
TRANSPORT DIRECT

Transport Direct: Disability Policy 3.2

User Division: Transport Direct
Created by: Transport Direct
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Introduction

This is the third version of the Transport Direct disability policy¹. It states Transport Direct's progress and delivery against its policy statements. It describes Transport Direct's policy towards disabled people and addresses the travel information needs and accessibility requirements of disabled people.

Transport Direct is a government service, provided by the Department for Transport (DfT), which seeks to improve the information available for everyone who travels within Great Britain.

This policy document supports the overall Transport Direct strategic objectives (SOs):

SO1	Encourage and stimulate each passenger transport sector to develop high quality and accurate information and retailing systems
SO2	Create a web portal to enable users to find all available electronic travel information from a wide range of sources and ticket e-tailers
SO3	Build on strategic objective 1 so that transport operators and retailers can develop integrated information and ticket sales for journeys involving more than one mode of transport, including, in the long term, how to get to the public transport point by car
SO4	Deliver Transport Direct as an integrated and comprehensive information service for all travel modes and mode combinations that allows the user to submit their selection to an e-tailer without re-keying the enquiry.

Disabled people are not a homogenous group. Their travel information needs vary according to the accessibility of the system they want to use as well as their level of independent mobility. In 2003 we commissioned research from Transport and Travel Research Ltd (TTR)², and the findings of that research have been reflected in this policy. The TTR research identified four broad groups of disabled people, and these are the groups that are reflected in this policy:

- People with physical disabilities (including wheelchair users and people who have difficulty walking)
- Blind and partially sighted people (both users and non-users of guide dogs)
- Deaf and hard of hearing people (both users and non-users of assistance dogs)
- People with learning disabilities

This policy is based on four statements:

- 1 Transport Direct will take account of the duties under the Disability Discrimination Act 1995 (Part 3) (DDA).
- 2 Transport Direct will encourage and stimulate the passenger transport sector to develop and maintain high quality and accurate information about the accessibility of transport services and infrastructure for disabled people

¹ The previous version (2.1) was published on 31st January 2006

² traveline and Transport Direct Disabilities Customer Research, July 2004, available at <http://www.transportdirect.gov.uk/research/pdf/prog-dcr.pdf>

- 3 When Transport Direct creates portal services it will seek to ensure that they are usable by disabled people who use:
 - PC-based Internet
 - Mobile devices (PDAs and mobile phones)
 - Public access terminals
 - Interactive digital television

- 4 The Transport Direct portal will seek to assist disabled people with how to plan and undertake their journeys:
 - by comparing routes and modes;
 - by providing available information about accessibility of transport services and infrastructure

The following sections describe each policy statement in turn, giving examples of our progress in support of that statement, as well as what further steps we expect to take.

The annexes give background on the legislation; the needs of disabled people; and the research by TTR, as well as more detail on how these have a bearing on the Transport Direct service, and on the wider activities of the Transport Direct division of DfT.

1.0 Policy Statement 1

Transport Direct will take account of the duties under the Disability Discrimination Act 1995 (Part 3) (DDA).

On-going Activity:

- 1.1 Transport Direct will continue to consider and apply the Disability Rights Commission (DRC) Code of Practice.
- 1.2 Transport Direct will continue to make 'reasonable adjustments' to the portal service to ensure the information requirements for disabled people are addressed.
- 1.3 As Transport Direct makes enhancements and / or creates new functionality / designs the service will continue to review the DDA 1995 (Part 3).
- 1.4 The inclusion in the portal of new information available is described in Policy Statements 2 and 4.

Activity in 2006

- 1.5 The Department for Transport (DfT) now has a legal duty to assess the impact its policy objectives and proposals have on disability equality. The Disability Discrimination Act 2005 amended the Disability Discrimination Act 1995 (DDA) to introduce a new duty on all public authorities, including DfT, to promote disability equality. The Department's first disability equality scheme (DES) annual report was published on 4 December 2006, and will be renewed every three years. Please also refer to annex 1.
- 1.6 The specific duty requires the Department to involve disabled people who appear to have an interest in the way it carries out its functions.

Planned Activity for 2007:

- 1.7 Under this disability equality duty Transport Direct will continue to involve and engage disabled people in testing major releases of the portal. Transport Direct will also look to involve the Disabled Persons Transport Advisory Committee (DPTAC) and disabled people in stakeholder meetings and research. See Policy statement 2 and 3.
- 1.8 Further areas of development are continually being considered in order to extend the availability of information for disabled users. These are described in the future actions of Policy Statements 2 and 4.

The DDA 1995 (Part 3) is further discussed in annex A.

2.0 Policy Statement 2

Transport Direct will encourage and stimulate the passenger transport sector to develop and maintain high quality and accurate information about the accessibility of transport services and infrastructure for disabled people.

On-going Activity

- 2.1 Transport Direct is not responsible for providing information that is not available. The UK transport industry and relevant public bodies should consider their information responsibilities under the DDA. Transport Direct will encourage them to do this and monitor progress.
- 2.2 Transport Direct will continue working with transport operators and transport / travel information providers to improve the extent and pertinence of travel information.
- 2.3 Representatives from the transport industry and relevant public bodies have been advising and will continue to advise Transport Direct through the work of the Stakeholder's Group, which has replaced the previous Advisory and Sounding Boards, and the Research Steering Group.
- 2.4 Transport Direct is keeping new developments in accessibility information and data availability under review.
- 2.5 Traveline is a crucial source of local public transport information. Transport Direct is represented on the traveline data management group, service delivery group, and its advisory board. Transport Direct's Chief Executive, Nick Illsley, chairs the traveline board.
- 2.6 Following publication of the Transport Direct Disability Policy, traveline has developed a national disability policy as well as separate regional policies.
- 2.7 A working relationship between Transport Direct, traveline and at the time Tripscope was established in 2005. This took account of the roles that each organisation could play in responding to the DDA duties, including joint working.
- 2.8 The Transport Direct portal identifies taxi companies which offer accessible vehicles as part of their service. Transport Direct took its information on accessible taxis from Tripscope and shared this information through a contract with TrainTaxi Ltd and this data is regularly fed to the portal and maintained.
- 2.9 The content on the door-to-door pages of the DPTAC website to which Transport Direct carries links to, used to be sourced from and maintained by Tripscope. This service is now provided by an alternative data source.
- 2.10 Transport Direct will bring relevant research to the attention of transport operators and public authorities. Research has so far been published on the Department for Transport website and shared with traveline and operators.

