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Central London Bus Review: Transport for All's response

About Transport for All

Transport for All is the only disabled-led group striving to increase access to transport and streets across the UK. We are a pan-impairment organisation, guided by the passionate belief that all Deaf, disabled and older people have the right to travel with freedom and independence.

About this response

This submission focusses on the lived experiences of disabled people: the barriers to public transport, the predicted impacts of cutting bus services, and effectiveness of mitigations. This submission was compiled through our independent research, including insights from our pan-impairment membership (600 people across the UK) and from enquiries made to our helpline (250 calls a month), and our previously published research. We have provided a top-level response to this consultation, focussing on the overall impacts of cuts to buses. We have not provided commentary on each of the >100 route changes; as a small organisation of disabled people, this was not achievable. We have used examples of specific routes in this response, but it should be noted that this is not a catalogue of all the potential impacts for those routes, neither are the examples representative of the total impact of the proposed cuts.

Key messages

- Transport for All oppose these proposals in the strongest terms.
- Accessible and affordable transport is key to addressing inequalities in health, employment, education, and wellbeing for 1.2 million Deaf and disabled Londoners.
- Buses are often the only accessible option for disabled people. They are also sustainable.
- Impacts on disabled people include: crowded services, waiting times, changing buses, interchanges between bus stops, personal security, and financial impacts.
- Disabled people will be disproportionately impacted as they already face significantly longer journey times, more complex journeys and barriers to transport.
- These proposals are the latest in a long series of changes that have deepened inequalities and created further barriers for disabled people.

1. Introduction

1.2 million Deaf and disabled people live in Londonⁱ, or roughly 20% of the population. For such a significant group of people, immense barriers exist resulting in deep inequalities in employment, education, health, wellbeing, and opportunities.

The employment rate of disabled Londoners is just 46.5% (compared to the overall employment rate in London of 85%)ⁱⁱ. 1 in 3 families with a Disabled adult are living in poverty, compared to 1 in 4 families without a Disabled adultⁱⁱⁱ. Disabled people are more likely to feel lonely^{iv} and isolated. Access to transport and mobility plays a vital role in addressing these inequalities.

2. The important role of the bus

Buses play an integral role in disabled Londoners' transport lives. With only 25% of mainline rail stations having step-free access, and only 91 out of 270 Tube stations – buses are often the most accessible mode for many disabled people and certainly the most step-free option. Around two thirds of disabled Londoners have no household access to a car^v, so it's no surprise that buses are the second most used form of transport for disabled Londoners after walking and wheeling^{vi}. All 9000 of London's bus vehicles are low-floor and are fitted with automatic ramps, hearing loops and other accessibility features. And the Freedom Pass provides free travel to many disabled people, addressing the financial barrier to travel.

In addition to being an accessible and affordable option, the bus plays a huge part in addressing the issues of congestion, air pollution and climate breakdown. Disabled people are among the most severely impacted by increased pollution levels^{vii} and the disastrous effects of climate change. Emergencies and extreme weather events – such as heatwaves, fires, drought, and floods– will also hit disabled people the hardest who have fewer options for evacuation, and these events are all set to become more frequent. It's imperative the bus is protected as an attractive and viable option to avoid an increase in car-use that would spell disaster for climate.

The proposed cuts will save an estimated £35 million, but TfL is tasked with saving over £400 million^{viii}. These are dramatic cuts that will only save a tiny fraction of overall target. Disabled and poorer Londoners will bear the brunt of these impacts so are disproportionately paying for a small saving overall.

3. Impact of cuts to buses on disabled and older Londoners

A disproportionate and unfair impact

While a non-disabled person may have access to a selection of different routes to choose from when planning a journey from A to B, a disabled person will often have only one or two options available to them. Therefore, any reduction of a service is likely to have a disproportionately negative impact on disabled people who will be more reliant upon particular routes.

Maintaining accessible routes

We are deeply concerned that these proposals have not adequately considered the unique way in which disabled people have to make journeys in accordance with access needs. Many disabled people are reliant upon door-to-door journeys, with minimal walking/connections, and step-free access throughout.

