Working towards a fully accessible railway: a frame of reference for the Williams Review

1. A 'fully accessible' railway

Disability affects around 14 million people in the UK. It includes physical and sensory impairments as well as 'non-visible' disabilities such as autism, dementia, and anxiety. For many disabled people their inability to use the rail network, because of physical or other barriers, or because of a lack of confidence, prevents them from being able to access employment, education and health care, as well as participating in leisure, social and commercial activities.

Although there has been worthwhile progress in improving the accessibility of the rail network in recent years (improvements to the accessibility of rolling stock for instance), the network nevertheless remains substantially inaccessible for many disabled people. This point is reflected in the Review's own evidence paper 'The user experience of the railway in Great Britain', which highlights that people with a mobility difficulty made roughly two and a half times fewer trips by rail in 2017 than people without such an impairment. We strongly suspect that similar disparities exist for people with other types of disability.

Against this background, we have already submitted evidence to the Review arguing that accessibility needs to be seen as a **fundamental** requirement of a successful railway. We further argued that the overall objective of the railway (irrespective of whatever organisational model is used in the future) should be: '...a safe, secure <u>and accessible</u> railway that is delivering the right outcomes for passengers, taxpayers and wider society.'

In this context, it is intended that this further submission, which sets out what a 'fully accessible' railway might look like, should be used as a 'frame of reference' by the Review, when considering how accessibility can best be addressed by potential future organisational models.

A 'fully accessible' railway is, of course, not an end in its own right. It is the means by which disabled people are able to access and use the rail network on an equal basis. This provides direct and obvious benefits to disabled people, but also contributes to a more inclusive and integrated society. It also provides direct benefit to the rail industry in terms of a wider customer base and increased revenue, and leads to wider economic benefits in terms of increased economic activity, higher tax yields, and potentially lower health and social care costs.

However, before moving on to the substance of our paper, it is worth briefing considering what a 'fully accessible' railway means. It is a challenging concept for two reasons:

- (i) It is difficult to envisage a railway where there are not, at least, some operational and physical characteristics that represent a barrier to some disabled people;
- (ii) 'Full accessibility' is a moving target in the sense that technology, our understanding of disability and, indeed, of accessibility is constantly evolving.

This document, therefore, sets out DPTAC's view on what as close to a fully accessible railway as is reasonably possible would look like at this point in time. As such our view certainly isn't Utopian, but it is very ambitious, aspirational, and crucially, we believe, deliverable.

2. Where are we now?

There is currently no agreed approach to quantifying the accessibility of the rail network, and indeed, in many areas, a lack of quantified data on specific aspects of network accessibility.

Against this background, we have drawn on the report 'On Track for 2020?' produced by ATOC in 2015 (specifically the report's appendices). Whilst the report's methodology and publication date means that data should be regarded as indicative, the report does nevertheless, uniquely, provide a quantified overview of network accessibility. We have used our own judgement in highlighting below those issues identified by the report which we believe to be particularly significant.

Stations

- Step-free access between street and platforms only 20% of stations incorporate this to new-build standards, and at a further 31% there is 'reasonable' step-free access, likely to be usable by many disabled people but where some barriers exist. At the remainder there are major barriers likely to prevent some disabled people from travelling.
- Platform-train stepping distance fewer than 2% of stations have level access between train and platform meaning a platform-train ramp is required, along with manual deployment by staff. At 33% of stations either the vertical or horizontal step/gap is greater than 25cm in places.
- **Platform width** at 67% of stations the platform(s) are too narrow in places to permit a compliant turning circle for wheelchair users at the base of a ramp.
- **Toilets** only 38% of stations have toilets, 35% accessible toilets, and 0.2% 'Changing Places' toilets. However, all toilets are almost universally closed when stations are unstaffed, meaning that of these only 53% are available at all times.
- **Heated waiting areas** present at 47% of stations, but only available on all platforms at 8% of stations. Furthermore, they are generally closed when stations are unstaffed. Stations without heated waiting areas include many busy locations.
- **Staircase and ramp quality** only 64% of stations have handrails on both sides of all stairs and ramps. Only 72% of stations have visual contrasting on all step edges.

