



Transport Committee Accessible Transport Review - CTA Response

CTA Response

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www.ctauk.org

1. Introduction to the CTA

- 1.1. The Community Transport Association (CTA) is the national charity that represents and supports providers of community transport (CT) - thousands of local charities and community groups in all parts of the UK that provide transport services which fulfil a social purpose and community benefit.
- 1.2. Our vision is of a world where people can shape and create their own accessible and inclusive transport solutions and our mission is to achieve this through championing accessible and inclusive transport, connecting people and ideas, and by strengthening our members and raising standards.
- 1.3. We do this by contributing to the formation of public policy that affects our sector and their service users and showing how better outcomes are achieved for people and communities when they have access to CT. We create partnerships with like-minded organisations across all sectors; manage a national programme of quality assured education and training; provide comprehensive advice and guidance to those delivering CT; and we take every opportunity to champion the vital and indispensable work that our members do.

2. Summary

- 2.1. The current effort to produce an accessible transport network is not going far enough. Whilst progress has been made, this progress has been focused on the accessibility of vehicles which, whilst important, does not address all accessibility concerns. Work still needs to be done on making the transport system itself more accessible by bringing it to people who struggle to leave their houses unsupported. This is where the Community transport (CT) sector can and does step in.
- 2.2. The CT sector is all about accessible transport. Those involved in this sector provide accessible transportation options in their communities for people to whom mainstream transportation is inaccessible. The role of CT is vital for accessibility as many services offer door-to-door transport for people that are unable to access mainstream services.
- 2.3. Due to the role CTs play in providing accessible transport to often vulnerable people, if the Government and other transport bodies want to make a truly accessible system, they need to include CT within that. This inclusion means including CT in transport network decision-making processes and strategies and supporting the sector to overcome the barriers that threaten the stability of services and hold the sector back. Taking these actions will ensure that more people with additional transport accessibility needs have these needs met.

3. Current Level of Transport Accessibility

- 3.1. Nearly 1 in 10 bus routes were lost in Britain in 2022, with local people and communities often left to pick up the pieces and create their own solutions or

replacement services.¹ Patronage levels on bus and rail continue to be generally lower than before the pandemic, while private car use and single occupancy journeys are increasing.² Disabled people in the UK take 38% fewer journeys than the rest of the population, a significant and stubborn ‘transport accessibility gap’ that has remained unchanged for over a decade.³ The 2010 Equality Act says that a disabled person must be able to get on and off a public service vehicle safely and without unreasonable difficulty and travel in a reasonably safe and comfortable manner.

- 3.2. The Government’s work to meet these requirements has been heavily focused on improving the accessibility of the vehicles themselves, for example, having wheelchair ramps and priority spaces onboard. It is unquestionably true that these improvements are essential and much needed, however, there is still a substantial group of people who will continue to be excluded from using public transportation even after these improvements are implemented. This is the group of people that, due to a physical disability, mental health condition or their age, cannot make the journey from their front door to a bus station.
- 3.3. For these people with significant additional transport needs, accessible transport needs to be more than just a bus with a ramp and priority spaces. This group need transportation that picks them up at the door and takes them to their destination while accounting for their individual needs.
- 3.4. Many of the people that require this level of accessibility are left isolated at home with no way of accessing necessities like GPs, shops, and social opportunities. If the Government wants to deliver a truly accessible transport network, it needs to do more to ensure this group, those most likely to be isolated, have transport options that meet their needs and provide equal access to society.

4. How can Community Transport improve accessibility?

- 4.1. Community Transport provides a lifeline for people whose mobility challenges restrict their ability to leave their homes unsupported. CT providers offer flexible, accessible, and affordable transport for those that, for whatever reason, including disabilities, cannot access mainstream transport services. Many CT providers offer door-to-door services and cater to the individual needs of their passengers. These services enable people that otherwise would be left isolated to connect to the rest of society and meet their basic needs such as socialisation, health, and shopping.
- 4.2. CTA looked in depth at CT in Scotland and published the findings in the More Than a Minibus report⁴. The report highlighted that of the over 900 vehicles in the Scottish CT

¹ www.theguardian.com/uk-news/2023/jan/24/almost-one-10-local-bus-services-axed-last-year-great-britain

² www.racfoundation.org/motoring-faqs/mobility#a30

³ www.motability.org.uk/media/iwaidhxx/motability_transport_accessibility_gap_report_march-2022_final.pdf

⁴ <https://ctauk.org/wp-content/uploads/2022/09/More-Than-a-Minibus-CTA-2022.pdf>

sector, nearly 70% were accessible, comprising accessible buses, accessible minibuses, accessible MPVs and accessible cars. The sector is, therefore, geared toward addressing accessibility needs, and this is demonstrated by its focus on supporting those with additional mobility needs, as 54% and 51% of Scottish CT services are used by older people and disabled people, respectively. The mix of the ambition to provide truly accessible door-to-door transport to those with limited mobility and a fleet which is highly accessible is what makes CT so well placed to support those to whom public transport does not cater.

