

## Disabled Motoring UK response

### Automated Vehicles: Passenger Services and Public Transport

Disabled Motoring UK was formed in 2005 from the merger of The Disabled Drivers' Motor Club (established in 1922) and The Disabled Drivers' Association (established in 1948). Disabled Motoring UK is the only UK charity specialising in the mobility needs of disabled people. Disabled Motoring UK has approximately 17,000 members across the UK supporting the campaigning work of the charity and is the only charity representing their interests at a national level.

DMUK has only responded to questions 24-28 in Chapter 6 on Accessibility

*Question 24: We seek views on how regulation can best promote the accessibility of Highly Automated Passenger Services (HARPS)? In particular, we seek views on key benefits and concerns that regulation should address.*

Most modes of passenger service are physically accessible to many disabled people and these regulations should definitely extend to HARPS. The problems that often occur are due to priorities for disabled people not being enforced. For example, buses usually provide a designated wheelchair space on board, but there have been many incidents when the driver has not asked a non-wheelchair user to vacate this space meaning that the disabled person cannot travel. We like to see regulations do more to address these types of issues. It's not enough for HARPS to be physically accessible they need to be required to enforce rules. This could be problematic in the absence of a 'driver'.

Historically, the term 'wheelchair accessible' is used when talking about accessibility. The landscape has moved forward in recognising different types of disabilities and the regulations need to reflect this. Cognitive disabilities, mental health conditions and hidden disabilities are much more prominent in today's society and regulation needs to cater for a much wider range of people with different conditions. Operators of HARPS need to be required to address the needs of people with diverse disabilities and provide 'reasonable adjustments' to help these people. DMUK does appreciate that this could be a mammoth task for an operator and it is impossible to address the needs of absolutely everybody as disabilities will affect people in unique ways, but emphasis needs to be placed on not just being 'wheelchair accessible'.

*Question 25: We provisionally propose that the protection against discrimination and duties to make reasonable adjustments that apply to land transport service providers under section 29 of the Equality Act 2010 should be extended to operators of HARPS. Do you agree?*

Yes. This must be the minimum. With the absence of drivers disabled people are likely to be at higher risk of discrimination because there will be a lack of an authority type figure available to enforce the rules. This protection needs to go much further with HARPS and operators should be required to demonstrate that their reasonable adjustments can be properly enforced even in the absence of a driver.

The lack of drivers could cause problem with physical adjustments. For example the deployment of ramps on trains and buses. Some sort of human assistance must still be available to disabled people that require it.

*Question 26: We seek views on how regulation could address the challenges posed by the absence of a driver, and how crucial role drivers play in order to deliver safe and accessible journeys. For example, should provision be made for:*

*(1) Ensuring passengers can board and alight vehicle?*

Most physical adjustment currently require the assistance of person. For example, the bus driver to lower the bus or deploy a ramp. Regulations need to provide provision in the absence of a driver so that disabled people can physically access the transport they wish to use. This would be very difficult to fully automate as access from street level will not be uniform possibly requiring the need for human judgement. E.g. pavements can be different heights and the driver needs to use their judgement when deploying ramps.

*(2) Requiring reassurance when there is a disruption and accessible information?*

When things go wrong, for example a service disruption, the absence of a driver could cause lots of anxiety. Operators need to make sure they can relay information to passengers in these types of situation. Information also needs to be available in accessible formats.

*(3) Expansion of support at designated points of departure and arrival?*

This would be vital in the absence of drivers, as disabled people would need help in a variety of ways depending on how their disability affects them. Wheelchair users might need help to board or alight, or someone with a cognitive impairment might need help to make sure they are on the right HARPS.

The charity is worried about the safety of disabled passengers if there is to be no staff presence on board HARPS.

*Question 27: We seek views whether national minimum standards of accessibility for HARPS should be developed and what such standards should cover.*

Yes. If HARPS are standardised disabled people will have more confidence in using services. Variation in accessibility does cause anxiety. You explain well in the chapter on accessibility about a blind person being familiar with their environment which can build confidence in using a service. This excellently demonstrates how standardisation can be positive for disabled people.

Standardisation should cover physical features of HARPS, enforcement of disability priorities and information available in accessible formats.

*Question 28: We seek views on whether operators of HARPS should have reporting requirements regarding usage by older and disabled people, and what type of data may be required.*

It is important to gather information on numbers of people using HARPS. This would inform to what extent it has been successful in getting people to use the services. This feedback is vital in improving services and in turn getting more older and disabled people to use them.