Rail vehicles

- Compliance with TSI/RVAR accessibility compliance standards all rail vehicles will be substantively compliant by 2020, although some minor issues will remain under the 'targeted compliance' approach.
- Issues not covered by the TSI/RVAR compliance standards these include: provision of toilets (15% of units have no toilet); 1st Class (less than 20% of 1st class accommodation has space for wheelchair users); and reservable seating (only 13% of units offer reservation of seats or wheelchair spaces).

Staffing and assistance

- **Station staffing** only 11% of stations are staffed at all times, with a further 45% staffed only part-time. At some single-staffed stations staff are unable to provide assistance.
- **On-train staffing** at around 20% of stations some or all trains do not have a guaranteed on-board conductor/ guard able to deliver assistance and provide a platform-train ramp.

- Combination of unstaffed trains and unstaffed stations a number of stations that are unstaffed at some or all times, are also served by unstaffed trains (meaning the provision of boarding/alighting assistance, including the use of a platform-train ramp, is dependent on prior notice being given, and/or may require the passenger to use a replacement taxi instead of the train). We estimate that this situation may currently apply at some or all times at up to 10% of all stations.
- Assistance for disabled passengers according to research undertaken by the ORR less than half
 of disabled people are aware of Passenger Assist, and only around a quarter have any
 understanding of it. Again, according to ORR research, around 15% of booked assistance is not
 delivered or is delivered unsatisfactorily.

Industry accessibility drivers

A number of drivers currently contribute to improvements in the accessibility of the rail network: the industry's legal obligations under the Equality Act (enforced by the courts, and reinforced by obligations under the 'Public Sector Equality Duty' for some industry organisations), the industry's regulatory framework (enforced by the ORR), contractual obligations in franchise agreements (enforced by the DfT), and the commercial and reputational opportunities open to train companies, ROSCOs and Network Rail. A number of other stakeholder organisations are also actively involved in efforts to improve accessibility including Network Rail, the RDG, Transport Focus, the RSSB, the Welsh and Scottish governments, Transport for London, and the PTEs.

While all the above generate initiatives to improve accessibility, there is no single 'guiding mind' setting and driving an overall industry accessibility strategy, or, indeed even a framework within which relevant stakeholders can work collaboratively to develop and implement such a strategy. As such, improvements tend to be piecemeal rather than systemic, synergies are not identified or realised, effort is sometimes wastefully duplicated, and opportunities to improve are missed. The sheer number of organisations involved dissipates and blurs responsibilities, meaning that it is difficult for disabled people and their representative bodies to hold the industry to account.

There are contractual and commercial issues as well. Franchise agreements generally impose accessibility-related obligations on operators, with limited flexibility to change once agreed. This is exacerbated by the constraints on purely commercial investment by train operators because franchise lengths are too short to allow them to earn a return on their investment. Investments by Network Rail, including the DfT-specified 'Access for All' programme, are subject to a range of sometimes conflicting pressures, and it is not always clear that the resulting accessibility outcomes are optimal. The regulatory framework is complex, and slow and difficult to change.

Finally, all the above contribute to a culture where accessibility is seen as an 'add-on' rather than a **fundamental** aspect of the industry, and where industry leaders at every level are too often equivocal about the need to deliver an accessible railway.

Overall, it is clear that the industry is some considerable distance short of what might be reasonably considered close to a fully accessible railway. It is also clear that the current culture, structure and regulatory/commercial framework of the industry is unlikely to deliver such an inclusive railway.

3. Working towards a 'fully accessible' railway

In this section we set out our view on what as close to a fully accessible railway as is reasonably possible would look like. In doing we first look at a couple of cross-cutting themes, followed by consideration of the industry's physical infrastructure, before moving on to staff, information, fares and ticketing, and, most critically, in section 4 culture and leadership.