Activity In 2006

- 2.11 Tripscope closed down in early 2006. Although no single party is now offering what Tripscope used to provide, there is more information available on-line than was the case when they were formed, and DDA legislation has encouraged the provision of improved information across the board.
- 2.12 The Scottish Executive conducted a study into the availability of information required by disabled people when planning a journey using public transport in Scotland³. The aim of this study was to improve the level of service provided by government-supported multi-modal journey planning and information services to people with a disability. Transport Direct reviewed this research and will continue to consider any implications such studies might have on its disability policy, and identify any potential areas of joint working.
- 2.13.1 In 2006 Transport Direct reviewed what information is available from Passenger Transport Executives (PTE) in satisfying the availability of the information requirements of disabled people, as significant progress was made by PTEs during the year. This is further discussed in Annex G.
- 2.14 Traintaxi Ltd has created and is maintaining available taxi data associated with airports and ferry ports that is then fed to the portal.

Further information can be found at annex B and D.

Future Activity in 2007

- 2.15 Consideration is being given to the availability of accessible information from traveline journey planning systems.
- 2.16 Under the disability equality duty, Transport Direct will also seek to involve the Disabled Persons Transport Advisory Committee (DPTAC) and disabled people in Transport Direct Stakeholder meetings and in research projects.
- 2.17 Following Transport Direct's review of the information available from PTEs we will now consider how the portal can make use of it.
- 2.18 Transport Direct has been sponsoring a PhD student who is due to complete research on Dyslexia and Travel information before the end of 2007. The results of this work will contribute to the next version of this policy.
- 2.19 Traintaxi has started to create and maintain data for bus and coach stops and this is likely to be completed and implemented in 2007.
- 2.20 Transport Direct will review the website Direct Enquiries (<http://www.directenquiries.com/disabledaccess.aspx>) to examine the data that is available on accessibility of transport facilities.

³ Availability of Transport Accessibility Information for Disabled People, September 2006, available at <http://www.scotland.gov.uk/Publications/2006/08/22140502/0>

- 2.21 Further consideration needs to be given to existing public transport databases and standards, in particular highlighting areas for extension of those standards. This will be developed further in Annex G.

3.0 Policy Statement 3

When Transport Direct creates portal services it will seek to ensure that they are usable by disabled people who use:

- **PC-based Internet**
- **Mobile devices (PDAs and mobile phones)**
- **Public access terminals**
- **Interactive digital television**

3.1 The Transport Direct service became available to mobile phone users in August 2005. Since late 2006, Transport Direct has also been available through interactive digital television services.

Accessibility testing and reviewing

On-going Activity

- 3.2 For each release of the Transport Direct portal user interface (UI), a comprehensive accessibility review is conducted by the Portal Contractor, Atos Origin, to ensure that the site is compliant to the relevant guidelines, including Web Content Accessibility Guidelines (WCAG) and to a level agreed by the Consortium. Transport Direct currently achieves Website Accessibility Initiative (WAI) level 'A'.
- 3.3 At each major release of the portal, an independent accessibility and usability expert will conduct usability tests with people who have a range of disabilities. Any significant findings will be fed back into the development programme – normally in the next bi-monthly release, although minor issues, where the impact is not significant, might be deferred.

Activity in 2006 and 2007

Due to the timing of this policy update we have included results of usability testing conducted in March 2007.

- 3.4 As a result of the testing that was carried out at the end of 2005, Atos Origin produced an action plan to resolve the identified issues and these were implemented into the portal in the early half of 2006. Please refer to Transport Direct's Disability Policy 2.1 at www.dft.gov.uk/transportdirect
- 3.5 In March/April 2007 usability and accessibility testing was conducted by System Concepts. The functions tested included car parking, the carbon calculator and search by rail cost. As a result of the testing, Atos Origin has produced an action plan, with a set of priorities. Priority level one will ensure that the portal continues to meet WAI Band A accessibility and these changes to the portal will be implemented in June 2007. Priority levels two and three will be considered and implemented in future major releases of the portal. A full list of these priorities can be found at annex C.
- 3.6 Overall the conclusions from the report were favourable and only two level one priorities were found, which included ensuring that all Alt tags are in place and are correctly

worded. A summary of the most recent independent usability testing, conducted by System Concepts, can be found at annex C.

Future Activity in 2007

3.7 Please refer to section 3.5.

Complying with recognised standards for accessibility

On-going Activity

- 3.8 We seek to meet widely recognised standards for accessibility. For PC-based channels, we use the W3C Website Accessibility Initiative guidelines. Atos Origin is contractually required to ensure that the portal complies with WCAG to WAI level A. If new widely recognised guidelines are developed for other particular channels such as kiosks or mobile devices we will also need to consider compliance with these.
- 3.9 Where W3C WAI guidelines for a particular channel exist we will check for compliance with that channel's standards. Where appropriate we will display the level of compliance on the site for that channel. The PC internet portal has currently satisfied level 'A' but has many of the qualities of levels 'AA' and 'AAA'.
- 3.10 Adherence to WAI guidelines for web based PCs ensures that all images have relevant 'alternative text' ('alt' tags) and the design facilitates the use of a range of assistive technology.

