Written response to the recommendations from SPT

I thank you for your letter of 13 September 2007 asking me to give my response, by 7 December, to your Committee’s report “Removing Barriers and Creating Opportunities”. I have number of comments on issues of relevance to transport. These are attached at Appendix A.

Strathclyde Partnership for Transport, the Regional Transport Partnership for the west of Scotland, is committed to ensuring that the needs of disabled people are taken into account in all its activities. We welcome the report of the Equal Opportunities Committee Report on disability equality as it will help us in achieving our vision of ‘a world-class, sustainable transport system that acts as a catalyst for an improved quality of life for all.’

SPT has a good track record in promoting improved accessibility and mobility for disabled people, and of consulting disabled people in the planning and delivery of its transport services. Our Dial-a-Bus service helps those who are unable to use or have difficulty using standard buses to access their local community. It is used by nearly 400,000 passengers every year.

SPT’s bus stations have improved accessibility features for disabled passengers, including 100% wheelchair access, wayfinding slabs, information points in audio-visual format and the REACT audio way-finding system.

SPT is committed to the highest levels of accessibility to the Subway but it is challenging to adapt 19th century infrastructure to cater for the needs of the 21st century. We provide priority seats for elderly people and people with disabilities to use in each carriage; ticket offices have amplification equipment for customers with hearing impairments; customers with sight impairment are welcomed (along with their guide dogs) and all stations have staff who are ready to help. Describe Online has also produced a set of detailed text-only descriptions for each of the 15 Glasgow Subway stations.

For our staff, SPT ensures that adequate provision is made within the workplace to ensure all disabled staff can carry out their duties to the best of their abilities. All our offices are fully compliant with relevant legislation.

SPT has significantly developed its approach to Equality Impact Assessment (EqIA) over the last two years. We ensured that the needs of disabled travellers were taken into account in developing our Regional Transport Strategy. Details on this work can be found in the RTS Equality Impact Assessment, available from our website at www.spt.co.uk/equality.

Furthermore, the report was of particular use in drafting SPT’s Disability Equality Scheme. This gives further information on our progress on disability equality; our involvement of disabled people in the west of Scotland; our disability equality objectives; and our action plan for 2007-2010. A copy of our Disability Equality Scheme, as submitted to the Partnership board for approval on 14 December 2007, will be available on the Equality section of our website after that date.
Once again, I would like to thank you for the opportunity to comment on the report, and would emphasise to you SPT’s ongoing commitment to ensuring that disabled people have the same transport opportunities as everyone else in the west of Scotland.

Ron Culley
Chief Executive
SPT
20 November 2007
Appendix A – SPT comments on relevant recommendations

**Recommendation 18**

The Committee is of the view that the public sector should be setting an example in the employment of disabled people and the Committee recommends that public bodies should use the Disability Equality Duty to establish and deliver exemplar practices in the employment of disabled people (paragraph 453).

*SPT: We agree. Our Disability Equality Scheme (DES) sets out a number of specific actions that we believe will, within the context of employment within SPT, ensure that SPT offers equal opportunity of employment to people with disabilities. The DES further proposes to regular monitor employment of disabled people within SPT so that corrective action can be taken if required.*

**Recommendation 20**

The Committee recommends that all employers should be as flexible as possible in relation to the recruitment of disabled people and should strive to go beyond the minimum statutory requirements. In particular, the Committee recommends that the Disability Rights Commission and its successor, the Commission for Equality and Human Rights, should work with relevant personnel and recruitment professionals to develop and disseminate best practice in the conduct of interviews and the wider recruitment process as it relates to disabled people (paragraph 472).

*SPT: As part of the DES we propose to develop a training programme in equalities issues including recruitment. SPT would welcome best practice guidance on this issue, and look forward to working with the CEHR on this.*

**Recommendation 94**

The Committee recommends that—

- all Equality and Diversity Training programmes should contain an element of Disability Equality Training;
- the Disability Equality Training element of Equality and Diversity Training programmes should be devised and developed by disabled people or, at the very least, in consultation with disabled people;
- all high-level Disability Equality Training programmes should be devised, developed and delivered by disabled people with the appropriate training skills, experience and/or qualifications;
- high-level Disability Equality Training should be included as part of training programmes aimed at those who work or intend to work with disabled people. As well as professionals, such as those who work in the fields of medicine and health, in social care or in education, this training should be delivered to all those who work in the care industry; it should be included as a required element in all courses leading to qualifications in these fields;
high-level Disability Equality Training should be a required element of the training and development of all staff with policy development responsibility, including senior staff, throughout the public sector in Scotland, particularly within the Scottish Executive (paragraph 1136).