Cross-Cutting themes

There are two themes, which we believe, apply to much of what we say next:

- There is a need for a consistency of approach across all organisations involved in any future structure, but particularly those that perform customer-facing roles. A consistent customer experience for disabled passengers across all operators would make using the rail network more straightforward, and allow them to travel with greater confidence.
- There is a need for greater centralisation in some areas, to make it simpler and easier for disabled people to access and use the railway.

In this context, we have already highlighted in section (2) the way in which the currently fragmented structure of the industry impacts on its ability to drive forward improvements to accessibility.

Physical infrastructure

There are essentially two elements to the railways' physical infrastructure that impact on accessibility; trains and stations.

Trains

As noted in section 2 above, the rolling stock fleet should be compliant with the current TSI/RVAR regulations by 2020. This provides a relatively strong baseline from which to move forwards. Achieving full accessibility depends on addressing those accessibility elements not currently encompassed by the TSI/RVAR regulations, and reviewing/updating the TSI/RVAR standards themselves.

A combination of centrally-defined, universally-applicable accessibility standards for rolling stock coupled with mandatory deadlines for compliance have proved to be an effective way of driving improvement over the last two decades, and there seems no reason why a similar approach could not be continued in the future.

In this context, we would advocate that the current TSI/RVAR standards are reviewed and updated by 2025, with a new implementation deadline of 2040 (the improvements to rolling stock required should be much less significant, given the 2020 baseline). The opportunity afforded by the new standards should be taken to think more broadly about inclusive design: the siting of wheelchair spaces near accessible toilets; accommodating the companions and carers travelling with disabled people; how disabled people with non-visible disabilities might be better accommodated; and so on.

The same deadline should be set for improvements in other areas, specifically: the provision of accessible toilets on all trains that meet a defined threshold in terms of journey length; wheelchair spaces in First Class accommodation (all new rolling stock, and retrofitting of existing rolling stock

where it is feasible); and the extension of reservable seating/wheelchair spaces to all services where this is practical (again, a defined journey length threshold would be sensible).

Such an approach would require a central rail authority of some kind to review revise and define standards, and to monitor/enforce compliance. It is worth noting that the TSI is a European Union-defined standard, but only represents a baseline, and nothing prevents nationally-defined standards that set more onerous requirements.

Stations

Section 2 highlighted that, unlike trains and despite around £500m of government and third party investment since 2006, stations remain a very considerable distance from anything even approaching full accessibility.

The quantum of investment required to achieve something approaching 'full accessibility' is very significant. For example, it is currently costing around £3m just to upgrade a station to new-build standards of step-free access, meaning that around £6 billion would be required to upgrade all stations that currently fall short of this standard. At current annual rates of investment spend on station accessibility it will take around 100 years to make the entirety of the station estate step-free to new-build standards. Even excluding those stations with 'reasonable' access at the moment would involve investment of around £3.75 billion.

Notwithstanding the sheer financial and temporal scale of the challenge involved in making the station estate accessible, we believe that there are other factors that constrain the pace of improvement in this area. The first is the lack of any kind of strategic plan for station upgrading, with every five-year control period of 'Access for All' funding the subject of intense competition between competing stakeholders. In addition, and probably as importantly, we are convinced that currently the limited funding is effectively spent with an inappropriate focus on raising stations to new-build standards when the same amount of funding could be used to improve a larger number of stations to the point that they provided a 'reasonable' degree of accessibility.

However, it is clear that even if the current approach to improving station accessibility was made more effective, there is still a very considerable shortfall in terms of the kind of investment needed to improve the station estate in anything like a reasonable timescale. There is, therefore, no escaping the simple fact that significantly more investment is required.

In this context, we would advocate that the annual quantum of investment in improving station accessibility is increased, and that a strategic plan with compliance deadlines is developed to allow better prioritised and more focussed delivery. This is directly analogous to the approach adopted for rolling stock over recent years, which has been transformative since the introduction of the RVAR regulations and setting of the 2020 compliance deadline in 1995. In this context, we would advocate the development of station standards that mirror the RVAR/TSI rolling stock standards, building on the existing station design guidelines.

