

The Licensing Office  
PO Box 290  
Brighton Street  
Wallasey  
Wirral  
CH27 9FQ



11<sup>th</sup> September 2019

Dear Sir/Madam,

**Consultation on the Licensing of Rear Loading Wheelchair Accessible Vehicles as Hackney Carriage  
& Private Hire Vehicles**

I am writing on behalf the Spinal Injuries Association (SIA), the leading charity for spinal cord injured people in the UK. Founded in 1974, we represent the estimated 50,000 people living in the UK with a spinal cord injury, working to support them throughout England Wales and Northern Ireland. As such, we have been asked for our comments on thoughts on the above consultation.

We are acutely aware from our work with those with a spinal cord injury, their families and friends of the need for a greater level of accessible public transport, be that buses, trains or taxis. However, that increase cannot come with a reduced level of safety for all concerned and it is with that in mind that we urge licensing authorities to ensure that all licensed taxi drivers receive training to better understand the needs of all disabled passengers and, most importantly, are able to operate and maintain equipment properly for the safety of disabled passengers and drivers alike.

SIA's position is clear in that accessible taxi specifications must be demonstrably safe in all respects and any converted vehicles should not be tested to a lower level of safety standard than that used for saloon cars. It is therefore entirely appropriate that every make of vehicle that is proposed to be used as a rear-loading taxi be crash tested with the proposed equipment in place to ascertain the effect of that additional equipment on passengers being carried in the vehicle, particularly those in close proximity to that equipment.

We believe that it is safer for all to keep wheelchair users on the pavement rather than place them and those assisting them in the road, facing away from oncoming traffic, hence our preference for accessible vehicles to be accessed via a side door. From a passenger safety perspective, our access route of choice for taxis is via a side door as this gives greater options to exit the vehicle safely in the event of an impact. Furthermore, taxi drivers may not be familiar with lowering a wheelchair over a kerb which can, as a result, present a risk to the wheelchair user. Indeed, those using an electric wheelchair may find it impossible to go down a kerb and to the road. If access is from the pavement into the taxi, these issues do not arise.

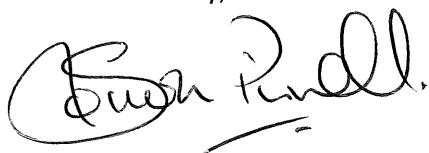
Once in the vehicle, being seated in the centre of a taxi is far more likely to be safer than the wheelchair passenger placed at the rear of the vehicle, directly in the impact zone as is the case with rear-loading taxis. The need to have an alternative exit route in the event of an accident is paramount; a side loading taxi provides exactly this. In the case of a rear loading vehicle where the rear doors or tailgate are damaged, this could prove impossible in the absence of a side access door and, in the event of a fire breaking out, places the user at an unacceptable risk.

Safety features and equipment aside, SIA believes very firmly that it is imperative that, as a condition of the license, all licensed taxi drivers are required to be trained in disability awareness and in assisting all disabled passengers safely into and out of their taxis. This is a major concern, both in terms of the safety of the disabled passengers and the willingness of drivers to undertake journeys with disabled passengers, particularly wheelchair users. We believe that all taxi drivers must undertake disability awareness training as part of their conditions of licensing. Additionally, licensed drivers must be able to demonstrate that they have full working knowledge of the equipment fitted to their taxi. This must include the ability to load and secure a wheelchair and assist passengers with other mobility requirements.

I do hope this information proves useful as part of the consultation process but naturally, if I am able to be of any further assistance, please do not hesitate to contact me.

Kind regards.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Simon Pinnell', with a horizontal line underneath the name.

**Simon Pinnell**

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