SPT: As part of the DES we propose to develop a training programme in equalities issues including disability equality, both in terms of transport and employment. SPT would further recommend that Disability Equality Training, and in particular training in dealing with disabled passengers should be compulsory for all staff working in the public transport industry, including train, bus and taxi drivers, station / on-vehicle, and all senior staff in organisations involved in planning and delivering transport services in Scotland.

**Recommendation 95**

The Committee, therefore, recommends that the Scottish Executive fund and co-ordinate a long-term, strategic campaign aimed at tackling negative attitudes towards disabled people. The Scottish Executive should work with key partners and stakeholders to deliver the campaign and support and reinforce the national activities with relevant activities at local level along the lines of the ‘see me’ campaign (paragraph 1151).

SPT: Any such campaign should take account of transportation issues, such as misuse of parking spaces for people with disabilities. As the transport authority for more than 40% of the Scottish population, SPT would be happy to participate in such a campaign.

**Recommendations 102 + 103**

102: The Committee, therefore, recommends that the Scottish Executive develop a coherent and comprehensive strategy for achieving equality of mobility for disabled people across Scotland. The Committee considers that the Executive’s current work on the national transport strategy offers an ideal opportunity for the development of such a strategy (paragraph 1181).

103: The Committee further recommends that the coherent and comprehensive strategy for equality of mobility should be an integral part of national, regional and local transport strategies and backed up by clear target setting and monitoring (paragraph 1182).

SPT: We have developed an Equality Impact Assessment, including impact on travellers with disabilities, for our Regional Transport Strategy (RTS). We are further developing our approach to Equality Impact Assessments of individual schemes and projects. We have developed a DES that sets out our work to date and our proposed actions to 2010. SPT would be happy to work with the Scottish Government on further development of a strategy to improve mobility for people with disabilities.

**Recommendation 104**
Whilst accepting the reality of local and regional differences across the country, the Committee recommends that services and schemes which require co-ordination across different transport operators and geographic boundaries must be overseen by appropriate regional or national authorities to ensure that the chain of accessibility is maintained (paragraph 1185).

SPT: We agree. Disability equality issues are being discussed as part of our regular consultation with the other six Scottish Regional Transport Partnerships (RTPs) to ensure proper co-ordination of cross-boundary issues and to improve plans to remove barriers. As the Regional Transport Partnership for the west of Scotland, SPT are ideally placed to lead or co-ordinate activities with regard to disability equality and transport, for both our private and public sector partners.

**Recommendations 105 + 106**

105: The Committee recommends that the Scottish Executive, within the framework of its national transport strategy, develop clear incentives and disincentives for regional and local authorities in delivering against the targets referred to above (paragraph 1186).

106: The Committee further recommends that the Scottish Executive develop a model which will require RTPs to demonstrate that they are carrying out and monitoring equality impact assessments in relation to their regional transport plans and that the Executive consider making this compulsory when a legislative opportunity arises (paragraph 1187).

SPT: We agree. The statutory DES requires SPT to work proactively towards delivering meaningful and demonstrable outcomes for disabled people. SPT believes that the DESs, together with the further development of Equality Impact Assessment of the project roll-out of the RTSs provide a clear framework for RTPs in delivering better mobility for disabled travellers. We would welcome further engagement with the Scottish Government and Transport Scotland in developing a consistent approach to Equality Impact Assessment, and would support enshrining the need to undertake assessments in legislation.

**Recommendation 107**

In order to ensure that accessibility considerations are included from the outset, the Committee recommends that disabled people be actively involved in the strategic development, design, implementation and monitoring of all transport services across Scotland (paragraph 1188).

SPT: In line with our own policy objectives, SPT has been keen to ensure that disabled people were fully involved in the development of its RTS and DES. Further details of this involvement can be found in the DES and the RTSs Equality Impact Assessment – see [www.spt.co.uk/equality](http://www.spt.co.uk/equality)

**Recommendation 108**
The Committee, therefore, recommends that the Service Quality and Incentive Regime be amended to include the full range of accessibility issues at the earliest possible opportunity (paragraph 1199).