Given the above, we would suggest the following approach is adopted to strategic planning:

 Develop a 'first phase' strategic plan with a deadline of 2040 for upgrading the entire station estate to a 'reasonable' level of step-free access as defined by a new 'Stations' TSI' (except in cases where this would be unreasonably expensive), as well as ensuring the provision of stairway/ramp handrails, colour-contrasted steps, and real-time audio and visual information systems at all stations. This will involve a substantial increase in investment funding, and a much greater focus on upgrading to reasonable rather than 'new-build' standards.

Set a 'second phase' strategic plan with a deadline of 2060 for the upgrading the majority of
the station estate to new-build standards of step-free access, but adopting a targeted
approach to stations that fall just short of the standard or where compliance would be
unreasonably expensive.

This would still leave significant issues relating to station accessibility, in particular platform-train horizontal and vertical stepping distances, accessible toilets and heated waiting rooms. The quantum of investment required to address these issues is likely to considerably exceed that involved in addressing step-free access. As such, we would advocate the following approach:

- Develop a strategic plan and provide funding for the provision of toilets and heated waiting rooms that would ensure that a defined proportion of passenger journeys enjoy these features by 2040.
- Ensure that all new stations or major station refurbishments incorporate these features, subject to a defined expected usage threshold.
- Develop a long-term strategy (by 2022) to address the issue of platform-train stepping distances, based on an intensive programme of research to define and analyse alternative (including innovative) approaches.

In order to deliver the above, a central rail authority of some kind would need to develop and publish a new 'Stations' TSI' as well as prioritised strategic plans, disburse funds to delivery bodies, and monitor delivery.

It is worth noting that the approach described above whilst focussed on disabled people will benefit a much wider swathe of passengers including older passengers and passengers with children.

Staff

The availability of well-trained staff to provide support and assistance to disabled passengers is key to the achievement of an accessible railway. There are two elements to this: the number and deployment of staff; and the quality and frequency of their training on disability issues.

Number and deployment of staff

As a minimum we would expect there always to be a member of staff to provide assistance either at the stations where a disabled passenger boards/alights or on-board the train service(s) they use, and in the latter case that the member of on-board staff can provide assistance in boarding/alighting. It is possible to envisage enhanced levels of staffing beyond this; in particular the staffing of more stations on a first to last train basis.

Given the dearth of detailed data on staffing levels currently, it is difficult to estimate the extent to which additional staff would be required to meet the minimum or enhanced requirements set out

above. However, there are opportunities to potentially use existing staff more effectively and flexibly.

However, we should also note the linked issue of providing assistance to disabled passengers, which we discuss in more detail below. Currently only around a quarter of disabled passengers are aware of 'Passenger Assist' and what it offers, but a railway that is as close to being as fully accessible as is reasonably possible would need awareness to be much higher. This will, in turn, increase the demand for the provision of assistance, with potentially concomitant effects on staffing levels.

An additional and a powerful mitigating factor when considering staffing is that any additional staff deployed will be able to provide help and support to all customers, not just those with a disability.

Staff training

There is little point in having adequate staff if they haven't been properly trained to provide assistance to disabled passengers. Much good work is already being done by the ORR and others to raise the standards of staff training, although there is still some way to go. However, this is an area of 'low-hanging' fruit in terms of the potential for improvement, given that costs are relatively low, and that there is already a reasonable base to build on.

Thus, it seems entirely possible to us that by 2022 all customer-facing rail staff should have been trained to at least the standard set out in the industry's regulatory framework (currently the mandatory elements of the Guidance provided to train operators on writing their DPPPs), and that all new staff should be trained to the same level. There should also regular and regulated refresher training (at least every two years) for existing staff.

We set out in section 4 our views on training for management staff and the senior leadership of the industry.

