



Disability Advice (post DPTAC)
Department for Transport
Sustainable Travel and Equalities
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By email to: PostDPTACviews@dft.gsi.gov.uk

Our ref: RTIG-c060-mc
Date: 21 July 2011

Dear Sirs

Re: Public Bodies Bill – Disabled Persons Transport Advisory Committee (DPTAC): Seeking Views and evidence to inform the Department for Transport of possible successor arrangements

Thank you for the opportunity to respond to the consultation at reference.

The attachment to this letter provides the corporate view of RTIG as a group; individual members may have different perspectives and may, of course, make their own submissions.

We trust this is helpful, but are happy to clarify or explain our views in more detail.

Finally, it will be clear that while we are not able to replicate the functions of DPTAC, we believe RTIG has a valuable (and proven) part to play in the future of travel for disabled people. We look forward to continuing to work with the Department, and others, to assist where we can.

Yours sincerely

A handwritten signature in black ink, appearing to be 'NS' followed by a flourish.

pp Neil Scales
Chair

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Post-DPTAC options for advice to DfT: RTIG's response

Introduction

RTIG is a community group whose members include UK local authorities, public transport operators and system suppliers, with representatives from Government and other key industry groups. Our aim is to further the effective use of information technology in the public transport sector, through sharing experience and through developing common approaches and specifications.

RTIG was established with the express purpose of bringing together a range of stakeholders within public transport, to promote knowledge sharing and consensus. This has given RTIG access to a wide range of perspectives, expandable where appropriate, and an objective credibility across the sector.

Since 2005, RTIG has actively worked to facilitate support for disabled travellers on public transport. We first published the guidance document *Meeting the Needs of Disabled Travellers* in 2007; widely used, including by TfL in its recent fleet-wide projects, it is currently undergoing its second revision. We have also supported the Department through research into Audio/Visual information on buses.

Both of these initiatives involved working alongside DPTAC and individual disability charities, along with operational stakeholders from local authorities, public transport operators, and the systems industry.

Below are our comments on the specific questions raised in the consultation document.

Q1: In your opinion what disability advice does the Department need?

Since the establishment of DPTAC in 1985, there have been many changes in UK plc's transport operations; but two may be highlighted specifically. First, the deregulation begun in the early 1980s has led to a huge change in the industry structure, which now includes private sector providers, statutory regulators and a significant international connection. Second, the information revolution has changed the way that transport undertakings do business, and the way that travellers approach their transport needs.

In this environment, the Department requires a good understanding of both the opportunities for, and impacts of, its policy decisions. Since the transport industry (and its supply chain) is diverse and complex, external advice is likely to be helpful in many cases – although not every decision will require specialist external advice.

We see a requirement for four principal kinds of advice:

- Advice on the needs of transport users (people and goods), drawn from passenger groups, business and others.
- Advice on the current quality of provision, through general or specific surveys.
- Advice on opportunities for policy making, from "think tanks" and interest groups.

- Advice on industry impact of policy options, both interested (eg through public consultations) and disinterested (eg through analytical studies).

Some of this advice is cognitive, and informs the Department on people's thoughts and feelings. Other advice is technical, and ensure the Department has sufficient factual knowledge or specialist skills to undertake its work effectively.

All advice carries a cost, whether financial or simply through the time taken to seek it. (There is also a cost, normally in time, for those providing advice.) For each specific question the Department will need to determine the nature, scope and extent of the advice required. With the exception of regular surveys, this is rarely determinable in advance.

Q2: Could this advice be delivered solely through stakeholder bodies?

No. Although the established disability groups have a crucial role to play in advising the Department, their role is to represent the disability communities. By definition this will not be able to provide the views of transport industry, or objective analytical advice. Their advice focuses largely on user requirements; it is true that some larger bodies have a more technical role, although it is worth noting that this may operate commercially or quasi-commercially.

Similarly, trade bodies such as the LGA (for local authorities), CPT (for public transport operators) or SMMT (for the motor vehicles industry) will have a specific perspective to offer.

The totality of such bodies will certainly provide a valuable course of advice. However it will be difficult to distil these into a forum which is small enough to be workable, contains the relevant perspectives to address any given question, and remains fit for purpose over time.

We feel that any framework which is established to provide advice to the Department must have the flexibility to consult with the right people for each issue. While the Department clearly must have access to as complete a range of stakeholders as possible, it will not need to consult with all of them for every issue.

Q3: Can you give examples where DPTAC has either provided good/poor advice or failed to act?

