

Response to Senior Traffic Commissioner consultation on Statutory Document No. 14 on Local Bus Services: Guidance and Directions on punctuality

Summary

Our research shows that improving punctuality is bus passengers' top priority; their satisfaction with punctuality is lower than their overall satisfaction with their bus service.

We commissioned new passenger research to inform our response to the Senior Traffic Commissioner's consultation.

Passengers want timetables to reflect traffic conditions and other variables. They see the timetable as a 'guide' and accept waiting up to five minutes for the bus to turn up, but they do not expect buses to depart early. We support what the Guidance says on these points.

We would like to see more emphasis in the document on bus companies managing operations in real time.

We agree that a sample of bus journeys should be regularly monitored – this sample should be weighted towards busier services since these affect more passengers.

All of the evidence suggests that the proposed 100% standard is not achievable. The document could be strengthened by drawing a clearer distinction between standards and targets and by being more consistent about what it says about them.

Passengers distinguish between poor punctuality (represented by their bus turning up late at the start of their journey) and 'delays' (the bus arriving late at their destination). Passengers would like bus operators to take any steps they can to help them manage their journey.

Passenger Focus recommends:

- A comprehensive, up-to-date study of the performance of buses should be embarked upon immediately, covering a large sample of buses across a wide range of operating environments. The results should be published.
- Punctuality standards should be revisited in 18 months. Realistic, route-specific targets informed by evidence of actual performance should then be set, as they are in London. Until we have a more substantial body of evidence about the performance being achieved outside London, we see no basis for changing the existing Traffic Commissioner targets.

- Performance against these new targets should be published on a regular basis – the Traffic Commissioners should not have to rely on tip-offs from competitors and local authorities.
- The Traffic Commissioners and VOSA should be given more resources to enable them to respond. We believe improvements in punctuality will result in increased patronage for bus operators. A significant number of the participants in our bus punctuality research hoped or assumed that there must be some kind of regulatory body for buses and thought this was a good idea but not one had heard of the Traffic Commissioners.
- Traffic Commissioners should focus in the first instance on the worst performing services.
- Passengers should have a right to complain to the operator, the local authority and the Traffic Commissioner about late-running services and should have a right to access to information about the performance of their bus services and to key action taken by operators, local authorities and the regulator to improve it.

Introduction

Passenger Focus welcomes this consultation which focuses on bus punctuality, the single most important issue for bus passengers. We recognise that running punctual services on congested roads can be difficult. It is unlikely that a single document can transform the situation, but we are pleased that a start is being made.

Passenger Focus is an independent consumer organisation, and our response reflects our commitment to represent the interests of passengers and potential passengers.

We are also an evidence-based organisation. Our response draws on passenger research, such as our report on [Bus Passenger Priorities for Improvement](#) (March 2010), our [Bus Passenger Survey](#) (March 2013) and [Bus passengers' experience of delays and disruption](#) (April 2013). It also draws on experience from the national Bus Punctuality Project on which we embarked in September 2011 and on qualitative research on bus punctuality specially commissioned to inform our response to this consultation and due to be published shortly.

Principles

Our response is structured around the following principles:

- Bus punctuality matters to passengers
- Timetables should be deliverable
- Operations should be well managed
- Someone independent should be monitoring performance and in a position to intervene
- Standards should be transparent and achievable
- Where there are problems, corrective action should be taken and passengers should be compensated
- Passengers should have a right to complain and a right to see how operators are performing

The importance of punctuality

Punctuality matters. Our research into *Bus Passenger Priorities for Improvement*, published in March 2010, found that punctuality is the aspect of their bus service that passengers most want to see improved. Passengers are less satisfied with the *punctuality* of their buses than they are with buses services *as a whole*. Our *Bus Passenger Survey*, published in March 2013, found that the satisfaction of passengers with the punctuality of their last bus journey ranged from 57-83% across the 22 areas of the country surveyed (overall passenger satisfaction ranged from 73-92%).

Our report *Bus passengers' experience of delays and disruption* (April 2013) catalogues the frustration of passengers using delayed and disrupted services and makes a range of recommendations about improving passenger information and driver training.

Getting timetables right

Timetables should be deliverable. They should reflect variable traffic conditions and passenger volumes.

