

# Bus Services Act 2017: accessible information

You can respond online here - <https://www.smartsurvey.co.uk/s/BUSACCESSDATA/>

## 1. Introduction

This is a consultation on the government's plans to require the provision of audible and visible information on board local bus services in Great Britain.

Please read the consultation document and use this form to submit your response to the proposals.

### Confidentiality and data protection

The purpose of this consultation is to support the government's plans to require the provision of audible and visible information on board local bus services in Great Britain. It is carried out in the public interest to inform public policy.

As part of this consultation we request the following information:

Your name and email address - in case we need to ask you follow-up questions regarding any of your responses.

You don't have to give us this information. If you do, we will not share this information with anyone.

If you do give us your contact information, you consent to DfT using it only for the purpose set out above.

All your personal data will be deleted within 3 years of collection. You can withdraw your consent for us to hold your personal data at any time by emailing [busaccessibleinfo@dft.gov.uk](mailto:busaccessibleinfo@dft.gov.uk).

Find out more about the [Department for Transport's data protection and privacy policy](#).

## 2. Personal details

1. Your name and email address. We will only use this if we need to contact you to ask about any of your responses.

Name	Mark Cartwright
Email	mark.cartwright@centaurconsulting.co.uk

2. Are you responding: \*

<input type="checkbox"/>	on behalf of an organisation? Go to question 3
<input type="checkbox"/>	as an individual? Go to question 4

### 3. Organisation details

#### 3. Name of organisation

RTIG

#### 4. Type of organisation

	bus operator
	bus manufacturer
	onboard equipment manufacturer or developer
	local transport authority.
	representative organisation (bus and coach operators)
	representative organisation (disabled people)
	representative organisation (other)
X	Other (please specify): RTIG is a community group which seeks to establish, support and promulgate good practice in the use of information and communications technology in transport. With members from public authorities, transport operators, consultancies and the systems industry, we have an impartial perspective and support the common good. We have an excellent and long-standing relationship with DfT and work closely with other community groups.

## 4. Extent of regulations and information to be provided

5. We have reflected the priorities of Scottish and Welsh stakeholders in our plans, and propose that the Accessible Information Regulations should apply consistently across Great Britain. Do you agree that the Accessible Information Regulations should apply consistently across England, Scotland and Wales?

X	Yes
	No

Please explain your answer.

Not only would a variation in regulations create odd market tensions, operator costs and/or barriers to efficient fleet deployments, but it would create an inconsistent passenger experience across GB. Moreover we cannot see any active (technical) reason for varying the regulations.

While of course we recognise that this is a policy question, we are very keen that DfT and the devolved administrations work together to create a common solution.

6. Do you agree that the core proposal is an appropriate response to the need for change identified in this document?

	Yes
	No
	Don't know

Please explain your answer.

Insofar as this is a policy question, RTIG does not have an official view.

We would note though that some elements of the core proposal will be more challenging than others. Any system will of course give rise to financial and technical challenges; beyond that, we suggest that audio systems giving:

- information about the current vehicle service are now relatively robust
- information about diversions are much less so (especially regarding the public description of the diversion)
- information connecting services (especially those from other operators) require significantly new system architectures and associated processes

It is noted that disabled passengers are more likely to suffer distress from disruptions, and less easily able to find alternatives to journey completion. Clear and detailed disruption information is therefore of significant value to them. However, providing this effectively is often far from easy.

**7. Do you agree that the proposed list of required information is an appropriate use of the powers available?**

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

Please explain your answer.

This is a policy question and RTIG has no view.

## 5. Timing of information provision and quality of information

8. Do you agree that the proposed information timing requirements are appropriate?

	Yes
	No
X	Don't know

Please explain your answer.

We have concerns about the phrasing of these. In particular, the time when doors are open is generally quite busy and often noisy, and may not be the best time for the announcement to be audible; moreover, there may be issues related to the details of individual routes (stops close or widely separated), information messages (long or short names), vehicle layout (front only or mid bus boarding), etc that make small tweaks to the timing beneficial.

From a regulatory perspective we would suggest that the phrasing would be better as something like "in sufficient time for..., as far as reasonably possible" in all cases.

9. 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?

	Yes
	No
X	Don't know

Please explain your answer.

We recognise that it is difficult to establish a wholly objective metric for "adequate quality", and that some human assessment will be necessary. A Specimen Person advising on problems would therefore be very valuable.

However we also see potential risks from regulation enforcement that relies on a wholly subjective (and therefore not externally reproducible) assessment.

10. Do you agree that the information provision quality requirements should require that a person using a hearing aid together with an audible induction loop system should be able to discern audible information?

	Yes
	No
	Don't know

Please explain your answer.

This is a policy question and RTIG has no view.

We note, though, that once an onboard system is in place to provide audio information, the additional costs of implementing an inductive loop channel will normally be relatively modest – subject to the bus body allowing for convenient loop placement.

However, radio noise and extraneous electrical interference can make it difficult to ensure clear audio over inductive loops, throughout the bus.

## 6. Use of technology and exemptions

**11. Do you agree that it would currently be inappropriate to require passengers to purchase or possess smart devices in order to access required information?**

	Yes
	No
	Don't know

Please explain your answer.

This is a policy question and RTIG has no official view. Generally, however, we favour solutions which are not exclusive or discriminatory, while recognising that there are practical and financial limitations on what can be reasonably achieved.