Specific assistance for disabled passengers

One of the key roles performed by staff in relation to disabled passengers is the provision of assistance at stations, most commonly assistance with boarding and alighting trains. At the moment, such assistance, provided by the Passenger Assist service, generally involves pre-booking the assistance required 24 hours in advance of travel, although some train companies and some larger stations require shorter pre-booking periods, or provide assistance on a 'turn up and go basis'.

For the railway to be as close to 'fully accessible' as reasonably possible, 'turn up and go' assistance, that doesn't require pre-booking should be available from all stations (unless there are exceptional circumstances that dictate otherwise), with navigational assistance available at larger/busier stations. Staffing is clearly key to achieving this, as is the better exploitation of technology (allowing disabled passengers waiting at an unstaffed station to alert the on-board staff of the train they intend to catch that they will need assistance boarding for instance).

Finally, it needs to be emphasised that a near to fully accessible railway means that the vast majority of disabled people are aware of the availability of assistance. Achieving this will require a very significant improvement in the current position, implying a much greater focus on communicating the availability of assistance.

Information

Many disabled passengers would like to be able to travel independently without the need for booked (or un-booked) assistance. Information is a key enabler for such independent travel, allowing disabled passengers to plan and undertake journeys with confidence. As such it is worth considering both pre-journey information and 'in-journey' information.

Pre-journey information

Pre-journey information needs to be comprehensive (covering stations, trains, the availability of assistance, and fares and ticketing), detailed, accurate, available in accessible formats, and easy to find. This is a challenging set of objectives given the current multiplicity of pre-journey information sources, all of which fall short of the required standards to a greater or lesser degree.

Digital information sources (online and 'app.' based) are likely to remain the primary sources of information for all rail passengers (both disabled and non-disabled) for the foreseeable future. The extent to which there will continue to be a multiplicity of such sources will depend to an extent on whatever future industry structure emerges from the Review. Given this, we would advocate three approaches to pre-journey information:

- The collection and maintenance of industry data on accessibility by a central rail authority, with the onward provision of such data to information providers.
- The operation of a network-wide information site for accessibility, including journey-planning.
- Extension of the industry's regulatory framework to include requirements upon information providers to provide comprehensive, accessible and easily comprehensible information on accessibility.

For the foreseeable future there will also be a need to provide information in non-digital formats (print and by telephone). We suspect that there will be a long term need for the provision of information by telephone and we believe that would best be provided by a single national information telephone service operated by a central rail authority. The future of printed information is more difficult to predict, but provision for a single network-wide informational leaflet produced by a central rail authority, augmented by more specific information by geographical region, line of route or train operator would seem a sensible way forward.

In-journey information

In-journey information falls essentially into three categories: information provided at stations, information provided on-board trains, and real-time information provided digitally. Accessible information on-board trains is already encompassed within the TSI/RVAR regulations and we would regard current standards as generally satisfactory, albeit needing periodic updating. Accessible information at stations would benefit from a similar approach, which could be incorporated in the stations equivalent of RVAR/TSI already suggested. We would advocate that real time information provided digitally be encompassed within the same extension to the regulatory framework as that already suggested for digital pre-journey information.

One final issue on information concerns the information provided to disabled passengers when services are subject to disruption. We accept that there is a wider issue here that affects all

passengers, but believe that disabled passengers face specific and significantly more difficult challenges in such circumstances. We do not have a proposal to make in this area, but believe that current problems reflect the wider issues with industry culture and structure already highlighted. To be clear, the adequate and effective provision is of information and assistance to disabled passengers during periods of disruption is a fundamental requirement of an accessible railway.

Fares and ticketing

Fares and ticketing, whilst often conflated, are, in reality, linked but separate subjects. We will begin by looking at fares.

Fares

In one sense equal access to the railway for disabled people implies that they should pay the same fares as other passengers. However we believe that there is another factor that should also be taken into account when considering this issue: there is a much lower propensity for disabled people to use the rail network, partly because of the continued existence of barriers to travel; partly because of a lack of awareness of the extent to which the rail network is accessible; and partly because, on average, they experience lower rates of employment and lower incomes, meaning that rail travel is less affordable than for non-disabled people.