Example: the proposals to bus Route 4.

The Borough of Islington has 10 Tube stations located in it, and only 2 (Caledonian Road and Finsbury Park) have step free access. Disabled Islington residents are heavily reliant upon the bus network, particularly for connections to the only step free station in their area. Currently, for disabled people who live in the Tufnell Park area (the Tube station for which does not have step free access), who want to travel into Brixton: instead of being able to get straight on the Northern Line at Tufnell Park and change to Victoria Line at Euston down to Brixton (an inaccessible route that would take just 25 minutes), passengers requiring step free access must first get the Route 4 bus to the nearest step free station which is Finsbury Park to get on the Victoria Line there. This takes just under 1 hour, which is already **double the journey time** than for non-disabled passengers. Should the Route 4 be removed, it is a 25 minute walk or wheel at average pace to get to Finsbury Park (not an option for many). It is proposed that the 236 be routed to retain these links, but we note that the 236 is a single-decker bus with less capacity, and is less frequent.

As demonstrated in the example above, disabled people already experience significantly longer journey times, and more complex/difficult journeys with multiple changes, than non-disabled people. These proposals are set to worsen an already bad situation. This **will** result in fewer disabled people feeling able to use the bus.

Crowded services

We have been assured by Transport for London that they do not expect over-crowding as a result of these proposed changes and that the changes allow them to continue to accommodate peak demand levels. However, Passenger Demand Figures have demonstrated a growth in demand for buses over the past several months. The latest figures for May 2022 showed 140 million^{ix} bus journeys taken, a figure which has been steadily ticking up. We are therefore concerned that these proposals do not account for increasing demand.

Significant reductions in the frequency of buses that leads to crowded services would severely impact disabled passengers. It would mean an increased likelihood of the one wheelchair priority space per vehicle being occupied, either legitimately by another disabled person or by another passenger with luggage or a buggy, putting the disabled passenger into a position of conflict (an experience that is consistently cited by our members as a key barrier to using the bus). A more crowded service also presents a barrier to blind and visually impaired people, or those who are less steady on their feet – the more packed the service, the more pushing and

jostling there is which can lead to falls. Chronically ill people or those who are immuno-compromised will also be deterred from boarding crowded buses for risk of virus transmission. For neurodivergent people, crowded services can add to sensory overload and anxiety.

Waiting times

Reducing the frequency of buses means people having to wait longer at bus stops. Many disabled people simply cannot stand at a bus stop for longer than 10 minutes, especially at stops where there is no shelter with seating – and even with seating, in cold weather. Longer waits will also add up to a longer overall journey time, when disabled people already face significantly longer journeys as we have already outlined above. When a journey becomes too long and difficult to do, it can become an unsurmountable barrier to leaving the house, meaning disabled people may feel trapped and isolated.

Interchanges at same stop

Currently, around 19% of bus journeys made on central London bus routes involve a change of bus. Under these proposals, this is expected to increase to 24%^x.

The impact of this cannot be overstated. For disabled passengers, getting on and off the bus is the most critical part of the journey, and is fraught with barriers and opportunities for things to go wrong:

Issues getting on the bus:

- Bus drivers refusing to pick up disabled passengers
- Buses not stopping to inform a blind or visually impaired passenger of which service is at the stop
- Negative/discriminatory behaviour from bus drivers toward disabled passenger while boarding
- Buses pulling up not close enough to kerb, or aligning the back door so it is blocked by bins, bollards, a pole etc and not accessible
- Issues deploying ramps: ramp will not come out, ramp faulty or broken or gets jammed, ramp deployed at steep gradient so inaccessible
- Priority space for wheelchairs is already occupied by another disabled person, meaning passenger cannot board and has to wait for another bus
- Priority space for wheelchairs is already occupied illegitimately by passengers with luggage or buggies, putting disabled passenger into conflict/ uncomfortable position
- Priority seats are taken OR disabled passenger experiences negative attitudes from other passengers while using priority seats (particularly an issue for those with non-visible impairments)
- Bus is tightly packed making it difficult for disabled person to maneuver on and off
- Bus pulls away before disabled passenger is securely seated, leading to falls

