030.
 - Invite devolved nations to participate in the Commission.
 - Develop a practice of ongoing review of accessible transport standards.⁷¹

⁷⁰ As set out in ncat's [Accessible Transport Charter](#).

⁷¹ The Commission could be a collaboration between the government/DfT and the British Standards Institute and ncat. This combination of organisations would give the Commission the expertise and profile needed to make sure that the transport sector adopts the standards. ncat would provide an evidence base and access to the lived experiences and insights of disabled people through its Community of Accessible Transport research panel and Expert Advisory Group of Disabled People's Organisations and disability charities. As the National Standards Body, the British Standards Institute produces authoritative guidance for the transport sector. The Department for Transport is best placed to work with policymakers and industry to ensure the standards are adopted. The Commission should adopt a similar approach to [DSIT's new Regulatory Innovation Office](#), which aims to "reduce the burden of red tape on innovation and help kickstart economic growth," building a more inclusive and better-integrated transport system. The Commission's service model would also build on examples of international good practice, such as the [US Access Board](#) ("...an independent federal agency that advances accessibility through leadership in accessible design and the development of accessibility guidelines and standards").

- Establish a UK-wide Disability Transport Taskforce.
 - As an official-level subgroup of the Council of Nations and Regions.
 - The taskforce would aim for consistency between each nation's accessible transport frameworks, and create an opportunity for best practice sharing.
 - Its governance should be set out in a published terms of reference, with transparent reporting via annual updates and shared meeting summaries.
- Propose and consult the reform of the Equality Act 2010 to strengthen regulation.⁷² In particular:
 - Improve its transport provisions, including developing a clearer definition of reasonable adjustments, extending coverage to maritime, and exploring the inclusion of aviation.
 - This process should be co-produced with DPTAC, DPOs, and the Accessible Transport Policy Commission.
- Improve regulatory practices.
 - Require regulatory bodies to publish plain-language annual reviews of their accessibility enforcement activity, and maintain a publicly available register of these documents.
 - Pilot financial penalty frameworks for non-compliance.⁷³

⁷² Accessibility regulations in transport are inconsistent, outdated, and weakly enforced, with many transport providers treating accessibility as optional rather than a legal requirement. Without strong laws and consistent regulation, other accessibility reforms will lack enforcement power.

⁷³ The ORR currently holds such powers in Great Britain. Regulatory bodies such as the CAA currently rely on reputational powers which are not enough. In other countries such as Australia, the equivalent aviation authorities have financial powers.

- Resources collected by fines should be reinvested into accessibility improvements.⁷⁴

Years 4-5: Transparency and Evaluation

- Conduct an England-specific review of the impact of the accessibility design and training standards.
 - This review should contribute to UK-wide learning while addressing region-specific challenges.
 - Gather devolved nations' reviews within the Accessible Transport Standards Commission.
- Publish an annual accessibility enforcement and compliance summary, in plain language.
 - Share findings with DPTAC, and the UK-wide Disability Transport Taskforce.

Wales: Welsh Government

This roadmap recommends a five-year set of actions for the Welsh Government to improve transport accessibility in Wales. These recommendations include UK-wide collaboration to develop and implement accessible transport standards and establishing statutory and local coproduction mechanisms. In the lead up to the election, all parties should agree to this roadmap to create a transport system that is accessible for everyone.

Year 1: Strategy and Co-production

⁷⁴ As previously recommended by [ncat's Working Together For Accessible Transport report](#)

- Establish a Disabled People’s Access and Inclusion Panel to advise Ministers, Welsh Government policy leads and Transport for Wales.
 - This should be a formal, cross-modal, structure with long-term funding, support for people with a wide range of lived experience to be members, and have links to regional level panels.
 - Build on the work of the Disability Rights Taskforce and Transport for Wales’ current Access and Inclusion panel.
 - Membership should include representatives from Transport for Wales’ current Access and Inclusion panel, and other DPOs.
- Integrate Disability Rights Taskforce Working Group for Travel’s recommendations and the Travel for All Action Plan into Llwybr Newydd.
 - Secure dedicated funding for the Disabled People’s Access and Inclusion Panel to ensure contribution and monitoring of the Plan.
- Mandate accessibility and disability awareness training for all public-facing transport staff and managers within TfW.
 - Monitor uptake and quality annually with the Disabled People’s Access and Inclusion Panel.

Year 2-3: Standards

- Join the proposed UK-wide Accessible Transport Standards Commission (see our roadmap for England, years 2-3).

- Co-develop standards while ensuring Wales-specific concerns are addressed.
- Contribute to the UK-wide Disability Transport Taskforce to ensure strategic alignment (see our roadmap for England, years 2-3).
- Establish local access panels, working with local authorities and corporate joint committees in Wales.
 - Each local authority (or region) should have an access panel, chaired by a councillor, involving disabled people and DPOs.
 - Formalise their role in regional transport planning and link their work with the national strategy, and the Disabled People's Access and Inclusion Panel.
 - Provide stable funding and capacity building.
 - Propose to local authorities or regions to appoint a disabled people's champion to key transport public decision-making bodies.

Year 4-5: Evaluation and Enforcement

- Conduct a Wales-specific review of the impact of the accessibility design and training standards.
 - This review should contribute to UK-wide learning while addressing region-specific challenges.
- Publish an annual accessibility enforcement and compliance summary, in plain language.
 - Share findings with the Disabled People's Access and Inclusion Panel and Welsh Government officials.
 - Share findings with the Disability Transport Taskforce (see our roadmap for England, years 2-3), and UK-wide dashboards and standards reviews.

Scotland: Transport Scotland

This five-year plan sets out a roadmap for the Transport Scotland to improve transport accessibility in Scotland. Key recommendations include coproducing the upcoming updated Accessible Travel Framework with Mobility and Access Committee for Scotland (MACS) and Disability Equality Scotland, and collaborating with other departments overseeing transport to develop and implement transport accessibility standards. In the lead up to the election, all parties should agree to this roadmap to create a transport system that is accessible for everyone.

Year 1: Coordination and Co-production

- Begin co-production of the successor Accessible Travel Framework for post-2026 that is in line with the National Transport Strategy 2.
 - Build on the 2024-2026 Delivery Plan's seven workstreams.⁷⁵
 - Lead engagement through MACS, Disability Equality Scotland, local access panels, and disability specific DPOs such as RNIB Scotland, and Down Syndrome Scotland.
 - Prioritise areas such as evaluation frameworks, clear enforcement steps, data, and training.
 - Prepare for accessible transport standards setting.

⁷⁵ In the final stage, there was a commitment to improving passenger experience, journey information, street accessibility, parking, data and evaluation of accessible transport, and transport to health and social care.