The industry's current discount schemes for disabled passengers – principally the Disabled persons Railcard, but also the specific fares for visually-impaired and wheelchair-using passengers – have proved to be a good but not fully effective way of encouraging greater use of the rail network by disabled people. The current review of the Railcard being undertaken by the RDG/DfT is addressing issues associated with the eligibility criteria and companion/carer discounts offered by the Railcard. Provided that these issues are resolved and the Railcard much more strongly promoted, it should continue to provide an effective way of encouraging disabled people to use the rail network for the foreseeable future, particularly for leisure, business and irregular-commuting journeys.

However, the Railcard does not provide discounts on Season Tickets, meaning that it is of less benefit to regular commuters; a weakness only partly compensated for by the discounts available to visually impaired and wheelchair-using disabled passengers. In this context, we believe that there is a strong case for government intervention, possibly through the development of a specific scheme designed to help disabled people re-enter employment by reducing the cost of commuting.

Ticketing

Rail ticketing is currently in a transformational phase with widespread migration from traditional paper tickets to smartcards, debit/credit cards, barcodes on mobile devices, as well as print at home tickets. These new approaches to ticketing have not yet resulted in any significant issues from an accessibility perspective (indeed some forms of new ticketing provide positive benefits to disabled passengers, and potentially provide the opportunity for the re-deployment of staff to more visible and helpful customer-facing roles), although we would prefer to avoid a proliferation of local smartcard and PAYG schemes, which can be confusing for some disabled people. Future-proofing against the risk of new, less accessible forms of ticketing being introduced is probably best provided by a disability-aware and pro-accessibility industry culture. We will consider what is necessary to achieve this next.

4. Culture and leadership

This paper has demonstrated the scale of challenge involved in reaching the point at which the rail industry is as close to fully accessible as is reasonably possible. It is not a challenge that is going to be met by minor adjustment or simply raising the profile of accessibility. Instead it requires that accessibility is seen as a *fundamental* requirement of the industry in the same way that safety, security (and to an extent environmental policy) is seen at the moment. It requires a culture (and structure) that embeds accessibility into the heart of what the industry does. The paradigm shift required to achieve this is the single most important objective for the Review from an accessibility perspective.

Achieving such a transformational change to industry culture will critically be dependent on the leadership of whatever industry structure emerges from the Review. As such, it needs industry leaders at every level, but most importantly those in the most senior positions, to not just have good awareness and understanding of the issues around accessibility, but to proactively promote and focus on delivering an inclusive railway. Achieving this is, of course, easier said than done, but we have some suggestions as to how it might be achieved:

- Make in-depth disability awareness training a mandatory, regulated requirement for every appointee to a Director-level post or above.
- Make it a regulatory requirement that all industry organisations have dedicated accessibility managers, and a Board-level 'accessibility champion'.
- Ensure that all management staff, at every level, and irrespective of their role, receive disability awareness training.
- Build accessibility-related incentives into the industry's reward structure at an individual and corporate level.
- Develop much more extensive and deeper relationships between industry organisations and disabled people, their representative organisations, and other relevant stakeholders.
- Ensure that any central rail authority and, if separate, industry regulator become leadership 'beacons' in terms of accessibility.
- Employ a greater number of disabled people within the industry.
- Ensure that any central rail authority monitors and publishes performance data on outputbased accessibility data at an organisational level.

The use of Equality Impact Assessments for major industry changes would also, we believe, contribute to a more systemic approach to dealing with accessibility issues.

A disability-aware and pro-accessibility industry culture ought to deliver dividends in other areas as well. It ought to reduce the risk of successful legal challenge. More importantly (and fundamentally) it ought to inculcate a mind-set of continuous improvement, and an appetite for innovation. Both are fundamental requirements for a railway that wants to become and, as importantly, remain as near fully accessible as is reasonably possible.