Paragraphs 50-51 of the document make it clear that operators are expected to ensure that timetables are 'realistic and achievable' and tested prior to registering them with the traffic commissioner. Operators are expected to alert the local authority to any changes that should be made to timetables of subsidised services (paragraph 55) and put their concerns in writing (paragraph 57). We agree with what has been written here, but would recommend adding a sentence about the need to keep registered timetables under constant review to ensure that they continue to reflect variations in traffic conditions and passenger volumes.

The draft Guidance suggests that “the objective is to achieve a timetable that can normally be met rather than one which in theory relies upon clock face headway (and which is easy to remember) but which rarely achieves its aspirations” [paragraph 128]. We tested passenger attitudes on this point in our *bus punctuality* research, asking

- How do different types of passengers use timetables?
- How do passengers trade-off the benefits of a more ambitious timetable, which is sometimes not achieved, against a more cautious one which is always (or almost always) achieved, but at the cost of a lot of hanging around to avoid leaving stops early
- Do passengers prefer simpler and supposedly easier-to-remember clock-face timetables with buses sometimes departing early or late, or more complex ones which attempt to reflect the complexity of traffic conditions which can vary by time or day, day of the week and time of year

The conclusions from the eight focus groups and 24 depth interviews we carried out with passengers were clear:

- Overall, passengers would prefer a timetable that is accurate and harder to remember than one that is easy to remember but less accurate
 - They expect this to reflect the complexity of the day
 - And to result in buses waiting at stops at times (more likely off-peak) in order to stick to the schedule
- The caveat is that they would not want bus operators to ‘use’ this need to reduce the number of buses through decreasing the frequency of services

Paragraph 59 highlights the importance of alerting passengers to timetable changes. Our research on notifying passengers of [Service changes](#) (June 2010) found that a majority of passengers think the bus operator should give them at least four weeks’ notice of timetable changes. Three quarters of passengers think there should be a notice on the bus stop; six out of ten think there should be a notice inside the bus.

Operations should be well managed

Operators are responsible for managing their operations in real time. They need to take prompt action when buses break down, drivers call in sick or traffic grinds to a halt because of a road traffic accident or a burst water main. This requires them to know where their buses are at any given time; to have contingency plans in place to enable them to respond quickly and appropriately; and to have good communication with their drivers. We would like to see more emphasis in the document on ensuring that adequate systems are in place to manage operations in real time. We would also like to see a reference to the importance of keeping passengers informed about delays and disruptions, as set out in our report *Bus passengers’ experience of delays and disruption*.

Operators should also make effective use of data about their bus services as a management tool. This is discussed in paragraphs 60-62 and 66-87 and 91 of the document. We believe that the relevant questions to ask here are:

- What data is collected? Which bus routes are monitored, which services and at which timing points?
- How is this data collected?
- How is this data analysed? Who does it?
- How is it reported? In what format?
- Where is that data reported? Who looks at it? How often?
- What evidence is supplied about the reasons for delays?
- What action is taken? How is the effectiveness of that action monitored?

Passenger Focus' national Bus Punctuality Project has sought to shed light on how a number of operators, local authorities and PTEs currently collect and analyse data: see [Bus Punctuality – A Briefing Note](#) (September 2013). We concluded:

- access to comprehensive GPS route-based punctuality data is desirable but far from universal; many areas still rely on more selective data which is labour-intensive to collect
- even where comprehensive GPS route-based data does exist, it can tell you *when* and *where* buses are delayed, but not *why*; on-bus manual surveys, drivers and passengers can help to identify causes
- even where sufficient data exists, some operators and authorities struggle to take advantage of its potential
- punctuality data is not consistently shared with local partners
- reporting systems exist, but their effectiveness depends on the quality of information and analysis made available.

The draft Guidance states that “historically some operators have “monitored” a small percentage (5 to 10%) of their services and have relied on this ‘monitoring’ to seek to ensure compliance with the registered particulars”. It continues “Traffic Commissioners have previously expressed concern that this approach does not present a full enough picture of compliance or otherwise with the registered particulars and that this small percentage is in fact not monitoring of registered services but an audit of registered services” [paragraph 60]. The draft Guidance states that operators are not required to keep a record of 100% of the running of their services but wisely does not suggest an alternative figure, preferring to emphasise the need to keep fuller records of new and less punctual services [paragraph 61]. Monitoring should be carried out “at different times of the day and night to take account of peak and off-peak periods and at different times during the year to take account of seasonal variations” [paragraph 69].

