

National Assembly for Wales
Equality of Opportunity Committee

Inquiry into the impact of Welsh
Government policy on the accessibility
of transport services for disabled people
in Wales

February 2011



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Equality of Opportunity Committee

The Equality of Opportunity Committee is appointed by the National Assembly for Wales to consider and report on the relevant duties contained in the Government of Wales Act 2006 placed on the Assembly, the First Minister, Welsh Ministers or the Commission.

Powers

The Committee was established on 26 June 2007 as one of the Assembly's scrutiny committees. Its powers are set out in the National Assembly for Wales's Standing Orders, particularly SO 17. These are available at www.assemblywales.org

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Chair's Foreword

I am pleased that the Committee has been able to undertake an inquiry into the important issue of how the Welsh Government's policies impact on the accessibility of transport services for disabled people in Wales. This inquiry follows on from the Committee's previous inquiry into the Accessibility of Railway Stations in Wales, which highlighted a significant number of barriers not only for those with a disability, but also parents with young children or people struggling with heavy luggage, as they tried to use train services in their everyday lives.

Members of the Committee were concerned at some of the experiences of the people we heard from and so decided to undertake a short inquiry focussing on other aspects of public transport, including the accessibility of bus and taxi services and how all elements integrated with each other. We also wanted to explore issues around concessionary travel schemes and how they impacted on people's ability to use public transport.

We heard from many people, some who came and gave evidence in person to the Committee and others who took the time to respond in writing to our call for evidence, of the problems they had experienced with the inconsistencies in applying for and using concessionary bus passes, the poor accessibility and availability of transport information, the shortage of accessible private hire vehicles and the potential dangers of shared spaces. I would like to thank everyone who provided us with evidence, as without their input we would not have been able to consider these issues in such detail.

We know that improvements have already been made; the introduction of buses compliant with DDA requirements has been a significant step forward, bus operators told us about the disability awareness training their drivers receive which we welcome, but the experiences of some of those we have heard from tell us that further improvement is still needed. Such change will not happen overnight, but we hope that some of the practical recommendations we have made in this report will result in better experiences for everyone in Wales.

Ann Jones
Chair

The Committee's Recommendations

The Committee's recommendations to the Welsh Government are listed below, in the order that they appear in this report. Please refer to the relevant pages of the report to see the supporting evidence and conclusions:

Recommendation 1. The Committee places the highest priority on ensuring that the implementation of the National Transport Plan takes into account the needs of disabled people, and recommends that the Welsh Government takes steps to ensure its engagement with disabled people's groups is further enhanced. (Page 14)

Recommendation 2. The Committee believes that transport related dialogue between local authorities, transport providers and disability groups could be enhanced, and recommends that the Welsh Government ensures that such dialogue is further mainstreamed into service planning mechanisms. (Page 16)

Recommendation 3. The Committee recognises the costs involved in providing free bus travel for older and disabled people in Wales, but recommends that the Welsh Government continues to protect this highly important policy. (Page 18)

Recommendation 4. The Committee recommends that the Welsh Government makes representation to the UK Government to reconsider its decision to remove the mobility component of Disability Living Allowance for people in residential care. (Page 18)

Recommendation 5. The Welsh Government revises its guidance to local authorities on concessionary bus travel to: (Page 20)

- include the introduction of a common application form for all local authorities, developed in consultation with learning disability groups, to ensure it is user friendly, uses appropriate language and is accessible to all;
- clarify the criteria for use of companion bus passes.

Recommendation 6. The Committee recommends that the Welsh Government considers options by which legislation could be used to enhance disabled people's accessibility to taxi services, and makes representations on a preferred option to the UK Government. (Page 25)

Recommendation 7. The Welsh Government should work with the Community Transport Association to better understand the distribution of drivers and availability of physical equipment to ensure that better use is made of those resources. (Page 27)

Recommendation 8. The Committee recommends that the Welsh Government ensures transport providers and local authorities work with disabled groups to get a better understanding of how the format and provision of information could be improved. (Page 29)

Recommendation 9. The Committee recommends that the Welsh Government should include training on accessing transport in the curriculum for SEN students. (Page 33)

Recommendation 10. When developing shared spaces and schemes involving dropped kerbs, the Welsh Government and local authorities should engage with disabled persons groups from the start of the planning process. (Page 35)

