

Cynulliad Cenedlaethol Cymru	National Assembly for Wales
Y Pwyllgor Menter a Busnes	Enterprise and Business Committee
Gwasanaethau Bysiau a Thrafnidiaeth Gymunedol yng Nghymru	Bus and Community Transport Services in Wales
BCT 46	BCT 46
Anabledd Cymru	Disability Wales

### **Consultation questions**

**Question 1** –How would you describe the current condition of the bus and community transport sectors in Wales?

Disability Wales recognises that at the core of full inclusive participation in society is the right to access all public transport modes, including buses. Inaccessible transport remains a significant barrier to independent living for many disabled people.

In general, accessible buses and services are increasing in line with the deadline, stated in the Public Service Vehicle Accessibility Regulations 2000 (PSVAR).

The PSVAR require facilities such as low floor boarding devices, visual contrast on step edges, handholds and handrails, priority seats and provision for passengers in wheelchairs.

All buses designed to carry 22 passenger or more and used on local or scheduled services will be required to be fully PSVAR compliant by 2015, 2016 or 2017 (depending on the bus type).

The transition will take place over time and transport operators will inevitably use a mixed fleet of accessible and non-accessible vehicles.

- Since 31 December 2000, new full size single deck buses over 7.5 tonnes and double deck buses have been required to be fully accessible to disabled people, including wheelchair users.
- All full size single deck buses over 7.5 tonnes will be fully accessible from 1 January 2016, and all double deck buses from 1 January 2017.
- All buses weighing up to 7.5 tonnes will be fully accessible from 1 January 2015 and coaches by 1 January 2020.
- Also since 31 December 2000, new buses weighing up to 7.5 tonnes and coaches have had improved access for ambulant and sensory impaired passengers and, from 1 January 2005, new buses weighing

up to 7.5 tonnes have to be wheelchair accessible.

On the whole bus accessibility is improving albeit at a slower rate than we would like: access barriers to full inclusion still exist.

**Bus Passenger Survey 2010. Key findings concluded that:**

Overall the results from the 2010 Bus Passenger Survey present a positive picture of users' views about bus services in Wales. There is very little difference of opinion between disabled and other bus users about bus services in Wales. The survey shows that:

- 81% of disabled bus users are generally satisfied with the bus services they use.
- Almost three quarters (73%), of disabled bus users are satisfied with their personal safety at the bus stop, with 84% satisfied with their personal safety on the bus service itself.
- 90% of disabled bus users are satisfied with the ease of getting on and off the bus service.
- 89% of disabled bus users are satisfied with the length of time their journey took on the bus service.
- 89% of disabled bus users are satisfied with the helpfulness and attitude of the driver of the bus
- 90% of disabled bus users are satisfied overall with the bus journey they were making when they were handed the survey form

These statistics should be treated with caution because many disabled people under-report access issues and negative experiences encountered. Under-reporting reasons could include lack of confidence needed to report issues, stress and bother of reporting which could exasperate some impairments and embarrassment or fear of not being taken seriously.

It is worth noting that many disabled people are not confident using public transport services due to the physical, attitudinal and communication barriers encountered, including lack of assistance and negative attitudes of staff. Discriminatory attitudes and behaviour towards disabled people still occur. Without significant improvements to counter negative experiences, it is highly unlikely that disabled people who use cars would be able to choose buses as a real alternative. Lack of accessible and inclusive bus services, and limited options for many disabled people wanting to use their local bus network mean there is less choice for disabled people to adopt environmentally sustainable behaviours

Bus companies correctly state that legally they do not need to have their entire fleet fully accessible until 2020, but some companies are using the deadline as an excuse for continued poor service for disabled passengers. In rural areas especially, there is a lack of low level buses, this is a major concern for many disabled people. Bus operators in rural areas use older vehicles, thus it is more likely that their fleet have stepped access: it may not be cost effective to upgrade their buses to match access requirements.

Some local areas have an accessible alternative to public transport.

Initiatives include:

- Barbara bus in Gwynedd (North West Wales)<sup>1</sup>
- Similarly Pembrokeshire Association of Community Transport Organisations (PACTO) a number of schemes run in the Pembrokeshire area (South West Wales)<sup>2</sup>
- In Rhondda Cynon Taff/ Mountain Ash area, there is a bus service called Accessible Caring Transport which aims to provide community transport services and schemes to disabled people and older people.<sup>3</sup>

Adequate provisions of Community Transport are available to some communities across Wales, however, some areas have no accessible alternatives to public transport at all. In recent years some Community Transport providers have gone into liquidation due to budget cuts such as Caerphilly's 'CATS' community Transport.