- Establish cross-departmental taskforce to deliver the framework as a part of the National Transport Strategy 2.
 - Include transport, health, housing, education, and digital infrastructure.
- Strengthen the Access Panel Network through a coordination fund.
 - Expand Disability Equality Scotland's support with secure, dedicated funding.
 - Prioritise capacity-building in rural and island areas.

Year 2-3: Standards and Coordination

- Join the proposed UK-wide Accessible Transport Standards Commission (see our roadmap for England, years 2-3).
 - Co-develop standards while ensuring Scotland-specific concerns are addressed.
 - Propose the uptake of the concessionary schemes in Scotland across the UK.
- Contribute to the UK-wide Disability Transport Taskforce to ensure strategic alignment (see our roadmap for England, years 2-3).
- Mandate accessibility and disability awareness training for all public-facing transport staff and managers within Transport Scotland.
 - Monitor uptake and quality annually with MACS, and the Access Panel Network.

Year 4-5: Evaluation and Enforcement

- Conduct a Scotland-specific review of the impact of the accessibility design and training standards.
 - This review should contribute to UK-wide learning while addressing region-specific challenges.
- Publish an annual accessibility enforcement and compliance summary, in plain language.
 - Share findings with the Disability Transport Taskforce (see our roadmap for England, years 2-3), and UK-wide dashboards and standards reviews.

Northern Ireland: Department for Infrastructure (DfI)

The five-year roadmap of recommendations for the Department for Infrastructure (DfI) aims to improve transport accessibility in Northern Ireland. The recommendations include coproducing an inclusive transport strategy, legislative reform, and collaboration to achieve integrated transport networks.

Year 1: Strategy and Co-production

- Publish an inclusive transport strategy for Northern Ireland.
 - Coproduce the strategy with IMTAC, ensuring their partnership is respected and long-term in the development and evaluation of the strategy.
 - Invite other DPOs, representing a variety of disability groups, to contribute directly via structured input processes.
 - Ensure the prioritisation of equitable access to transport, rural inclusion, and taxi reform.
 - Review the availability and quality of transport accessibility standards in Northern Ireland.

- Set up more community accessibility panels at the district council level, linked to rural partnerships.
 - These panels should be funded by DfI and operate independently to assess local access needs.
 - Each panel should be chaired by a councillor.
 - Each panel should make recommendations to the Department and Translink.
- Establish a cross-departmental Ministerial Taskforce on Accessible Transport (DfI-led, with representation from health, education, and communities).

Years 2-3: Reform, Standards, and Delivery

- Propose to reform the Disability Discrimination Act 1995 (DDA).
 - The Department for Communities would lead this work.
 - Introduce protection from indirect discrimination.
 - Define 'reasonable adjustments' in the context of transport services.
 - Put anticipatory duties on public bodies in line with the Public Sector Equality Duty in Great Britain.
- Contribute to the UK-wide Disability Transport Taskforce to ensure strategic alignment (see our roadmap for England, years 2-3).
- Accept DfT's invitation to the Accessible Transport Standards Commission with IMTAC's input (see our roadmap for England, years 2-3).
 - Directly issue standards through public service obligations and contracts.
- Mandate accessibility and disability awareness training for all public-facing transport staff and managers within DfI.

- Monitor uptake and quality annually with IMTAC.

Years 4-5: Enforcement and Evaluation

- Conduct a Northern Ireland-specific review of the impact of the accessibility design and training standards.
 - This review should contribute to UK-wide learning while addressing region-specific challenges.
- Publish an annual accessibility enforcement and compliance summary, in plain language.
 - IMTAC should be involved in shaping the reporting framework and reviewing findings.
 - Share findings with the Disability Transport Taskforce (see our roadmap for England, years 2-3), and UK-wide dashboards and standards reviews.

6 How will ncat use these findings to achieve change for disabled people's transport?

As a UK-wide centre, ncat will work for disabled people across the UK to have equitable access to transport, regardless of geography or their background.

To inform the actions outlined in the roadmaps, particularly for the UK Government, the Accessible Transport Policy Commission will continue to bring together key stakeholders.

To inform devolved governments in delivering the roadmaps, ncat will continue to connect with Disabled People's Organisations, advisory boards, transport and regulatory bodies, and departments overseeing transport across the UK.

This report further highlighted the importance of centring disabled people in decision-making processes that impact them, legislation and regulation to protect disabled people's rights, and training to effectively implement policy changes. In its next phase, ncat will be conducting applied research to develop coproduction and training frameworks, and improving complaints processes.

7 About ncat

The National Centre for Accessible Transport works to ensure that no disabled person faces challenges arising from poor access to transport. ncat aims to deliver on this mission by:

- Engaging with disabled people to better understand their experiences and co-design solutions
- Amplifying the voices of disabled people in all decision making
- Collaborating widely with all transport stakeholders
- Demonstrating good practice and impact to influence policy.

ncat is delivered by a consortium of organisations that includes Coventry University, Policy Connect, The Research Institute for Disabled Consumers (RiDC), Designability, Connected Places Catapult, and WSP. It is funded for the period 2023-2030 by the Motability Foundation.

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9 Terms used in this report

Accessibility: The degree to which a transport system or environment is usable by disabled people.

Access Panels: Local or institutional advisory groups involving disabled people in planning and review.

Coproduction: A process in which service users, in this case disabled people, are equal partners in the design and delivery of policies or services.

Cross-modal transport: Travel involving multiple forms of transport (for example, bus to train to taxi).

Disabled People's Organisations (DPOs): Groups led by and for disabled people advocating for rights and access.

Intersectionality: Understanding how overlapping identities (such as disability, race, gender) create unique barriers or experiences.

Level Boarding: Boarding a vehicle without a step or gap, typically between a platform and train.

Mystery Traveller Programme: A method of assessing accessibility through unannounced journeys made by disabled people, used to test service compliance.

Pan-disability: Approaches that consider the full range of disabilities (physical, sensory, cognitive, mental health, etc.).

Reasonable adjustments: Changes required by law to remove barriers that put disabled people at a disadvantage.

Regulator: An official body responsible for monitoring and enforcing standards.

Retrofitting: The process of modifying existing infrastructure to improve accessibility, often more expensive than designing it in from the outset.

Statutory Advisory Body: A formal organisation established by law to advise the government on specific issues, such as transport accessibility.

Step-free Access: Infrastructure that does not require the use of steps, allowing easier access for wheelchair users.

Turn-up-and-go: A system where assistance is provided without needing to book in advance.

10 Appendices

Appendix 1: Call for evidence survey questions

Q1 What is your name?

Q1.2 What interests you in this Call for Evidence?