Introduction and Background

1. The Committee has focused much of its time over the last twelve months on looking at the accessibility of public transport.
2. Our first report, published in October 2010, looked specifically at railway stations and the range of difficulties experienced by both disabled and non-disabled passengers in accessing rail facilities. As a result of evidence received during the course of that inquiry, the Committee agreed to undertake a second inquiry looking at other forms of public transport.
3. Many disabled people are without private transport and so rely on the public transport network to enable them to live independently in the community. This is particularly true of people with learning disabilities, who are far more likely to be dependent on public transport or taxis.
4. Representatives of disabled people's organisations told us that poor public transport provision has the effect of compounding existing disadvantages, preventing disabled people from accessing education, social events, employment and health services, and so increasing their social exclusion.
5. This report details the Committee's conclusions and recommendations for improvement based on the evidence taken.

Terms of Reference

6. The Committee agreed the following terms of reference for the inquiry:
7. The Committee aims to scrutinise the impact of Welsh Government policy and actions in relation to the accessibility of transport for disabled people in Wales.
8. In order to do this the inquiry will consider the following:
 - issues of particular concern to disabled people who use, or want to use, transport services;
 - the adequacy of the National Transport Plan and its associated Equality Action Plan as a means of improving the accessibility of transport in Wales;
 - the impact of Welsh Government guidance on Regional Transport Plans as a means to improve accessibility of transport in Wales;
 - in areas that are the responsibility of the Welsh Government:
 - policies which aim to improve the accessibility of bus and coach services, such as concessionary fare policy and community transport;
 - accessibility issues facing pedestrians, such as the use of shared spaces;
 - the accessibility of taxis and private hire vehicles services.
 - the impact of Welsh Government policy on the integration of transport services in relation to the needs and concerns of disabled people.

Role of the Welsh Government

9. Although significant aspects of railway policy are non-devolved, Welsh Ministers do have powers that could, in principle, be used to improve the accessibility of railway stations in Wales. The *Railways Act 2005* gave new powers to Welsh Ministers. Under the Act, Welsh Ministers are joint signatories with the Secretary of State for the Wales and the Borders Franchise. The Act also enables Welsh Ministers to:

- give financial assistance to any organisation for the purpose of developing Welsh railways (including Network Rail and Train Operating Companies (such as Arriva Trains Wales)) - this includes the power to fund new services as well as new rail infrastructure or improvements to existing infrastructure (including stations);
- publish guidance jointly with the Secretary of State in relation to, and make any proposals for, closures of services or facilities that it funds;
- designate, where applicable, new services it funds as experimental for a trial period of up to five years.

10. Statutory responsibility for other public transport services, such as buses, coaches and taxis, is also non-devolved to the Welsh Government. Unlike rail services, the Welsh Government has no direct contractual relationship with service operators. The bus industry, for example, continues to be deregulated. The vast majority of local bus services are provided commercially by operators. However, local authorities do have responsibility for providing socially necessary services and the Welsh Government makes available funding to support and protect these services and those within rural areas. The main support is provided through bus service operators grant and local transport services grant.

The Welsh Government's National Transport Plan and the Needs of Disabled People

11. The Welsh Government published Regional Transport Plan Guidance in 2007, providing guidelines for regional transport consortia to follow whilst preparing their Regional Transport Plans.¹

12. Following an equality impact assessment,² the Welsh Government published a National Transport Plan Equality Action Plan in February 2010, and the National Transport plan – setting out how the Welsh Government intends to implement their National Transport Strategy in the next five years – in March 2010.³

13. In their written evidence to the Committee, Mencap Cymru stated that, in their opinion:

“The National Transport Plan contains achievable and sustainable objectives for making public transport accessible to disabled people across Wales.”⁴

14. However, when they gave oral evidence to the Committee on 9 November, representatives of Mencap told us that they had found the final plan difficult to read. They also felt that, even though they had attended two meetings organised by the Welsh Government during the development of the National Transport Plan, the meetings were poorly attended, in their opinion due to poor publicity. Advertising “through day centres, local disability groups or other third sector channels”⁵ would have been a much more effective method of obtaining the views of disabled people. They were also disappointed that some of the issues they had raised, particularly in relation to training, had not been taken on board in the finalised plan.