Access barriers include:

Stepped entry only: Common in rural areas because smaller bus operators tend to use older vehicles. Wheelchair users are unable to use many bus services in rural Wales because of stepped access barriers. Many older people and disabled people with mobility impairments also find stepped access very difficult to negotiate.

Low height of bus stops: mostly but not limited to rural areas. Bus stops are often very low, resulting in a high step up requirement when boarding. When alighting, many ambulant disabled people find that the high step down can also cause them problems.

On board the majority of buses in Wales there is a limited number of wheelchair spaces available: having only one or two wheelchair spaces on low floor buses means that a group of wheelchair users are not able to travel together.

Motorised scooter users are often denied passage on low level buses because not all bus companies allow motor scooters on board. Conditions of carriage are sometimes displayed on board a bus. There is usually a maximum allowed weight, some motor scooters are heavier than allowed by the conditions of carriage. Each bus company has its own policies relating to carriage of motor scooters which could confuse disabled passengers.

Inconsistency of various bus operators' policies, rules and regulations on access and carriage is a source of ambiguity for many disabled passengers.

Community Transport very often attempts to fill the gaps left behind by bus service cuts and could be required to do so considerably more in the future despite continued funding cuts to their own budgets. However there are costs to older and disabled passengers; since April 2013 concessionary bus passes can no longer be used on the majority of Community Transport

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<sup>1</sup> <http://www.barbarabus.com/>

<sup>2</sup> [http://www.pembrokeshiretransport.co.uk/content.asp?nav=688,735&parent\\_directory\\_id=673](http://www.pembrokeshiretransport.co.uk/content.asp?nav=688,735&parent_directory_id=673)

<sup>3</sup> <http://www.shape-it.org/Community/TravelTourism/TransportRCT/AccessibleCaringTransport.aspx>

services in Wales. Many eligible older people and disabled people cannot therefore take advantage of free bus travel due to inaccessible or non-existent bus services.

Many Community Transport providers frequently rely on volunteer drivers giving their time for free, which dramatically reduces the time frame in which the service can run, especially when compared to services of larger bus operators. A like for like comparison is unfair due to a resource disparity. Fewer resources are available to Community Transport initiatives (and smaller bus operators) which lessen their capacity to initiate access improvements.

The Welsh Government support of the Traws Cymru, the longer distance bus services, are an important part of the integrated public transport network in Wales which are not financially viable for many service providers to take on. This commitment to long distance services remains positive; these routes reach areas of Wales not otherwise serviced by bus or rail, thus avoiding rural isolation for those who do not have access to cars.

The Traws Cymru website states that “the buses provide vital public transport for many communities across Wales, while also giving visitors an accessible, affordable and environmentally friendly option for exploring the scenic beauty of the country.” This links in with the environmental benefits of providing accessible, fully inclusive bus services throughout Wales. (see Question 3)

**Question 2 – why do you think the number of bus services and the number of bus passengers is declining in Wales?**

**Bus services** – Running costs and falling passenger numbers hugely affects business viability. Profit margins decrease due to a fall in passenger numbers coupled with the rising costs of fuel. The repercussions of the legislation and commitment making all buses accessible to all by 2020 may also impact on service provision. Many smaller operators may not have the financial capacity to update their fleet. Rather than spend money on new vehicles they could close before legalities force them to cease trading. Pending legislation could cause concern for smaller operators especially in rural areas who are more likely to have old rolling stock vehicles on the road.

The Welsh Government have to be mindful come 2020 because many rural towns and villages could lose vital transport links completely. Negotiations with larger operators or contingency funding to bridge accessibility modifications i.e. accessible vehicles. Funds may need to be allocated to smaller operators to ensure continuity. Contingency plans should be considered sooner rather than later in order for potential problematic routes / areas to be mapped out, disabled passengers' fears alleviated and solutions identified, before smaller bus operators cease services due to cost implications in 2020.

**Bus passengers.** In short; affordability, quality, reliability, consistency of access requirements being met, frequency of services and convenience, are all factors in diminishing passenger numbers.

