

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 43	BCT 43
RNIB Cymru	RNIB Cymru

The Enterprise and Business Committee Inquiry into Bus and Community Transport Services in Wales:

RNIB Cymru welcomes this opportunity to submit evidence to the committee's Inquiry into Bus and Community Transport Services in Wales.

Blind and partially sighted people are often totally dependent on public transport on a daily basis and so are directly affected by decisions made at a strategic level and the way that local authorities implement local bus and community transport provision.

1. About RNIB Cymru

RNIB Cymru is Wales' largest sight loss charity. We provide support, advice and information to people living with sight loss across Wales, as well as campaigning for improvements to services and raising awareness of eye health and the issues facing blind and partially sighted people.

RNIB Cymru also works in partnership with organisations across Wales to provide local services, providing practical solutions to every day challenges.

RNIB Cymru has over 1,000 members in Wales. Access problems with buses are one of the most persistent topics raised by our members.

2. About sight loss

There are currently 110,000 people in Wales living with sight loss. It is estimated that the number of people living with sight loss in Wales will double in the next 25 years (1).



Yn cefnogi pobl
â cholled golwg
Supporting people
with sight loss

RNIB charity nos. 226227,
SC039316 and 1109
RNIB rhifau elusen 226227,
SC039316 a 1109

Sight loss has a huge impact on individuals. For many people, loss of sight results in increased dependence on others. In a survey of blind and partially sighted people conducted by RNIB, 60 per cent of respondents stated that they needed help to get out of the house because of their sight loss (2). Nearly half of blind and partially sighted people report feeling 'moderately' or 'completely' cut off from people and things around them (3), with 43 per cent saying that they would like to leave their homes more often (4). This sense of isolation inevitably has an impact on people's mental and emotional wellbeing.

Public transport can provide a vital role in promoting the wellbeing of blind and partially sighted people by providing the link to facilities and places within and outside their local community. However, blind and partially sighted people can experience many challenges when using public transport. For example, a Guide Dogs survey (5) on bus use found that:

- 18 per cent of blind and partially sighted respondents described their usually on board experience poor;
- 81 per cent said as a result of the difficulties encountered when travelling by bus, they felt unable to enjoy the freedom others take for granted;
- 63 per cent said they chose to stay at home on at least a couple of occasions each month rather than using the bus;
- 9 per cent had missed job interviews, 14 per cent had turned down jobs and 35 per cent said that the prospect of travelling by bus put them off attending doctors or hospital appointments.

Using public transport requires both confidence and resilience for someone with limited sight.

One third of people with sight loss live in poverty in Wales (6). Thus the affordability of public transport is a key issue for blind and partially sighted people. The concessionary bus fare scheme is highly valued by RNIB Cymru's members. In many cases, bus travel is the only affordable travel option available to blind and partially sighted people, and for many older people with sight loss it can be the only way of reaching essential services (7). We

welcome the commitment to continue the scheme through 2020 and beyond in the National Transport Finance Plan (July 2015). Community transport should be viewed within this context and concessionary bus passes should be extended for use on all community transport.

3. Response to consultation questions

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

RNIB Cymru understands that the total Welsh budget for supported bus services in 2014-15 was £19.1 million, which is distributed to the 22 local authorities in Wales.

Work undertaken by the Campaign for Better Transport has indicated that £900k has been cut from spending since 2013-14, although the most significant cuts have been the £5.45m reduction in the concessionary travel scheme for older people and the disabled, since 2013 (8). Though the concessionary scheme is projected to continue to 2020 and beyond, the scheme must continue to be fully supported for it to work effectively.

The number of passenger journeys in Wales continues to decline, and this may be in part due to the reductions in provision across Wales and the withdrawal of entire services in some areas which has impacted rural provision in particular.

RNIB Cymru believes that the pressure on bus service provision in Wales is having a disproportionate effect on the lives of many people with sight loss and whilst we recognise that hard financial decisions are having to be made by local authorities, we believe that subsidised bus and community transport provision is an essential resource for many people in Wales and that it should be treated as such.

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

The reduction in bus and community transport services is having a significant impact on all sections of the community. As a result of the overall cuts to funding from the UK Government, which have been reflected in Welsh Government budget allocations, local authorities, bus companies and community transport have all seen their funding reduced.

Long term effects could be significant and far reaching on service provision and ultimately the wellbeing of many people, particularly those reliant on the public transport system.

RNIB Cymru believes that the reasons for the decline in passenger numbers are complex and likely to be due to a combination of factors, including the reduction in service provision, continuity of service and changing consumer demands. However, given the demographics of Wales and the increasing age of the population, demand for a reliable well funded bus and community transport service is likely to increase in future.

In general bus and community transport is often seen as a poorer alternative to other modes of transport; with slower journey times, infrequent services and poor quality of service. The lack of a reliable service to take people to and from work has also been cited by RNIB Cymru members as a barrier to using bus services.