Q1.3 Do you consider yourself to be a disabled person?

Type 'x' next to your selected choice

Yes

I use a different term:

No, I am non-disabled

Q1.4 What institution(s) or organisation(s) do you work for?

Please leave this blank if it does not apply to you.

Q1.5 If you work for any institution(s) or organisation(s), what is your role there?

Q1.6 If you work for any institution(s) or organisation(s), can we attribute this submission to your institution(s) or organisation(s)?

Type 'x' next to your selected choice

Yes

No

Q1.7 Can we attribute this submission to you personally, listing your job role?

Type 'x' next to your selected choice

Yes

No

Q1.8 If you choose to share videos, photos, voice notes or any other media, do you give permission for the Commission to publish these as part of our findings?

Note that we may not be able to keep this fully anonymous, depending on what you share.

Type 'x' next to your selected choice

Yes

No

Q1.9 If you have any questions or comments about this, please share them here:

Q1.10 Which part of the UK are you giving evidence for?

If you work or live across multiple nations, please select all that apply.
You will then be asked the same set of questions for each nation.

Type 'x' next to one

England

Wales

Northern Ireland

Scotland

The UK as a whole

Topic 1: Collaboration between national and devolved levels of government

Q2.1 How can national and devolved levels of government collaborate effectively to improve transport delivery for disabled people? What strategies could support this collaboration?

By national government, we mean Westminster. By devolved levels, we mean the institutions in Scotland, Wales, Northern Ireland, London and parts of England that hold varying degrees of national or regional power.

Q2.2 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Q2.3 How can funding be used to improve transport accessibility?

Q2.4 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Topic 2: Regulation of transport by road, rail, air and sea

Q3.1 How well do the transport inaccessibility complaints and compensation processes work? How can disabled people be better supported during these processes?

Q3.2 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Q3.3 How effective are regulators at enforcing transport accessibility? How could this enforcement be more successful?

By regulators, we mean organisations that oversee compliance of transport organisations to a variety of rules. These include Office of Rail and Road, Traffic Commissioners for Great Britain, Civil Aviation Authority.

Q3.4 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Q3.5 How well do regulators work with transport organisations and professionals? How can regulatory processes be improved?

By regulators, we mean organisations that oversee compliance of transport organisations to a variety of rules. These include Office of Rail and Road, Traffic Commissioners for Great Britain, Civil Aviation Authority.

Some examples of transport organisations include Network Rail, Transport for London, Enterprise, Rent-A-Car, and Ryanair.

Q3.6 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Topic 3: Areas neglected in policy

Q4.1 What barriers to transport are overlooked in policy? How might these be addressed and mitigated?

Q4.2 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Q4.3 What is one key issue about transport accessibility you would like to address to policymakers?

Q4.4 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Topic 4 Coproduction with disabled people

Q5.1 What are the best methods to ensure that changes affecting disabled people involve their direct input? Can you provide real-life examples of successful and unsuccessful approaches?

Q5.2 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Q5.3 Finally, what other strategies could be implemented to ensure disabled people are central to decision-making?

Q5.4 You can upload any documents, photos, videos or voice notes related to this question here. This is optional.

Appendix 2: Outcome Briefing for the Wales policy roundtable

Overview

On 17 September 2024, Baroness Tanni Grey-Thompson chaired the Accessible Transport Policy Commission's Wales evidence session for the Policy and Regulation Roadmap Inquiry. The roundtable focused on the role of policy and regulation in shaping accessible transport systems and Disabled people's experiences.

The briefing captures the main findings from the discussion. As a part of the evidence gathering stage of the Policy and Regulation Roadmap Inquiry, the findings will inform recommendations for national and devolved governments and the future work of the National Centre for Accessible Transport.

Key Findings

"How can you have an accessible transport system when there is not a safe road crossing from railway station to the bus stop, when there is not accessible audio and visual information on board on all of our trains and buses, and when we've got so much to do to raise awareness among staff and transport providers so that we can plan our journeys and be a part of society and contribute to everyday life" (Andrea Gordon, Chair of the Disability Rights Taskforce Working Group on Travel)

Infrequent and inconsistent services put disabled people's safety and confidence at risk and often lead to social isolation

"A lack of information, successive underfunding has meant that more and more individuals, both with a disability and of pension age and above, are too scared to undertake journeys by public transport. [...] This then means that marginal services take less passengers, increasing costs, which makes them more susceptible to being withdrawn or amended. But that doesn't solve the situation, just adds fuel to the fire that people will just not use public transport." (Mark Jones, Gig Buddies Ambassador)

- A key issue in Wales is the lack of evening bus services. limiting disabled people's ability to attend social events and return home safely. For example, in Pembrokeshire bus services stop at 6:45 in

the evening, earlier than the pre-pandemic 8:30 p.m. service.

Many events that happen past regular work hours end after the last bus, limiting transport options.

- Accessible taxis are scarce, expensive, often only possible to book via phone, and driving is often unaffordable due to the high cost of learning. Therefore, alternative modes of transport are not always appropriate.
- Unpredictable services and cancellations exacerbate this risk. Route changes can force disabled people to take longer, less accessible journeys. Sometimes these changes force passengers to go through remote areas, risking safety and draining electric wheelchair batteries. These challenges discourage travel, causing further isolation.
- Initiatives like travel buddy schemes aim to boost confidence. But attendees emphasised that without sufficient funding for reliable services, these initiatives cannot significantly increase public transport use. A cycle of service cuts leads to fewer users, higher costs, and further service reductions. Despite calls for action, this cycle has worsened in recent years.

Without accessible information, journey planning and seamless transport are impossible

“The problem with joined up services is everything is done via phones, and I cannot book a taxi. So, for people like me services aren’t joined up. It’s actually worse for somebody that’s a BSL user that doesn’t speak for themselves. That joined up service needs to be thought about not only for physical access but for sensory access as well.” (Gaye Hampton, Member of the Access & Inclusion Panel)

- When journey information is hard to access, the negative impact of cancellations is exacerbated. Information is not centralised and joined-up service that accommodates sensory access is needed.
- Costs of journeys are unclear, especially for companion tickets, where inconsistencies across local authorities create confusion. A cross-Wales approach, ideally making companion tickets free and eligibility based on a social model of disability, would reduce barriers.
- To ensure accessibility, information must be provided through various formats—physical, digital, visual, auditory, and signed. Digital journey planning is often faulty or incompatible with assistive technology. Physical timetables are often outdated, hard to find, or not user-friendly. Public transport booklets exist but are often not widely known or up-to-date, with small print and complicated 24-hour formats making them inaccessible to many disabled people.
- Live updates are frequently auditory only, excluding people across the d/Deaf spectrum. Written information, while helpful, does not accommodate Deaf people who rely on sign language or deafblind people. Attendees stressed that current efforts to improve accessibility fall short and do not adequately serve the communities they are intended to benefit.

