



## **Motability Foundation response to the Disability Action Plan 2023 to 2024: consultation document**

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### **About us**

The Motability Foundation is a registered charity set up in 1977. The Motability Foundation funds, supports, researches and innovates so that all disabled people can make the journeys they choose. The Foundation oversees the Mobility Scheme and provide grants to help people use it, providing access to transport to hundreds of thousands of people a year. The Foundation awards grants to other charities and organisations that provide different types of transport or work towards making transport accessible. We also carry out ongoing research, in partnership with disabled people and key stakeholders in the industry, to inspire innovations that continue to champion accessible transport for all.

### **Background**

We welcome the opportunity to contribute to the Disability Action Plan consultation. In terms of our response, we have largely focused our answers on our evidence and research, which we view as being particularly relevant on proposals that are covered in Section 3 and Questions 4, 5, 9 and 11. We would welcome the opportunity to discuss our responses and evidence in more detail with the Disability Unit (DU) if that would be helpful.

### **Response to Section 3**

We broadly welcome the new cross-government work led or coordinated by the DU, as outlined in section 3 of the consultation. This will be an important step to ensuring that disability inclusion is co-ordinated across all departments in government as part of the wider commitment to support disabled people across the UK.

In particular, we are supportive of plans for the Department for Transport to make journeys more accessible and inclusive. Our research has shown that in the UK, those with disabilities (as defined under the Equality Act 2010) take 38% fewer trips than those without, a figure which has not changed over the period for which we have data, 2007-2019.<sup>1</sup> While this 'transport accessibility gap' is driven by many factors, a significant proportion is due to the current provision of transport, both public and private, not being accessible for disabled people.

Our research suggests that closing the transport accessibility gap widens access to healthcare, employment, education, and social activities. Working with econometric

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<sup>1</sup> [The Transport Accessibility Gap, 2022](#)

experts, our estimate is that the socio-economic benefit of completely closing the transport accessibility gap for disabled people in the UK is £72.4 billion per annum.<sup>2</sup>

#### **Response to Question 4**

**DU has identified climate adaptations and mitigations as an emerging area in need of increased disability inclusion. This would mean making sure that measures addressing climate change consider and respond to the needs of disabled people. Examples of climate adaptations and mitigations include measures implemented to change people's car use and energy consumption.**

**4a. To what extent do you agree with the need to focus on the emerging area of climate adaptations and mitigations?**

**4b. If there is anything further that you would like the government to do to increase disability inclusion in climate adaptations and mitigations, or you would like to explain your answer, please do so here.**

In 2022, the transport sector accounted for 34% of all territorial carbon dioxide emissions, the largest majority of these emissions are from road transport.<sup>3</sup> We therefore believe transportation should be a major focus of the DU's measures to consider disabled people when developing policies aimed at addressing climate change.

Motability Foundation has undertaken a significant amount of research into disability inclusion in the context of climate change and Government Net Zero targets, specifically in respect of the accessibility of charging infrastructure for electric vehicles (EVs), and barriers that many disabled people face making the transition to EVs.

The Government recently announced plans to delay the ban on the sale of new petrol and diesel vehicles to 2035, by which time the number of disabled drivers or passengers is expected to increase to 2.7 million.<sup>4</sup> Secondary analysis conducted by the NatCen Social Research has also highlighted that cars and vans were those more likely to be selected for transport by those with a disability (68%).<sup>5</sup>

With many reliant on car travel to support their independence, freedom and wellbeing, Motability Foundation wants to ensure EV charging is inclusive for all. However, we have found through research that the infrastructure that would support this transition to Net Zero through EVs remains inaccessible. A report from the Research Institute for Disabled Consumers (RiDC)<sup>6</sup> tested the experiences of disabled drivers with EVs, and identified a range of specific challenges with design features, such as high kerbs, inadequate space for wheelchair users around the charge point and heavy cables.

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<sup>2</sup> [Ibid](#)

<sup>3</sup> [2022 Provision Emissions Statistics, Department for Climate Change and Energy](#)

<sup>4</sup> [Electric Vehicle Charging Infrastructure report](#)

<sup>5</sup> [Motability: disability and transport needs](#)

<sup>6</sup> [Going Electric?](#) Research report into the accessibility of plug-in electric vehicles, 2020

Moreover, the vehicles themselves may not be accessible. Our report “[EV design & disability inclusion](#)”, with the Energy Saving Trust (EST) examined the current barriers to accessible EV design for disabled people, with a spotlight on Wheelchair Accessible Vehicles (WAVs). The research highlighted a number of key challenges that faced disabled users of EVs, including design inclusivity, limited availability of models suitable to disabled people, and affordability.<sup>7</sup>

We believe it's important that the government monitor the effects of incentives for Electrified Wheelchair Accessible Vehicles (e-WAVs) in the ZEV mandate. The additional 1.5 credits proposed for e-WAVs in the mandate is supported by Motability Foundation. We believe it will support OEMs in allocating EV vehicles (M1) to the conversion industry. This will contribute to ensuring that disabled people with the most significant mobility requirements and their families can have an electric solution that meets their needs as manufacturing pivots into EV production.