Access barriers, as mentioned in the previous question impede disabled passengers' enjoyment of bus travel. The low number of wheelchair spaces available remain problematic. Often there is not a dedicated wheelchair space, instead wheelchair users must compete with parents with buggies over the sole accessible space. There have been instances of wheelchair users being unable to board a bus due to parents refusing to vacate the wheelchair space. A legal challenge to determine who has priority is still going through the courts after a lengthy legal wrangle in England<sup>4</sup>.

Many individuals on low incomes, including disabled people, often live in transport poverty. Disabled people are financially hit the hardest due to Welfare reforms. Disabled people who lose their Mobility Higher Care component when transferred from Disability Living Allowance to Personal Independence Payment could be faced with having to purchase and run an adapted car themselves. This may cause some disabled people to lose their car all together. Accessible bus services would be required then more than ever to avoid disabled people having to rely on friends and family giving lifts. That is if bus services in their area are indeed accessible and actually exist and also whether disabled people can make use of their local bus services and concessionary pass. Disabled peoples' right to independent living will be under threat.

Car use increases year on year, once young people, who make up a large passenger number base learn to drive and have a car, very few return to using buses, this is something that needs to be addressed. Initiatives to explore how bus operators can keep young adult bus passengers after they pass their driving tests are crucial. With new initiatives such as Young Persons Discounted Bus Travel Scheme for 16 – 18 year olds, which was previously limited to those in education, it is hoped that, travel will no longer be confined to work and education but will also include social and leisure purposes. Which could broaden its appeal and potentially increase uptake. An on board marketing campaign strategically aimed at young people and bus operators publicizing the scheme has started.

**Question 3** – what do you think is the social, economic and environmental impact of recent changes in bus and community transport service levels?

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<sup>4</sup> <http://www.bbc.co.uk/news/uk-england-leeds-30376446>

**Social:-** Lack of social interaction potentially caused by bus service cuts would impact on disabled peoples' opportunity to live independently and impact on their health too, especially their mental health as one of its effects would be loneliness. For a number of disabled people, public transport is their preferred or only option of transportation. Some appreciate the low costs of using public transport and relief at not having to look for suitable parking spaces; while others endeavour to do their part in combating climate change. Disabled people wanting to be 'green' may be forced to use cars and given no choice of an alternative in the matter. Accessible transport is crucial for these people to live independently in their communities and to be able to fully access the services which they require. Some disabled people do not own a car or are unable to drive and so for these people their reliance on public transport is even greater.

**Economic:-** Bus fares are increasing every year, with fare increases there could be a knock on affect with an increased economic pressure to maintain the cost effectivity of concessionary passes subsidiaries. Fuel costs have soared in recent times, this also puts pressure on bus operators to increase fares to maintain their profit margins. In all bar two Local Authorities in Wales (Newport and Cardiff) bus operators are privately owned, therefore services are run for profit not for passenger comfort / satisfaction.

This fact should be carefully considered throughout the decision making process because financial viability would be the key priority as to whether a bus route continues or are is removed. Routes defined as 'Socially necessary services' could these in theory expand due to the possibility that commercial services could reduce in number?

The expense could put off many fare paying customers. Concessionary passes are invaluable to disabled people who can access bus services, who would otherwise face social isolation in their communities. Without accessible bus services, economically deprived areas would continue not to prosper due to lack of public transport to and from places of work, education, leisure and health settings.

**Transport Poverty Wales: from the Poverty Site on 2006:<sup>5</sup>**

Relating to the adequacy of bus services in Wales:

Among households without a car, two-fifths describe the local bus service as failing to meet their needs for travel to the town centre or the shops while two thirds say it does not meet the need for travel to the hospital. Among households with a car, the proportion in each of these cases is higher still.

Almost all households (90%), and irrespective of whether they have car, say that the bus service does not meet the need either for travel at night or travel on Sundays.