Infrastructure and capacity are crucial to ensuring accessibility and safety before, during, and after using public transport and travelling

“There seems to be an assumption that no one goes out on a Sunday which clearly isn’t the case. Which makes me wonder why they have

chosen not to use doubledeckers in Cardiff on Sundays. [...] Even though they have more of the electric buses than they used to, they are not being used effectively on the weekends” Simon Richards, Cardiff People First

- Onboard accessibility is crucial for positive transport experiences. Some common issues with on-board accessibility include overcrowding, lack of accessible toilets, wheelchair accessibility, and the amount of wheelchair spaces.
 - An example of overcrowding is on buses on weekends in Cardiff. This has been linked to infrequent services and the double-decker buses not running.
 - Many buses do not accommodate more than one wheelchair, leading to Disabled people having to wait to get on already infrequent bus services, which extends journey durations.
 - Attendees emphasised that a new line of buses in Cwmbran are too narrow and should have had consultations with disabled people.
 - Many taxis are not wheelchair accessible, especially for NHS power chairs. Although cheaper folding electric wheelchairs help, greater capacity is needed due to increased demand.
- Train station accessibility, particularly independent level boarding, is also a crucial part of accessible transport. Ensuring independent level boarding is a challenge due to differing platform heights and the listed status of many train stations. The hydraulic lowering of buses in Germany can make it easier for disabled people to use public transport. Transport for Wales aims to have tactile pavements in every station by December.

- Street spaces must be accessible for safety, active travel, and seamless journeys. An example of infrastructure issues is the new cycling lanes in Cardiff city centre. Some of these lanes are too close to bus stops, which has been endangering pedestrians.
- To ensure appropriate infrastructure on-board, at stations, and on the street, co-production from the start is essential but currently lacking.

Public, transport staff, and policymaker awareness around transport barriers and access needs of disabled people must be improved

“We need to do better. We need to make sure that disabled people are focussed on, and that communication is fundamental as well within the messages that we give to staff.” (Charles Hampton, Wales Council for Deaf People)

- The Disability Rights Taskforce recommended that the Welsh Cabinet spend a day using public transport with disabled people to experience challenges firsthand. They also called for public awareness campaigns on transport inaccessibility and the Blue Badge scheme.
- Improving awareness among transport professionals about accessible information and support is essential, as many staff members lack the knowledge to effectively communicate with and assist disabled people. The Disability Rights Taskforce recommended that a programme of mandatory disability equality training for bus drivers should be developed as influenced by taxi training that has recently been developed to tackle Equality Act breaches.

- The language used around active travel requires clarity to ensure inclusivity. The language must be built on co-productive efforts with disabled people.

Regulation of public transport has gaps around licensing standards and complaint processes

“Discussions around licensing reform have been extremely positive. We've got work going ahead in Wales to develop mandatory disability equality training for taxi and PHV drivers, and a better, more consistent approach across local authorities to breaches of the Equality Act such as refusals of guide and Assistance dogs or failure to support access for disabled people who have mobility aids. In contrast to that is bus services. There are next to no mechanisms for disabled people to raise concerns with bus operators. We would like to see a programme of mandatory, standardised disability equality training for bus drivers.”

(Andrea Gordon, Chair of Disability Rights Taskforce Working Group on Travel)

- Complaint processes are inaccessible, particularly inaccessible for Deaf people who use British Sign Language as they cannot independently submit a complaint nor express their frustrations in real time.
- Complaint processes are inconsistent across transport modes. In creating the mechanism for regulation, co-production with disabled people, application of the key principles of ongoing taxi reform, and standardisation across transport modes are vital.

Overall, issues facing disabled people are further exacerbated for those in rural areas

“It’s all well and good announcing Metro style schemes for urban areas, but what about the rural areas where people are unable to get home past 5 p.m.?” (Mark Jones, Gig Buddies Ambassador)

- Insufficient bus services, train cancellations, lack of accessible taxis, outdated journey information, unsafe and inaccessible infrastructure are more common in rural areas, and have a disproportionate impact on disabled people.
- Poor transport infrastructure and services in the countryside are causing more people to migrate to towns and cities, resulting in increased isolation for disabled people in rural locations.

Appendix 3: Outcome Briefing for the England policy roundtable

Overview

On 19 September 2024, Lord Shinkwin chaired the Accessible Transport Policy Commission’s England evidence session for the Policy and Regulation Roadmap Inquiry. The roundtable focused on the role of policy and regulation in shaping accessible transport systems and Disabled people’s experiences.

The session included presentations from Emma Vogelmann (Transport for All), Claire Walters (Bus Users UK), and Antoneta Horbury (the Chartered Institution of Highways & Transportation; CIHT). The presentations were followed by a discussion among disabled people, transport professionals, researchers, and policymakers.

The briefing captures the main findings from the discussion, which include co-production, a joined-up approach to transport, journey information, regulation, training, and societal benefits of accessible transport.

As a part of the evidence gathering stage of the Policy and Regulation Roadmap Inquiry, the findings will inform recommendations for national and devolved governments and the future work of the National Centre for Accessible Transport.

Key findings

Disabled people are frequently excluded from transport decision making processes, resulting in wasted resources and time on changes that fail to improve accessibility

"We keep talking about 'nothing about us without us,' but everything seems to happen without us half the time, and we only find out afterwards. We need to have a statutory right to information at the early stage rather than a consultation once they have made up their mind about what it is they want to do and are just ticking the box." (Claire Walters, Bus Users UK)

- Panellists agreed that co-designing with disabled people often stops at superficial consultation, typically after key decisions have already been made.
- To avoid inefficiencies, accessibility must be integrated into all stages of transport policy—design, implementation, and evaluation. The Chartered Institution of Highways and Transportation (CIHT) emphasised this approach as "co-cultivation" as coined by Nick Tyler.

- Disabled people have invaluable insights that transport providers need. They should be treated as paid experts and consulted meaningfully. Furthermore, transport providers should routinely communicate and solicit feedback from their disabled customers.
- Many disabled people lack confidence in existing policies. In the Transport for All report [Are We There Yet?](#), 44% of over 500 respondents expressed concern that accessibility in transport and streets will worsen over the next decade.
- Despite its clear benefits, co-production is rare in practice. To close this gap, disabled people must be given statutory rights to information and opportunities to make meaningful contributions at every stage of decision making.