*SPT: We would agree with an extension of the regime to include further accessibility issues. We would also seek to see accessibility issues be included as part of any similar SQUIRE-style scheme for bus, and other transport services.

**Recommendations 109 + 110**

109: The Committee, therefore, recommends that the Scottish Executive and relevant agencies work effectively with the Office of the Rail Regulator and Network Rail to develop a strategy in relation to the accessibility of railway stations in Scotland which need more than minor alterations to improve accessibility for disabled people (paragraph 1201).

110: The Committee recommends that the Scottish Executive identify suitable targets for an effective programme of railway station improvements across Scotland to make all railway stations accessible within a specific timescale and against which progress can be measured (paragraph 1202).

*SPT: We agree with this recommendation. As the RTP for the west of Scotland we would welcome working with Transport Scotland, Network Rail, ORR and local councils to improve accessibility of railway stations throughout our region.

**Recommendation 111**

The Committee further recommends that, where the Executive considers that improvements are insufficient, it take action to ensure that acceptable improvements are undertaken, even if this requires additional funding to be made available by the Scottish Executive (paragraph 1203).

*SPT: We would welcome specific funding aimed at speeding up delivery of accessibility improvements in the Scottish public transport system. We would like to see any such fund covering all aspects of public transport and active travel, including bus stations and ferry terminals.

**Recommendation 112**

The Committee recommends that transport providers be encouraged to make their transport fleets accessible ahead of the deadlines provided for in legislation and that relevant assistance be made available to support this process by national or local government as applicable (paragraph 1204).

*SPT: All vehicles in our Dial-a-Bus fleet are already accessible. Our DES commits us to working to ensure all SPT vehicles and vehicles used in delivering SPT-supported services will become accessible ahead of legislative
requirements. Any assistance by the Scottish Government in this would be welcome.

**Recommendation 113 + 115**

113: In view of the particular importance to disabled people of the need for effective, accessible information in relation to transport services, the Committee recommends that the Scottish Executive, where possible, ensure that all transport providers provide and promote effective pre-journey information which makes clear the accessibility level and any necessary accessibility arrangements of the services they provide (paragraph 1210).

115: Travel information should also be made available in real-time in accessible formats to support disabled people while travelling and travel information providers should link their information systems to those of other operators to assist whole-journey planning (paragraph 1212).

*SPT:* We have an extensive track-record in providing and promoting effective information on transport services, both prior to embarking on a journey and during a journey. For example, at Buchanan Bus Station, we have installed a tactile map to assist visually-impaired travellers to find their way around the station. We have also installed audio information points at every stance which provide departure information for that stance and are constantly striving to improve information provision further. We would welcome advanced best practice guidance by the Scottish Government on this issue.

**Recommendation 114**

In addition, the Committee recommends that information provided by transport operators be provided in plain English and a comprehensive range of alternative formats (paragraph 1211).

*SPT:* We agree. SPT, in preparing the RTS, commissioned a consultant to ensure our document was in plain English. Our DES commits us to ensuring that all our future publications will be available in a range of alternative formats on request.

**Recommendation 116 + 117 + 118**

116: The Committee therefore recommends that all staff involved in the planning and provision of transport services attend Disability Equality Training (paragraph 1220).

117: The Committee, therefore, recommends that the Scottish Executive introduce and ensure the enforcement of minimum national standards in relation to staff training in disability equality and the provision of suitable customer care for disabled travellers (paragraph 1222).

118: The Committee also recommends that the Scottish Executive should encourage all transport providers to implement, in partnership with disabled
people and access panels, suitable monitoring programmes to ensure that Disability Equality Training has the desired impact on service delivery for disabled travellers (paragraph 1223).

*SPT: We agree. Training in dealing with disabled passengers must be made compulsory for all staff working in the public transport industry. It is unacceptable that, for example, travellers in wheelchairs are left behind because drivers of low-floor buses do not know how to operate the equipment. Our DES commits SPT to provide disability awareness training across a range of our staff. We would welcome the opportunity to co-ordinate similar training across the transport industry of the west of Scotland, should funding become available to do so. We further welcome any opportunity to monitor the effectiveness of this training with disabled groups.*

**Recommendation 119**

The Committee recommends that the Scottish Executive co-ordinate the development of properly funded, long-term, demand-responsive transport services across Scotland both to assist those disabled people who currently find it difficult to access public transport services and those who cannot use public transport services (paragraph 1238).