Local bus services do not meet the need for weekday travel for the majority

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<sup>5</sup> <http://www.poverty.org.uk/w75/index.shtml>

in any part of Wales. Support for the view that local bus services do not meet weekday travel needs is highest in the Valleys, at 80%. At the same time, the proportion of people with daily access to a car is lowest in the Valleys, at 55%.<sup>6</sup>

The 2004 'Living in Wales' survey included a question about satisfaction with public transport. Although levels of satisfaction were much higher than suggested by the 2004 Welsh Consumer Council Survey, the geographic pattern was similar: high levels of dissatisfaction in rural areas (Powys, Ceredigion, Monmouthshire and Carmarthenshire) and some Valleys authorities (Rhondda Cynon Taff and Blaenau Gwent).<sup>7</sup>

People often use a form of transport due to lack of alternatives rather than choice. Four-fifths of bus users in Wales would prefer to travel by car.<sup>8</sup>

Bus service costs have risen by 31% over the last 20 years.<sup>9</sup> Since 1991, the cost per passenger journey has increased more in Wales than in other parts of Great Britain.<sup>10</sup>

**Environmental:** Many disabled people rely on private vehicles to remain independent in the community, getting from A to B reliably. Many car drivers who would leave or already have left the car behind due to good quality transport, i.e. to commute, would be pushed into driving again due to potential cuts in services. Therefore there would be a negative impact on the environment. More cars on the road means an increase in carbon emissions, which is the opposite of climate change initiatives that actively encourage and advocate alternative forms of transport usage rather than reliance on car travel, for commuting, hospital trips or to partake in leisure activities for example. However, disabled people who can only maintain their independence by using private cars rather than inaccessible public transport alternatives should not be criticised.

Smaller bus operators may not be able to invest in pricey greener vehicles. Adding greener vehicles to their fleets may not be financially viable or sustainable. Incidentally, the charity Guide Dogs Cymru have historically commented that greener vehicle engines (i.e. electric) were quieter and therefore harder to hear which could cause safety concerns and an access barrier for blind or visually impaired bus passengers.

**Question 4 –**what do you think the Welsh Government should do to support bus and community transport in Wales?

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<sup>6</sup> Omnibus Survey for Wales, Welsh Consumer Council, 2004

<sup>7</sup> Living in Wales, 2004 and Omnibus Survey for Wales, Welsh Consumer Council, 2004.

<sup>8</sup> Bus travel in Wales, Welsh Consumer Council, 2001.

<sup>9</sup> *10 year transport plan*, 2003

<sup>10</sup> Transport Statistics Wales 2004

Continued commitment to the concessionary bus passes is a must to ensure disabled people and older people maintain their right to independent living, enabling independent travel within their community thus avoiding social isolation.

As mentioned in Question 1, consistency is key. Without standard referencing tools such as a common thread policy implemented throughout on scooter carriage and bus vs pram priority clarification disabled passengers would face a wide and varied experiences throughout Wales which is not conducive guaranteed access every time disabled passengers want to board a bus. Inconsistency in service provision causes stress and worry which could prevent many disabled people using buses, although they possess a concessionary pass, due to negative travel experiences in the past.

We agree with all of the key recommendations of in the Report of the Bus Policy Advisory Group.

Stability of funding in order for bus operators plans to be established over a certain time frame. Giving scope and solidity to new projects or initiatives, guaranteeing to see them through.

A consistent pan-Wales approach to bus service provision, operator policies and standards throughout Wales. Joined-up networking across boundaries and between operators is essential for understanding connectivity and enhancing fluidity of services.

Network Partnerships – Local Authorities, bus operators and other local services in the area such as health provision and community transport should be encouraged.

Kick start funding – short term financial support for new commercial service initiatives to mitigate potential early loss of revenue. (In accordance with the geographical Local Authority variations to bus subsidiary grants presently).

Investment in infrastructure – roads and connectivity, to ensure a more joined up approach with commercial bus services and Community Transport and other transport modes, to make bus travel more appealing i.e. changing road layouts to cut down in journey times especially in peak hours which would make regular commutes quicker.

All Wales - fair fares – fare standardisation and simplicity. Complex and expensive fare systems put off fare paying potential passengers. To compete with the car and the train bus fares need to remain competitive and comparable to make bus travel a viable affordable option. A joint ticketing system could be fraught with difficulties but could make bus travel more appealing. However money would need to be invested to progress this initiative.

Creation of an information task group to improve information provision,



looking at digital technology. But progress in and investment in new technology should not hinder passengers who are digitally excluded, i.e. a high number of disabled people do not have access to online facilities due to costs incurred. Information should be provided in accessible formats to ensure access to information for all. Accessible information includes Large Print, Easy Read and Braille etc. to ensure information is conveyed in the most appropriate method.

Disability Wales strongly advocates real time information provision, visual and audio announcements at bus stops and on board, to ensure fully inclusive access to information for disabled passengers with sensory impairments.