- 4.3. The effect that the truly accessible transport that CT provides has on the everyday lives of people can be seen through the example of Eileen from Stirlingshire, Scotland. Eileen is 73 years old and suffers from Glaucoma. Community transport services enable her to continue to feel connected to her community despite her condition and additional transport needs. Eileen is supported by Killin and District Volunteer Car Scheme. When speaking about the service, she said:

“The volunteers go above and beyond to make sure I reach critical healthcare appointments. These wonderful people ensure I am physically and socially supported, heard and connected to my community... The service they offer is priceless.”

- 4.4. Stories like Eileen’s are not uncommon. CT organisations across the UK work tirelessly to support individuals like Eileen to ensure they are not left out and left behind. However, many people do not have a local CT scheme, aren’t aware of it, or their CT scheme does not have the capacity or funding to help. There is, therefore, still lots more to do to provide accessible transport to all those that want transport but due to a mobility issue cannot access it.

5. What the Government should do to ensure there is accessible, inclusive transport

- 5.1. As outlined in the previous section, the CT sector is vital for providing accessible transport for those excluded by the current transport system.
- 5.2. Due to the role that CT does play, CTA believes that the Government should take action to implement regulatory change and increase investment in an equitable public, private and third-sector relationship. This will then enable community-owned and -led solutions to take a leading role in enabling there to be a truly accessible and inclusive public transport network.
- 5.3. From the CTAs report on the Scotland CT sector⁵, we know that 69% of providers in Scotland wanted to expand their services to support more people, and similar views

⁵ <https://ctauk.org/wp-content/uploads/2022/09/More-Than-a-Minibus-CTA-2022.pdf>

are held across the UK. If CT operators can do just that and expand their services, the UK will have fewer isolated people suffering from unequal access to transport due to a system that does not meet their needs.

- 5.4. However, several factors are acting as barriers to CT expansion and, in some cases, threaten to force the closure of vital services, which could, in part, be addressed through changes in government legislation, policy or guidance, including;
- A shortage of drivers, which is exacerbated by the current driver licensing regime.
 - Ensuring fair treatment for volunteers with a need to review the current AMAP rate.
 - CT not being considered part of the bus network by the Government, which means it cannot access capital funding for new accessible vehicles as commercial operators can.
 - Restrictions on securing organisational blue badges limit some services' capacity to carry and support people with disabilities.
 - The complexities around operating small vehicles (8 passengers and under) on a Section 19 permit which is creating barriers to the development of new or more sustainable services.
 - If the Government and other transport bodies worked with CTA and CT providers to tackle these issues, it would ensure that there was a sustainable, affordable, inclusive, and accessible transport offer available.

Each section is explored in more detail below, including actions the Government could take to ensure accessible transport for all.

5.5. Driver Shortage

- 5.5.1. Many CT organisations are struggling to recruit paid and volunteer drivers. This shortage of drivers is restricting the ability of many CT organisations to deliver their services, which are vital for so many disabled people across the UK.
- 5.5.2. "Tackling shortages in community transport drivers" is something the Government committed to achieving in the National Disability Strategy⁶. The Government can achieve this by removing the EU-derived law, which remains in the UK statute book, that requires drivers with a post-1997 driving licence to go through an additional testing process to obtain a D1 Licence (Which is required to drive a vehicle with 9-16 passenger seats for hire and reward and to drive a similar vehicle with a MAM over 3,500kg as a volunteer). This is creating a blockage on paid and volunteer minibuses driver recruitment for CT organisations.
- 5.5.3. CTA Would like to see the government remove the need for D1 testing and return to the pre-1997 licencing situation where B licence holders have an automatic entitlement to D1 (CTA are open to additional safety requirements, including the need to be of a certain age and years of driving experience to qualify for the D1 entitlement).

⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1006098/National-Disability-Strategy_web-accessible-pdf.pdf

- 5.5.4. CTA has seen work by DFT to begin to address this through the recent call for evidence on Driver Licencing, which included the proposal to give automatic D1 entitlement to category B licence holders.
- 5.5.5. CTA and the CT sector need to see the Government prioritise this amendment on D1 entitlement to increase the pool of potential minibus drivers and ensure that the CT sector can recruit the people they need.

