

SATA

Scottish Accessible Transport Alliance

Scottish Charity No SC027600

Department for Transport Consultation on Improving Access to Taxis - SATA's response

General

SATA represents the interests of disabled people in achieving accessible transport services and thereby greater mobility. To this end the availability, accessibility and affordability of taxis is of the utmost importance to them. This is especially so for those who live in isolated communities, who require door-to-door transport, who do not have use of a car and who cannot use bus services.

We feel strongly that action to regulate the use of taxis under the DDA is long overdue. This consultation is therefore welcome if it gives immediate rise to measures which will increase the ability of disabled people to use taxi services. However we think that government, central and/or local, should take positive action to support the taxi trade, including funding for the purchase of vehicles, the training of drivers and the provision of fare subsidies through 'Taxicard' or 'entitlement card' schemes. It should also encourage and support other demand-responsive and community transport services.

Questions and responses

What is the make up of the current licensed taxi fleet?

Q1

What is your view of the analysis and data included here in the Impact Assessment? Do you have any further or more accurate data that you would be able to send us?

R1

It is important for us in Scotland to have baseline data for Scotland and to have an Impact Assessment for Scotland. We would expect the Department for Transport and/or the Scottish Government to do this in association with local licensing authorities.

Scottish Transport Statistics for the three year period 2004-8 show an increase in the number of 'wheelchair accessible taxis' from 2,563 to 4,461, an increase of 1,898. The total number of licensed taxis rose from 9,538 to 10,441 over the same 5 year period, an increase of 903. The percentage of 'wheelchair accessible taxis' went up from 37% to 43%. The number in Edinburgh and Glasgow increased slightly over the period and remained at 100%. East Lothian, Midlothian and South Ayrshire have also now achieved 100%. There has been marked growth in Renfrewshire which has achieved 80%. Elsewhere however only West Dunbartonshire has exceeded 50%. The number in many areas remained static at a low level or even declined.

A SATA survey in 2003 showed that only 12 local authorities had a specific policy for increasing the number of accessible taxis. Other policies featured a wide range of requirements, including 100% wheelchair accessibility by a certain date. Research by Reid-Howie Associates for the Scottish Executive in 2004 found that 16 had a specific policy, the approach from 8 of them being to require all new licensed vehicles to be wheelchair accessible. Those without policies were waiting for regulations and guidance. We do not have more recent data but suspect that the current position is little changed.

SATA has had a Policy Outline on 'Affordable and Accessible Taxi and Private Hire Car services' since February 2006. As indicated by the title, we think that accessibility and affordability go hand in hand. However accessible vehicles are, unless fares are affordable for disabled people, they will not use them on a regular basis. Supply-side investment will therefore be wasted and user-side benefits will not be realised. Driver training is also vital to produce good customer service. A copy the Policy Outline was sent to every local authority in Scotland and is shown in Appendix A to this response.

In 2007 the Mobility and Access Committee for Scotland (MACS) undertook a survey of 'Taxicard' fare concession schemes in Scotland as an adjunct to a Policy Statement on 'Travel by Taxis and Private Hire Cars'. This showed that:

- out of 32 local authorities only 14 operated such schemes and no authority in the Strathclyde region had one
- there were 37,903 registered users in the schemes in 2004, increasing to 48,081 in 2006
- total journeys undertaken in 2004/5 numbered 826,753 and in 2006/7 899,912 but not all authorities recorded this data
- take up was generally below the journey entitlement, the annual average in 2006/7 being 22 journeys
- the total cost to the authorities in 2004/5 (where recorded) was £2,778,71, rising in 2006/7 to £3,118,163.

The survey noted that there were significant differences between schemes in terms of eligibility, the number of journeys allowed and the degree of concession offered, all of which affected the number registered, the number of journeys undertaken and the cost to the authorities. There were also differences in the number, type and scale of taxi and private hire vehicles available and in other services provided in the area such as dial-a-ride, dial-a-bus and community transport minibus services. Finally, the survey revealed shortcomings in data on the use on these schemes and the need for more information to evaluate their cost effectiveness in terms of users' mobility and benefits.

