



Bus Users UK Response to the Disability Action Plan 2023/2024 Consultation

6 September 2023

This response confines itself to aspects of bus and coach travel which are relevant to the overall strategy and plan.

It is encouraging to see commitments to including disabled people in all policy developments at the concept stage as co-production will mitigate any unintended negative consequences resulting from well-meaning ideas. Nearly all adjustments made with a specific group of people with disabilities in mind become helpful to many other people in the community too, so such creativity benefits far more people than the intended user.

In terms of the specific policy commitments of government departments in Section 3, it is disappointing to note that, apart from DfT, only Defra has touched upon the need for accessible transport space in meeting its priorities.

In order to play an active part in society, accessible and inclusive transport must be available and affordable and this is currently a postcode lottery across the country. Transport provision for all should be a consideration in all aspects of all policies by every government department in order for any of the plans and actions to succeed. Disabled people should be able to take advantage of any of the opportunities on offer and will not be able to if accessible transport is not planned in at the start. It is not practical for all departments to assume that all transport needs are the sole purview of the Department for Transport. This kind of silo working will cause outcomes to be sub-optimal. Instead, a senior transport specialist should be part of every policy planning team. There is a clear intention to include all relevant departments in emergency planning and resilience work and that spirit could and should be widened to all priority areas.

The review of Public Service Vehicles Accessibility Regulations 2000 (PSVAR) has enabled us to comment on plans and ideas for making the bus and coach sector more accessible and inclusive as well as highlighting the need to make accessible infrastructure a legal requirement in all urban settings so we will not repeat those comments here. However, all plans to make other modes accessible should take into account that most journeys are multimodal so interchanges between various mods should be planned in at the start and all operators of public and sustainable transport modes, including taxi and private hire drivers, should be required to complete disability awareness and assistance training within their first year of operation and regularly thereafter.

In addition, home to school transport for disabled children should, wherever feasible, enable the child to travel with other pupils, rather than excluding them by sending them to school by taxi. If we want attitudes to be more inclusive in adult life, disability should be seen as a standard part of school life at as early a stage as possible and transport is a great leveller.

We also look forward to seeing a draft of regulatory measures to empower bus drivers to give access to priority on-board wheelchair spaces and would support research into the use of bus and coach by disabled people in any way possible.

In terms of the plans in Section 4, all of the priority areas would require good transport access in order to make them feasible and ensure that disabled people of all ages and all sections of society are able to play a full part.

This might require candidates for election to be given free travel on all modes in the area concerned with fully-paid support workers available to meet their needs prior to and following election. While online hubs can be useful they are not, of themselves, inclusive. Access to relevant equipment and high-quality broadband is not always affordable or even available/reliable, such as in some rural areas.

Guidance information must not be exclusively online. Resources must be available to everyone including those without online access in order to help co-produce the design of inclusive playgrounds.

Accessible playgrounds begin at the front door of potential users so that travel to the site is accessible and inclusive, as well as making the site itself accessible.

Climate change considerations clearly require work to improve air quality and one of these considerations is the need for clean, accessible, sustainable transport options. All local buses are required to be wheelchair accessible and much work is going on within the industry and designers for the bus industry to improve and update the accessibility options in public transport.

In many cases, a change of fuel mechanism can make buses more accessible as it offers more low-floor space. However, there needs to be more protection for people at bus stops who often bear the brunt of tailpipe and particulate pollution by removing non-compliant traffic from bus routes, wherever practical. This could be assisted in the short term by bus stop co-design challenges which could screen passengers from road pollution.

While a Disability Enabled Badge scheme is a helpful concept, it seems a rather overly gentle approach to businesses which are denying the basic rights of disabled consumers to reasonable adjustments. All bus and coach staff are required in law to be trained in this regard and therefore it is an area where government has seen fit to intervene previously. Making such training mandatory would improve the confidence of many more disabled people that they can experience a full life and result in fewer illegal refusals.

Special Olympics are dependent on successful transport plans being set in place well in advance of the event. The UK has run a number of such coordinated transport plans in London, Glasgow and Birmingham which have been the result of huge cooperative efforts of operators UK-wide, alongside local authorities and event organisers. Whether there is an appetite for another such event in the near future, given the straitened circumstances of most operators at present and the uncertainty in funding plans, is doubtful. Before moving ahead with any study, it would be wise to consult transport operator bodies such as the Confederation of Passenger Transport.

Assistance animals may not be refused – this should not be limited to registered guide dogs as many more users legally require access. This is the case with bus and coach even though there are logistical issues, especially in coach. These have been resolved and egregious breaches could be acted upon by the Traffic Commissioner if an operator was being obstructive. This area of law should be made clearer and a simple reporting mechanism designed. This should be backed up with enforcement which is sufficiently punitive to ensure traders pay attention.

Assistive Technology is extremely enabling for many people with disabilities. However, it must be remembered that not everyone, disabled or not, can use the technology on offer. Any champion should also be looking at non-digital alternatives to ensure no one is further isolated.

Cross-government collaboration is vital and, as previously mentioned, should include accessible transport elements across all aspects of government policy if the intended outcomes are to be achieved.

The wellbeing and opportunities for disabled children and their parents will only be optimised if their public transport needs are met and it becomes a standard sight to see groups of people with a disabled member regularly travelling on bus and coach, starting from primary school transport. Similarly, design standards for public transport should move towards including more than one wheelchair space, separate luggage space and more flexible seating to enable a more diverse group of passengers to board. This is another policy area that fundamentally requires transport expertise in the co-production of services and policies.

Disability evidence and data improvement are key aspects of making the case for improvements and funding. This should be done on an open platform and allow for experiential/anecdotal evidence to be collated alongside more formal research. All projects should ensure the lived experience of disabled people with many different requirements is key to their aims.

A combination of hard evidence and outcomes data is invaluable as one should balance the other and enable deeper dives into apparent conflicts.

Disability Foresight will always be useful as a guide but known needs will be likely to take precedence when funding decisions need to be made and there is so much needing to be done to make society more equitable. However, if there is consensus across a majority of disability groups about an anticipated obstruction, then clearly it would be prudent to set aside resource to investigate this.

Alternative actions. The clearest **additional** action which could open up opportunities for disabled people in the UK is to remove the barrier preventing a concessionary pass being used across the borders of England, Wales, Scotland and Northern Ireland. The NHS can recharge treatment to the citizen of one home country to another NHS region and there seems no reason why this could not be done for concessionary passes. This would open up employment and leisure opportunities for disabled people, especially those who live close to an internal border.

About Bus Users

Bus Users UK is a charity that campaigns for inclusive, accessible transport. We are the only approved Alternative Dispute Resolution Body for the bus and coach industry and the designated body for handling complaints under the Passenger Rights in Bus and Coach Legislation. We are also part of the Sustainable Transport Alliance, a group working to promote the benefits of public, shared and active travel. Alongside our complaints work we investigate and monitor services and work with operators and transport providers to improve services for everyone. We run events, carry out research, respond to consultations, speak at government select committees and take part in industry events to make sure the voice of the passenger is heard.

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