Activity in 2006/07

- 3.11 As part of the accessibility testing that was conducted by System Concepts in March 2007, the contractors also used web tools to test three functions of the portal. See also section 3.5.

Future Activity in 2007

- 3.12 Atos Origin will ensure that Transport Direct continues to comply with relevant accessibility standards where appropriate and implement priority level 1, as outlined in their action plan and in section 3.5.

Screen-reader review

On-going Activity

- 3.13 It is Atos Origin's responsibility to ensure that the necessary alternative text is available on the site. For channels where assistive technology such as screen readers (e.g JAWS) can be used we will ask a visually impaired user proficient in using such technology to navigate through new features on the site. Transport Direct and Atos Origin will work together to provide solutions within the future development programme. Such checks have also been made on pre-released versions.

Activity in 2006

- 3.14 Transport Direct has considered the Royal National Institute for the Blind (RNIB) web accessibility audit ('Seeing It Right Logo'). It was concluded that we fulfilled over 50% of the requirements for this accreditation, however we will continue to concentrate on compliance with WAI, as an internationally-recognised standard, as our main priority.

Future Activity in 2007

- 3.15 See section 3.5.

Pictures used where possible

Ongoing Activity

- 3.16 Where appropriate on a particular channel we will try to describe travel information using pictures / line diagrams as well as words. This can assist some travellers, for example by giving increased confidence to those with learning disabilities. This is particularly relevant to paper printed outputs that people take away to use during the course of their journey. However, in doing this we also need to reconcile the possible conflicting needs of different user groups and that pictures are not appropriate for some users, such as those who need to use screen readers.
- 3.17 We will continue to create and implement a set of graphical icons to assist users' understanding; where appropriate these will be described and associated with alternative text for the benefit of those who use screen readers.
- 3.18 Rail users can link from the 'Maps' page or via the 'Accessibility' link at the foot of the website to the maps of stations with access - both deep link to the National Rail website. Some information on station accessibility can also be accessed by clicking on the station name from the journey 'details' page.

Activity in 2006

- 3.19 We have considered improvements to our printed outputs, in line with research conducted into users' needs in this area, however it was concluded that in the short term Transport Direct's current output is adequate as other accessibility issues need to take priority in the longer term.
- 3.20 We have introduced more iconography, and included screenshot examples by adding "overview" pages to each section of the site. It is intended that this will use a step by step explanation of the site.

Activities for 2007

- 3.21 There may be formats of maps that are more appropriate for some kinds of travellers (e.g. showing step-free access rather than walking routes or information relevant to other kinds of accessibility need) than the standard portal maps. We have not found any examples on PTE websites but believe that there must be examples available. We

will continue to seek examples of this kind of information and evaluate whether these could be provided either as a variant to the portal maps or by access to external sites.

Providing Interfaces for disabled people to use assistive technologies

Ongoing Activity

3.22 The design of the Transport Direct portal includes facilities for users to utilise assistive technologies to plug into the TD branded user interface so that it can be used by disabled people. However, Transport Direct will not be responsible for providing users with assistive technologies.

Further information can be found at annex C.

4.0 Policy Statement 4

The Transport Direct portal will seek to assist disabled people with how to plan and undertake their journeys:

- by comparing routes and modes;
- by providing available information about accessibility of transport services and infrastructure.

On-going Activity:

- 4.1 Transport Direct will endeavour to distinguish between the absence of information about accessibility and the known inaccessibility of a location.
- 4.2 Transport Direct has evaluated how it could enable users more easily to find direct public transport services, i.e. those not involving changing vehicle. This is a complex requirement, but some assistance is provided by the 'Find a train' function which includes direct overtaken services, giving users the options of staying on a direct train rather than changing (even where in usual circumstances to change would be quicker). The 'force coach' feature within the functionality of the portal's Door-to-Door service also helps in this regard.
- 4.3 Transport Direct includes the rail and coach fares available to holders of relevant disabled persons' concession cards.
- 4.4 Some toll systems have concessions for certain groups of disabled people that need consideration in journey pricing. Typical costs that result from the use of a toll road or bridge/crossing are included as part of the portal's road journey planning engine. Concessionary costs are currently obtainable from a direct link, offered from the portal results page, to the toll operator websites.
- 4.5 Transport Direct has established links between the portal and the DPTAC 'Door to Door' journey information page. Further information can be found in annex D.
- 4.6 Transport Direct offers a link to the "Maps for People with reduced Mobility" available on the National Rail website.
- 4.7 Transport Direct has reviewed what data is relevant to disabled people and this outlined in annexes D and E.

Activity in 2006

- 4.8 Transport Direct has reviewed the information by PTEs that includes local infrastructure and facilities. Refer to Policy statement 2.
- 4.9.1 All advertorials have mentioned that Transport Direct has accessibility information and some local authorities have referred to TD accessibility information to their public leaflets.

4.9.2 As part of Transport Direct's collation of car park data we have considered what accessibility information and facilities are available at car parks.

Future Activity in 2007

- 4.10 We will further analyse other accessibility information and facilities available at public transport nodes and collate data when it becomes available (e.g. airports, ferry terminals, bus / coach stations, car_parks).
- 4.11 We will consider further how Transport Direct can include local infrastructure and facilities, offered by the Passenger Transport Executives (PTEs), by extending the information contained in the portal service (see Annex G). Further consideration needs to be given to existing public transport databases and standards, in particular highlighting areas for extension of those standards.

Further information can be found at annex D.

Annex A - Policy Statement 1

Transport Direct will take account of the duties under the disability discrimination act 1995 (part 3) (DDA)

The Disability Discrimination Act (DDA) defines a disabled person as someone who has a "physical or mental impairment which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities".