"I get challenged a lot about my mobility scooter and I get butterflies in my tummy now when I have to get on a bus because I just don't know quite what the driver's attitude is going to be." - *Transport for All focus group participant*

"Drivers should understand the implications on people when they fail to stop. The awful feeling when you hear a bus go past and don't know if it's your bus."
- *Transport for All focus group participant*

Issues getting off the bus:

- Audio and/or visual announcements are not working, so a passenger with visual impairment or a Deaf passenger is unaware their stop has passed
- A diversion is in place and not fully communicated to passengers, so a passenger disembarks away from their normal stop
- Request stop buzzer is not working OR bus driver ignores request for stop, and does not deploy the ramp or pull up at the bus stop correctly meaning disabled passenger cannot get off the bus
- Issues deploying ramp: ramp will not come out, ramp faulty or broken or gets jammed, ramp deployed at steep gradient so inaccessible

Increasing the number of bus changes a disabled person has to make along their journey will increase the likelihood and frequency of the above issues, and will act as a strong deterrent to many disabled people.

It's also important to note that while 24% in itself is a worrying increase, the number of 'broken links' varies considerably between routes, resulting in some routes with an even larger increase. For the route 205, the percentage of broken links will be 26% of daily trips. This rises to 36% on current routes 12 and 78. These percentages equate to thousands of daily journeys.

For many journeys under the proposed changes, it will be necessary for disabled passengers to change buses more than once. For passengers on the Route 4 detailed above, riding from one end of the route to the other will necessitate 2 changes (a disproportionate negative impact given the lack of available accessible alternatives in the area served). Passengers on the 205 may need to change buses three times to complete their journey, which TfL say 'may increase journey times by up to 36 minutes for some passengers who are unable to make the same journey by rail.' 36 minutes on top of the existing longer journey times disabled people face is unacceptable.

London TravelWatch has analysed the proposals in detail, and has estimated that if the proposals go ahead in their entirety, over 93,000 daily journeys will involve a change of bus where it doesn't currently. This is almost 10% of the total of all journeys currently made on the routes in the consultation.

Interchanges at different stops

These changes will also result in 88 new bus interchanges that involve moving between stops. This is a worrying accessibility concern. For blind and visually impaired passengers, as well as some of those with cognitive impairments, identifying and finding a bus stop is extremely difficult, and having to do this again half way through your journey will be a deterrent. Changing bus stops may also require crossing the road, another barrier for disabled people especially more at-risk pedestrians (including blind people and those living with Dementia). For people with mobility impairments who use mobility aids or find walking more difficult, issues with inaccessible streetspace (uneven/bumpy pavements, street clutter, tree roots, missing dropped kerbs or tactile paving, cobbles, etc) will make these interchanges impossible.

The interchanges included within the proposals range from crossing the road to making a journey of **600 meters** (the figure for current passengers of Route 56 travelling Southbound to Giltspur Street, or the equivalent of 11 bus stops). 600 meters walking/wheeling is simply not an option for many disabled people, and there are no proposed mitigations for this in the EqIA.

While Transport for London has included details in the proposals about where bus stops are located and if they have shelters with seating, we are concerned that TfL does not have data about the quality of streetspace surrounding the interchange.

Personal security

The above impacts on disabled people with regards to waiting times and interchanges are even more acute for the night services.

The frequency of bus services at night has a profound effect on how safe passengers feel. Passengers do not want to wait at bus stops for extended periods of time when it is dark and there are fewer people around. This is especially true for disabled people, and even more so for disabled women, disabled LGBTQ+ people, and disabled people of colour who face intersectional prejudice and increased occurrence of hate crime (which is grossly underreported^{xi})

These issues are exacerbated by the lack of alternative options. The Night Tube is in many instances not accessible to disabled people (for example, when there is no step free access). Disabled people have many issues with using Taxis and Private Hire Vehicles (and this is an expensive and unaffordable option for many). The bus is often the only way to get home.