¹ Welsh Government: *Regional Transport Plan Guidance* [April 2007]

² Welsh Government: *National Transport Plan Equality Impact Assessment* [February 2010]

³ Welsh Government: *National Transport Plan* [March 2010]

⁴ Equality of Opportunity Committee Paper *EOC(3)-14-10, Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Submission from Mencap Cymru, 9 November 2010

⁵ RoP [para 56], 9 November 2010, Equality of Opportunity Committee

15. A number of respondents also felt that the National Transport Plan did not adequately address the needs of older and disabled people. Learning Disability Wales said:

“The national travel plan (sic) is a strategic type of document, by definition. There is only one passing reference to disabled people in the document itself. It is a helpful document at a general level about how transport will be better coordinated in Wales, so it is welcome. However, when you dig down into the equality action plan, there is still an emphasis on improvements that will be made, perhaps to platforms or rolling stock, but not so much on what the outcomes will be for disabled people.”⁶

16. Whilst RNID Cymru said:

“...there is very little mention of access requirements for people with disabilities to buses, trains or taxis in the Welsh Government’s National Transport Plan. Whilst RNID Cymru agrees for the need for a better integrated transport system, we are very disappointed that the plan does not include more focus on accessibility to public transport.”⁷

17. In his evidence to the Committee, the Deputy First Minister and Minister for the Economy and Transport said:

“The equality impact assessment is not a static document, and nor is the national transport plan. As we say in our evidence, the transport equality impact assessment is a dynamic document. It will evolve to encompass more stretching plans and learning from the projects that we undertake. We are currently updating the plan to reflect the progress to date. So, it is an important tool for us, but we do not regard it as a final document, because we want to see how it responds to the needs of the users.”⁸

⁶ RoP [para 68], 9 November 2010, Equality of Opportunity Committee

⁷ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from RNID Cymru, EOC(3) ATS27

⁸ RoP [para 59], 18 January 2010, Equality of Opportunity Committee

18. He also went on to highlight a project at Swansea High Street station where, through the involvement of the Guide Dogs for the Blind Association, Swansea Access for Everyone and MS Society Cymru, the actual design of the project had changed between the theory and the delivery stages.

“Work is ongoing, as I speak, on improved tactile directional pathways between the two entrances that there will be to the new station, and in the taxi area and at the metro stops. There will also be improvements - again, outside the station - to the taxi rank, to assist disabled people to board taxis more easily. These points have come from actual people, from local representative groups, and it is a new process. Five years ago, the railway would have been much more cursory in its attention to the needs of specific people; it is now embedded in all that we do.”⁹

19. In their written evidence, the Association of Transport Co-ordinators stated that “at this early stage, there appears to be no obvious impact”¹⁰ of the National Transport Plan, and, in relation to the Regional Transport Plan guidance, noted that it did not provide a “mechanism to address whether or not (regional transport) consortia met or exceeded what was expected of them”.¹¹

20. In response, Jeff Collins, Deputy Director, Transport Planning and Governance told the Committee:

“We have introduced the annual progress report, which the regional transport plans will be measured against. WeITAG (Welsh Transport Appraisal Guide) also applies to the collation of the list of projects that form the regional transport plan. The consortia work with our guidelines to develop these projects and then they will be measured against these outcomes. So, those outcomes will appear in our measure of the regional transport plans in each area.”¹²

⁹ RoP [para 48], 18 January 2010, Equality of Opportunity Committee

¹⁰ Equality of Opportunity Committee paper *EOC(3)-16-10, Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Submission from the Welsh Local Government Association, 7 December 2010

¹¹ *ibid*

¹² RoP [para 64], 18 January 2010, Equality of Opportunity Committee

21. The Committee was concerned to hear that disabled people's groups felt that their needs and views had not been taken on board in the development of the National Transport Plan but welcomed the Minister's assurance that this was an evolving process and would develop to respond to the needs of users.

Recommendation 1: The Committee places the highest priority on ensuring that the implementation of the National Transport Plan takes into account the needs of disabled people, and recommends that the Welsh Government takes steps to ensure its engagement with disabled people's groups is further enhanced.

Engaging with Disability Groups

22. The Committee heard that the level of engagement between local authorities, transport providers and disability groups varied significantly across Wales.

