

Response from Bus Users UK to the Consultation on Accessible Information Regulation

1. Bus Users welcomes the fact that this will be a strategy for all modes of transport as interchanges often prove very difficult to navigate, even for passengers with no particular disability or challenges. However, for anyone without a car, it should be recognised that the majority of journeys will be undertaken by bus.
2. This legislation could provide an opportunity to strengthen and extend the existing Rights of Passengers in Bus and Coach (2013/2017) to all passengers on all transport modes. This would simplify the currently confused picture of passenger rights across all transport modes and enable operators to ensure consistency for multi-modal passengers.
3. In the original discussions on this legislation, it was made clear that a low-tech solution to A/V information on buses would be acceptable. This is not clear from the consultation document and should be highlighted as being one way of meeting the requirements of the legislation. We need to ensure that we do not lose marginal, especially rural, services because of gold-plating the requirements to the point that it becomes impossible to meet them without considerable cost. Many rural bus routes will have regular drivers and passengers whose needs are clearly understood and are already met, without the need for electronic A/V and it should be clearer that these can continue to operate.
4. Under Passenger Rights and Trading Standards legislation, all passengers should be made aware of a complaints procedure they could follow and an escalation option if they are not satisfied with the initial response and making this accessible to people with all disabilities could be expensive and onerous if a specific method is stipulated. Bus Users UK believes that all reasonable measures should be explored in order to ensure that all passengers have recourse to the complaints procedure and next stage escalation, but that this needs to be proportionate to the scale of the business involved.
5. There is an amount of £2m for buses to retrofit accessibility measures. In comparison to the £300m available for rail changes, this seems disproportionately low considering the relative passenger numbers are 3 times as high for bus than for rail. More parity for bus and coach passengers in terms of funding should therefore be prioritised.
6. Where electronic A/V is available, an announcement of “Bus Stopping” should be required when a stop has been requested as this is currently only done visually, which is unhelpful. It should also be made clear at any stop when the next stop is closed or otherwise unavailable, to allow for choices to be made by the passenger. This is not regularly done and where it is, is usually only made clear by an announcement and not visually.
7. The legislation envisages that any passenger on any vehicle should be able to have sight of the visual information and/or hear the announcements from any seat on the vehicle. This raises the key issue of the passenger in the wheelchair space being seated underneath the bus stop sign in many designs of vehicle. While it is not feasible to change the design of every vehicle currently in service, Bus Users UK believes that this requirement should stay in the legislation as a

- requirement for all new bus design to meet from 2020 onwards so that by 2035, new bus design will have resolved these issues and allow all passengers equal access to bus stop information.
8. New bus and/or bus stop design should also be required to include the means to announce the bus number and destination to passengers waiting at the bus stops, before boarding, to enable passengers to make the relevant choice. There should also be an audio option for RTi signs at bus stops which are presently only of use to those who have no visual impairment.
 9. RTi signs at bus stops should be mandatory in urban environments and should announce any planned or emerging delays or disruptions to services, where known (also to be stated in response to the Open Data consultation). A requirement for electronic ink signs to be installed at bus stops and all main interchanges should also be considered as the requirement for a physical timetable will not disappear soon.
 10. The document talks about the role of government in awareness-raising and this is key to successful legislation in this regard as both passengers and operators need to understand their responsibilities and rights.. Awareness-raising takes careful targeting, time and money to succeed.
 11. Disability Awareness training is insufficient on its own, it should be accompanied by Disability Assistance training as inappropriate assistance can do more harm than good in some instances. This is also outlined in the Rights of Passengers in Bus and Coach 2013/2017 legislation, for which the exemption expired in 2017.
 12. There is a suggestion that League tables might be used to incentivise compliance and advertise successes. It is critical that any such measures should compare like with like and ensure a fair platform. It may be more useful to instigate a “star” system instead, rewarding achievements. Such a system could acknowledge the challenges and creativity of much smaller operators in meeting the requirements, rather than disadvantaging them by comparing their service to that of large multinational companies.
 13. There should perhaps be some acknowledgement of the challenges of running low-floor buses in very rural areas and the lack of space or funding for step-free raised bus stops in rural areas. This could be the subject of a design challenge which could enable a solution to be found which would not place an unreasonable burden on operators or local authorities. The alternative could be that many rural areas could lose their marginal bus service which would be disastrous for many rural communities and their residents, in particular the most vulnerable local people.
 14. The section on significant progress in transport accessibility (para 1.2) should recognise the achievement in accessible bus and coach as this has only partly been driven by the Disability Discrimination Act 1995 and the Equalities Act 2010 but has involved huge investment by bus, coach and Community Transport operators. Credit should be given where it’s due.
 15. Companion passes are vital to ensure public transport is accessible for disabled people and should be allocated free of charge throughout the UK. The number of passes to be given should relate to the number of carers required in their disability assessment. In one case handled by Bus Users UK, a disabled person was assessed to need 3 carers at all times to be safe but only one Companion pass was issued, which meant that person could not safely travel. Such complex needs are unlikely to occur very often so should not impose much cost on any funding authority but should be a requirement where the assessment determines that need. Companion passes should also be issued to the disabled person and be valid only when travelling with that person.
 16. In terms of infrastructure, all new urban infrastructure work should meet accessibility standards for bus and coach passengers and particular attention should be paid to the requirements of major interchanges, such as at airports.
 17. The ideal to which we should all be aspiring is that anyone, regardless of disability or restricted mobility, can turn up and go, without advance warning, on any mode at any time. Clearly, we are

not close to this at present but we must have this in our sights when planning any new development in any sector, using the Access for All principles across government. The current postcode lottery in this regard is unacceptable.

18. Once the legislation is in place, an enforcement mechanism will be needed. A Rail Ombudsman service is being set up and it makes sense for there to also be a recognised central point of contact for complaints in the bus and coach sector. The sector has very different actors within it and it would be useful to nominate an organisation with expertise and understanding of this industry with skill and experience in dealing effectively with complaints in this arena. The only registered Alternative Dispute Resolution body dedicated to the bus and coach industry is Bus Users UK, and it would be logical to formally nominate this organisation as the entity to handle all such complaints. This would also underline and restate the requirement within the Rights of Passengers in Bus and Coach Transport Regulations 2017 to display a complaints procedure, including an escalation option, on all vehicles, publications and websites.
19. Bus Users UK is also well-placed to carry out monitoring and evaluation of progress against standards laid down, as it already has the Compliance Monitoring role in Wales and Scotland and could scale up to do so in England and/or Northern Ireland as required.

Information on the organisation submitting this response:

Bus Users UK - bringing people together

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)

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Full consultation is available at: <https://www.gov.uk/government/consultations/bus-services-act-2017-accessible-information>