We agree that a sample of journeys should be monitored and that this sample should take into account different times of day and times of year – and indeed days of the week, since weekends in particular may present different challenges. We would like to see the following principles applied:

- each route should be sampled every month
- the size of the sample should reflect the degree of precision and confidence required
- the sample should be weighted according to the patronage of particular services – busier services affect more passengers, so they need to be well-represented.

A carefully designed 10% sample could provide a reasonable level of precision, but only if based on a reasonably random set of observations – otherwise the sample would need to be larger. Passenger Focus would be happy to advise further on the construction of appropriate samples.

The draft Guidance draws attention to the value of talking to drivers [paragraph 70]: we agree – drivers are an obvious and crucial source of intelligence. This is not simply a matter of displaying comments cards in the bus depot canteen or adding an item to the agenda of a regular meeting with drivers' representatives. Structured face-to-face discussions held at a time convenient to drivers can help operators to exploit that intelligence more fully. We encountered effective engagement of this type in a range of bus operators, e.g. Trent Barton and Go North East.

The draft Guidance also highlights the failure by some operators to get the most out of the data they collect [paragraph 71], citing evidence from the Passenger Focus project. NCT are able to quickly produce route-specific graphs which show exactly where and when recurrent problems are occurring. This demonstrates the potential of deploying a skilled and committed analyst with access to the right software and given enough time to spot patterns in the data.

The draft Guidance includes some sensible advice about the keeping of records and the benefits of operators and local authorities regularly talking to each other [paragraphs 75-86].

The draft Guidance's emphasis on effective Bus Punctuality Improvements Partnerships is welcome, as is the highlighting of the local authority's role in notifying the operator about roadworks and enforcing parking restrictions [paragraphs 88-100]. In our Bus Punctuality Project we concluded that there was an urgent need to reinvigorate such partnerships and provide them with a clear focus on problem routes and corridors.

The draft Guidance could say more about internal reporting systems. *PSV Operator Licensing: Guide for Operators (VOSA)* (April 2009) says "if you wish to run registered services you should ensure that you have... systems for managing bus punctuality" which consider (among other considerations) "how monitoring is reported through line managers in the organisation"; "how compliance with

timetables is discussed at the most senior management level and, in the case of limited companies, at board level” and “actions taken to remedy failures to comply with registered timetables”. The Guide goes on to say: “should you fail to operate your services correctly the traffic commissioner may require you to produce evidence that you have such systems in place”. We would welcome a reiteration of these points in the Senior Traffic Commissioner’s Guidance.

Independent intervention

Our starting point is that there needs to be some independent oversight of bus punctuality. The performance of supported services can be managed through a separate contractual regime between the local authority and the operator. In respect of commercial services, the traffic commissioner performs regulatory functions. The key questions for passengers are:

- Are standards clear and achievable and are targets stretching?
- Is performance against standards and targets monitored, and is this information available to the Traffic Commissioners?
- Do Traffic Commissioners have the powers they need to intervene to seek an improvement and, where appropriate, compensate passengers?

The draft Guidance defines standards for the starting point of journeys [paragraph 112], timing points [paragraph 114] and final destination [paragraph 116]. The distinction between frequent and timetabled services is maintained. Standards require:

- 100% of all timetabled services to depart the starting point, depart timing points and arrive at the final destination no more than five minutes late
- Six or more buses per hour to depart the starting point on 100% of occasions, with the interval between buses never exceeding 15 minutes; the excess waiting time of frequent services at timing points is expressed as a target: 1.25 minutes above the average waiting time

The draft Guidance sees no justification for early running: keeping the passengers already on the bus waiting is preferable to prospective passengers missing an early-running bus [paragraphs 42-43 and 110]. In the bus punctuality research that we commissioned specially to inform our response, passengers endorsed this approach. The consistent attitude of most passengers can be characterised as “I’m prepared to wait for you if you’re running a bit late; you should be prepared to wait for me if you’re running a bit early”. Passengers using frequent services saw things differently: they have not turned up at the stop to catch a particular timed service and are happy for the bus to depart as soon as possible.

