

Response from Bus Users UK to the Open Data Consultation

Background

At Bus Users UK, our mission is to bring people and communities together, through socially inclusive transport.

Bus Users is an approved Alternative Dispute Resolution (ADR) Body for bus and coach passengers, and the nominated body for dealing with complaints under the European Passenger Rights Regulation 2013 / (The Rights of Passengers in Bus and Coach Transport (Exemptions and Enforcement) (Amendment) Regulations 2017). Bus Users UK Charitable Trust is a Registered Charity number 1178677 and a Company Limited by Guarantee Registration Number: 04635458

We have worked closely with the Department for Transport to advise on passenger rights, the passenger involvement aspects of the Bus Services Act 2017, the detail of the proposed Accessible Information Regulation and all other matters where input on behalf of passengers is needed.

We deal with complaints from bus passengers and work alongside communities to try to make the case for continuing service provision and subsidy. We also hold regular events in rural and urban settings to enable residents to make local transport providers and policymakers to understand their needs and the impact of poor transport on people at risk of social exclusion.

In recent years, we have seen an increase in passenger frustration with the perceived unreliability of bus services and the difficulty of finding accurate information and this has had a damaging effect on people's confidence in and willingness to use buses.

We therefore welcome this consultation into the Open Data proposals to provide more consistent information for passengers and ensure that anyone considering making a switch to bus has all the information they need easily available.

1 The Provision of information on English bus services

Bus Users UK supports the underlying concept in principle although we do have some concerns about the lack of funding available to meet the requirements and the potential impact on already marginal services.

2 Distributed or Non-Distributed data models

The mechanics of how the data is loaded is not really of concern to passengers so much as the final product and its presentation which should aim to make moving from one area to another or from one operators' services to another as seamless as possible.

Consistent presentation of information would be helpful in printed or digital format and **both are still needed** (see figures on smartphone/internet access on page 2) The difficulties for smaller operators are clear but it would make more sense to set a longer timeframe for compliance for these and offer financial support where possible to comply with a national standard, than to allow different and uncoordinated approaches to be developed. While the complexity of the underlying functions may need to vary, the end product should look the same to bus passengers everywhere, even if some of the detail is absent in places. This is especially critical for people living close to the boundaries of Local Authorities, PTEs or countries within the UK, whose regular journeys take them across those boundaries. While app developers may wish to offer a variety of interfaces, it should be noted that dealing with very different presentations of information would reduce usage and confidence.

3 Scope

This paper would seem to exclude London. If it is not intended that London be subject to the same rules, this would, in our view, be a grave error. The belief that London bus passengers all have RTi (at bus stops and on every bus) is inaccurate. Even worse, the text service which replaces the electronic signs is completely unreliable and regularly gives false information, often saying that there is no service for over 30 minutes when several are due within 5 minutes.

London is also not a good current example of finding the best fares for a journey. TfL Journey Planner gives a single adult fare only so this is not a helpful example. Traveline gives some fares in some places but not all those available, even for the same bus company in the same city which has standard flat rates.

4 Fare Information

Would-be passengers clearly need to know what fares are in places where the buses offer no cash fares, no contactless option and/or no change given, which is not currently available for most parts of the UK (It took 2 years for bus stops in London to carry any information that one cannot use cash on buses) and visitors to the city are still often turned off buses for this reason.

There is still a long way to go to ensure people without home internet access or smartphones (15% of the population, including 5% of young people¹) or contactless bank accounts (1.6 million UK working adults are unbanked² and 8 million have basic bank accounts with no smartcard access³) so these are an important target grouping among bus passengers who should be able to access information in print and via a telephone enquiry service such as Traveline.

It is a common concern that the best fares are often only available to those with the least need and the ability to pay more in advance or by electronic methods so developer s need to be encouraged to find appropriate workarounds for this issue to reduce what is seen as direct discrimination by lower income groups.

From a consumer point of view, fare comparison is also key. So passengers would welcome a requirement for basic fares information to be published as soon as possible and more detailed information within two years. The requirement should also be that any app developed should be allow for the cheapest fare for the journey entered to be returned, with any caveats or conditions.

