

**Transport and Disability Discrimination
A Practical Guide for Rail Services – DRC
January 2007**

Thank you for the opportunity to view the draft document, which is welcomed by *pteg*. *pteg* would comment as follows-

1. Section 2 – Would it possible to provide Light Rail and Tram operators with a dedicated guidance document?
2. Section 2 third paragraph – should state Disability Discrimination Act (DDA);
3. Section 3 Last paragraph – should state “Rail Vehicle Accessibility Regulations”;
4. Section 5 First para – Advice should be given as to how TOCs can make DPPP available to disabled passengers;
5. Section 6.1 – Although the text explains the Social Model of Disability to someone who is familiar with the terminology, we are not sure a “layperson” would be so confident with message being given. Suggested rewording as follows-“Be based upon the principles of the “Social Model” of disability in that it is poor design of facilities and attitudes of people that place obstacles in the way of disabled people and not the disability itself. So for example, a stepped entrance stops a person who uses a wheelchair gaining access or, a member of staff who doesn’t speak or make announcements clearly is the source of problems for hearing impaired people”;
6. Section 6.1 Last paragraph – should state “British Sign Language (BSL)”;
7. Section 7 - TOCs should consider working with local authorities, PTEs, local disability organisations in the promotion of services that they provide;
8. Section 7.4 – comment as per 7;
9. Section 8.1 – Penultimate paragraph – should state “whenever they undertake”;
10. Section 8.3 third line – should state “car park”;
11. Section 8.3 - TOCs should ensure that vehicles used by contractors working on the station should not park in the dedicated disabled parking bays;
12. Section 9.5 2nd paragraph – TOCs should work with operators of local buses and taxi operators on this issue. Information on local bus service and taxis should be made available at the rail station;
13. Section 9.8 – Passengers should be contacted by their preferred method of communication, for example - telephone, e-mail, easy read questionnaire;
14. Section 9.9 - More emphasis should be given to ensure the passenger that has booked assistance for a specific train is facilitated to board the train and to take up the space or seat that they have reserved, even if the train is considered to be busy;
15. Section 10.2 The TOC should ensure that the wheelchair space is kept free of luggage if it is known that a wheelchair user has previously

- booked the space through APRS. Luggage should not have priority over a disabled passenger;
16. Section 10.3 TOCs should have a clear policy on the use of scooters on their services, which should be included within their DPPP and promoted to local authorities, PTEs, local disability organisations, and to suppliers of scooter equipment in the local area. A hyperlink or telephone number could be included which provides up to date information. The last paragraph in this section is confusing and requires re-wording;
 17. Section 10.4 It is suggested that this heading is amended to “Assistance Dogs”;
 18. Section 11.1 third paragraph & Section 13 – this section is brief – it would be preferable to give more specific guidance to TOCs on their actions and responsibilities in the event of an emergency situation. At minimum a reference to a specific guidance document should be included;
 19. Appendix 1 Legislative background – Although there is reference to “reasonable adjustments”, none is made to “anticipatory measures”. This limits the scope of the document as the ethical approach to “anticipatory measures” focuses on anticipating how the needs of people with a range of disabilities should be met as opposed to adopting a formula which allows TOC staff to “tick the box” that applies to visually impaired, hearing impaired, learning disabled people etc. TOCs should be encouraged to develop their own innovative solutions and to use the guidance in this document as a starting point to promote equal access for disabled people using heavy rail services;
 20. General comment – The guide could be reformatted to show the relevant information in each area of a passengers journey, for example: “Pre-journey information”, “At the station” “ On the train” etc.

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on behalf of *pteg*
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