The Act states that someone is disabled if they have:

- a mental or physical impairment
- this has an adverse effect on your ability to carry out normal day-to-day activities
- the adverse effect is substantial
- the adverse effect is long-term (meaning it has lasted for 12 months, or is likely to last for more than 12 months or for the rest of your life).

There are some special provisions, for example:

- If your impairment has substantially affected your ability to carry out normal day-to-day activities, but doesn't any more, it will still be counted as having that effect if it is likely to do so again
- if you have a progressive condition, and it will substantially affect your ability to carry out normal day-to-day activities in the future, you will be regarded as having an impairment which has a substantial adverse effect from the moment the condition has some effect on your ability to carry out normal day to day activities
- if you have been diagnosed as having cancer, HIV infection or multiple sclerosis you will automatically be considered as 'disabled'
- if you are registered as blind or partially sighted or certified as blind or partially sighted by a consultant ophthalmologist, you will automatically be considered as "disabled"
- people who have had a disability in the past but are no longer disabled are covered by certain parts of the DDA.

For the purposes of the Act:

- 'substantial' means neither minor nor trivial
- 'long-term' means that the effect of the impairment has lasted or is likely to last for at least 12 months (there are special rules covering recurring or fluctuating conditions)
- normal day-to-day activities include everyday things like eating, washing, walking and going shopping
- a normal day-to-day activity must affect one of the 'capacities' listed in the Act which include mobility, manual dexterity, speech, hearing, seeing and memory

The DDA 2005 amends the definition of disability, removing the requirement that a mental illness should be 'clinically well-recognised'.

In summary, disabled people should not be treated 'less favourably than non-disabled people' [The Department is required to make 'reasonable adjustments' to our service to ensure disabled people's information needs are addressed in the same way as everyone else's. The DDA is a piece of civil rights legislation therefore there is no specific action or information we

have to provide. What is reasonable will be decided on a case by case basis – ultimately by the courts. The definition of what is ‘reasonable’ will emerge over time, as and when cases are brought to court and tested. The specific requirements that arise from ‘reasonableness’ will also vary according to the content and mode of presentation of the information service in question; thus the requirements for traveline will be different from those for Transport Direct, for example.

Having a policy (and acting on it) on addressing the needs of disabled people will help us to meet our obligations under the DDA. We need to consider:

- if anything we are doing will act as a barrier to disabled people accessing our service.
- what information we need to include so it is possible for disabled people to plan journeys – this will be influenced by the findings of the research into the information needs of disabled people that was commissioned in 2003-4.

Disability Discrimination Act Part 3 - Access to Goods, Services and Facilities.

Part 3 of the DDA gives disabled people important rights of access to everyday goods, services and facilities. Service providers have specific duties under Part 3, which have been phased in since 1996. It is now unlawful for service providers to discriminate against a disabled person:

- By refusing to provide (or deliberately not providing) any service which is provided (or prepared to provide) to members of the public; or
- In the standard of service which it provides to the disabled person or the manner in which it provides it; or
- In the terms on which it provides a service to the disabled person.

It is also unlawful for a service provider to discriminate where a failure to make a reasonable adjustment results in making it impossible or unreasonably difficult for the disabled person to make use of any such service.

Further information can be accessed at:

http://www.direct.gov.uk/DisabledPeople/RightsAndObligations/YourRights/YourRightsArticles/fs/en?CONTENT_ID=4001069&chk=Bjab3%2B

The Disability Equality Duty

The Disability Discrimination Act 2005 amended the DDA Act 1995 to introduce a new duty on all public authorities, including the Department for Transport, to promote disability equality. Essentially the amendment ensures that, in broad terms, all the activities of the public sector are brought within the scope of the Act. The disability equality duty is a series of legal requirements with which the Department must comply and applies equally to both external policy functions and its role as an employer.

As well as a general duty to promote equality for disabled people, the Department is also under a specific duty to:

- Prepare and publish a disability equality scheme (DES)
- Publish an annual report stating how it has implemented its DES

The Department's first DES, which must be renewed every three years, was published on 4 December 2006.

A review of the legal obligations of the DDA can be found in Section 4 of the TTR report.

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Annex B - Policy Statement 2

Transport Direct will encourage and stimulate the passenger transport sector to develop and maintain high quality and accurate information about the accessibility of transport services and infrastructure for disabled people

Transport Direct is not responsible for providing information that is not available, but we have been working with Transport Operators and travel information providers, for example Tripscope (now closed) and ATOC, to find out what information is available. Transport Direct will continue to work with stakeholders to seek to achieve data on accessibility.

Complete information is seen as important, especially by people with physical disabilities in terms of the accessibility or otherwise of transport vehicles and infrastructure.

Similarly the TTR research showed that people with learning disabilities also wanted complete journey information; they would not go if they felt confused or worried about their journey.

Following research in 03/04 Transport and Travel Research (TTR) recommended that:

“Transport Direct should strive to provide information on such items that are essential to disabled travellers and can be provided at a reasonable cost.”

Information on the physical accessibility of services is very important and the research showed that complete information is essential for many and disabled travellers are unlikely to take the trip without that information. Considerations that disabled people must make, and which may ultimately prove to be barriers to their being able to travel, include:

- availability of appropriate assistance at stops and stations
- accessibility of individual stops and stations
- accessibility of vehicles normally used on the route in question
- availability of (accessible) toilets
- gap between train and platform
- contact details of taxi companies serving major stops and stations
- contact details of specialist organisations able to help disabled people with special requirements outside of the scope of traveline and Transport Direct

Blind and partially sighted people essentially require information on service infrastructure and any announcements made during the trip need also to be made via voice announcements. For deaf people, announcements should also be made via visual displays.