¹ ONS report 2018 and Statista report 2018

² LSE report Dec 2017 Alex Kong

³ HM Treasury report Basic bank accounts Dec 2017

However, we should not underestimate the burden that this places on operators. Ten years ago when Norfolk Green decided to publish all its fare figures online, the dataset ran to 800,000 individual fares ⁴which created a huge programming challenge. From the beginning of these discussions it has been said that a complete fare dataset would create one of the world's largest databases so this is no small undertaking.

Given the scale of that undertaking, there is also a risk that operators will wish to move away from special offers and time-limited discounts on which many people on lower-incomes rely, so there will need to be some flexibility built in to allow such fares to be added and deleted swiftly and without extensive work or delays. Inaccurate information can be worse than none.

5 Information at bus stops

There have been many reported instances of the installation of RTi signage at bus stops which raises the expectation of passengers but no provision of funding to keep it updated. This means it either stops working or, worse, it carries information on some routes but not all. Where services are infrequent, such as many rural areas, accurate information is of critical importance but these are the areas least likely to have RTi. If this initiative is to succeed therefore, Local Authorities or Passenger Transport Executives will need to be required to (and receive ring-fenced funding) install and keep this information comprehensive and up to date.

Bus Users UK believes RTi signs at bus stops should also be used to push information on current or planned disruption to services, closed bus stops and so on, in order to build and retain the confidence of passengers. This should also be used to warn passengers of imminent timetable changes which many operators implement for understandable reasons twice or more per year, but rarely advertise, leaving people stranded at stops waiting for services that will not run. This often affects students changing schools in particular as the changes are often timed to coincide with the demands of a new school year.

The information should state how far away the bus is in minutes as a current location or map is of no help to people unfamiliar with the area.

Passengers benefit from having information they can use to plan their journeys but also benefit from knowing how long they have left to wait so they could pop into a nearby shop, walk to the next stop and so on. In order for this to work, all buses need to have AVL. It is hugely frustrating to decide to walk to the next stop as the RTi says the next bus isn't for 12 minutes, only to be passed by a bus without its AVL switched on. Armed with the correct information, people waiting to travel would also have the option (where available) to change routes in the event that their preferred service is some way off.

6 Other information which should be provided

Making accessibility data available online and via apps would improve the confidence of people with physical disabilities, including high steps, accessible bus stops currently blocked by inconsiderate parking/loading (which could be used by towing services) or any other temporary barriers to travel. We can see no reason why affected routes could not also supply this information via the RTi system.

Publishing punctuality data would enable dissatisfied passengers regularly experiencing disruption to provide evidence of regular problems on a route. Likewise, it would show operators whether such accusations were true and allow for investigation of reasons for delays and reregistration if a

⁴ Ben Colson MBE, former MD of Norfolk Green

problem is out of their control. It would also back up anecdotal evidence from drivers of those routes and enabling problems to be drawn to the attention of the relevant authority, whether it be parking enforcement, Local Authorities, planners etc. It would provide evidence to support the promotion of the generally high punctuality rates for buses and combat the prevailing myth that buses are unreliable. This is particularly important in urban areas so we would not agree that only rural areas' data should be published. We would not suggest that this information be available on RTi screens.

7 Compliance

It is suggested in the document that BSOG enhancements might be considered to encourage operators to comply. If this is a requirement, operators will comply in due course, or cease operation. There have already been reductions in the levels of BSOG and concessionary fares reimbursement and our fear is that tying this to BSOG will put more pressure on the operators who will find these requirements most onerous, leading to reductions in options for passengers.

8 Support for implementation and upkeep

We would underline the fact that marginal operators will need support to meet these requirements and encourage them to continue operation so some funding will need to be set aside for each new element if passengers are to keep those services. We see the services provided by SMEs and smaller operators generally as critical to the ongoing provision of bus services in all areas, but especially in rural environments, and trust that their input into the technical requirements will be taken into consideration.

Improvements of the kind outlined in the proposal are needed in order to encourage more people to have the confidence and information needed to travel by bus, and we support the introduction of these changes. However, there would be dramatic consequences for communities if more marginal services were cancelled as a result of raised costs owing to the fact that their operators are unlikely to see a consequent matching rise in income. Increased social exclusion would be the inevitable result.

If you need further information, please contact:

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