The transition to electric vehicles will be more complex for disabled people in need of WAVs, and it's going to be important for Government to be open to change and consider alternative approaches if they don't provide a sufficient supply of convertible EVs to ensure disabled people don't get left behind.

One potential mechanism that could be utilised to guarantee supply is to offer more certificates for WAV base vehicles. The number of additional ZEV mandate certificates should be decided in consultation with government, OEMs and converters. Additional WAV certificates could be divided between them to encourage greater collaboration. This would also allow converters to sell certificates as an additional revenue stream.

Our report with the EST also highlighted that the unique position occupied by converters and adapters in the UK appears to only be understood and recognised by a small circle of stakeholders. In order to support these industries, we need to take a more pro-active approach to overcome industry barriers together. This is especially important with regard to the strong benefits that the adaptation and conversion market offer to disabled consumers, such as improved mobility and independence.

We would also recommend the adoption of a single charging standard to ensure that the transition to EV charging remains equitable for all users. Last year, in partnership with the Office for Zero Emission Vehicles (OZEV), Motability Foundation sponsored the British Standards Institute (BSI) to develop the world's first national accessible charging standard, PAS 1899.<sup>8</sup> The standard defines the minimum accessibility requirements for all public chargepoints, as well as supplementary best practice guidance. Making charge points accessible can also benefit everyone, especially older people and those with young children. The standard also covers good practice guidance for improving safety around chargepoints.

Motability Foundation is continuing to support the uptake of the PAS 1899 standard, and it may be in the interests of Government and industry to encourage take up of

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<sup>7</sup> [EV design & disability inclusion](#)

<sup>8</sup> PAS 1899: 2022: Electric vehicles – Accessible charging – Specification, contains the best available evidence on making EV charging accessible for disabled people, and can be downloaded [here](#)

the standard over time, including looking at the possibility of mandating, to ensure in future all disabled drivers can charge accessibly and confidently by 2035.

## **Response to Question 5**

**DU is proposing to develop a ‘Disability Enabled Badge’ to encourage businesses and services to train their staff in disability awareness, and to make it easy for disabled customers to identify businesses and services that have done so.**

### **5a. To what extent do you agree that this scheme would give increased confidence to disabled customers when accessing businesses or services?**

We support proposals in the consultation to establish a Disability Enabled Badge, and our evidence shows that improved training for transport staff could help with attitudinal problems disabled people sometimes encounter when travelling, and provide them with greater confidence.

Participants in a survey conducted by the RNIB for a report funded by Motability Foundation revealed that around nine per cent found it difficult getting to public transport due to a lack of specialist support on transport operators. When asked if there was anything else that would help them have a better experience when using public transport, 11 per cent cited the attitudes of public transport staff, and 12 per cent said the attitudes of fellow passengers.<sup>9</sup>

We also know that the Covid-19 pandemic had a significant impact on disabled people’s experiences of travel accessibility. Research conducted by Britain Thinks on behalf of Motability Foundation has shown that attitudes and behaviours of non-disabled passengers, motorists and transport staff have been a significant challenge throughout the pandemic.

In quantitative research taken in February 2022, 1 in 3 (32%) disabled people said they found the attitudes and behaviours of other passengers or motorists a challenge when travelling during the pandemic – making this the option most likely to be selected from the list of challenges presented. In qualitative research, participants described experiences of being challenged by others as to their support needs, having to advocate for the use of disabled spaces (on both public transport and parking spaces) and a lack of awareness of non-visible impairments. While experiences with non-disabled passengers and staff are varied, and only a minority are negative for most participants, adverse interactions with non-disabled passengers, staff and motorists were felt to have a significant impact on participants’ confidence to travel.<sup>10</sup>

As an example of how training can improve the experience of disabled people when travelling, Motability Foundation recently partnered with the Community Transport Association and Hampshire County Council to transform the existing training given to minibus drivers. The updated training will be designed with all community transport

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<sup>9</sup> [Inclusive Journeys: Improving the accessibility of public transport for people with sight loss](#)

<sup>10</sup> [Impact of Covid 19 on disabled people’s experience of transport](#)

users in mind, and specifically gives drivers the knowledge and confidence to support disabled people to use their service from door to door. We would be happy to share our knowledge and findings of this scheme with the DU, if this would be helpful in developing its proposals for a 'Disability Enabled Badge'.