5. Industry structure and regulation

It is not the purpose of this paper to set out what a future industry might look like, but rather to provide a frame of reference for what any future structure needs to achieve in terms of accessibility. However, we believe some points have emerged from our work on this paper that are worth highlighting:

- In many areas there is a need for some kind of central rail authority, not least to provide an over-arching, 'guiding-mind' for the industry in areas like accessibility, but also to be a leadership beacon for a more inclusive railway and, more practically, to undertake a range of activities that are best delivered centrally.
- Regulation has proved to be an effective way of improving accessibility in many areas, and we
 have advocated in this paper its extension to embrace other aspects of accessibility; but for
 regulation to be most effective the current fragmented approach should be replaced by a single
 regulatory code administered by a single enforcement body.
- Measurement of progress towards a fully accessible railway is crucial (and a glaring gap in the
 industry and government's current approach), and a vital role for any central rail authority
 should be the collection and publication of performance data at an industry, sub-industry and
 organisational level.

The Review team have already indicated that a 'one size fits all' approach may not be appropriate for any future industry structure, and we believe it is worth considering this emerging conclusion in an accessibility context. For instance, it may be sensible to consider different types of performance measure for different parts of the industry, with output-based measures (how satisfied are disabled passengers) for those parts of the railway where physical accessibility is already good (much of the long-distance railway for instance) and a more hybrid input- (did the step-free access scheme get delivered on time?) and output-based approach for other parts of the railway.

6. How long will it all take?

We believe it would be best to work towards a three-phase approach, noting that the last two phases are essentially dependant on improving the accessibility of the station estate. Our suggested three target dates are:

Target 2030: A railway which has achieved all the accessibility features described in this paper apart from those relating to station infrastructure (noting that the proposed approach to rolling-stock accessibility means that it will constitute a constantly evolving target).

Target 2040: A railway which has achieved all the accessibility features described in this paper, and where the entire station estate has been upgraded to a 'reasonable' level of accessibility for step-free access and some other accessibility features.

Target 2060: A railway which has achieved all the accessibility features described in this paper, and where the majority of the station estate has been upgraded to new-build standards of accessibility.

Forty years seems like a long time to achieve a railway that is as close to full accessibility as is reasonable possible. It is not: these are ambitious and aggressive targets that will take determination, singularity of purpose, and money to achieve.

7. What will it cost?

We have deliberately not been squeamish in this paper about saying that moving towards 'full accessibility' will require investment and potentially additional operational cost. We have summarised likely additional costs below:

Investment: principally in upgrading station infrastructure, with more limited amounts for rolling stock upgrades, and very significantly smaller amounts in areas such as information.

Operational cost: potentially there will be a need for additional staff, as well as increased spending in areas such as training.

The potential sources of funding will depend on whatever future structure the industry is likely to adopt. However, for station infrastructure in particular, it seems very likely that additional government funding will be required, albeit with contributions from the private sector, local government and other third parties. In this context, there ought to be wider consideration given to whether other parts of government should contribute to accessibility funding. For example, should DHSS funding be used for accessibility improvements at stations close to health care facilities?

Other costs may more easily be absorbed by the industry itself, in some cases on a pure business case basis. However, realistic business models need to be built into any future structure. Even a commercially independent, long distance operator for instance will need longer than five years to earn an investment return on installing a new lift.

8. Conclusions

Accessibility is still seen as an 'add-on' by much of the rail industry; a desirable rather than necessary feature of rail travel. As such a 'whole-system' approach is needed if the deeply-rooted barriers to travel by disabled people are to be removed. Focussing on specific issues such as step-free access at stations is a necessary but insufficient approach. Instead accessibility needs to be embedded into the core of what the railway does in the same way that safety is currently.

As our paper has documented, that implies a wide range of specific actions to improve accessibility, but, most importantly, it requires major cultural change, and an industry leadership, that at every level, is committed to delivering an accessible and inclusive railway. This is a tough challenge and, in our view, can only be properly addressed if accessibility is seen as a **fundamental** requirement of a successful railway.

Disabled Persons Transport Advisory Committee (DPTAC)

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