We suggest that the Government's policy towards on-bus provision should be consistent with its policy towards at-stop provision: so, it is odd to have an obligation to install equipment on bus (under the principle that smartphones may not be assumed), while the downplaying of at-stop signage has been widely condoned and even encouraged (on the grounds that apps would adequately fill the gap).

**12. Do you agree that services operated under Section 19 and 22 permits should be exempt from the requirements in full?**

	Yes
	No
	Don't know

Please explain your answer.

This is a policy question and RTIG has no view.

**13. Do you agree that vehicles designed to carry fewer than 17 passengers should be exempt from the requirements in full?**

	Yes
	No
	Don't know

Please explain your answer.



This is a policy question and RTIG has no view.

**14. Do you agree that tour services, as defined in the Public Service Vehicles Accessibility Regulations (PSVAR) should be exempt from the requirements in full?**

	Yes
	No
	Don't know

Please explain your answer.

This is a policy question and RTIG has no view.

**15. Do you agree that:**

	Yes	No	Don't know
heritage vehicles should be exempt from the requirement to provide visible information?			
heritage vehicles should be defined as those first used before 1 January 1973?			

Please explain your answer.

This is a policy question and RTIG has no view.

## 7. Implementation timescales and cost / benefit analysis

16. We have identified option A as our preferred option. Do you agree that implementation option A is the most appropriate of the 3 options identified?

	Yes
	No
X	Don't know

Please explain your answer.

We assume that "Option A" refers to the (preferred) "Option 3" of the document.

Insofar as this is a policy question, RTIG has no view. Technically, the implementation issues are far too nuanced for a simple answer to be provided.

17. Do you agree with our proposal to define 'small operators' as those operating 20 or fewer vehicles?

	Yes
	No
	Don't know

Please explain your answer.

This is a policy issue, in the context of the proposed timescales for introduction of regulations, and RTIG has no view.

18. Do you agree with our analysis of the costs and benefits of the preferred option?

	Yes
	No
X	Don't know

Please explain your answer.

Generally, we agree with the analysis of most of the costs and benefits (and risks). We do however have three significant comments:

- There is very little evidence that on bus AV will lead to a (statistically) significant increase in patronage. It must also be recognised that registered disabled passengers who travel

on concession cannot, by law, contribute to an operator's *profit* even if they contribute to *turnover*.

- As indicated in the IA sensitivity analysis, the actual costs of implementation and operation are very uncertain at this point in time.
- The actual costs (and the robustness of their estimates) will depend strongly on the approach to regulation and its enforcement, not just to the timetables.

**19. We are aware of at least one operator which has subsidised the ongoing costs of providing audible and visible information by using visible information displays to show advertisements. Please explain how effective you think such an approach could be in mitigating the costs of providing audible and visible information.**

Advertising revenue available will be very context sensitive, by geography, demographics, patronage levels, etc. It is also worth noting that the kind of display (and/or audio) that is suited to advertisement is not necessarily the same as that for bus service information, so any revenue is unlikely always to be a simple subsidy. Finally, advertising systems need their own back office, content management and human support, which has its own cost.

This is of course an opportunity that will be available in some circumstances. However operators will doubtless have a better view on how widely this approach might be applicable.

**20. We understand that the cost of installing systems to provide accessible information can vary depending upon the vehicle and method of installation. Please comment on the difference in cost between procuring new buses with systems to provide audible and visible information already installed, and retrofitting related equipment.**

While RTIG shares the general view that retrofitting is more expensive than at-build installation, we will need to leave quantitative comments on the actual cost variability to those closer to the process: operators and bus builders.

## 8. Guidance for operators and compliance and enforcement

21. Do you agree with our proposed content for the guidance?

X	Yes
	No
	Don't know

Please explain your answer.

In particular, or in addition, the guidance should describe the following (where it is not already explicit and sufficiently detailed in the Regulations):

- *what* information needs to be provided (message types, structures, etc);
- *how* it needs to be provided (display layout, audio parameters, etc);
- *when* it needs to be provided (as discussed above under "Timing");
- how compliance will be monitored and enforced;
- the penalties for non-compliance.

22. Do you agree with our proposed enforcement principles?

	Yes
	No
	Don't know

Please explain your answer.

Insofar as this represents a policy choice rather than factual matters, RTIG would not wish to comment.

Our only observation is that any support processes should obviously be market neutral. Dilatory operators should not be rewarded for not investing (or not having historically invested) in systems or processes. It would however be reasonable for contextual factors to be taken into account, for example extra time to implement or lower compliance thresholds for rural services where communications may be (or may have been) patchy or expensive, or for older vehicles where retrofitting may be more challenging.

23. Do you have any other comments on our assessment of the costs and benefits of this policy? Please provide examples where possible.

24. Any other comments?

## How to respond

The consultation period began on 05 July 2018 and will run until 16 September 2018. Please ensure that your response reaches us before the closing date.

If you would like further copies of this consultation document, it can be found at <https://www.gov.uk/dft#consultations> or you can contact [busaccessibleinfo@dft.gov.uk](mailto:busaccessibleinfo@dft.gov.uk) if you need alternative formats (Braille, audio CD, etc).

You can respond online here - <https://www.smartsurvey.co.uk/s/BUSACCESSSDATA/>

Or fill in this form and send it to:

Caitriona Moore  
Great Minster House,  
33 Horseferry Road,  
London,  
SW1P 4DR

Or via email to:

Email: [busaccessibleinfo@dft.gov.uk](mailto:busaccessibleinfo@dft.gov.uk)