Options

We are pleased to note that the Government remains committed to improving access to taxis. We favour the regulatory option but with aspects of the proactive programme approach to support it.

1. The 'do nothing' option.

We do not think that this option will bring the level or rate of progress required to implement the DDA. Indeed it would most likely see progress gained so far put into reverse.

The potential impacts, costs and benefits of a 'do nothing' approach.

Q2

What do you think are the potential impacts, costs and benefits of the 'do nothing' scenario?

R2

We think that many local authorities would review their licencing policies, the number of wheelchair accessible taxis would fall and the inconsistent nature of provision will continue. In this case the objectives of the DDA 1995 and potential benefits for disabled people will not be realised.

Q3

Do you have any further or more accurate data on potential costs and benefits of a 'do

nothing' scenario that you would be able to send us?

R3

See R1

We can send a copy of our SATA survey data and the results of the MACS survey can be obtained from its Secretariat at the Scottish Government.

2. The pro-active programme option.

We think that this option might bring some improvement in the required level and rate of progress, but would not cover the whole country and would be hard to sustain.

The potential impacts, costs and benefits of a proactive programme of DfT initiatives.

Q4

What kind of guidance would be most effective, in what format should it be produced and what can DfT do to promote take up?

R4

In November 2006 the Department for Transport issued 'Taxi and Private Hire Vehicle Licensing: Best Practice Guidance' which encouraged local authorities to introduce taxi accessibility policies pending regulation under the DDA. To our knowledge this has not had a significant impact in Scotland since 2003 when we did our own survey (see above). The former Disability Rights Commission published 'A Practical Guide for Taxi and Private Hire Services' as one of a series of useful guidance documents on transport modes but its impact is not known. These guidance documents are still valuable.

Q5

What do you think of the draft technical specification? Do you think it would help to improve levels of accessibility? Which aspects of it could be delivered easily and which ones would be problematic?

R5

We note that the Initial Specification is broadly based on existing design needs and will require no modification for a majority of vehicles. We understand that it would be simple and quick to introduce and could deliver 30,000 compliant vehicles over the next 10 years. There are additions to the specification that need to be considered such as those concerned with safety standards, an intermediary step and a swivel seat. We are against rear loading for taxis on grounds of safety.

Q6

What do you think are the advantages and disadvantages of DfT-funded demonstration schemes?

R6

We would be broadly in favour of these but *not in place of, or as an alternative to, regulation*. If undertaken there should be more than one in Scotland and they should be planned and run with the involvement of disabled people and a wide range of agencies. They would need to embrace not only taxis but private hire and community transport services, and also demonstrate how they can be coordinated and integrated into mainstream transport provision. Evaluation of outcomes in terms of user benefits must be undertaken before any publicity or guidance is given.

The Mobility and Access Committee for Scotland (MACS) in its report to the Scottish Government 'Actions Required to Improve the Mobility of Disabled People' (November 2008) has called for more comprehensive research and guidance on how to provide effective demand responsive transport (DRT) services.

Q7

What do you think would be the most effective ways of influencing action by local licensing authorities, drivers and manufacturers?

R7

We are in favour of stronger links between central government and local planning and licencing regimes on the provision of wheelchair accessible taxis but *in addition to regulation, not as an alternative.*

Similarly we consider that financial incentives must be provided, even with regulation, to help drivers and operators to purchase vehicles that meet accessibility standards and there should be a reduction in VAT on such vehicles. Mandatory training for drivers must be provided free of charge.

We also consider that user-side measures, such as fare subsidies through 'Taxicard' schemes, supports both the taxi trade and other transport providers by making services affordable and thus enabling disabled people to travel more. They benefit from greater mobility, attain greater social inclusion and gain better access to community services and facilities.