23. Pablo Rees Mortby from Swansea Disability Forum told the Committee that in his experience the level of engagement between local authorities and disability groups varied as some local authorities were more involved than others. He said that having an access officer, specialising in that area of work made it easier to improve partnership working.

24. The Committee also heard that when disability groups were invited to comment on proposals, the timeframe involved was not always sufficient to respond, as some groups only met monthly.

25. The Committee would like to stress that engaging with disability groups is vital to ensuring that their needs are met when new schemes or initiatives are being developed.

26. On a positive note, both transport operators who provided evidence to the Committee, Newport Transport and Arriva Buses Wales, described how they work with disabled groups to improve the service they provide. In his oral evidence, Michael Morton the Managing Director of Arriva Buses Wales, told the Committee of schemes his company had implemented through engaging with disability groups. He described how a 'touch card' had been developed with the help of a deaf group in Llandudno, which allowed people with hearing difficulties to communicate to the driver which stop they were travelling to or the price of the ticket they wished to buy.

27. In their written evidence, Newport Transport told the Committee how they had worked with disabled passengers to identify that the merging of designated areas for wheelchairs and prams into one space could cause problems. They said that they had then used this information to change the layout to provide separate areas for wheelchairs to those earmarked for parents with prams.

28. The Committee welcomes the commitment from Newport Transport and Arriva Buses to engage with disability groups to deliver further service improvements.

Recommendation 2: The Committee believes that transport related dialogue between local authorities, transport providers and disability groups could be enhanced, and recommends that the Welsh Government ensures that such dialogue is further mainstreamed into service planning mechanisms.

Bus Travel

Use of the concessionary bus pass

29. The concessionary bus pass was widely welcomed and many witnesses told us of the difference it made to their lives. In written evidence to the Committee, Deborah Harding said:

“Having my concessionary bus pass recently has made a big difference to the way I travel – in that it means the cost of travelling has been reduced so paying for a carer to accompany me is easier.”¹³

30. This sentiment was echoed by many of the disabled people’s representative groups, who told us of the benefits it brought to their members in enabling them to utilise public transport to access employment, education, health and leisure services, and to participate fully in society.

31. There was widespread concern, however, that the current financial climate might have a detrimental effect on the provision of concessionary bus passes, with devastating implications for many disabled and older people.

32. Another concern raised by witnesses was the UK Government’s announcement to end payment of the mobility component of Disability Living Allowance (DLA) for all state funded residents in care homes. Suzanne Jones, Scope Cymru, told the Committee:

“...although you are in a residential service, you still want to get out. The DLA is what is used to allow people to go out to access the community. We all hear about the importance of being part of a community, so it should not be about going to the big old-fashioned building and staying there.”¹⁴

¹³ Equality of Opportunity Committee, *Inquiry into impact of Welsh Government policy on the accessibility of transport services for disabled people in Wales*, Written evidence from Deborah Harding, EOC(3) ATS12

¹⁴ RoP [para 244], 9 November 2010, Equality of Opportunity Committee

33. The Committee acknowledges that welfare benefits remain a matter reserved to the UK Government but is concerned about the potential impact this proposed change will have on some of the most vulnerable people in Wales.

Recommendation 3: The Committee recognises the costs involved in providing free bus travel for older and disabled people in Wales, but recommends that the Welsh Government continues to protect this highly important policy.

Recommendation 4: The Committee recommends that the Welsh Government makes representation to the UK Government to reconsider its decision to remove the mobility component of Disability Living Allowance for people in residential care.

Applying for a concessionary bus pass

34. Two issues of concern were brought to the Committee's attention with regard to applying for a concessionary bus pass. Firstly, that there was no consistency in the application process. Each local authority produced their own application form; many had different eligibility criteria and asked for different pieces of supporting information.

35. The second, more concerning issue, was the language used in the application form by some local authorities. Paul Hunt, Mencap Cymru, told the Committee:

“...some of them are asking people with a learning disability to tick a box saying:

“I declare that I am stricken by a learning disability that is a state of arrested or incomplete development of mind which includes significant impairment of intelligence.”¹⁵

36. This wording has been taken from the Transport Act 2000 but the Committee feels that use of such terminology by any organisation is inappropriate and offensive to anyone with a learning disability. We would therefore urge the Welsh Government to put pressure on local authorities to revise their application forms as a matter of urgency.