Transition points from one mode of transport to another are often critical to disabled people's experiences of transport. It only takes one inaccessible interchange to make an otherwise manageable journey impossible

"Access barriers are the main reason disabled people are not making as many trips as they would like to. If transport was accessible, disabled people would ideally make twice the number of journeys that they currently do." (Emma Vogelmann, Transport for All; based on Are We There Yet? 2023)

- In a survey of over 500 people, Transport for All found that interchanges and making connections were the most difficult stage of a journey for disabled people. Disabled passengers often face significant delays and confusion when transitioning between modes of transport.

- Poor pavement conditions, such as broken paving stones, uneven surfaces, and clutter (e.g., bins, bike racks, café furniture), directly impact disabled people's ability to safely access active travel, public transport, and transition between modes of transport.
- The places passengers get on and off public transport, such as ports, bus stops, and train stations, are as important as the vehicles themselves.
 - Disabled people have lower levels of satisfaction with bus stops. Bus stops are generally badly designed, high kerbs, broken paving stones, inconsiderate parking etc.
 - The design of bus stops can vary widely and are often inaccessible and risk putting disabled people in dangerous situations. Brighton and Hove Buses highlighted that there is no national framework or guidance on accessible bus stops.

Infrastructure accessibility requires national frameworks and regular maintenance

“What we don’t have at the moment is a national framework or guidance for local authorities to follow, setting out what is required to make a bus stop accessible and a national register of accessible bus stops.

Improving infrastructure isn’t something that requires a lot of funding because year on year lots of bus stops are getting upgraded allowing for a gradual roll out” (Ed Wills, Brighton & Hove Buses)

- A national accessibility framework is needed, particularly for key infrastructure like bus stops, to make sure standards are applied consistently across regions.

- Clear guidance would allow transport providers to make services accessible with greater confidence without worries around drawing negative attention due to failures to meet best practice.
- Existing accessible infrastructure often becomes inaccessible after maintenance works. Maintenance must follow clear guidance to avoid undoing of progress. National guidance would ensure that retrofitting and upgrades to infrastructure are not undone by improper maintenance, and help to preserve accessibility over the long term.
- Maintenance and construction activities often create additional barriers to travel by blocking pathways without providing safe, accessible alternatives.
- Current guidance on infrastructure, when available, often fails to encourage developers to go beyond the bare minimum.

Information on journeys and fares must be accurate and accessible using a variety of formats

“English is not necessarily accessible to all Deaf people. A QR code with timetable information translated into BSL would be fantastic. It’s about treating people with equity. At the same time, we are all different. My concern is that it tends to be that one thing fits all.” (Charles Hampton, Wales Council for Deaf People)

- Disabled travellers often face challenges in accessing accurate and timely journey updates, particularly during disruptions. For example, alerts about disruptions to train services tend to rely on audio announcements over the station's intercom system, disadvantaging Deaf people and those who are hard of hearing.

Even critical information such as evacuation notices are rarely made available in alternative formats.

- Contradictory information, such as when a bus stop display gives different information to a mobile app, can lead to anxiety and reduced confidence around travelling.
- Integration of accessibility features in journey-planning tools, such as Google Maps, could greatly enhance confidence and ease of travel for disabled passengers. It is worth noting that while digital platforms can help improve accessibility, not everyone owns a smart phone, and apps can vary in their accessibility.
- There are no national standards for transport providers and local authorities on communicating accessibility information of transport services. This includes which aspects of accessibility to communicate, as well as the format in which such information should be communicated.
- Transport regulations need to be enforced more effectively There is a general lack of awareness of disabled passengers' rights which stems from the difficulty in finding and understanding laws and regulations in place. Transport providers must be obligated to clearly display easy to understand information on disabled passengers' rights.
- Retrofitting can often be expensive. Transport providers may avoid changes that are essential for accessibility because regulations relating to accessibility are often inadequately enforced.
- There are barriers to disabled people engaging with existing regulatory structures in place. Complaint processes are the second most difficult stage of journeys as identified by Transport for All's report "Are we there yet?". This can particularly be difficult for

disabled people who do not communicate through English, such as Deaf people who use British Sign Language (BSL).

Disability awareness and accessibility training that is consistent, funded, and up-to-date across the nation is essential to ensure disabled people's access to transport services

“When accessibility is not prioritised, it sends a message that disabled people's needs are secondary. Regular accessibility audits can allow for HR to identify gaps and make transport safer and equitable.” (Spencer Collins, Disability Inclusion Consultant)

- Negative attitudes from transport staff and the public, coupled with insufficient awareness of disability needs, contribute to a sense of exclusion and loneliness for disabled travellers.
- Accessibility training is essential to equip staff with the knowledge and skills needed to support disabled travellers effectively. This includes understanding how to communicate critical information and address accessibility needs.
- Awareness training must be nation-wide to ensure disabled people can access to transport at every stage and through every mode.
- CIHT has argued that local authorities can be incentivised to provide training to their staff through making such training a minimum requirement for transport funding.
- Accessibility changes including training must be regularly assessed and refreshed.

Lack of accessible, reliable, and affordable transport services severely restricts disabled people's ability to engage with their communities, contribute to the economy, or prioritise environmentally friendly modes of transport

"The cost of providing a bus service is demonstrably lower than that of providing social and health care services for people who become socially isolated by not having access to transport." (Claire Walters, Bus Users UK)

- 1 in 3 people in the UK catch a bus once a week to talk to someone. When buses combat loneliness, negative bus journeys can lead to further social isolation for disabled people.
- Transport for All found that 71% of their respondents wish to use environmentally friendly modes of transport, however, due to accessibility barriers, they end up having to use private transport modes.

Appendix 4: Outcome Briefing for the Scotland policy roundtable

Overview

On 14 November 2024, Richard Baker chaired the Accessible Transport Policy Commission's Scotland evidence session for the Policy and Regulation Roadmap Inquiry. The roundtable focused on the role of policy and regulation in shaping accessible transport systems and disabled people's experiences.

The roundtable consisted of disabled people, transport professionals, researchers, and policymakers from Scotland. Kirstie Henderson, Alan

Stewart and Gerogea Stratchan, who represented RNIB Scotland, and Olivia Sklenar, who represented Lothian Buses as their Accessibility and Inclusion Officer, delivered presentations prior to a larger discussion among the attendees.

The briefing captures the main findings from the discussion. These include insights on co-production, journey information, regulation, benefits of accessible transport, and particular barriers to road, sea, and active travel.

The findings will inform the Inquiry's recommendations for national and devolved governments and the future work of the National Centre for Accessible Transport.

Key findings

1) Accessible transport reforms such as the Accessible Transport Framework can only be delivered successfully through coproduction with disabled people.