Establishing a Welsh Bus standard – to establish uniformity of practices and procedures. Using incentives rather than punishments for bus operators using best practices. Rewards for service standards reached would improve passenger experiences. It is hoped that within the standard meeting disabled passengers' access requirements should be included as a determiner of good practice.

Coordination with health and education related transport to avoid duplication could enhance disabled passengers experience with different types of transport operating complementarily rather than as unrelated entities. Collaboration is key.

Youth Concessionary Fares Policy (which we cannot comment on in detail) However having a policy in place could enhance young people's passengers experience. Reducing fare costs could improve social inclusion of young people, and encourage more young people onto the bus.

Subsidies and service related bus services:

A roll out of an 'Orange Wallet' type scheme which should be adopted nationally by all bus operators, whereby disabled passengers can indicate whether they are deaf, have autism or require extra time to reach their seat in written flash cards contained in the orange wallet. Originally the orange scheme was aimed at individuals with Autistic spectrum disorders<sup>11</sup>.

Improved, Continuing Professional Development accredited, driver training is a must – driver certificates of competence currently include a disability module which mainly concentrates on manual handling of wheelchairs and ramps etc. A more holistic approach to training content is required, including modules relating to improving service provision and delivery for disabled passengers which is in line with the Social Model of Disability. The Social Model of Disability recognises that people are disabled more by poor design, inaccessible services and other people's attitudes than by their impairment.

It is worth noting that Disability Awareness training is not the same as Disability Equality Training.

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<sup>11</sup> <http://www.cardiffbus.com/english/feature-article.shtml?articleid=4289>

Disability Arts Cymru definitions<sup>12</sup>:

*“Disability Awareness Training is often led by non-disabled people who are professionals in the medical or caring professions. This training has a medical focus; it informs participants about disabled people’s impairments, and ways of ‘overcoming’ disability.*

*Disability Equality Training is always led by trainers who are disabled people. The focus is on disabled and non-disabled people working together to overcome the disabling barriers in society. This training has a holistic focus, recognising that removing physical, financial and attitudinal barriers will create a more inclusive, accessible society.”*

Disability Wales unequivocally supports the requirement that any disability related training should be delivered by appropriately qualified disabled people. We do not know if this is actually the case when bus operators provide in-house training. We reiterate that ‘Apps’ and online Widgets, etc should not be the only method of communication investigated. Exploration of offline communication methods are vital to prevent discrimination against a high percentage of disabled people who are ‘digitally excluded’.

Creating a disabled passengers’ charter was mentioned in the report. A common charter operating throughout Wales could potentially provide a consistent standard of accessible travel and guarantee, positive driver attitudes and access requirements are met. Avoid ambiguity and uncertainty for both bus operators and disabled bus passengers. Disabled passenger travel experiences could improve if there was a single access standard throughout Wales, whether a rural, town or city service. A reliable and guaranteed common access standard is a must for all bus operators to abide.

Commercial services collaborative working with health boards, especially when factoring in the budget cuts to health boards, could create a more joined-up transport network, utilising what is available and increasing disabled passengers’ access by providing services which meet their needs.

The Welsh Government could enhance their use of what is already available. For example continued liaison with Traveline Cymru in providing both travel information and disability access information to disabled passengers in accessible formats. Collaboration is key to ensuring successful bus service integration. (Which was one of the proposals in the Bus Policy Advisory Group Report.)

The Welsh Bus Passenger Survey, 2010:

Bus users with a disability or long term illness<sup>13</sup> found that over half of all respondents, disabled people with a range of disabilities and non-disabled people too, relied on **printed timetables** to plan their journey. Respondent percentages ranged from 52% to 63%. The highest percentages were, 60% and 63% from respondents with sensory impairments, hearing loss and sight

<sup>12</sup> <http://www.disabilityartscymru.co.uk/training-and-consultancy/disability-equality-training/>

<sup>13</sup> <http://gov.wales/docs/statistics/2011/110721sb652011en.pdf>

loss respectively.

**Question 5** –what do you think Welsh local authorities should do to support bus and community transport services?

Provide financial support to ensure daytime and evening services that match the needs of residents in communities across Wales. Ensuring a regular, affordable, reliable, 'attractive' service which provides a real alternative to car use. It is very often the case that evening and weekend public transport provision is overlooked when funding decisions, timetabling and route planning are made.