For most modes the majority of the information above does not exist. It is not the responsibility of Transport Direct to provide what is not available, but it is for the UK transport industry to consider its responsibilities under the DDA and for Transport Direct to encourage them to do this. When information is made available, Transport Direct should consider how to integrate it into the existing portal. Policy statement 4 outlines what is currently available from transport operators and travel information providers.

Annex C - Policy Statement 3

When Transport Direct creates portal services it will seek to ensure that they are usable by disabled people who use:

- **PC internet**
- **mobile devices**
- **public access terminals, and**
- **interactive digital television.**

We want the portal to be used, useful and usable and it is necessary to examine what the barriers are to disabled people who use transport and who used or would use a website.

Barriers to Travelling and Information

We know for example that the main barriers to planning a journey for blind and partially sighted people are:

- Accessibility of internet sites. Transport Direct is currently available through a range of assistive technology
- Websites should have the function to print in large print.

Transport Direct is currently available through a range of assistive technology. Websites should have the function to print in large print.

When considering deaf and hard of hearing people and people with learning disabilities Transport Direct should consider:

- Using iconography/pictures when possible
- Simple/Plain text
- During trip - any announcements should be made visually not just by voice announcements. While this is not directly related to Transport Direct, Transport Direct should provide access to the service via other mediums e.g mobile phone
- Printed information, using plain English and supplemented with illustrations, is strongly favoured by people with learning disabilities as they have difficulty in remembering details. In the TTR research such people were concerned that if they were on a long-distance journey they would forget what they had to do.
- Transport Direct needs to encourage all providers of travel information in the UK to ensure any websites (or other channels) conform to best practice guidance and meet any appropriate standards (WAI, RNIB etc).

The TTR Research recommended that:

“Transport Direct should comply with guidelines relating to the accessibility of internet-based information provision”

Transport Direct has already done a lot of work in ensuring the TD portal complies with any relevant standards. This is an on-going piece of work, and compliance will have to be revisited every time the portal's user interface is changed.

The TTR research also recommended that:

“Transport Direct information should be available by mobile-phone and on-street kiosks”

DfT commissioned System Concepts Ltd to conduct research into "User needs for future channels"⁴. The purpose of the research was to investigate travellers' informational needs while planning and making journeys, the extent to which travellers thought that certain channels / services could meet these needs and how likely they were to use (and pay) for these services. This is part of the general issue of tackling how the Transport Direct portal can reach those who do not have access to the internet.

Access to the Transport Direct website via mobile phone is essential for all disabled people (particularly those who are deaf) during their journey and was made available to the public in August 2005. Many deaf people can access Transport Direct via their mobile phones, providing them with visual access to travel information. Transport Direct has since been extended to interactive digital television.

The TTR research reported that there is a lack of in-trip information, acting as a barrier to travelling. Disabled people are more likely to travel if they can have access to this information. All announcements and delays via 'Live Travel' for example need to be on screen, giving people information to them in planning an alternative route or look at the live travel section.

Any services developed for these other media should also be accessible to disabled people. Technology exists for text messages to be converted into voice (and possibly WAP or internet pages) so blind and partially-sighted people can use the full functionality of mobile phones (www.talx.de)

SYSTEMS CONCEPT ACCESSIBILITY TESTING - Summary of Key Issues

Accessibility testing was conducted in March / April 2007 with the following users:

- partially sighted participants (1 was colour blind)
- blind
- 1 visually impaired participant who was also mobility impaired
- participants with learning disabilities
- 1 participant who had partial hearing (lip reader)
- 1 participant who first language was British Sign Language.

Users were tested on functions made available on Transport Direct in the latter half of 2006. Users performed up to three typical tasks:

- Car journey planning with the Car Park Database
- Search-by-Price Rail Journeys
- Car journey planning involving the Carbon Calculator

⁴ Focus Group Research: Future Transport Direct Channels & Services, System Concepts Ltd, July 2004. Available at <http://www.transportdirect.gov.uk/research/pdf/mr11.pdf>.

Recommendations

For the purpose of this policy we have set out a list of priorities for Transport Direct. To ensure that Transport Direct meets level 1 WAI, the portal must ensure that it addresses level 1 priorities as recommended by System Concepts. The accessibility audit checked the three functionalities against W3C, using web-based accessibility checking tools.

The full report is available on: www.dft.gov.uk/transportdirect

Recommendations from the audit are:

Priority 1

- Ensure all alt tags are in place
- Ensure all alt tags are correct and appropriately worded.

Priority 2

- Ensure all forms have associated labels
- Ensure all tables have column headings which will enable screen readers to read the data.
- Consider alt tags on the carbon graphic screen and better text description of the graphic.
- The contrast between the background and foreground colours were not sufficient on some pages.
- Ensure pages have headers to guide screen readers and all pages were titled.
- Some of the tables were images and these did not increase in size when text was enlarged.
- Ensure all pages on the portal validate to published grammars
- Ensure that links have meaningful names

Priority 3.

- Ensure that a logical tabbing order is implemented.

In addition the results from the accessibility testing with users also set out a number of high priorities for Transport Direct, although these are not essential requirements to meet level 1 WAI. The recommendations for accessibility testing were very similar to those found in the usability testing.

High Priority

- Increase the number of entry points to car park functionality
- Change labels 'Drive to' and 'Drive from'.
- Order the tickets by price rather than availability
- Add the amend button to the 'Modify' section.

Medium Priority

- Provide car journey details on the summary page.

Low Priority

- Inform the users that the option to select a train time is provided in the next step.
- Provide Co2 and fuel costs of both cars

Findings from Car Park tasks

- Most participants found this feature to be very useful
- All participants found it difficult to find the entry point.

Findings from carbon task

- 91% found the entry point and were very impressed with the functionality.

Findings from rail task

- 45% of the participants could not find the entry point.
- Found the functionality tedious and confusing.

