

## **Bus Services Act: Accessible Information Consultation Response**

West Yorkshire Combined Authority recognises that bus use is a fundamental and significant component in the delivery of a modern, integrated inclusive transport network for West Yorkshire. In addition to the economic benefits of connecting people to places, the bus is an effective tool of social policy for delivering inclusive growth; providing the jobless with access to work; young people to education and training; and providing a way out of social isolation for older and disabled people. The Combined Authority recognises the importance of ensuring that all passengers have access to the information they need to make informed travel decisions. The Combined Authority therefore welcomes the proposals set out to improve on-board accessible information, which should lead to a better and more consistent passenger experience.

West Yorkshire Combined Authority, through its Metro transport network, is enabling easily accessible travel information through a range of formats. British Sign Language films are available which explain how passengers can use easy access buses and Access Bus facilities, and also include a SmartCard user guide. The Combined Authority also provides 'Easy Read' feedback forms to enable customers to tell us their thoughts about our services. In terms of bus operators, First West Yorkshire have recently trialled audio visual information on their new buses with positive feedback received.

Our West Yorkshire Bus Strategy outlines our aspirations for accessibility over the next 20 years, including providing information which meets best practice guidelines and statutory requirements and ensuring that complaints procedures are accessible and well promoted, of which there are evident synergies within the consultation proposals.

### 3. Information to be provided

#### **1. Do you agree that the Core Proposal is an appropriate response to the need for change identified in this document? Please explain your answer.**

The Combined Authority agrees with the Core Proposal.

#### **2. Do you agree that the proposed list of required information is an appropriate use of the powers available? Please explain your answer.**

The Combined Authority agrees that the proposed list of required information is an appropriate use of the powers available. Further commentary in relation to information identifying diversions specifically has been included in Question 3.

### 5. Timing of Information Provision

#### **3. Do you agree that the proposed information timing requirements are appropriate? Please explain your response.**

The Combined Authority agrees that the proposed timing requirements are appropriate. The Combined Authority would specifically like to highlight the proposal that information is provided before the scheduled stopping place to give

the passenger enough time to signal to the driver that they wish to alight. The Combined Authority believes the need for sufficient time for passengers is key, especially for those with visual impairments who may need extra time to gather any shopping and/or physical aids, e.g. cane, Guide Dog. For example, the 'Moovit' app has comprehensive VoiceOver/TalkBack support for the visually impaired, providing clear voice directions including get off alerts. These alerts provide an adequate amount of time for the passenger to move themselves and any appropriate items and is a valued feature by users of the app.

Regarding diversions, there may be difficulty implementing this with regards to unplanned diversions specifically, unless it is possible that a driver could have control over pre-programmed generic announcements which could be used at the touch of a button. Passengers with learning disabilities or autism specifically may have difficulties with this, for example if they have undertaken independent travel training they may have learned a structured way of travelling. Unplanned diversion announcements may disrupt their pre-conceptions about travelling and create a level of unnecessary stress.

## 6. Quality of Information

- 4. Do you agree that the pro-posed use of a Specimen Person is the most appropriate way to ensure information provision is of an adequate quality to be useful to passengers? Please explain your response.**

The Combined Authority agrees with the proposals that audible and visible information must be discernible to a specimen person positioned at the furthest extent possible from the source of the information on both decks of the vehicle and are pleased that this also includes being seated in the designated wheelchair space. The Combined Authority similarly received feedback from our wheelchair user groups that wheelchair users facing backwards are at a disadvantage and need to be able to see and hear information. The Combined Authority believes it's important to provide these standards in the legislation in order to give passengers confidence that their information needs will be met reliably and consistently across different operators.

- 5. Do you agree that the regulations should require that a person using a hearing aid in conjunction with an audible induction loop system should be able to discern audible information? Please explain your response.**

The Combined Authority also agrees with the proposal that audible information must be discernible to a person using a hearing aid in conjunction with an audible induction loop system. The Combined Authority believes it's important to provide these standards in the legislation in order to give passengers confidence that their information needs will be met reliably and consistently across different operators.

## 7. Use of Technology

- 6. Do you agree that it would currently be inappropriate to require passengers to purchase or possess smart devices in order to access required information? Please explain your response.**

The Combined Authority agrees that it would be inappropriate to require passengers to purchase or possess smart devices in order to access required information. Despite the prevalence of smart devices amongst the general population, some people aren't technologically minded and don't own these products therefore such a requirement would be extremely restrictive and could dissuade people from wanting to travel. The Combined Authority also feels that any need for reliance on such technology for information is a potential distraction from moving around the bus, especially for those, for example, with visual impairments. The Combined Authority do feel however that information could still be made available for those with smart devices but without it having to be the sole medium of accessing it.

8. Use of Exemptions

**7. Do you agree that vehicles operated under Section 19 and 22 permits should be exempt from the requirements in full? Please explain your answer.**

The Combined Authority agrees that vehicles operated under Section 19 and 22 permits should be exempt from the requirements. The Combined Authority appreciates that providing audio and visual information would be unaffordable for these types of operators.

**8. Do you agree that vehicles carrying fewer than seventeen passengers should be exempt from the requirements in full? Please explain your answer.**

The Combined Authority agrees that vehicles carrying fewer than seventeen passengers should be exempt from the requirements. The Combined Authority believes providing audio and visual information would be a financial burden for these types of operators.