Recurrent open dialogue and engagement events held in towns and cities could improve relations between Local Authorities, local bus operators and disabled passengers. Community Transport should also be involved and represented at these events accordingly.

Community Transport is key to ensuring disabled people who cannot access regular bus services still remain active members of their community. Funding for Community transport is an issue, so is affordability. Local Authorities could supplement Community transport providers to enable them to accept concessionary passes and companion passes on their services.

Welsh Government liaison to establish and incorporate tender 'conditions' which could be attached to all funding streams, to encourage operators to improve effectiveness of their services. In addition, potentially, imposing financial penalties for non-compliance. Using both the carrot and stick approach to ensuring disabled bus passengers access requirements are met.

**Question 6** - what do you think about proposals to devolve bus registration powers to Wales? How should these be used?

Devolving Bus registration could prove positive because the Welsh Government would have powers to govern services and service providers. Greater control of service provision and delivery could be beneficial, ensuring a joined-up approach across Wales. Control of the registration process could mean that the criteria could be tightened up, enhancing surety of meeting disabled passengers access requirements. At the start of the tendering process, within the early stages of bus operators business plans, policies and procedures accessibility should be paramount considerations.

Wales's geography could affect bus service provision and transport providers. If bus regulations were devolved, geographical barriers which

often prove to be a major public transport hurdle may be better understood within Wales by the Welsh Government rather than London. Unique challenges exist for bus operators in Wales, such as increased rurality and road infrastructure and route connectivity throughout Wales. Smaller bus operators servicing rural areas with comparatively low footfall could deem particular routes financially unsustainable. People in villages using services that run through less profitable routes would be left isolated if services were to cease on cost grounds. Financially the Welsh Government could assist smaller operators to continue servicing rural areas to prevent loss of services. There would be a dramatic negative impact on already isolated communities because many of these villages are often without train stations. Bus services to these areas are therefore even more of a vital lifeline. People without access to private vehicles, older and disabled people especially, would become cut off.

Reducing carbon emissions and the negative environmental impact of increased car use is important and is a long term strategy for the Welsh Government. We support initiatives to improve the environment. However, this climate change aim, which may require a paradigm shift in car drivers' attitudes, of decreasing car usage would become academic if there is no viable alternative transport available to disabled people due to bus inaccessibility or lack of bus services.

**Question 7** – please tell us whether you think further powers to regulate the bus industry in Wales are required and why?

We cannot comment in-depth, however from a general perspective further powers could prove positive if this leads to greater consistency of service provision throughout Wales. This could be achieved by enhancing reliability, affordability and accessible, inclusive travel on buses throughout Wales. As a consequence disabled passengers should be guaranteed the same positive experience of bus travel throughout the whole of Wales on all buses.

Bus operators could be held to account, monitored and scrutinised by the Welsh Government. It is hoped that more scrutiny and powers to act when operators are not providing an appropriate accessible service to disabled passengers would improve bus service and passenger experience. It is essential that the Welsh Government take operators to task when access issues are not rectified, ensuring measures are put in place to improve service provision forthwith. Financial penalty initiatives could be imposed if access barriers are not removed within certain time frames.

**Question 8** – what other action can be taken to ensure that bus and community transport services meet the needs of people in Wales?

Implementation of positive, active, open and meaningful engagement at Welsh Government level and at Local Authority level, utilising organisations such as Transport Focus and Bus Users Cymru to facilitate focus groups / events with local disabled people who use the bus and disabled non-bus users. Information gathering activities such as this would attempt to establish facts such as disabled peoples' concerns and suggestions for improvements. In the past Bus Users Cymru set up Deaf bus users meetings in Caerphilly on a regular basis. Currently Bus Users Cymru have 9 generic bus surgeries in the Valleys.

Collaborative working involving strategists and decision makers within all large and small Bus companies would increase their awareness of disabled peoples' access requirements and undertaking in conjunction with Disability Equality Training (delivered by suitably qualified disabled people), using a top down approach. It is hoped that specific training would enhance decision makers' knowledge of disability issues, identifying barriers and implementing solutions.

A standardised approach to inclusive, accessible bus services throughout Wales, using a joined-up network approach across Local Authority boundaries, including bus services that cross into England, is essential. A single approach would ensure a minimum level of guaranteed access disabled passengers can expect on bus services throughout Wales. (Currently, Welsh concessionary passes can be only used on bus routes that start and finish their journey in Wales).