*SPT: As operators of Dial-a-Bus, one of the largest demand responsive transport services in Scotland, we very much agree with the need for special services to assist those who find it difficult to access mainstream public transport services or cannot use them at all. We would welcome further support from the Scottish Government in enhancing this service, and would recommend that in order to build on the success of SPT’s current scheme, the co-ordination and delivery of demand responsive transport continues at regional level.*

**Recommendation 120**

The Committee recommends that the Scottish Executive carry out the necessary research to identify demand as a basis for developing suitable systems and include consideration of the alternative costs to society of not providing such services (paragraph 1239).

*SPT: We agree, and would look forward to working with the Scottish Government on this issue.*

**Recommendation 121**

The Committee recommends that the Scottish Executive make current and future demand-responsive transport services eligible for concessionary fares in line with the concessionary fare scheme it introduced in April 2006 (paragraph 1240).

*SPT: SPT would welcome clarification on this point, as the Dial-a-Bus service we provide is currently free to all those eligible. We support the commitment to ensure that all future demand responsive transport services are eligible for
concessionary fares, and further to this, would wish to see this extended to disabled travellers’ carers.

**Recommendation 122**

The Committee welcomes the fact that inspectors of the concessionary fare scheme will note down evidence of accessibility issues on buses as this will offer a useful source of information to bus operators regarding accessibility issues on their services and the Committee recommends that Transport Scotland collate the evidence collected and pass it on to bus operators as a matter of course to assist operators to improve the accessibility of their services where possible (paragraph 1242).

*SPT: As commented above, we would further recommend that accessibility issues are to be included as part of SPT’s “bus warden” scheme (see [http://www.spt.co.uk/news/story444.html](http://www.spt.co.uk/news/story444.html) for more details). We would be happy to discuss this issue with the Scottish Government / Transport Scotland.*

**Recommendations 123 + 124**

123: In view of the importance of a coherent system of concessionary fares which maximises transport opportunities for disabled people, the Committee recommends that the Scottish Executive work with the Convention of Scottish Local Authorities to encourage and support local authorities in providing concessionary taxi schemes to ensure that these are available on a consistent basis across Scotland and they do not disqualify people from eligibility for other concessionary schemes (paragraph 1247).

124: The Committee additionally recommends that local authorities take full advantage of their licensing powers to encourage increased provision of accessible taxis and private hire cars and to encourage providers to ensure that drivers attend Disability Equality Training (paragraph 1248).

*SPT: SPT, in principle, support the concept of the disabled concessionary fares scheme being extended to taxis, as this would further increase the transport opportunities for disabled people. We would welcome further discussions on the scope and nature of any future scheme in this regard.

Given the size of some local authorities, and the cross-boundary nature of many trips, we believe such schemes are better planned and delivered on a regional level, and would welcome further discussions on this issue.*

**Recommendation 125**

The Committee recommends that the equalities criteria included in tender documents for transport services should be developed in conjunction with disabled people and the subsequent services monitored and evaluated against these criteria in consultation with the disabled travellers who use the services. This should also be the case for those projects where the procurement is undertaken by a project sponsor (paragraph 1252).
SPT: Our DES commits us to continue to work with disabled people and to review standard contract conditions to ensure compliance with relevant equality legislation, and that the needs of disabled people are taken into account. SPT would welcome further discussions with the Scottish Government on how improved tender specifications could be funded.

**Recommendations 126 + 127**

126: The Committee welcomes the fact that the Scottish Executive has commissioned research into the abuse of parking provided for disabled people and recommends that the Executive identify and implement, in conjunction with the Convention of Scottish Local Authorities and other relevant organisations, including of disabled people, a suitable process to ensure the provision of adequate accessible parking for disabled people (paragraph 1260).

127: The Committee also recommends that the Scottish Executive develop and promote suitable mechanisms for the effective enforcement of proper use of accessible parking for disabled people wherever it exists including encouraging local authorities to make full use of Traffic Regulation Orders (paragraph 1261).

SPT: The issue of abuse of parking provision for disabled people has been regularly discussed at liaison meetings between SPT and the west of Scotland councils. SPT believes any further work should look in particular into options for improved parking enforcement, and consistency of approach across our region.