**9. Do you agree that tour services, as defined in the Public Service Vehicles Accessibility Regulations 2000 (PSVAR) should be exempt from the requirements in full? Please explain your answer.**

The Combined Authority agrees that tour services should be exempt from the requirements. The Combined Authority appreciates these services don't run a regular timetable, therefore the need to provide audio and visual information is unnecessary.

**10. Do you agree that heritage vehicles should be exempt from the requirement to provide visible information; and heritage vehicles should be defined as those first used before 1st January 1973.**

The Combined Authority agrees that heritage vehicles should be exempt from the requirement to provide visible information, and that the definition of heritage vehicles is as proposed.

## 9. Implementation Timescales

- 11. Do you agree that the proposed implementation option indicated above is the most appropriate of the three options identified? Please explain your response.**

The Combined Authority agrees that the proposed implementation option is the most appropriate, however the Combined Authority is conscious that most operators will be required to retrofit the equipment onto their buses which will create a substantial financial burden for them, plus there are the practicalities of a multi-operator and multi-route environment. Whilst the Combined Authority does not oppose this option, there are also important implications for local transport authorities with the additional costs of supported bus services as a result.

- 12. Do you agree with our proposal to define “small operators” as those operating 20 or fewer vehicles? Please explain your response.**

The Combined Authority broadly agrees with the proposal to define “small operators” as those operating 20 or fewer vehicles, but this needs to be specified for buses running on registered local bus routes, not buses and coaches deployed on contracts, tours etc.

- 13. Do you agree with our analysis of the costs and benefits of the preferred option, as indicated in the consultation-stage Impact Assessment? Please explain your response.**

The Combined Authority agrees, as mentioned in Question 11. However, the Combined Authority is conscious that there is a lack of consideration of the potential impact on supported bus services. For instance, on a number of contracts there is minimum opportunity to increase passenger numbers through this technology, such as through school and rural services, therefore there is no potential of increased revenue from customers for the operator. If operators have to invest in new technology then this cost will be passed on in contract prices, therefore the burden will fall to the local authority.

- 14. a) We are aware of at least one operator which has subsidised the ongoing costs of providing audible and visible information by using visible information displays to show advertisements. Please explain how effective you think such an approach could be in mitigating the costs of providing audible and visible information for other operators?**

The Combined Authority broadly agrees, but would recommend that the guidance includes consideration with regards to the balance between advertising and audio/visual announcements. For example the Combined Authority feels that interrupting visual information with advertisements would be okay if any audible information is ad-free. Ultimately it is important that the primary functions of the system, to provide travel information, are respected and that any advertising doesn't overwhelm or override them.

- 14. b) We also understand that the cost of installing systems to provide accessible information can vary depending upon the vehicle and method of installation. Please comment on the difference in cost between procuring new buses with systems to provide audible and visible information already installed, and retrofitting related equipment.**

The Combined Authority is not familiar with the costs of implementation. Whilst it may appear simpler for operators to procure new buses with the systems already installed, the Combined Authority believe it will take a long time to roll out without retrofit and there will be a variability/unreliability in the system.

10. Guidance for Operators

- 15. Do you agree with our proposed content for the guidance? Please explain your answer, providing examples of potential content where appropriate.**

The Combined Authority agree with the proposed content for the guidance, especially with supporting passengers to understand what accessible information will be available to them and how to report alleged non-compliance, as referred to in Question 16.

Compliance and Enforcement

- 16. Do you agree with our proposed enforcement principles? Please explain your response.**

The Combined Authority agrees with the proposed enforcement principles and acknowledge the importance for passengers to be aware of their rights. This also appears to complement DfT's recently published Inclusive Transport Strategy, which aims to raise awareness and enforcement of passenger rights by raising awareness of the obligations on transport operators, the processes for raising concerns or complaints and working with regulators to hold operators to account. The Combined Authority is aware that many disabled people lack awareness of the levels of service they could expect from transport providers and the complaints and enforcement procedures available for addressing poor service, so this is welcomed. However, the Combined Authority is conscious of how important it will be for operators to consider how they publicise these messages to passengers so they can easily understand what the processes entail.

11. Extent of Regulations

- 17. Do you agree that the Accessible Information Regulations should apply consistently across England, Scotland and Wales? Please explain your answer.**

The Combined Authority agrees that the Accessible Information Regulations should apply consistently across England, Scotland and Wales. The Combined Authority believes the regulations should certainly apply cross boundary.

12. Impact Assessment

**18. Do you agree with our analysis of the costs and benefits of the preferred option, as indicated in the consultation-stage Impact Assessment? Please explain your response. We are aware of at least one operator which has subsidised the ongoing costs of providing audible and visible information by using visible information displays to show advertisements.**

Please see answer to Question 13.

**19a. Please explain how effective you think such an approach could be in mitigating the costs of providing audible and visible information for other operators? We also understand that the cost of installing systems to provide accessible information can vary depending upon the vehicle and method of installation.**

Please see answer to Question 14a.

**19b. Please comment on the difference in cost between procuring new buses with systems to provide audible and visible information already installed, and retrofitting related equipment.**

Please see answer to Question 14b.