We are particularly concerned about the increased number of interchanges for night services. For many, these will feel unsafe; to get off a bus which is well-lit with CCTV and wait in the dark on your own, perhaps having to move between stops. Many will simply choose to avoid travel.

Financial impact

Many disabled people do not have a Freedom Pass (due to barriers with the application process, and the narrow eligibility criteria.) Since June 2020, Transport for London have also placed a limitation on the 60+ Oyster card and Older Persons Freedom Pass, meaning older people cannot use these to travel for free during peak hours. TfL also plans to phase the 60+ Oyster Card out entirely over the coming years. Many disabled people pay for a carer or assistant to travel with them. For disabled and older people without concessions in place, we are concerned these proposals will have a significant financial impact as number of changes increase.

Throughout the consultation, TfL highlight that the Hopper fare provides passengers with the ability to make a second journey within 60 minutes of boarding the first bus. However, for disabled and older passengers making journeys that require an interchange, this 60 minute period may not be sufficient. Disabled and older people typically take longer to make journeys, and this may lead to the interchanges taking significantly longer. Disabled people may also experience issues with boarding the bus (as detailed above) and have to wait longer for subsequent buses.

On average, a disabled person faces £583 more monthly costs than a non-disabled person^{xiii}. Disabled people are over a third less likely to be employed as non-disabled people^{xiii}. The proportion of working age disabled people living in poverty (after housing costs) is 27%, which is 8% higher than the figure for working age non-disabled people^{xiv}. Disabled people simply cannot afford an additional financial burden, especially given the worsening cost of living crisis.

Change in itself is a barrier

Throughout our work and the insights we have from our members, we know that change itself can pose additional barriers. Disabled people are masterful at adapting and innovating and are proficient at navigating barriers. Many often build up 'mental maps' of the most accessible routes for them. Blind and visually impaired people memorise routes, and those working with Assistance Dogs undergo extensive training to familiarise the dog with their usual routes. For people with cognitive impairments and learning disabilities, it can take a long time to learn how to use a particular bus route and to build up the confidence to use it. Sudden and drastic changes to these routes will have a profound impact on so many who will feel back at square 1 and needing to learn, train, and build confidence all again. This will be felt strongly among disabled people whose confidence in public transport post-pandemic has returned slowly.

The changing of various rules on buses (and other services) has meant people on the autism spectrum have stopped using them because of not knowing what to do or what to expect.- *Transport for All focus group participant*

Compounding impact of other changes

We are seriously concerned that these proposals are the latest in a long series of changes that have deepened inequalities and created further barriers for disabled people.

Disabled people, who have been disproportionately impacted by COVID-19 – accounting for 60% of all COVID deaths^{xv} and being among the hardest hit by impacts of lockdown and shielding, are now weathering the cost of living crisis.

In London, **existing inequalities in transport are set to worsen**. If the proposed cuts to bus services, as set out in the live Central London Bus Review, go ahead, many disabled people will find the bus difficult or impossible to use (one of the only accessible options available for many). Future Step Free tube works have been scrapped, the 60+ Oyster Card is being phased out, and there are ongoing issues with Dial-A-Ride^{xvi} and TaxiCard (see below case study). Additionally, the proposed ULEZ expansion could impact upon some disabled people if not mitigated effectively through scrappage schemes and a robust reimbursement scheme. We do not believe any one of these issues is being mitigated effectively, nor their compounding effects.

Transport for All helpline user – experience with TaxiCard June-August 2022

In June, I had a return journey booked for 22.45. I called them at 23.00 them as no one had turned up and no one had contacted me. They told me no driver available. I rang again and the attitude was 'can't you find another way home!' My friend and I spent the next two hours trying to book via ComCab/Uber. We were eventually able to book a ComCab. This experience had a knock-on effect as the carers I had organised had to wait up for me.