As noted above, RTIG has worked with DPTAC in two contexts: the production of our guideline document, and on cost/benefit study of Audio/Visual on buses study. In both of these cases, we found DPTAC's involvement useful in providing a neutral view of disabled travellers' needs.

However, DPTAC has not grown in response to the industry changes over the past quarter century, and does not have the ability to advise on either the technology and systems of transport, or on the business architecture of transport.

Specifically, the Audio/Visual study began as a proposal from DPTAC. RTIG helped facilitate a workshop with TfL, bus operators, DPTAC, and DfT. It became clear that DPTAC did not have adequate technical or commercial knowledge of the bus industry,

although they were able to understand and respond to explanations provided by the practitioners.

DfT took over the project, and contracted RTIG to facilitate the analytical work. DPTAC sat on the project working group and continued to make extremely valuable contributions within their area of expertise. However, because we also had the bus industry, the Society for Motor Manufacturers, Passenger Focus, TfL and LAs on the Working Group, the consensus position that was achieved truly represented all stakeholders.

Q4: Are there different areas of advice needed to ensure mode specific transport is addressed? For example, are disability issues in the aviation context substantially different from railways, or from street design?

The fundamental needs of disabled people do not change dramatically from mode to mode: they need access to the full range of goods and services; they need clear, concise and accurate information; they need staff trained to address their needs; and so on.

How best to achieve these needs within each mode of transport will differ, not just because of the physical differences of each mode, but because of the commercial differences within each industry and because of the nature of the “end-to-end” journey. For instance, any discussion of aviation involves at least some discussion of airports (check-in layout, security procedures, etc), and similarly a discussion of rail travel requires an understanding of railway stations and terminals (ticket machines, platform bridges, etc).

The Department needs access to advice for all of these aspects of the journey. This will require access to mode-specialist expertise.

End to end journeys are particularly challenging because they may involve multiple modes. This includes the “walk mode”, which for a blind person or wheelchair user may call up public-space issues outside the traditional scope of DfT. The role of personal technology devices such as mobile phones, therefore, also needs to be understood.

Q5: Do you think the Department requires specific i.e. technical advice or does it need further general disability awareness advice? Are the means of obtaining this advice different – for example would only general policy advice be available from representative bodies, or would they be able to provide technical advice?

The answers to the previous questions have touched on this question.

We believe that the Department is likely, from time to time, to require access to both types of advice. Representative bodies may provide general policy advice but their principal role is to provide advice on user requirements. Some have very good experience of support technologies, and regularly provide technical advice (and/or sell products to) transport practitioners at a local level. However, this is quite variable, and the smaller and less well-funded bodies are less able to support this kind of function.

Q6: Would the Department receive better disability advice if it procured it from consultants? Could examples be provided? How much would you estimate procuring advice would cost?

It depends on the nature of the advice sought. For basic advice on what users want or how operators will respond, there is little benefit in procuring from consultants. (Though if the advice is very diverse, technical, or voluminous, a consultant might help synthesise the results.)

On the other hand if the Department wishes to ensure the objectivity of advice, an impartial third party operating under contract is likely to be appropriate. Although RTIG is a not-for-profit organisation rather than a commercial consultant, our services to DfT on the Audio/Visual work are essentially of this kind.

It is worth noting that consultancy can leverage other advice, and the way in which it is established can help it do so in a broader or narrower way. As noted previously, RTIG often convenes a working group of (voluntary) representatives with different perspectives, and the advice we provide is a distilled synthesis of these.

Costing the advice that DfT will require *a priori* is almost impossible. However, it is worth noting that in this scenario, each paid-for piece of advice will require a financial case to be made – there are no “retainer” costs. This allows the Department to trim its sails under tight fiscal conditions, and to explore more fully when money is less tight.

Q7: Please look at the options and consider what the advantages or disadvantages are. Providing data to substantiate your views would be helpful.

It is our view that a panel of experts (Option 5) would best suit the Department’s needs. Panel members should be selected to address a range of issues, and ideally should provide representation of or a gateway to a broader community.

This option has the following benefits:

- It provides the flexibility necessary to address issues which are not well known in advance, with minimal overhead.
- It captures and benefits from the value of representative bodies, without building in a “lobby regime”.
- It enables a framework to be set up for funded work if necessary, but allows it to be kept efficient.

There are challenges in this approach, for example:

- Deciding how people (individuals or organisations) will be appointed to the panel – or removed from it.
- Deciding which panel members should be approached to provide advice on any specific issue.

- Explaining the obligations of panel members, and identifying mechanisms that enable them to fulfil those obligations.
- Managing the consensus-building process, either for the panel in plenary or for working subgroups.