"Sometimes I feel that as people with disabilities, when consultations take place, we are sitting in a box waiting to be ticked." (Alan Stewart, RNIB Scotland Campaigner)

- Disabled people's lived experiences must be at the core of transport planning and service development to ensure the success of these programmes. Coproduction can be ensured through meaningful involvement at all levels rather than tokenistic consultation.

Disability Equality Scotland's [recent report](#) on the Accessible Travel Framework has highlighted that data sharing between transport

organisations is essential for effective design and implementation. Lothian Buses and ScotRail, in collaboration with RNIB Scotland, have been working on specialist apps to monitor and communicate accessibility information.

- Practical challenges such as budget constraints and competing priorities can hinder progress. These barriers are often caused by accessibility being treated as an afterthought by transport providers and highlight the need for actionable implementation strategies.

2) Clear, multimodal journey information is critical for disabled passengers to access transport and assistance effectively. Transport providers should provide guidance for disabled passengers on journey information.

"Accessible and clear information is vital for people with learning disabilities to understand their travel options. Materials need to be co-designed with disabled people, using formats like easy-read, to ensure they are genuinely accessible." (Jamie Cooke, Head of Policy and Communications at Enable)

- Even when disabled people book passenger assistance on the railways, they are not always informed about train cancellations. This especially impacts passengers from rural areas that do not always have staff to provide further support.
- Information should be provided in a range of formats to help cater for different circumstances and needs. Audio announcements can help people who may not be able to read or whose view of written notices might be obstructed. Providing information in Easy Read

can support disabled people with a range of impairments who might find it hard to use other information sources while travelling.

- Deaf Action, RNIB Scotland, and Lothian Buses are working on an app to provide real-time journey information on timetables and tactile accessibility.
- Travel training and accessible materials should help disabled people to find and interpret information, ensuring equitable access to services like bus passes and timetables.

3) Road, sea, and active travel were highlighted as key modes of travel that need reform.

“Even with a blue badge there is always that fear that you will lose access to your Motability car, and in Shetland so many disabled people can only rely on having access to a car because the buses are inaccessible - how can we support people in feeling secure that they won't lose their entitlement?” (Leanne Goodlad, Access and Participation Worker at Who Cares? Scotland)

- Ferry travel, especially for those who do not live on mainland Scotland, can be a crucial for accessing services such as healthcare. The small number of accessible cabins available are often fully booked. Minor changes to regular cabins, such as the removal of steps to the toilets, can alleviate the demand on accessible cabins.
- Accessible cars make up a large proportion of disabled people's transport. There is a need for guaranteed continuous access to private car access schemes such as Motability. These schemes should be linked to all areas of life, and not just work.

- Barriers to bus travel come from physical barriers and journey information inaccessibility. Many buses are too narrow for certain wheelchairs, have only one wheelchair space, lack toilets, and do not provide audio announcements.
- Street spaces are crucial for active travel and connections between different modes of transport. RNIB Scotland's [Street Credibility](#) report encourages the provision of detectable kerbs and signalised pedestrian crossings, and reducing pavement clutter. Pavement clutter, including pavement parking, can also endanger wheelchair and scooter users by forcing them to go on the road to continue their journeys.

4) Regulation and disability rights must be strengthened through training, transparency, and data collection.

“Lothian drivers receive robust Disability Awareness Training which includes open discussions about invisible disabilities, the challenges that our customers may face and the importance of recognising the Sunflower Lanyard and Thistle Assistance Card. We also teach our colleagues how to safely and appropriately assist customers who are Blind or partially sighted and those who use a wheelchair; and also, how to recognise the range of assistance dogs and types of cane.” (Olivia Sklenar, Accessibility and Inclusion Officer at Lothian Buses)

- Existing regulation often go unenforced such as pavement parking bans, and audible announcements and the prioritisation of wheelchairs over prams on buses.
- Equality Impact Assessments (EQIAs), high-quality and collaborative standard data collection, and training can enhance compliance and accountability.

- Disabled people's rights must be made clearer to both the public and transport staff and rigorously enforced. These rights are not universal and depend on individuals' disabilities and needs. Every transport provider must display information and guidance on disabled passengers' rights.

5) Inaccessible transport exacerbates other forms inequality such as regional and financial inequalities. Working towards transport accessibility is crucial to ensuring disabled people can travel, and access all parts of society, regardless of their background.

“Without my wheelchair accessible car, I would not have been able to gain my master's degree, work within the NHS, or do my current job. These specialised cars can get people to areas where limited access can be had. However, with the grant I had, medical appointments were not seen as a priority, and the focus was on work.” (Rochelle Savage, Case Manager at DWP)

- Bus passes and other schemes that subsidise travel for disabled people are of limited help if public transport remains inaccessible. For example, the lack of toilets on longer distance buses forces disabled people to use quicker, often more expensive, transport options or not undertake journeys at all.
- Inaccessible public transport pushes disabled people toward more costly alternatives, such as taxis, which are often inaccessible, expensive, and scarce in rural areas.
- Disabled people are less likely to be able to drive or afford a personal vehicle. The Motability scheme is an important source of support for people who meet the eligibility criteria. The inability to

access or afford transport can prevent disabled people from attending work or completing vocational courses, particularly those requiring unpaid placements that involve travel.

- Community transport associations play a crucial role in rural areas but require more support and investment to meet the needs of disabled users.

Appendix 5: Outcome Briefing for the Northern Ireland policy roundtable

Overview

On 21 November 2024, Sorcha Eastwood MP chaired the Accessible Transport Policy Commission's Northern Ireland evidence session for the Policy and Regulation Roadmap Inquiry. The roundtable focused on the role of policy and regulation in shaping accessible transport systems and disabled people's experiences.

The roundtable included disabled people, transport professionals, researchers, and policymakers from Northern Ireland. Before the larger discussion, representatives from the Inclusive Mobility and Transport Advisory Committee (IMTAC), Disability Action Northern Ireland, and Consumer Council delivered presentations.

The briefing highlights the main findings from the discussion, such as the importance of transport strategy and funding, and the urgent need to reform transport accessibility regulation. The discussion also highlighted the importance of taxis and community transport in Northern Ireland and called for a comprehensive re-evaluation of how transport accessibility is approached.

The findings will inform the Inquiry's recommendations for national and devolved governments and the future work of the National Centre for Accessible Transport.

Key findings

1) Transport in Northern Ireland lacks strategy and is severely underfunded.