RNIB Cymru's own research has indicated that people with sight loss face many problems when using buses and this has led some to stop using buses altogether. Others say that they go out less often, or that when they do they have to prepare themselves for high levels of stress and inconvenience (9).

Work undertaken by RNIB in our 2012 report, "Quick wins...and missed opportunities", highlighted that experiences of public transport varied depending on location and also how local transport was provided: "...cuts to the bus pass for blind and partially sighted people meant that passengers could not travel

before 9.30am for free, and this prevented them from being able to take up work, or voluntary work opportunities, no matter how keen they were to take them on. Given the low incomes many blind and partially sighted people are on, concessionary travel was often the difference between whether someone could travel to an appointment, job, volunteering placement or have to stay at home.”
(10)

Poorly co-ordinated transport decisions can have significant knock-on effects restricting employment and volunteering opportunities, increasing costs and making blind and partially sighted people less confident to go out on their own.

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

As outlined above RNIB research has concluded that being able to get out and about and lead active lives is central to blind and partially sighted people’s sense of wellbeing and independence.

Whilst many people relied on lifts from family and friends, public transport was considered to be crucial. Concessionary travel was seen as critical, but there is recognition that the service is extremely vulnerable to budget cuts.

Bus and community transport is crucial in ensuring that blind and partially sighted people have equal opportunities in life, such as through work, social activities and education. Not being able to work or maintain social connections can have a severe impact on a person’s feeling of wellbeing and self-worth and can lead them to feel isolated and possibly depressed. For a young person, their life chances are being seriously affected if they cannot access education, and at a time when their peers are learning and gaining their independence, this can have severe social ramifications as well.

In the context of the implementation of the Future Generations Act (2015), bus and community transport should be considered to be

essential for the wellbeing of communities and grown and developed into local services which people can rely on.

Demographics are particularly relevant to discussions on the future impact of bus and community transport levels, as the population in Wales is projected to increase by 4% by 2022 and the number of retirement age people will double by 2037. (11)

There are an estimated 110,000 people with sight loss in Wales, 1 in 9 people over the age of 60 have a significant sight loss and this increases to 2 in 5 over the age of 85. (12)

It is projected that the number of people living with sight loss will double in the next 25 years and so there is an urgent need to ensure that enhancing provision and participation on the bus and community transport service remains high on the political agenda for the fifth Assembly.

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

RNIB Cymru is aware that Welsh Government has made several changes to the way it supports bus and community transport in Wales over recent years. This has led to some disparity in provision between Local Authorities, particularly in rural areas, where there are greater distances between bus stops (which is often referred to as ‘dead mileage’) and where some local authorities base their Bus Services Support Grant (BSSG) on ‘live mileage’ only.

This can affect the level of support given to rural public transport routes as it fails to take account the distances between stops in rural areas.

Other concerns include the loss of capital funding for vehicle replacement and the reduction in the minimum threshold to be allocated to community transport to 5%, although Welsh Government guidance ‘strongly recommends that a figure of 10% should be aspired to. (13)

RNIB Cymru believes that there is a need for Welsh Government to ensure that there is a consistent approach to any future changes to the funding regime and that consideration be given to the provision of clear guidelines to local authorities to reduce disparities between different service levels.

Bus travel is a vital service for people with sight loss and all providers have a duty under the Equality Act 2010 to make their services accessible.

EU regulations on passenger rights in bus and coach transport requiring non-discriminatory access to transport have been in force since 2013, although other requirements including; mandatory disability awareness training of staff of buses and coaches and information to be provided throughout the journey have not yet been enacted.

During 2014, the UK Minister for Transport undertook a review of driver training, including the derogation under EU Regulation 181/2011, but as yet there has been no outcome from the review.

RNIB Cymru would welcome Welsh Government working closely with the UK Government to seek the publication of the conclusions of this review and also to encourage the UK Government to enact those requirements which would improve the standards of service to meet the needs of passengers with sight loss.

We would also welcome the implementation of the recommendation of the Bus Policy Advisory Group, to introduce a Welsh module for the Driver Certificate of Competence to improve services for disabled people. (14)

RNIB would also stress the importance of ensuring that the recommendation that “operators and groups representing disabled passengers have regular dialogue”; be expanded to ensure that positive engagement with local people is enshrined within any decision making process about service provision and that the views of blind and partially sighted people are fully incorporated into the planning process.

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

Local authorities subsidise a range of supported services not provided by commercial bus companies; these include communities where no alternative routes exist, which means that any cuts or alternatives can have significant impacts on residents and local economies.

Some community transport organisations also receive financial support from local authorities, often for core functions and, according to the Community Transport Association (CTA), as local authorities face increasingly difficult spending decisions community transport funding has been coming under increasingly close scrutiny. The CTA's recent asks of Government, to both UK and devolved governments, includes the ask "Government should heed the ongoing concerns expressed by community transport operators and note that, as non-profit-making organisations, they are less likely to generate sufficient surplus to enable them to build up reserves; it should consider occasional capital investment as a means of support to the sector in all parts of the UK." (15) It is clear from this that it is not only local authorities or central governments which are responsible for the security of such services, but a meaningful partnership between the two.