**Recommendation 128**

However, in view of the extensive role that the Mobility and Access Committee for Scotland is expected to play throughout Scotland, the Committee recommends that the Scottish Executive review the current resourcing of the Mobility and Access Committee for Scotland to ensure that the organisation has the capacity to carry out its representative and advisory role effectively (paragraph 1266).

SPT: SPT would welcome a strengthening of resourcing of MACS and of local and regional Access Panels.

**Recommendation 129**

The Committee recommends that each local authority appoint an officer with specific responsibility for disability issues, and sufficient seniority and authority to influence policy. This officer’s duties should include the establishment, co-ordination and promotion of a local-access information service for disabled people and signposting and co-ordinating access to all council services (paragraph 1277).
SPT: SPT agree that in order for an organisation to fully embrace the equality agenda, commitment from senior officers essential. We support the concept of the appointment of an officer specifically for disability issues, and would recommend this be extended to strategic transport organisations / operators such as RTPs. We would welcome further discussions on the scope and funding of this position.

**Recommendation 133**

The Committee recommends that the Scottish Executive and relevant agencies work with organisations such as the Disability Rights Commission, Scottish Accessible Information Forum and Update to disseminate information to businesses across Scotland on the need to provide accessible formats and where to obtain relevant assistance and training (paragraph 1294).

SPT: We agree, and would wish to be included in the list of organisations who are informed on accessible formatting, assistance and training.

**Recommendation 135**

In view of the importance of promoting the provision of accessible information, the Committee recommends that the Scottish Executive consider its current level of support for services such as the Scottish Accessible Information Forum with a view to significantly expanding capacity in the provision of advice and training to organisations throughout Scotland on the provision of accessible information and accessible formats (paragraph 1296).

SPT: We agree, and would support an increase in resourcing for the Scottish Accessible Information Forum, provided advice and training in relation to transport information was included.

**Recommendation 136**

Given the unacceptably low percentage of websites which are currently accessible and the increase in the use of the internet as a key information source, the Committee recommends that the Scottish Executive establish, in partnership with relevant organisations, a campaign to encourage more organisations to make their websites accessible, both in the public and private sector (paragraph 1302).

SPT: We agree, and would welcome involvement in any such organisation when established.

**Recommendation 137**

The Committee recommends that commercial service providers be more proactive and clear in advertising the accessibility of their services and that
commercial representative organisations encourage and support their members to do so (paragraph 1308).

*SPT*: We agree. The transport industry in the west of Scotland has a mix of public and private sector service providers, some providing good information on accessibility and others not. SPT would therefore welcome any initiative which improves the approach to this, and would recommend that, as an RTP, we are ideally placed to co-ordinate such an initiative, provided adequate funding is in place to do so.

**Recommendation 138**

The Committee further recommends that public sector organisations ensure that they clearly publicise details of the accessibility of their services to ensure that those service users who may have individual access requirements are fully aware of what is available to them (paragraph 1309).

*SPT*: We agree, and our DES commits us to ensuring that adequate publicity of our services to disabled people is in place.

**Recommendation 139**

The Committee recommends that the Scottish Executive investigate, in partnership with organisations such as the Disability Rights Commission, the Scottish Accessible Information Forum, Update and the Convention of Scottish Local Authorities, mechanisms to develop a strategic approach for the effective sharing of good practice in the provision of accessible information across Scotland (paragraph 1313).

*SPT*: We would welcome any initiative which seeks to better disseminate good practice regarding accessible information at a strategic level.

**Recommendation 142 and 143**

The Committee notes that the Minister pointed out that access statements [those provided for by the Planning etc. (Scotland) Bill] would be required for ‘a broad range’ of applications and the Committee recommends that all planning applications for, at the very least, buildings to be accessed by the public be required to be accompanied by an access statement outlining how access will be maximised for disabled people (paragraph 1330).

The Committee further recommends that a report on the issues discussed in the access statement should be required on completion of the relevant building, showing the extent to which the access statement has actually been complied with. The Committee considers that access panels might usefully have a role to play in this process (paragraph 1331).

*SPT*: We welcome these proposals, and would seek further discussions with the Scottish Government on this issue, for example in relation to funding the preparation of access statements for transport infrastructure.