Transport plans and all the plans that have been developed, continually and perpetually fail to recognise those who are in rural areas, who through in many instances no choice of their own, are completely isolated and vulnerable. In thinking about investments, if we're serious about regional balance and with regard to those with protected status, we need to see a recalibration. (Jason Donaghy, Manager at Fermanagh Community Transport)

- Transport strategy and funding are crucial to tackling disproportionate barriers to transport faced by disabled people from rural areas and lower socioeconomic backgrounds.
- Northern Ireland is uniquely positioned to improve transport as most modes of transport are delivered through the same organisation. However, political instability has led to barriers such as a lack of an active transport strategy since 2015 and a loss of access to EU structural funds following Brexit.
- Transport is often vital in enabling disabled people to get to school, attend hospital appointments and engage in other important daily activities. However, transport is fragmented, undervalued, and poorly funded compared to other key policy areas such as health and education.

- Underinvestment in transport means only certain areas receive improvements. Rural communities have faced 50% cuts to community transport budgets since 1998, despite rising demand. By contrast, major urban projects, such as Belfast's £300m Central Station, dominate investment.
- The lack of funding limits the reach of important transport access programmes such as community transport schemes, mobility centres and door-to-door transport programmes.
- End-to-end journeys should be prioritised in transport policies. Public transport options are limited and disjointed in rural areas, often requiring active travel on inaccessible paths. Even essential journeys to hospitals can take over five hours for many people.
- By experiencing rural challenges firsthand, policymakers can understand barriers to transport and make effective changes to transport.

2) Infrastructure limitations such as poor connectivity and lack of accessible public transport services force disabled people to rely on more costly and less sustainable modes of transport.

“The lack of access to transport, in terms of challenges with service costs, provision, and timetabling often push disabled people towards accessing private solutions, which are more costly.” (Nuala Toman, Head of Innovation and Impact at Disability Action Northern Ireland)

- Disability Action Northern Ireland has found that nine out of ten disabled people do not find transport accessible.
- Some areas do not have bus services at all, and when buses and coaches are available, they are often not accessible. High-floor

coaches outside Belfast are not wheelchair accessible, and new vehicles purchased in 2020 ignored accessibility.

- Disability Action Northern Ireland found that 78% of rural residents find it impossible to reduce reliance on cars. This is not to say that every disabled person in rural areas can drive as many feel that roads are too unsafe to drive on.
- To travel to Great Britain, many disabled people disproportionately rely on air travel, as opposed to more sustainable options such as road and rail. In 2022, 83% of flights from Northern Ireland airports were domestic. In comparison, only 59% of the flights from Glasgow were domestic.

3) Taxis are crucial to travel within Northern Ireland. There is an urgent need for radical taxi reform, which requires political commitments, engagement, and funding.

“There isn’t any political appetite for radical taxi reform. The issue with taxis can only be addressed by politicians.” (Michael Lorimer, Executive Secretary of the Inclusive Mobility and Transport Advisory Committee)

- Taxi services are scarce and unreliable, with some services stopping in the afternoon. Many disabled people have voiced that the scarcity of services socially isolates them.
- There is also a shortage of wheelchair-accessible taxis, often with a single vehicle available to all wheelchair users in certain areas.
- Several drivers and organisations have been pushing for solutions. However, political commitments, wider engagement with taxi providers, and investment are essential to effective taxi reform.
- Taxi regulation introduced in 2016 has not been fit for purpose.

4) Current approach to improving transport accessibility can be improved by perceiving disabled people as a core part of society, unified advocacy, and centring disabled people.

Seeing disabled people as a drain on society and a burden is fundamentally wrong. I can contribute more than probably a lot of people, but I need to be seen as valuable and worth investing in for that to be sustainable. I guarantee you that if I was seen as valuable by policymakers, they would find the money from somewhere to give me what I need to be able to contribute.” (Sarah Griffiths, Communication Professional at EE)

- A core reason the transport system is often inaccessible is that society tends to view disabled people as a “burden”. Disabled people must be recognised as people who deserve independence and quality of life, and not just people who need access to the bare minimum of resources such as hospitals.
- Inaccessible transport leads to the direct exclusion and marginalisation of disabled people. Disabled people can only contribute to society if they have equity.
- Progress in transport accessibility has been a product of the work of disabled activists.
- Lived experience must be central to design and decision-making processes. Coproduction has been beneficial when utilised. For example, the Glider Rapid Transit project in Belfast was successful due to early engagement with disabled people. Furthermore, accessibility forums have made key improvements in airports, particularly around training, signage, changing places, and toilets.

- Advocacy for transport accessibility needs more systemic solutions.
- Accessibility being perceived as optional leads to funding being allocated unfairly and wastefully. For example, Goldline Coaches – which are inaccessible to many disabled people – are funded for eight years. Furthermore, many funding decisions bypass Section 75 obligations.
- Even when accessibility is not seen as optional, a compliance culture often takes over. This involves providers doing the bare minimum.

5) Effective regulation is essential for accessibility to be the rule, and not the exception, and be met to the highest standards. Without strong regulation and enforcement, disabled people face continued exclusion from transport services.

“Disabled people in Northern Ireland have fewer rights than disabled people in the rest of the UK. For example, there's no protection against indirect disability discrimination and discrimination arising from disability in Northern Ireland. This is because it hasn't kept speed with the Equality law in other areas of the UK and Ireland.” (Brian Drury, Policy Officer at Equality Commission Northern Ireland)

- Transport remains inaccessible 29 years after the Disability Discrimination Act (DDA).
- Equality laws in Northern Ireland need to be strengthened to improve regulation of transport accessibility. There are currently no protections against indirect disability discrimination. Laws rely on disabled individuals to take legal action, which is costly and emotionally taxing.

- The new Civil Aviation Authority Guidelines on aviation accessibility mark progress, but enforcement powers for airlines remain insufficient.
- Funding organisations based on their merit over their sector would benefit the strengthening of regulation.

Appendix 6: Outcome Briefing for the UK-wide regulation policy roundtable

Overview

On 26 November 2024, Baroness Brinton chaired the Accessible Transport Policy Commission’s UK-wide regulation evidence session. The roundtable focused on the role of policy and regulation in shaping accessible transport systems and disabled people’s experiences.

The roundtable included disabled people, regulators, transport professionals, researchers, and policymakers from across the UK. Before the larger discussion, representatives from the regulatory bodies the Office for Road and Rail (ORR), the Civil Aviation Authority (CAA), and the Maritime and Coastguard Agency (MCA) made presentations. Across transport modes—rail, aviation, and maritime—stronger regulation, enhanced enforcement powers, better data collection, legislative reforms, and the integration of lived experiences are essential to improving accessibility. While each sector faces unique challenges, the common themes are limited enforcement authority, data gaps, inconsistent service delivery, and a need for legal reforms to ensure that accessibility is not just a policy goal but a lived reality for all passengers.

The findings will inform the Inquiry's recommendations for national and devolved governments and the future work of the National Centre for Accessible Transport.