The standard that all timetabled services need to depart on time, stay on time and arrive at their final destination on time, i.e. within five minutes of the timetable, is easy to understand and remember. Most of the passengers participating in our bus

punctuality focus groups and depth interviews were quite forgiving about buses turning up late, feeling that there was little the bus operators could do to avoid the traffic. Most saw timetables as a 'guide' rather than a promise and spontaneously mentioned that giving them five minutes' leeway felt about right.

The standard for frequent services, while measuring the right thing from a passenger point of view (how long they have to wait at the stop) is harder to communicate and understand, requiring the passenger to calculate average waiting time and add on a complicated figure.

It would be helpful if the status of services which are cancelled or turned short of their destination could be clarified. Presumably not running a service at all counts as a service failure and stopping short means a part failure?

Like the Senior Traffic Commissioner, Passenger Focus would love it if all buses ran on time. However, the 100% standard is clearly not achievable.

The DFT has published two national surveys of bus punctuality. The first survey was carried out in March/April 2005. The second was conducted in May/June 2007 and published in May 2008 as *Bus Punctuality Statistics GB: 2007*. The data was gathered from VOSA's Bus Compliance Officers and on-bus GPS systems. The punctuality of infrequent services is measured against traffic commissioner standards; frequent services (every ten minutes or more frequent) are measured with reference to excess waiting time. The survey covers 460 frequent services and 3,897 non-frequent ones.

- In 2007, 75% of buses in England outside London were found to be on time (84% started on time, but this figure reduced to 69-74% at other bus stops). This represents an increase of one percentage point from 2005. The figures are apparently consistent with bus punctuality estimates produced by local authorities.
- The same survey found an average excess waiting time in England outside London of 1.33 minutes (compared to 1.63 minutes in 2005 and a traffic commissioner standard of 1.25 minutes per route). Buses observed at the start of their routes had an excess waiting time of 1.10 minutes, but this figure increased to 1.32-1.58 at other stops.
- The percentage of 'no-shows' in 2007 was found to be 2.4% (an increase from 1.8% in 2005).

A study by Passenger Focus of the published bus punctuality figures for local government national indicator (NI) 178 revealed that timetabled buses reached the 95% threshold in only three areas (Swindon, Kent and Durham) in 2008-9 and three areas (Swindon, Durham and Bracknell Forest) in 2009-10. Ten areas failed even to achieve even 70% in 2008-09, with seven areas failing to achieve 70% in 2009-10. Just under half failed to achieve the excess waiting time target for frequent services of 1.25 in each of the two years.

The latest annual figures from Transport for London indicate that 83.6% of low frequency services departed on time during 2012/13, with 11.6% departing over five minutes late, 0.8% departing early and 4% not arriving at all.

In addition to being unachievable, the 100% expectation appears to be contradicted earlier in the document, where it is recognised that a temporarily lower target (sic) than the current 95% one might be appropriate in some instances [paragraph 38] and also by the suggestion that a whole host of operational conditions can mean that “on some services it is unlikely that all services will run within the window of tolerance of five minutes late” [paragraph 46].

The terms “standards” and “targets” mean different things. A “standard” should always be achieved and there should be consequences for failing to achieve it, e.g. penalties for service providers, redress for consumers. A “target” is an aspiration – incentives, financial or otherwise, can be attached to reaching it, but this need not be so. It appears that the real “standard” is that 80% of services must keep within five minutes of the timetable as it is intended to give partnerships time to resolve punctuality issues “where the compliance rate is above 80%” and “any performance falling below that rate must be referred to the traffic commissioner as soon as possible” [paragraph 118] who will decide whether to convene a Public Inquiry, depending on the amount of effort being made to improve reliability and punctuality [paragraph 119].

Our bus punctuality research suggests that passengers do not expect all buses to be on time and are prepared to ‘forgive’ occasional lateness so long as they perceive bus operators to be doing their best and not running buses that regularly turn up late (or ever leave early).

Interestingly, our bus punctuality research reveals that passengers seem to distinguish between poor punctuality (represented by their bus turning up late at the start of their journey) and ‘delays’ (the bus arriving late at their destination). Passengers would like bus operators to take any steps they can to help them manage their journey: our report *Bus passengers’ experience of delays and disruption* (April 2013) provides more detailed evidence on this point.