Q8

What are your views on the Government's proposals to amend and commence Section 36 of the DDA? This would impose a duty on drivers to taxi and private hire vehicles that are designed to be wheelchair accessible to assist passengers in wheelchairs, to carry them in safely and comfort and not charge them any extra.

R8

We agree that drivers should have a statutory duty to assist passengers in wheelchairs and not charge extra. But this should only be if requested by the passenger or the passenger's companion. It should also be applied to all disabled passengers. Clarification and guidance will also be needed on what is reasonable for a driver to undertake and where assistance starts and finishes ie at the kerb side or beyond. The need for substantial training for drivers in these matters will also be highlighted.

On the down side, such measures may lead to more applications from drivers for exemption on health grounds or an unwillingness to accept bookings from disabled people requiring higher levels of assistance.

Q9

What additional enforcement action or tools would be the most effective ways of improving driver behaviour and attitudes?

Q10

What measures do you think could act as positive incentives to improve driver behaviour and the levels of service offered to disabled people?

R 9 & 10

Mandatory training should be provided without charge on first licensing, re-licensing and at regular intervals, free of charge plus expenses/loss of earnings. Measures such as giving disabled people a red card to attract the attention of taxi drivers and the facility for drivers to receive text messages would help.

Disabled people should be involved in the planning and delivery of driver training and should receive payment, including payment for attending 'training for trainers' sessions.

Q11

In relation to improving access to taxis, what do you think the DfT and local licensing authorities could do better or more effectively?

R11

The important role of taxis and private hire cars in the mix of transport and other services, including education, health and social services, must receive greater prominence in central and local government policies, strategies and action plans.

The DfT must work closely with the Scottish Government to set the policy agenda based on thorough consultation, sound research and accurate data. Likewise local authorities and their various departments must measure the nature and extent of existing provision (including a wide range of DRT and other relevant services), establish unmet needs, produce action plans and assess outcomes on a continuing basis. They must have the resources to do this,

The ECMT report is right to stress the importance of infrastructure for the effective delivery of taxi services.

Q12

How could we help increase the availability of accessible taxis and private hire vehicles at ports, airports, bus and rail stations?

R12

The ability to transfer between transport modes is vital if people are to be able to plan and complete whole journeys. So the provision of accessible and affordable taxis at these interchanges is essential and so is the availability of information about them.

To achieve a fully integrated transport system, major transport intersections must have conveniently located taxi ranks served by wheelchair accessible vehicles and there has to be a legal requirement on operators for these taxi ranks to be served by accessible taxis. .

Consideration should certainly be given to legislation to make such services mandatory but guidance will help to implement it.

Q13

How could we improve the consistency and quality of information provided to disabled people about taxis?

R13

Operators of all ports, airports, bus and rail stations should be required to provide information on how to contact an accessible taxi service provider and be given the ability to do so.

The provision of pre-journey information, advice about services and how to raise issues and complaints, should be a legal or contracted requirement on transport operators.

Additional DfT guidance on these matters would be helpful and operators should contact disability groups for advice.

Q14

What do you think are the potential impacts, costs and benefits of a proactive programme of DfT-led initiatives?

R14

Again, without regulation and despite these initiatives we think that many local authorities would review their licencing policies, the number of wheelchair accessible taxis would fall, and the inconsistent nature of provision will continue. The objectives of the DDA 1995 and potential benefits for disabled people will not be realised

Q15

Do you have any further or more accurate data on potential costs and benefits of a proactive programme of DfT-led initiatives?

R15

See the study 'Improved Public Transport for Disabled People' commissioned by the Scottish Executive in 2005/6 (Research Findings N0 220/2006). In its key findings (page 5). It said: 'By far the most common suggestion in relation to what might help disabled people use public transport more is 'transport from door-to-door/someone to pick me up' suggesting that the problem is not with existing modes of transport but with getting to stations and bus stops from home and getting to the final destination at the other end' and 'the options considered by the largest proportions of respondents as likely to encourage them to travel a lot more were 'an on-call, inexpensive and accessible door to door taxi service' and an 'on-call accessible door-to-door bus'.