5.6. Fair treatment of Volunteers – AMAP review

- 5.6.1. Volunteer drivers are essential to many forms of CT service, particularly volunteer car schemes. These schemes involve volunteers driving their own vehicles to pick up often vulnerable people and take them to where they need to be. Volunteers using their personal vehicles in their duties are reimbursed through the Approved Mileage Allowance Payment (AMAP) rate. This rate is no longer fit for the purpose. It is leaving volunteers out of pocket and is acting as a deterrent to volunteering. CTA has been calling on the Government to increase the AMAP rate to represent the real cost of motoring to support volunteer drivers and the organisations in need of them.⁷

5.7. Availability of Funding

- 5.7.1. Funding is also a key issue restricting the sector from being able to support more people. Funding for CT is often very inconsistent and short-term. This type of funding does not give CT operators the confidence they need to expand their services and support more people because, in the long run, many are uncertain where the next funding pot will come from. CTA needs to see the Government and local authorities supporting CT providers with consistent multi-year funding to give providers the confidence and resources to support more people to get where they need to be.
- 5.7.2. The current positioning of CT means that it falls outside of the scope of many Government schemes, for example, BSIP and the £2 Bus Cap Scheme. The lack of consideration of CT as a vital accessible service means that people with disabilities are specifically disadvantaged and cannot benefit from savings and investments made in the public transport system. If the Government were to take a reviewed policy stance around services operating with a Section 19 permit, then this would provide equal access for everyone to an accessible public transport system.

5.8. Organisational Blue Badges

- 5.8.1. Many CT providers need access to blue badges to ensure they are able to transport people with disabilities to their destinations. The current policy

⁷ <https://ctauk.org/wp-content/uploads/2023/02/CTA-AMAP-Coalition-Spring-Budget-Representation-2023.pdf>

guidance issued by DfT states that it is unlikely that taxi or private hire operators and CT operators would be eligible for an organisational Blue Badge as they are not usually concerned with the care of disabled people.⁸ The decision is then left up to the local authority as to whether they will issue an organisational badge. This has led to a postcode lottery as to whether CT providers can access vital blue badges.

5.8.2. It stated that residential care homes, social services or hospices are eligible, and there are many examples where CT operators are the only way for people to access these services in the first place. Again, CTA is beginning a discussion with DfT around this guidance. It is vital that this is prioritised and progressed to ensure equitable access across the UK and that some people are not refused access to CT as they can't meet their needs.

5.9. Clarity on Small Vehicle Section 19 Permits

5.9.1. A further challenge preventing the CT sector from doing more is the legislative complexity surrounding the sector. There are a large number of grey areas within CT legislation which affect the confidence of operators in delivering their services due to worries of being adjudged to be operating illegally. One example is the use of section 19 permits on small vehicles, where the complexity leaves people unsure about what they can and cannot do. We are aware of CT providers who would operate more frequent services if they felt confident, they could operate effectively with a smaller vehicle. They would be able to do this as they would have reduced operating costs with smaller vehicles compared to 9-seater minibuses. If there were a review of Section 19 permits for smaller vehicles bringing it in line with the same restrictions as larger vehicles, it would increase the potential range of accessible services.

5.9.2. CTA would like to work with the Government to simplify the legislation to ensure that CT can maximise its potential and ensure that as many people have access to transport as possible. By including the sector within the transport network decisions and strategies and supporting the sector to overcome the barriers mentioned, transport bodies can help unleash the CT sector's full potential and create a more accessible network.

6. Conclusions

6.1. There are, therefore, several actions that the Government and transport bodies can take to increase the accessibility of the transport network from the perspective of CT and its passengers. These actions include:

- Engagement and inclusion of the CT sector in transport decisions and transport strategies.

⁸ [Who can get a Blue Badge? - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

- Funding for CT needs to be protected, and the sector needs to see consistent multi-year funding.
- The Government and transport bodies working with the CTA and the CT sector to review policy and legislation to overcome the barriers affecting CT's ability to provide their services.

6.2. CTA would welcome the opportunity to discuss the CT sector with the Transport Select Committee regarding how the sector can improve the accessibility of the transport network and the actions that the Government can take to ensure CT is an integral part of accessible transport.

Further Information

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The Community Transport Association (CTA) is the UK charity that represents and supports providers of Community Transport. Our 1200 members across England, Wales, Scotland and Northern Ireland are local charities and community groups which provide transport services always for a social purpose and never for profit. We believe in accessible, inclusive and sustainable transport for all.