### **Consultation question 9**

**DU is proposing establishing a task force to improve the wellbeing and opportunities of disabled children. This task force would bring multiple government departments together to work on a broad issue that they are all responsible for in different ways. It would aim to improve the way government services for disabled children work together. The proposed areas of focus would be: transitions to adulthood, accessibility of public spaces and transport, bullying, personal safety and the impact on wellbeing and early identification of need and support for families.**

We support the focus on transport as part of a task force to improve wellbeing and opportunities of disabled children. Motability Foundation has worked closely with a wide range of disabled people and parents or guardians of disabled children, and heard about the challenging experiences in terms of accessibility to transport.

A key part of our work is to fund, support, research, and innovate so that all disabled people, including children and parents or guardians of disabled children, can make the journeys they choose. One example of this has been our funding of the Family Fund Mobility Support scheme, ensuring that 1,215 families across the UK, with disabled children, have easier access to appointments, reliability during emergencies and enough space to attend to their children's urgent medical needs, when required.<sup>11</sup>

The pilot scheme was carried out in phases, between January 2018 and December 2021, and helped 434 families with a lease for a vehicle and funding for the majority of their costs. A fully accessible car can make life significantly easier for families raising a disabled child with complex needs, providing space for multiple bulky medical items such as oxygen machines and wheelchairs and, crucially, cutting costs for families who are often forced to use taxis to reach medical, and other vital appointments. We would be pleased to engage with the taskforce to demonstrate the difference such funding can make to disabled children and their families.

### **Consultation question 11**

**Government evidence and evaluation on disabled people usually focuses on outcomes. Outcomes data is that which measures the final result of a policy area or service, such as being in employment or having a degree. This type of information can be very valuable, but DU believes that improving the lives of disabled people also requires government evidence and evaluation that focuses on the experiences of disabled people. This additional evidence helps**

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<sup>11</sup> <https://www.familyfund.org.uk/grants/schemes/ffms/>

**to put outcomes data in context, allowing a clearer picture of how policies really impact disabled people's lives.**

- **11a. To what extent do you agree with this proposed approach to evidence and evaluation?**
- **11b. If you would like to explain your answer, please do so here. (Suggested maximum 500 words)**

We strongly support building government policy proposals on evidence and evaluation that focuses on the experience of disabled people, and Motability Foundation has conducted widespread research with disabled people into their experiences in the transport system against measurable outcomes, which we are happy to share.

As part of our commitment to ensure disabled people are at the heart of the development and delivery of new policies and solutions to transport accessibility, we launched the [National Centre for Accessible Transport \(NCAT\)](#) earlier this year. We have provided funding of £20 million over seven years, and appointed a consortium of disability, transport and research experts to run the Centre. NCAT work with disabled people, disabled people's organisations, transport providers and policy makers with the aim of making transport accessible for all. We would be delighted to assist in facilitating discussions between and NCAT and the DU to help develop evidence-based solutions to make transport accessible for everyone.

In addition to this, we have also been reflecting on the value of innovation to accessible transport, and we recently undertook a review to investigate what the biggest current issues in this space that we should be addressing through innovation. We wanted to ensure that this review was as well informed as possible, taking into account a wide breadth of views and experience. It comprised of the following elements –

- A major evidence review conducted by Thinks Insight & Strategy
- Involvement of disabled people, working with disabled-led agency Purple Goat – including the establishing of an Experts by Experience (EBE) panel which designed our user insight approach, focus groups, and a survey with 750 disabled respondents
- Interviews and a survey with key stakeholders external to Motability, including engagement with other charities and foundations on best practice in innovation
- Extensive internal engagement with Motability staff

In response to our findings, we have decided to take a broader approach to our priority areas, working on a portfolio of solutions across transport modes and impairment types, which will enable us to achieve more through our innovation work. This includes being open and approachable with our projects, inviting early collaboration with stakeholders, and maintaining an open door to new ideas and partnerships. We would welcome further engagement with the DU, and seek opportunities to work together where appropriate, to develop these projects further.

**For more information please contact:**

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