Later in June, I had a booking to the Gielgud Theatre. My booked journey time came around, and I was told that no driver was available. I ended up missing my show. This put me £83 out of pocket. I have complained to ComCab and sent copies of the tickets so I can be reimbursed. I am still waiting for a response.

In August I had a return booking to Kings Cross station for a volunteer shift. The pick-up was booked for 12.30. At 12.35 ComCab called to tell me a taxi is on its way. I also get a text. At 12.58 they called again to tell me there is now no driver! Even though I was told earlier a taxi was on its way. 13.09 call to say still no driver. At 13.30 I cancelled the trip. I was not going to get to Kings Cross on time.

As a disabled person who wants to live their 'best life! I find this is impossible with the current level of service. **I'm getting to a point where I feel I should stay at home.** Going out is becoming more of a stress because I will get to a venue and not be able to get home or not get out at all.

5. Monitoring and evaluation

We are concerned about the lack of data on the numbers of people who will be impacted. The EQIA document notes that 3% of passengers using the affected bus routes are 'Disabled Person's Freedom Pass' holders, however (as the EQIA itself points out) this is not an adequate determination of how many disabled people use these routes as not all disabled people have a Freedom Pass, due to barriers to application process and eligibility criteria. Also, many disabled people who do have a Freedom Pass, for example wheelchair users, are not required to tap or show the pass on a bus journey, and so are not captured in these statistics. The EQIA goes on to say that 10% of bus users are disabled, however this data is from a 2014 bus user survey. Data which is almost a decade old is not sufficient to develop policy with such significant impacts.

There is also a lack of understanding and data on the relative accessibility of surrounding areas where cuts are proposed. For routes that will in future require an interchange between different bus stops, while there is data about the distance between bus stops, there is no data on the accessibility of this route (quality of pavements, if kerbs are dropped, if tactile paving is in place, if there are controlled crossings, if there is sufficient lighting, etc).

The EqIA also presents few meaningful mitigations. While it correctly identifies the following impact: "Increases in the number of interchanges required to undertake a journey may discourage use of the bus network and reduce the participation of disabled people in society, as a result of reduced access to cultural sites, hospitals, places of worship, schools, workplaces, etc." There is nothing proposed to mitigate it. Excluding disabled people from participating in society is too significant and dramatic an impact to go unmitigated.

6. Issues with this consultation

We would also like to raise some concerns with this consultation and the communication of these proposals.

While we are extremely pleased to see the way in which Transport for London have taken our feedback on board and made a commitment to publishing consultation materials in multiple accessible formats, there is still some room for improvement. Firstly, it was disappointing that the British Sign Language video did not become available until 20 days into the consultation. Secondly, it wasn't until 2 weeks into the consultation period that a summary of the route changes including maps appeared at the top of the page. For those first 2 weeks, the consultation page on first glance was very dense, technical, and information-heavy, meaning it was very difficult for disabled people to understand how their routes might change. Finally, some of the language used throughout the consultation has been confusing or misleading, for example repeating the phrase "rationalise and simplify the network".

Granular detail about routes, including distances of interchanges in meters, locations of stops and if these stops have shelters, is only available deep into the EqlAs. For the sake of transparency and ease it should have been included within the route proposals.



The EqlA states that 'TfL will aim to ensure that information on the planned changes is available at bus stops on affected routes.' We would like to point out that many disabled people are still shielding and not using buses regularly currently, but would still be impacted by the changes. The A5 poster announcing the consultation (see left) was placed in bus stops. However the poster does not say which routes are affected. It simply lists details of how passengers can find out information. The onus should not be on individuals to go to lengths to find out if their route is affected.

Furthermore, we are concerned that not enough outreach has been done to reach Deaf, disabled and older people who are digitally excluded. Disabled people are disproportionately represented in the number of people with no access to the internet; 23% of disabled adults had no access to the internet in 2019 compared to just 6% of non-disabled adults^{xvii}. Blind and visually impaired people are especially likely to be digitally excluded; roughly 38% of all blind and partially sighted people in the UK have never used the internet or have no internet access^{xviii}. For those who do have access to the internet, the ticket purchasing platforms themselves can be inaccessible, particularly for those using screen-reader technology or using a keyboard (mouseless). Older people also are less likely to use the internet; across England, 42% of people over the age of 75 report not using the internet at all^{xix}.