To incorporate a truly joined-up approach bus operators and other transport providers could work in partnership to ensure disabled passengers' access requirements are met, thus enhancing service provision. Local Health Board transport provision, Community Transport and Local Education Authority transport could work together to foster positive relations and improve accessibility of bus services in local areas. Putting disabled passengers at the heart of the decision making process.

Please tell us anything else you would like to mention this topic, thank you for contributing to our inquiry.

To reiterate the importance of concessionary travel for **social benefits**. Concessionary travel brings many benefits to its recipients and the wider population. The concessionary travel scheme enables disabled people to actively contribute to the Welsh economy, utilising public transport to access employment, education, health and leisure services, and participating fully in society.

Concessionary passes **assist** the economy; passes enable many disabled people to become economically active and remain so, with free travel to and from work. Without the pass many disabled people would not be able to afford bus fares, they would be stuck at home and reliant on benefits, which

would have a detrimental effect on the wider economy and health. Enabling disabled people who work and can access buses to commute for free impacts positively on the employment economy and increases disabled people's spending power i.e. the 'blue pound'.

The Welsh Assembly Government is fully committed to improving the skills base of the Welsh population, especially 'NEETs'. Concessionary travel opens up **education and development opportunities** for many young disabled people, who are also more likely to be NEETS, so that they can contribute to and benefit from the skills agenda.

Statistics taken from National Statistics; Young people not in education, employment or training (NEET) (Year to 31 March 2015)

- The proportion of young people who are NEET is higher for disabled people than non-disabled people for each age group.
- The proportion of disabled people who are NEET rises from 15.7 per cent at age 16-18 to 41.6 at age 19-24.
- Similarly the proportion of people not disabled who are NEET also increases by age.<sup>14</sup>

For many disabled people who require access to **health** services the concessionary scheme is vital. Without the concessionary passes the cost of hospital travel could lead to missed appointments due to unaffordable bus fares which would be detrimental to disabled people's health and the NHS.

Removal / limitation of the concessionary scheme would exclude many disabled people from taking up leisure services, which may be essential to their physical health and hugely beneficial to their psychological wellbeing. Many disabled people need support to enjoy swimming, using a gym and so on, and concessionary passes make taking a companion possible. As independent access to such facilities is unreasonably difficult, if not impossible, penalising a disabled person by making it too expensive to take a companion would mean that they could not continue to reap the benefits, or experience the enjoyment available to non-disabled people. This is a clear **reduction of independent living**.

The concessionary travel scheme is an invaluable asset to disabled people and underpins the right to independent living set out in '**Article 19**' of the '**UN Convention on the Rights of Persons with Disabilities**'. The Welsh Government has adopted the **Social Model of Disability**<sup>15</sup> and is fully supportive of the convention and the commitment to implementing **The Framework for Action on Independent Living**: One of the key priorities in the framework is accessible transport across **all** transport modes. Fully inclusive, accessible public transport is a vital enabler of independent living.

<sup>14</sup> <http://gov.wales/docs/statistics/2015/150729-young-people-not-education-employment-training-year-31-march-2015-en.pdf>

<sup>15</sup>

Within the Social Model of Disability, the individual's body is less relevant because people are "disabled" through lack of access to buildings, information, communication, personal support, education, and employment and by the attitudes of others

**UN Convention - Article 19:** To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, which includes transport provision.

Loss of local bus services could scupper the principles of the **Well-being of Future Generations (Wales) Act 2015**. Whereby, public bodies, i.e. Local Authorities have a duty to ensure due regard towards well-being. Disabled bus passengers health and well-being could be impaired if local bus services disappear. Communities would become isolated, which would affect all residents, thus preventing non car users participating in all aspects of society from social, economic and health purposes.

#### **Disclosure of information**

Unless you ask us not to, we will publish your response. The Assembly's policy on disclosure of information can be accessed [here](#), please ensure that you have considered these details carefully before submitting information to the Committee. This policy can be requested in other formats by contacting the Committee Clerk.

#### **Submitting evidence**

If you wish to submit evidence, please send an electronic copy of your submission form to [SeneddEcon@assembly.wales](mailto:SeneddEcon@assembly.wales).

Alternatively, you send it to:

Clerk,  
Enterprise and Business Committee  
National Assembly for Wales  
Cardiff Bay, CF99 1NA.