3. The regulation option.

We think that this option would be most likely to bring improvement in the required level and rate of progress and regulations would be consistent over the country and would be sustainable. However other supportive measures would be needed as suggested under Option 2.

The potential impacts, costs and benefits of regulation.**Q16**

What do you think about the draft technical specification?

R16

See R5

We note from the Impact Statement that the proposed Interim Standard would have to be met by 2025 but in view of the statement that the majority of existing vehicles would meet this standard, we think this should be earlier, say 2020. The date for meeting the Enhanced Standard will depend on the extent to which vehicles can be designed and produced which meet it and which are affordable,

Q17

What do you think are the potential impacts, cost and benefits of a regulation?

R17

We believe that regulation will bring positive outcomes for more disabled people especially if there is investment of public finance into the trade and if 'Taxicard' concessions are provided country-wide which will increase driver income well above the 1% projected and bring other cross-sector benefits. The regulation of taxis is in line with the regulation of other transport modes. It will remove the current uncertainty with certainty for the taxi trade, manufacturers and local authorities. It will replace the patchy nature of provision with greater consistency.

We understand that assumptions in the Impact Assessment on the purchase and use of vehicles and on the cost of compliance have been seriously challenged by sections of the taxi industry.

See also R8.

Q18

Do you have any further or more accurate data on the potential cost and benefits of a regulation that you would be able to send us?

R18

See R1 and R5.

The annual cost of implementing a standard 'Taxicard' scheme in all Scotland's 32 local authorities, in line with MACS's survey findings and SATA's outline policy shown in Appendix 1, we estimate to be £7- £12 million, recognising that take up will be well below the daily half-fare return trip allowance which we advocate.

Q19

How do you think that a technical standard should be enforced?

R19

The technical specification should be laid down as a minimum standard and implemented under the DDA. It should be enforced by local authority officers and the police.

Submitted after consultation with members

by

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17 April 2009

Appendix A

SATA's Policy Outline on Affordable and Accessible Taxi and Private Hire Car Services

(Note: This policy was adopted in February 2006 pending government regulation on vehicle accessibility or other matters)

Objects

1. Every local authority should have a **policy and strategy** for delivering affordable and accessible taxi and private hire car services
2. Every local authority should have a **fare concession scheme** for disabled people to use taxi and private hire car services
3. Every local authority should have *at least* **50% vehicle fleet accessibility**
4. Every local authority should have a **driver training** scheme for taxi and private hire car drivers

Details

1. Policy and strategy

- 1.1 A policy to improve the mobility of disabled people
- 1.2 A strategy for carrying out the policy by various means and within a timeframe.

2. Fare concession scheme

- 2.1 Membership with 'Taxicard' available free of charge on application for disabled residents unable to use bus services routinely (ie a concessionary bus pass may also be held but not always usable when the holder has luggage, travels after dark, etc)
- 2.2 An allowance of *at least* two single trips a day

- 2.3 *At least* half fare discount
- 2.4 Companions allowed at no extra charge.

3. Vehicle accessibility

- 3.1 All new and transferred licences for taxis (Hackney Carriages) should be for side-loading wheelchair accessible vehicles with M1 ECWVTA and include features to cater for passengers with reduced mobility, vision and hearing
- 3.2 All new licenses for private hire cars should require them to have an approved swivel seat fitted
- 3.3 It is anticipated that under the DDA all taxis will be required to be fully accessible to an agreed specification by a due date.

4. Driver training

- 4.1 Training in disability awareness, communication and use of equipment
- 4.2 Taken as part of the licence requirements on first issue and renewal.

February 2006