8. Transport for All's recommendations

Interchanges must be at same stops	Review the proposals and amend to ensure that where a change of bus is absolutely required, it takes place at the same bus stop and does not involve an interchange between stops.
Street audits	<p>If the above is not possible:</p> <p>Undertake extensive and detailed street audits to map out the accessibility of route interchanges between bus stops. Any such audit must use a pan-impairment approach to identify barriers for all disabled people. These should be carried out using the expertise of disabled people who are paid for their time. Audits should identify all barriers and factors in the journey, including physical infrastructure such as walking distances within stations, lifts, toilets, and rest spaces, as well as information about the sensory environment on routes (noise, light, temperature, smells, crowdedness).</p> <p>Funding should be made available to address as many identified barriers as possible, for example installing dropped kerbs, tactile paving, controlled crossings, etc.</p>
Bus stops and shelters	Improve accessibility of bus stops and shelters at locations where there will be higher levels of interchanges as a result of proposals. This includes improved lighting, wayfinding, customer information (including countdown screens) being made available in both audio and visual formats, and heated shelters.
Travel mentoring scheme	Expand the Travel Mentoring Scheme to support disabled people re-learning routes and adjusting to changes, and enable confidence to be rebuilt. There should also be more outreach undertaken to communicate and promote the scheme to people who may not be aware of it.
Ditch proposals to cut night services	We strongly urge Transport for London to reconsider cuts to night services due to the impact on personal security and safety.
Hopper Fare	Expand the Hopper Fare to a minimum of 120 minutes.

Appendix A: Barriers to the bus for disabled passengers

Physical:

- Priority space: there is only one priority space for wheelchair users per vehicle. Wheelchair users are reliant on that one space being available in order to make their journey. This means that two disabled people with mobility aids cannot travel together. It also means that when the priority space is already taken (by another disabled person, or by passengers with luggage or buggies), the passenger cannot board and has to wait for another bus.
- Grab poles: In some vehicles, the positioning of the grab poles makes it very difficult for those with mobility aids to enter and exit the bus, or turn around into the priority space, especially if there are lots of other passengers.
- Ramps: In some vehicles, the electric ramps deploy at a steep gradient that is not suitable for wheelchair users.
- Broken or faulty ramps: Despite it being policy for drivers to check ramps are working before leaving the garage, disabled people do encounter issues with faulty or broken ramps when boarding or alighting the bus.
- Bus stop infrastructure: Bus stop bypasses and floating bus stops, No seats or shelter, Unwelcoming environment (graffiti, rubbish, dirty)

Behavioural:

- Bus driver behaviour: Not knowing how to deploy ramp, or not knowing how to do so correctly (including how to 'crouch' (lower) the bus down before extending ramp), Ignoring the disabled passenger, refusing to pick them up, driving on by, pulling away too quickly, closing doors too quickly
- Passengers: Harassment, abuse, hate crime, Refusing /not offering to give up seats or move out of priority space, peer-policing of the priority seats and space

Information and communication:

- Real-time information: Bus tracking on Citymapper/Google maps/screens at bus stops is often wrong, and ETAs are very inaccurate. Sometimes the bus does not show up at all despite saying it's due and it disappears off the screen. This adds to anxiety.
- Diversion announcements: if a bus is on diversion or if things change, the alternative route is not communicated to passengers, they have to replan their journey - this can be very stress-inducing. The usual mode of communication in these instances is for the bus driver to inform passengers via an audio announcement, which is inaccessible to many deaf and hard of hearing people.
- Signage: in some vehicles, the signage for the priority seats is not clear
- Display screens: The display screens showing next bus stop are sometimes too high up to see, or not high contrast. They are also often positioned behind the priority space, so wheelchair users in the space cannot see them.

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