Annex D - Policy Statement 4

The Transport Direct portal will seek to assist disabled people how to plan and undertake journeys:

- By comparing routes and modes;
- By providing available information about accessibility of transport services and infrastructure

If the portal is aiming to be the central point of travel information and we are to address the information needs of disabled people, it needs to provide information on the accessibility of individual services. For some disabled people, it may be necessary for arrangements to be made to secure physical assistance from an operator's staff. The portal should inform people where this assistance exists and how they can get it. Many services have only recently become accessible, therefore disabled people may be new to travelling on these modes and any education on how they can use the service will be useful to them. The table below indicates the information which we would like to provide, as we understand from the TTR research that these types of information would be useful for disabled people.

Information Type	Services	Locations
Low floor and kneeling buses	Y	
Doors – ease of opening	Y	Y
Subways and underground routes (for those who are claustrophobic)	Y	Y
Toilets (accessible)	Y	Y
Accessible Toilets – baby changing facilities]	Y	Y
Travel at less busy times	Y	Y
Wheelchair spaces	Y	
Contact details of taxi – accessibility of taxis and training levels of staff.		Y
Contact details of community transport.		Y
Contact details of other organisations able to assist people wishing to travel	N/A	N/A
Staffing and staff training levels (e.g. sign language)	Y	Y
Availability of assistance for disabled people at stops and stations and how to book it		Y
Car parks (including disabled people's parking spaces)		Y
Drop-off areas		Y
Walking routes & distances, dropped kerbs, difficult surfaces and gaps between platforms and vehicles.		Y
Lifts/ramps/escalators/steps (to each platform, gate or bay).		Y
Temporary non-availability of the above due to repair, refurbishment etc		Y
Accessible ticket offices and ticket machines including wheelchair accessibility and induction loops		Y
Accessible (heated) waiting rooms		Y
Audio and visual (real time) information	Y	Y

There is a proposed enhancement to JourneyWeb (planned to be part of release 3) which introduces 'hazards' and the ability to plan journeys to avoid them. Hazards include stairs; escalators and uneven surfaces and so could cover a wide range of requirements. However, the ability to implement this effectively depends on thorough data collection and maintenance which is likely to cover only major interchanges for some time to come. It also depends on individual journey planners supporting this functionality, and there are as yet no plans to implement such capability.

TTR research recommended that:

“The Department for Transport should take steps to ensure that disabled people with special requirements outside of the scope of Transport Direct have access to information to assist them to travel through a specialist national agency such as Tripscope and/or a network of local agencies”

Transport Direct has established a relationship with DPTAC.

A review of the data held by the now closed Tripscope has been conducted and a paper drafted by Transport Direct, 'Tripscope - A data perspective' has been published. This is summarised below. We acknowledge the closure of Tripscope but believe that the appropriate data we collected from them is now fully embedded in the portal.

Tripscope - A Data Perspective (summary of conclusions)

Following the research conducted by Transport and Travel Research in 2004, Tripscope was identified as a potential source of information that could help Transport Direct to fulfil the requirements identified in the Transport Direct Disability policy. Transport Direct undertook a detailed review of the data held by Tripscope in order to consider if the information could (and should) be integrated as part of the Transport Direct portal travel information service.

'Tripscope - A Data Perspective' considered the information available from Tripscope in more detail following a visit that was made to Tripscope on 1st December 2004. The Tripscope organisation subsequently closed down in early 2006.

Tripscope had established itself as a recommended source of travel advice for disabled people, and established a comprehensive source of information associated with organisations that held information relevant to their service. Their knowledge and expertise of the industry was considered to be helpful in assisting Transport Direct to deliver some of the requirements of the Disability Policy.

Tripscope had the only source of accessible taxi information at the time of the visit, and had taken upon themselves the considerable task of collecting and maintaining this information. After their Tripscope closed, TrainTaxi Ltd took over the management of this data, and this has enabled Transport Direct to continue to present accessible taxi information, which has significantly increased both in quantity of firms listed and richness of data.

DPTAC: Linking Strategy (Summary)

A review of the DPTAC web site was conducted as a result of the findings of the Tripscope – A data perspective report. The purpose of this review was to determine the extent and manner of linking from the portal to the DPTAC web site e.g. deep linking to the appropriate page in the DPTAC site, as well as considering how this relationship between the two sites can be maintained.

The DPTAC website contains a significant amount of information that complements the journey planning service offered by the portal. The information contained in this web site is able to prepare a disabled person who is preparing to undertake a journey by public transport or

private car by identifying a number of important questions that should be considered before travelling. It was recommended that Transport Direct sought the necessary permissions to allow the portal to offer a link to the DPTAC web site, the level that this link (or links) could be varied depending on the questions that should be posed.

Annex E - Summary of the Information Available from Passenger Transport Executives

Transport Direct is keen to identify and establish links to other sources of accessibility information associated with journeys in Britain. This area of responsibility for providing information to the public resides with the local authorities (passenger transport executives) and with the transport operators. Earlier investigations into the availability of such information were not encouraging; however significant strides have been made by PTEs and information describing the accessibility of the public transport infrastructure and services.

Each PTE website was revisited to review and assess its ability to supply published material about the accessibility of its public transport infrastructure and services. All websites have evolved and increased the amount of information available. For example most sites now have a mobility page and some authorities have launched branded websites which cater for the information needs about the modes operating in their region e.g. Network West Midlands and Travel South Yorkshire.

The following table is a summary of the readiness of each passenger transport executives' website.