Key findings

1) Regulation is a key part of ensuring accessibility across modes of transport.

"The regulation is also in place to assist disabled passengers and passengers with reduced mobility, with passenger safety being at the forefront of what we do." (Danny Light, Departmental Inspector, Passenger Rights Enforcement Lead, Maritime and Coastguard Agency)

- Regulatory bodies assess the accessibility standards and practices through audits and surveys. For example, the CAA assesses around 30 airports under the Airport Accessibility Framework, ranking them from "poor" to "very good". Past poor ratings have led to significant investments. Last year, while a few airports needed improvement, none of them were graded as "poor".
- Regulators also set standards and guidance for operators. For example, in 2019 the ORR published passenger assistance guidance. This lowered the requirement to book assistance in advance from 24 hours to two hours. Furthermore, passenger assistance on the first train of any given route no longer requires booking in advance.
- Regulators can also encourage good practice through status signals. For example, the MCA provides a framework for best practices and grants the operators that apply and meet such practices "Inclusive Transport Leader" status.

2) Regulatory bodies differ in their powers, which can contribute to differing levels of accessibility between modes of transport and operators.

“The CAA relies heavily on reputational levers, such as naming and shaming. We could deliver even more for consumers if we were able to directly enforce the law with financial penalties, like our EU colleagues and UK counterparts in other sectors” (James Fremantle, Senior Manager of Consumer Policy and Enforcement, Civil Aviation Authority)

- In the face of non-compliance, the key regulatory actions that could be taken are financial, legal, and reputational. The ability of the regulatory bodies to take these actions differs by sector.
 - The ORR can issue formal compliance/improvement notices with legal consequences and fines.
 - While the CAA can issue legal undertakings, it cannot enforce penalties. This contrasts with aviation regulators in other countries that can fine airlines and airports.
 - The MCA's regulatory authority is limited because the maritime sector is excluded from the Equality Act 2010.
- When regulatory bodies lack enforcement powers, they rely on reputational pressures to drive improvements. This can be less effective for companies with limited exposure.

3) Data is key to the regulatory processes, such as passenger assistance.

"There is a really big cultural issue there that we need staff to feel comfortable reporting accurately what happened, including when it didn't

go smoothly. And that needs a no-blame culture, a culture of continuous learning.” (Jacqui Russell, Head of Consumer Team, Office of Rail and Road)

- To identify the areas of improvement, regulators aim to understand the day-to-day experiences of disabled passengers.
 - Over the last seven years, the ORR has surveyed 9000 people and highlighted the key issue of transport providers repeatedly failing to assist passengers who booked assistance before they arrived at help points. Passenger assistance is a crucial area for rail travel due to infrastructure limitations.
 - Over the last 12 years, the CAA has been collecting data from UK airports and airlines to understand transport accessibility. Since 2015, they have been requiring airports to regularly assess passenger assistance through surveys and access forums.
 - The MCA conducts an annual survey to understand passengers’ experiences with accessibility. Since 2023, the response rate increased from 250 to 17,000.
- Regulatory bodies’ ability to collect high-quality and regular data relies on their resources. Data collection requires funding, authority, and capacity.
 - While requiring providers to collect data can mitigate capacity issues, inconsistent reporting standards across operators limit comprehensive analysis.
 - The CAA plans to gather detailed data on onboard accessibility from 60-70 airlines. When the CAA had instances of airports failing to collect data, they required them to at least request the

email addresses of those who booked passenger assistance for survey purposes.

- Even the independently run ORR survey is limited in its reach and ability to assess “turn-up-and-go” services. Failure to provide turn-up-and-go assistance is inevitable as around 19% of train stations are unstaffed or partially staffed. Collecting data only on booked assistance fails to monitor such an access barrier that the ORR are aware of.

4) Regulatory authorities are only as strong as the legislation that underpins their work.

"If maritime is not included in the Equality Act... that is something else for the group of disabled parliamentarians to take up with ministers. We will do so." (Baroness Brinton, Vice Chair of the Accessible Transport Policy Commission)

- The Equality Act 2010 sets out responsibilities for operators to accommodate disabled passengers. However, maritime transport is not covered by the Act. The MCA is advocating for amendments to include maritime services under equality legislation.
- The upcoming transport reforms, including the re-nationalisation of rail services, may strengthen accessibility requirements by extending public sector equality duties to operators.
- While CAA operates under existing consumer protection laws, legislative changes could grant it the power to impose fines, aligning its authority with other international regulators.

5) Lived experience is crucial to evaluating service delivery and the impact of regulation.

"We hosted our first accessibility conference in 2022, bringing together disability groups and transport operators from across the UK. We had speakers from the Disabled Persons Transport Advisory Committee, Guide Dogs for the Blind, and passengers with lived experiences."

(Danny Light, Departmental Inspector, Passenger Rights Enforcement Lead, Maritime and Coastguard Agency)

- Surveys, consultations, anecdotal evidence, conferences, and engagement with disability organisations are some ways in which the ORR, CAA, and MCA strive to understand lived experience.
- Policy development and monitoring strategies of regulatory bodies would benefit from lived experience. The ORR has been engaging with Transport for All in these areas.
- Regulatory bodies can also play a role in developing best practices through larger engagement with disabled people. The MCA holds conferences that bring together key accessible transport stakeholders, with the second one being held on 25th March 2025.
- Coproduction can be key to creating best practices. Access forums were crucial to the CAA's recent work on improving accessibility practices in airports.

6) Regulatory bodies may set guidance for training. However, the training delivered depends on the organisation, the region, and the funding.

"There are a number of organisations now working closely with big organisations to provide modular online training. These modules cover areas such as deaf awareness and basic pleasantries and are already being used in places like the NHS. While not compulsory, data is being gathered on engagement, and it may be worth recommending this

approach in the future. The format—short, sharp, and punchy—makes it easier for staff to engage with, increasing the likelihood of meaningful learning and further exploration over time." (Gaye Hampton, Member of the BSL Advisory Board to the UK Government in Westminster)

- Disability training differs by operator in the railway sector. The ORR sets out eight areas in which staff should be knowledgeable to provide passenger assistance effectively. While they regulate the outcome of training, the ORR does not set requirements on the content of the training or the duration and method of its delivery.
- While deaf awareness and assistance of deaf people are gradually improving in the rail industry, positive changes are inconsistent across the UK. For example, sign language announcements on digital screens that are becoming widely used in London train stations do not exist in Wales, as these screens are funding dependent.
- Regulatory bodies may tackle discrepancies in training by recommending modular online training. These courses are easier to undertake. They also allow staff to engage with them in their own time and explore in more depth. Developing this idea further, the ORR could make such training compulsory.