In any case, the lack of more comprehensive and recent punctuality data across the country renders it very difficult to judge the level at which to set an achievable standard. Section 155 of the Transport Act 2000 appears to give the Traffic Commissioners adequate powers to intervene, seek improvements and compensate passengers. However, the lack of consistent monitoring and transparency about punctuality data going forward renders the standards largely unenforceable, except where the Traffic Commissioners happen to receive complaints. Given the lack of a requirement to publish performance data, most late buses seem destined to continue to operate beneath the Traffic Commissioners’ radar until the low public profile and lack of resources of VOSA and the Traffic Commissioners is addressed.

Passenger Focus recommends:

- A comprehensive, up-to-date study of the performance of buses should be embarked upon immediately, covering a large sample of buses across a wide range of operating environments. The results should be published.
- Punctuality standards should be revisited in 18 months. Realistic, route-specific targets informed by evidence of actual performance should then be set. Transport for London uses a formula to calculate the degree of difficulty in running a route reliably, taking into account the number of major centres the bus passes through, congested corridors, other traffic hotspots and the length of the route; performance against route-specific targets forms the basis for contractual rewards and penalties. Until we have a more substantial body of evidence about the performance being achieved outside London, we see no basis for changing the existing traffic commissioner targets.
- We acknowledge that major events outside the control of the operator, such as extreme weather conditions, can significantly affect punctuality statistics. In such circumstances, one option could be to allow operators a limited number of days where performance could be exempted from the statistics; alternatively, Traffic Commissioners could make some allowance for the performance of services on exceptional days.
- Performance against these new targets should be published on a regular basis – the Traffic Commissioners should not have to rely on tip-offs from competitors and local authorities.
- The Traffic Commissioners and VOSA should be given more resources to enable them to respond. We believe improvements in punctuality will result in increased patronage for bus operators. A significant number of the participants in our bus punctuality research hoped or assumed that there must be some kind of regulatory body for buses and thought this was a good idea but not one had heard of the Traffic Commissioners. This bus regulator's low public profile also came through in our [Giving Passengers A Voice in Bus Services](#) research (October 2013).

Where there are problems corrective action should be taken and passengers should be compensated

Where services are regularly delayed, the problem should be put right and passengers should receive compensation. Section 155 of the Transport Act 2000 provides for the traffic commissioner to require the operator to spend money improving services or compensating passengers as well as, or instead of, penalising operators. Of course, such action should only be taken against operators for matters within their control [paragraph 123].

The document sets out a sliding scale of penalties which can be imposed on bus operators under Section 155 of the Transport Act 2000. While we accept the principle of a sliding scale, we doubt that the Traffic Commissioners will have the resources to follow up compliance rates that are well over the 80% referred to in paragraph 118. In such circumstances we would recommend that the Traffic Commissioners focus in the first instance on the worst performing services [paragraph 124].

Passengers should also be compensated when passengers are significantly and avoidably delayed on an individual journey. Some operator charters already offer passengers their money back where journeys are seriously delayed and it is the operator's fault.

Passengers should be empowered

Passengers should have a right to complain to the operator, the local authority and the traffic commissioner about late-running services. However, our bus punctuality research indicates that most bus passengers feel there is no point complaining to the operator either because they do not generally regard it as important enough to complain or because, when they have done so, they have not received a reply. As already mentioned, none had heard of the Traffic Commissioners, but there was significant interest when they learned that such a body existed and handled complaints.

Passengers should have access to information about the performance of their bus services and to key action taken by operators, local authorities and the regulator to improve it. We would like to see this reflected in the Guidance. Passenger Focus research into the attitudes of rail passengers indicates that publishing this information is regarded as right in principle and is good for trust because "it keeps the industry honest". Participants in our bus punctuality research felt that punctuality data, independently audited, should be published and made available to regulatory bodies even if most passengers had little appetite in searching it out. Some suggested that there might be a public relations benefit to operators from publicising that "more than 9 out of 10 of our services are on time" on the back of buses.

Our *Bus Passenger Survey* suggests that some passengers feel they have no alternative but to use the bus. While some participants in our bus punctuality research initially questioned the value of performance information if they could not 'vote with their feet', they subsequently saw the value of bus operators being held accountable by someone independent looking at bus performance, handling complaints and publishing information). This ties in with the findings of our *Giving Passengers A Voice in Bus Services* research.

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