PTE	BUS		RAIL		UNDER - GROU ND		LIGHT RAIL		FERR Y		Mobility	Comments
	N	V	N	V	N	V	N	V	N	V		
Greater Manchester	Green	Blue	Green	Red	Grey	Grey	Green	Green	Grey	Grey	Green	Bus station maps, rail network map, multi-functional network maps, tram maps, metro station information pages & trams are accessible
MerseyTravel	Green	Green	Green	Yellow	Grey	Grey	Grey	Grey	Green	Yellow	Green	Bus & rail station and ferry terminal - station information pages. List of accessible bus services
West Midlands	Green	Yellow	Yellow	Blue	Grey	Grey	Green	Green	Grey	Grey	Green	Buy stop maps, metro map and facilities at each stop, station information for bus interchanges
West Yorkshire	Green	Green	Green	Blue	Grey	Grey	Grey	Grey	Grey	Grey	Green	Station information pages for bus interchanges and key bus points, rail station information pages, bus services offering easy access (low floor).
South Yorkshire	Green	Green	Yellow	Red	Grey	Grey	Green	Green	Grey	Grey	Green	List of bus services identifying the accessibility of the vehicles being used
Strathclyde	Green	Red	Yellow	Red	Green	Red	Grey	Grey	Blue	Red	Red	Station information pages for bus interchanges, station layouts,
Tyne & Wear	Red	Yellow	Blue	Red	Grey	Grey	Green	Blue	Yellow	Yellow	Green	Station information pages for all metro stations
Transport for London	Yellow	Green	Blue	Red	Green	Green	Green	Green	Green	Yellow	Green	Accessible tube station guide, station information pages for all underground stations, river piers, tram stops

Information published and of use to the portal ■
 Information published, useful, but limited in detail ■
 Information published but would not add any value to the portal ■
 No information ■
 Form of public transport not available in this region ■

N – Node/Infrastructure Stop
V - Vehicle

Conclusions

Transport Direct needs to consider how this information can be captured to provide a national and regional perspective for the travelling public.

Annex F - Summary of information requirements and preferences, and impact on travel behaviour (from TTR Report)

Group	Most important (required in order to make a journey)	'Nice to have' but would still make journey if not available	Preferred format	Likely impact on travel behaviour
Deaf and hard of hearing				
Regular public transport users	Times and destinations of services. Where to board and which stops to change train/bus at.	Availability of visual information during a journey (real time display boards). Times and destinations of services.	Text, Fax, e-mail, printed information posted to them direct.	Make journeys less stressful. Need to know reliable information sources in order to relax.
Irregular public transport users	Timings and cost of public transport. Also the availability of assistance at stations.	Cost of travelling by public transport. Nice to be able to find out which stations had staff who could communicate in sign language.	Text, Fax, e-mail, printed information posted to them direct.	Would use public transport more often. Able to relax more on public transport
Car users (non public transport users)	Would need times and routes, but unlikely to use public transport. Most were happy driving themselves.	Cost of travelling by public transport relative to travelling by car.	Plain English on timetables. English often a second language	Would possibly use public transport, but in many cases would still prefer the car
Blind and partially sighted				
Regular public transport users	Information about timings, cost and availability of assistance.	Accurate descriptions of how to get from platforms to taxis/buses.	Audio tape posted direct to their home address	More inclined to travel independently on public transport.
Irregular public transport users	Availability of assistance, audio information available prior to travelling, on board and at stops.	A way for the bus driver to notify them it is their stop.	Audio tape/Braille sent by post with journey information.	Not keen on using local buses alone. Some prepared to try out trains.
Taxi and community transport users	More reliable information about the times and available assistance on public transport.	Would be nice if community transport could be integrated with public transport services.	Audio tape/Braille sent by post with journey information.	Very unlikely to travel on public transport without assistance from carers, friends or relatives.

Group	Most important (required in order to make a journey)	'Nice to have' but would still make journey if not available	Preferred format	Likely impact on travel behaviour
Physically disabled				
Regular public transport users	Information about the physical accessibility of stops, stations and vehicles. Wanted to avoid having to detour on a journey to go to a station where a ramp exists or where there are lifts.	Availability of disabled parking at train stations, walking distances between interchanges or platforms. Availability of disabled toilet facilities.	Real-time information via text messaging, information by post and telephone requests. Some used the internet for train journeys.	Likely to travel longer distances, attend more day trips and holidays, visit friends and family more often Preference to use trains more and then a taxi than local buses as low-floor buses can not be guaranteed.
Irregular public transport users	Availability of staff assistance at stations and interchanges Accessibility of vehicles and infrastructure	Concessionary fares for themselves and carers travelling with them.	Real-time information via text messaging	Would use public transport more if they could find out better information about the accessibility of
Car users (non public transport users)	Availability of car parking at train stations	Concessionary fares which would make it cheaper to go by public transport than by car.	Telephone service with options for disabled callers.	Small impact upon car users. More important for longer journeys than locally.
Taxi and community transport users	Wanted to be able to combine booking a rail journey over the 'phone with booking a taxi/dial-a-ride to take them to and meet them from the station.	Concessionary fares. Would be nice if community transport could be integrated with public transport services.	Real-time information via text messaging. Telephone service where they could state their needs.	Little impact on people who are heavily reliant on community transport/taxis due to prior experiences of inaccessible public transport

Annex G - General Information on disabled people

Latest Government statistics on the numbers of adults in Britain covered by the DDA definition of disability indicate that there are over 10 million disabled people (22 per cent of the adult population).

Many disabled people find it difficult and in some cases impossible to use conventional public transport although this situation is improving rapidly with the introduction of legislation requiring all new trains, buses and coaches to have features making them accessible to disabled people, including wheelchair users.

The DDA defines disability as "a physical or mental impairment which has a substantial and long term adverse effect on a person's ability to carry out normal day-to-day activities". A 'physical impairment' may include blindness, deafness, paralysis or heart disease, whether in existence since birth or through illness or an accident. A 'mental impairment' is intended to cover a wide range of impairments relating to mental functioning, including what are known as learning difficulties.

