

Bus Services Act 2017: Consultation on Accessible Information Response from Transport Focus

Transport Focus welcomes the consultation *Bus Services Act 2017: Consultation on Accessible Information* and we would like to congratulate the Department on a well-written document which reflects significant discussion with stakeholders. We also welcome the decision to hold a number of events around the country to provide further opportunities for dialogue.

As the Guide Dogs research which you quote demonstrates, many disabled people have experience of a bus driver forgetting to notify them that they had arrived at their stop, often with significant consequences, and many have been put off from using buses for the first time because of the lack of information on board.

As you recognise, it is not just disabled passengers who benefit from on-board information. As you acknowledge, our *Bus Passenger Survey* research has found that passenger satisfaction with information provision inside the bus rises sharply where announcements and displays are present, with a satisfaction rate of 61% rising to 82% where audible information is provided, and an increase from 60% to 79% where there are next-stop displays on board. Such information can be helpful to anyone travelling on an unfamiliar route, including tourists. It can also benefit passengers travelling on familiar routes in different circumstances, for example when the view from the bus is blocked by standing passengers or obscured by steamed-up windows.

Although our statutory role is limited to England (outside London), and while we understand that there are different devolution settlements in Wales and Scotland, we would welcome a consistent approach to this matter across Great Britain.

We also note that the title 'Accessible Information' somewhat overstates the scope of the exercise and that issues remain to be addressed in giving everyone access to journey planning, bus stop and real time information.

AIR01. Do you agree that the Core Proposal is an appropriate response to the need for change identified in this document? Please explain your answer.

Yes. We agree with the statement in paragraph 1.23 of chapter 1 that compliant information will need to be:

- Provided both audibly and visibly
- Provided at specific points on a journey when it can be used by passengers
- Be discernible by passengers throughout the vehicle, and by people using audible induction loops
- Not be provided solely in a manner which requires users to purchase or possess smart devices in order to access it
- Be timed so that it is useful in informing passenger decisions whether to alight
- Of a quality which allows a Specimen Person to discern it at the furthest extent possible within each deck of the vehicle.

If the bus industry is successful in getting the message across that accessible next stop information is available on all vehicles, this should help to build confidence in bus travel among those anxious that they may miss their stop, particularly if journey planning information enables passengers to identify the name of the stop they need.

AIR02. Do you agree that the proposed list of required information is an appropriate use of the powers available? Please explain your answer.

Yes. We agree with the list of information set out in chapter 3 that you are proposing to require:

- The name or designation of the local service

- Direction of travel
- Stopping places
- Diversions
- Connecting local services

We have a number of specific observations.

We agree that it is important to provide passengers with confidence that they have boarded the right vehicle. The potential benefits to visually-impaired passengers are obvious, but there are wider gains for all kinds of passengers. Such information may be particularly important where buses with similar route numbers are using the same stop and need to be distinguished from one another, for example express services and buses stopping at every stop, or where services with similar numbers deviate from each other for part of the route. While many passengers will be standing at the bus stop when the bus approaches, some may be approaching the bus from behind or even the side, so this information should provide reassurance to them, too.

Direction of travel announcements can also be important, not least in areas where one-way systems may result in a considerable separation between stops. On lengthy routes, not all passengers may recognise the final destination of the bus, so it would be helpful to highlight the next sizable place.

The announcement of all scheduled stops will be of major benefit to passengers, particularly if journey planning information enables passengers to identify the name of the stop they need in advance.

We recognise that bus operators face practical limitations when announcing diversions. The key to providing such information is to do so in a timely manner to assist passengers with their decision-making, specifically whether to board the bus in the first place and subsequently where to get off. Passengers boarding a bus should be alerted to any known diversion which will result in some stops being missed or a significant extension to their journey time. Passengers approaching the start of a

diversion should be given plenty of notice of the upcoming diversion to enable them to start thinking about whether to stay on the bus or, for example, get out and walk before the bus diverts from its route. It is likely that some passengers may still wish to seek advice from the driver; however, providing the right information at the right time should reduce the need for them to do so.

AIR03. Do you agree that the proposed information timing requirements are appropriate? Please explain your response.

Yes. We agree generally with the proposal to specify in Regulations that:

- Information identifying the route and direction begins to be provided whilst the front passenger doors are open at every scheduled stop at which the vehicle calls
- Information identifying upcoming stops is provided for each scheduled stopping place and in sufficient time to enable a passenger relying on the information to signal to the driver that they wish to alight, and to alight the vehicle at the respective stop
- Information identifying the point at which a diversion begins is provided at the last point at which a passenger relying on the information can leave the vehicle prior to the start of the diversion
- Information identifying the end of a diversion is provided in sufficient time to enable a passenger relying on the information to alight the vehicle at the first scheduled stopping place following the resumption of the scheduled route.

Transport for London have extensive experience in the timing of next stop announcements.

It would be helpful if information about significant, known diversions could also be provided to passengers boarding the bus, particularly where stops might be missed out or journey time significantly extended.

AIR04. Do you agree that the proposed 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.

Yes. This appears to be a sensible solution. Picking up on paragraph 1.9 of chapter 6, we note that in addition to wheelchair users travelling backwards, some fixed bus seats also face the back of the bus.

AIR05. Do you agree that the regulations should require that a person using a hearing aid in conjunction with an audible loop system should be able to discern audible information? Please explain your response.

Yes. Many bus passengers use hearing aids and this seems to be a reasonable requirement.

AIR06. 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.

Yes, we agree. Ofcom's recently published report on *Adults' Media Use and Attitudes 2017* has highlighted that only 39% of 65-74 year olds and 15% of over 75s use a smart phone. Such a requirement would clearly be premature and unfair and would limit the usefulness of the Government's approach.

AIR07-AIR19b

We have no particular comments on the questions in the remainder of the consultation document, covering the use of exemptions, implementation timescales, guidance for operators, compliance and enforcement, and the impact assessment. It is important that passenger needs are met even on smaller vehicles, but we accept that there may be other, more practical ways of doing so than by making them subject to these regulations.

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