RNIB Cymru has had a number of questions, queries and complaints from blind and partially sighted people and their families over the course of 2015. These have often related to how a local authority has interacted with someone with sight loss over their application for a concessionary bus pass. Often, the claimant is legitimately entitled to a bus pass but the local authority puts additional barriers to accepting their application. This is a very unhelpful attitude to someone with a disability and often knocks the confidence of the person applying. Guidance on applying and receiving a bus pass should be clear and all departments of the local authority should be clear on the eligibility criteria for awarding these passes.

Whilst recognising the difficult decisions that have to be made by local authorities, RNIB Cymru believes that the remaining subsidised services provided by bus and community transport organisations are vital and should be retained, and even grown and developed.

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

RNIB Cymru recognises the rationale behind the proposals to devolve bus registration powers to Wales, which would allow Welsh Ministers more flexibility in developing an integrated transport plan, however we would highlight that the availability of an integrated public transport network is only the first step in a process of policy development aimed at breaking down the barriers faced by people with protected characteristics seeking to access the public transport system.

Blind and partially sighted people need safe access to bus stops and bus stations; barriers to these areas can include inappropriate placement of street furniture and parked cars. There must also be suitable provision of safe places to cross busy roads and access to linked services through transport interchanges, where for example a change of buses or change from bus to train is required.

RNIB Cymru believes that there should be ongoing communication and discussion between local authorities, transport providers, Welsh Government and representatives of local access groups to ensure that the development of an integrated public transport system is firmly enshrined in local development and regeneration plans.

Another major barrier to blind and partially sighted people using public transport is the lack of accessible, accurate information, which was picked up in the Public Transport Users Committee (PTUC) report:

“Disabled people are not a homogeneous group. Clearly public Transport users who are disabled have particular requirements in

respect of the provision of public transport information and these needs will vary. The Public Transport Users Committee received evidence in particular in respect of hearing and visual loss. A range of communication methods needs to be used to meet disabled people's needs. Audio and visual announcements are particularly beneficial to certain disabled people. Where audio and visual announcement systems are available they are not always activated. How, where and in what format information is provided does not currently consistently take disabled people's needs into account." (16)

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

Accessibility problems on buses are one of the most persistent topics raised by our members. In partnership with Guide Dogs Cymru and with funding from the Welsh Government we launched a guide to making bus services more accessible for people with sight loss in January 2015 to try and address these issues.

From research carried out to inform our guide "Get on Board: How to make bus travel better for people with sight loss", we found there were many issues blind and partially sighted people faced when accessing public transport.

Incidences included:

- bus drivers who were rude to partially sighted individuals who mistakenly pulled over the wrong bus number as it was too difficult to make out in time;
- drivers finding audio announcements annoying and turning them off, and drivers who are unable to assist the passenger with finding the right bus stop.

Often a blind or partially sighted person will learn a route to enable them to live independently. If a bus driver refuses or forgets to help them find this stop, or turns off audio announcements, people can very easily end up in the wrong place and no longer travel independently.

In rural areas blind and partially sighted people rely on public transport that is often old with bus stops that have almost no information. Any information that is present is often out of date, too small and weather-beaten to easily access.

Rural bus and social transport services are vital services for local communities, especially to blind and partially sighted people who cannot drive. It is vital that funding for these services be protected and enhanced.

Under the St David's Day agreement the Welsh Government will have greater control of bus regulation and this is a great opportunity to ensure that bus services are fit for purpose. RNIB Cymru believes the next Welsh Government should commit to ensuring bus operators must include audio announcements on all new buses. Information about which routes have audio announcements must also be communicated to people with sight loss so that they can make informed choices on the routes they use.

RNIB Cymru also believes that the need to consult and engage with local people and communities should be written in to any commissioning decision making processes. Often the consultation phase of any change is not publicised widely enough amongst a local community, and certainly not in accessible formats; often it is only published online – which does not help many with sight loss or those living in rural areas with limited access to the internet.

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

Given that it is expected that there will be further difficult spending decisions for local authorities, it is inevitable that the impact will be passed onto bus and community transport services. It is essential that going forward everyone in the community is offered an opportunity to become a partner in the decision-making process to ensure that those services are demand led rather than based on top down assumptions about future provision.

Meaningful engagement is integral to delivering any local transport offer and must sit alongside coherent equality impact assessments if reducing financial support or budgets. Equality impact assessments are published and factors which are likely to hinder those with protected characteristics are identified but actions to mitigate are sometimes not acted upon. Welsh Government must require those delivering the services and local authorities to listen to the needs to the local community.

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For more information, please contact:

Emma Sands
Public Affairs Manager
RNIB Cymru
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