The DDA Act 2005 states that someone is disabled if they have:

- a mental or physical impairment
- this has an adverse effect on your ability to carry out normal day-to-day activities
- the adverse effect is substantial
- the adverse effect is long-term (meaning it has lasted for 12 months, or is likely to last for more than 12 months or for the rest of your life).

There are some special provisions, for example:

- If your impairment has substantially affected your ability to carry out normal day-to-day activities, but doesn't any more, it will still be counted as having that effect if it is likely to do so again
- if you have a progressive condition, and it will substantially affect your ability to carry out normal day-to-day activities in the future, you will be regarded as having an impairment which has a substantial adverse effect from the moment the condition has some effect on your ability to carry out normal day to day activities
- if you have been diagnosed as having cancer, HIV infection or multiple sclerosis you will automatically be considered as 'disabled'
- if you are registered as blind or partially sighted or certified as blind or partially sighted by a consultant ophthalmologist, you will automatically be considered as "disabled"
- people who have had a disability in the past but are no longer disabled are covered by certain parts of the DDA.

The test of whether an impairment affects normal day-to-day activities is whether it affects one of the broad categories of capacity listed below (The

statistics are based on research carried out for the SRA by Cranfield University):

- Mobility - 4,600,000 people have difficulty in walking. 800,000 of these people use a wheelchair. 2,200,000 people have disabled people's parking badges
- manual dexterity - 7,500,000 people have arthritis (Source: Age Concern)
- physical co-ordination
- continence
- ability to lift, carry or otherwise move everyday objects
- eyesight (even when wearing glasses or contact lenses) - 1,970,000 people have impaired sight, even with glasses or contact lenses (Source: DSS Report No 94: Disability in Great Britain 1999). Approximately 5 per cent of this number are unable to use residual vision even for colour contrast
- speech - 1,000,000 people have communication impairments
- hearing - 8,700,000 people have some degree of hearing loss (Source: RNID). 23,000 people in the UK are deaf or blind. If older people with decreasing sight and hearing are taken into account, the figure rises to some 250,000.
- memory, learning, concentration, understanding or perception of the risk of physical danger - 1,400,000 people have learning difficulties

Some people have more than one impairment. Age and disability are, of course, not synonymous, but there is a very strong correlation between them. Over 15 per cent of the population and 50 per cent of disabled people are over the age of 65. The age of the population is steadily increasing and demographic projections suggest that this figure will increase markedly.

Disabled People and the Internet

"Disabled People and the Internet", research carried out by the Rehabilitation Resource Centre at City University for the Joseph Rowntree Foundation⁵, found general enthusiasm among disabled people for making services available on the web. The Internet was found to enable communication among housebound people, but users had difficulties over the cost of equipment and in identifying appropriate assistive devices.

The study concluded that Government subsidies of the costs of computers, of online access, and of assistive devices for disabled people on benefits or low incomes, and greater support for organisations providing information on assistive devices and training, would do much to overcome these barriers. Greater publicity was also needed for UK Online centres, and evaluation was needed of the effectiveness of the centres in supporting disabled access.

⁵ Available at <http://www.jrf.org.uk/bookshop/eBooks/1859351867.pdf>
See also <http://www.jrf.org.uk/knowledge/findings/socialcare/524.asp>

Annex H - traveline & Transport Direct Disabilities Customer Research

Research was commissioned by Transport Direct to look at the information needs of disabled people. It was carried out by TTR during 2003-04 and included focus groups of disabled people split into four categories:

- Physically disabled people
- Blind and partially-sighted people
- Deaf and Hard of Hearing people
- People with learning disabilities

Objectives of Research Project

1. To review legal obligations on transport operators and information providers to provide travel information to disabled people
2. To assess the extent to which providing better travel information to disabled people would encourage them to make greater use of public transport
3. To assess disabled people's travel information requirements
4. To examine whether information services like traveline and Transport Direct are the most effective providers of the information that disabled people need, or whether it might be better provided by a specialist organisation.

Annex I - Glossary

Term	Definition
ATOC	Association of Train Operating Companies
DDA	Disability Discrimination Act 1995 - aims to end discrimination which disabled people face and was amended in 2005
DPTAC	Disabled Person Transport Advisory Committee – Government's statutory advisors on the public passenger transport needs of disabled people
DRC	Disability Rights Commission –an independent body established in April 2000 by Act of Parliament to stop discrimination and promote equality of opportunity for disabled people. [NB will be disbanded in September 2007 in favour of the new Commission for Equality and human Rights]
GMPTE	Greater Manchester Passenger Transport Executive
JAWS	Brand name of screen-reader software
Megabus	A website for booking intercity bus travel tickets in the UK
NaPTAN	National Public Transport Access Node – a term which describes the points where there are public transport stops
NPFR	National Parking Facilities Register
NRES	National Rail Enquiry Service
PTE	Passenger Transport Executive
RADAR	Organisation acting as a disability network
RNIB	Royal National Institute for Blind
RTEL	Real-time Engineering Ltd
Traintaxi	Current online service that provides telephone numbers of taxi firms located near railway stations - enables customer to continue with their onward journey.
RTI	Real-time information
TTR	Transport and Travel Research – provide transport consultancy to both public and private sectors
UI	User Interface – this is a term used to describe the interaction between the user and the pages seen on screen
WAI	Website Accessibility Initiative – an initiative which co-ordinates organisations around the world promoting usability for people with disability

Annex J – References

Disability Discrimination Act 1995

<http://www.legislation.hmso.gov.uk/acts/acts1995/1995050.htm>

The following documents and research can be found on Transport Direct's background website at www.dft.gov.uk/transportdirect.

Transport Direct Disability Policy Version 1.0, published 21st October 2004

Transport Direct Disability Policy Version 2.1, published 31st January 2006

System Concepts Usability Testing 2005

System Concepts Usability Testing 2006