

APPENDIX 3.

Extract from DfT advice letter of September 2002

Local accessibility policies for taxis prior to taxi regulations being made under the Disability Discrimination Act 1995

1. As you know, we planned to make taxi accessibility regulations under the Disability Discrimination Act 1995 (DDA) effective between 2002 and 2012. When we realised that this could not be achieved in a way that would be acceptable to both disabled people and the taxi trade, the Minister announced in 2000 that regulations would not be introduced in 2002. Since that time we have been exploring a range of options to help to increase the number of accessible taxis available to disabled people throughout the country. We hope to issue further information on our future plans shortly.
2. In the meantime, local licensing authorities may of course make their own policy with regard to accessible taxis for their area, and many do so.
3. As we suggested in our letter to Chief Executives of 31 January 2000, local licensing authorities wishing to set local accessibility standards are advised to look at the various accessible vehicles on offer and judge their suitability against local circumstances and operating conditions. One effective way of making comparisons is to invite several manufacturers to present vehicles on the same day and to invite local disability organisations to try out the options and to offer comments. There are a number of vehicles currently available, which offer good accessibility, and from discussions with industry the Department expects that several vehicles are likely to be suitable.
4. We would stress that the adoption of a policy for accessible taxis is entirely a matter for local consideration and decision. There are several options for such policies which could result in the taxi fleet being wholly or partly accessible. Some authorities require the whole taxi fleet to be accessible whilst others require all new taxi licences issued to be for accessible vehicles only. Moreover, some authorities in areas where the number of taxi licences is controlled have issued additional licences specifically for accessible vehicles in order to improve the number of accessible taxis in their area.
5. In assessing the accessibility of particular vehicles, licensing authorities will want to ensure that they meet the needs of the widest range of disabled people, not only those who are wheelchair users. They will also wish to assure themselves that the equipment provided for wheelchair access and securing is appropriate. For example, the design should allow for wheelchair users to travel facing forward or rearward – never sideways.
6. The choice of vehicle is clearly important. However, unless the drivers know how to use the equipment which is provided for disabled people, for example, the ramps for wheelchair access, and have an understanding of the needs of disabled people, then many of the benefits of accessible transport will be lost. Licensing

authorities will therefore want to consider what training is necessary for drivers, both would-be and existing, to help them better meet the needs of their disabled passengers.

7. We know that some authorities have been holding back on any local initiative in this area in anticipation of national regulations. We would urge them not to do so. As and when any national requirements are introduced there will be a sufficient lead-time for any necessary changes to be made. In the meantime licensing authorities may be able to make significant improvements in the availability of taxis to disabled people in their area.
8. Some points to consider and questions which we consider might be useful for licensing authorities when making an accessibility policy for their area are attached as an annex to this letter. Please note that neither list is meant to be exhaustive.

Annex to September 2002 letter:

POINTS TO CONSIDER WHEN ASSESSING VEHICLES

- Other authorities may already have experience of introducing accessible vehicles, or are in the process of doing so. Sharing experience and resources may be useful.
- The vehicles should be available for viewing, but it might also be useful to invite the companies involved to provide data on the basic specification of their vehicles, and information on any optional extras. This information can then be made available to those attending the viewing or to others with an interest who are unable to attend in person. The companies should also make clear what specification of their vehicle is on display.
- It will be important to involve local disabled people and their organisations in the assessment process. In doing so authorities will want to consider the accommodation provided – which should preferably be somewhere with weather protection and access to facilities such as toilets and refreshments. They will also need to ensure disabled people can get to the venue and may wish to provide transport support.
- Authorities will want to ensure that the vehicles meet the needs of the widest range of disabled people, not only those who are wheelchair users.
- The wheelchair users who participate should ideally represent a cross-section of wheelchair users, eg users of both manual and powered wheelchairs. They should be invited to look at wheelchair entry, exit and the restraint equipment provided for wheelchairs and occupants.
- This exercise should help authorities to establish their minimum standard for accessible taxis which ideally should provide for a range of vehicles, catering for the needs of the widest range of disabled people. A list of the vehicles, including the specifications, which are accepted for licensing should be publicly available.

- It is important, however, that new designs of vehicle are not excluded because they do not feature on the published list. The minimum standard set by the authority could, therefore, be used as the benchmark against which to assess any new vehicle presented to the authority for licensing as a taxi.

USEFUL QUESTIONS WHEN ASSESSING VEHICLES

Entry for Ambulant and Semi-ambulant Passengers

How easy do people find it to enter and exit the vehicle?

How easy is it to open and close the door from both inside and outside the vehicle?

Are grab handles provided in appropriate places; are they highly visible and are they helpful?

Would the doors be sufficiently illuminated at night?

Assisted Entry

On vehicles with a high floor height, is a step provided and how easy is it to use?

Is a swivel seat provided and how helpful is it?

Entry for wheelchair users

How easy is it for wheelchair occupants to enter, exit and manoeuvre within the vehicle?

Are the wheelchair and occupant restraint systems suitable for a range of wheelchairs?

Internal Features

How easy is it for people with different disabilities to locate and operate passenger controls within the passenger area?

Safety Considerations

Is there a slip-resistant surface to the ramp, step (where fitted) and vehicle floor?

What is the Safe Working Load of the ramp?

Do the wheelchair and occupant restraint systems secure the wheelchair and occupant safely? Have they been tested in the vehicle?

Are the wheelchair and occupant restraint systems easy to use?

To which one of the following has the vehicle been tested in the converted state:

- European Community Whole Vehicle Type Approval
- UK Low Volume National Type Approval
- Single Vehicle Approval?