¹⁵ RoP [para 92], 9 November 2010, Equality of Opportunity Committee

Companion bus passes

37. The concessionary bus pass system allows for a companion to travel with a disabled pass holder free of charge where this is deemed necessary to enable the disabled person to travel. Guidance from the Welsh Government on the subject states that companion passes should be issued:

“to disabled people who meet the general criteria and who are so severely disabled that it could be impossible for them reasonably to use public transport without the assistance of a companion. (The effect of the disability need not be sufficient for the pass holder to require the help of a companion on every journey, and in determining such applications local authorities should assess the extent to which this help is likely to be required.)”¹⁶

38. Mencap Cymru noted that, in practice, in some areas of Wales individuals who had been granted a companion bus pass were told that they would not be able to travel alone.

39. When discussing the use of the companion pass with the Committee, Michael Morton, Managing Director of Arriva Buses Wales, stated that he “was not aware that we had it in Wales, so if I am not aware, then possibly quite a few of the drivers are not.”¹⁷ He did, however, resolve to take up the issue with Mencap Cymru and find out more about the problems they had experienced.

40. John Forsey of Powys County Council, representing the Association of Transport Co-ordinating Officers (ATCO) in Wales stated that, regarding the companion pass:

¹⁶ Welsh Government: *Mandatory concessionary travel by elderly and disabled people on local buses*

¹⁷ RoP [para 56], 7 December 2010, Equality of Opportunity Committee

“Unfortunately, there is a lot of local interpretation here. Perhaps there needs to be stronger guidance from the Welsh Assembly Government. [...] It needs to be made absolutely crystal clear that, if you have a companion pass, and you feel able to use the bus one day without a companion, that is fine.”¹⁸

41. The Committee believes that the concessionary bus pass scheme is vital in enabling disabled people to live more independent lives but is concerned that the misinterpretation of the guidance is affecting their ability to do so.

Recommendation 5: The Welsh Government revises its guidance to local authorities on concessionary bus travel to:

- **include the introduction of a common application form for all local authorities, developed in consultation with learning disability groups, to ensure it is user friendly, uses appropriate language and is accessible to all;**
- **clarify the criteria for use of companion bus passes.**

Driver training

42. A number of witnesses told the Committee that they believed bus drivers would benefit from better training, to teach them how to help disabled passengers. In his written evidence, John Skyner said:

“There have been occasions when the bus has driven past me even though I have been standing at the bus stop with my guide dog. Quite often the bus driver will forget that I have asked him to drop me off at my destination, this can involve a long walk or even a bus ride to take me back.”¹⁹

43. Scope Cymru told the Committee that “training is vital, and we are always happy to help with that”.²⁰ Whilst Mencap Cymru said:

¹⁸ RoP [para 132], 7 December 2010, Equality of Opportunity Committee

¹⁹ Equality of Opportunity Committee, *Inquiry into impact of Welsh Government policy on the accessibility of transport services for disabled people in Wales*, Written evidence from John Skyner, EOC(3) ATS04

²⁰ RoP [para 226], 9 November 2010, Equality of Opportunity Committee

“We felt that the importance of equality training for drivers is recognised, but there is an emphasis on delivering targets and the number of training opportunities, rather than on the content of the training. We want to ensure that there is more than just one afternoon of general equalities training and that the training is focused on specific disabilities”.²¹

44. Both Arriva Buses Wales and Newport Transport noted that all their drivers receive disability awareness training. Newport Transport stated that it is:

“...one of the only bus operators in the UK to specifically tailor its Certificate of Professional Competence driver training to include comprehensive modules on understanding the needs of disabled passengers.”²²

45. The Committee believes that driver training is essential and would support Mencap’s view that it must be meaningful and not merely a ‘tick box’ exercise. We welcome the commitment of Arriva Buses Wales and Newport Transport in ensuring their drivers are fully trained in understanding the needs of disabled passengers and would encourage other bus providers to follow their example. We would also urge bus companies to involve representatives of disability groups in designing and delivering training for drivers.

Accessibility of vehicles

46. The Public Service Vehicle Accessibility Regulations 2000 require all full size single deck buses over 7.5 tonnes to be fully accessible from 1 January 2016, and all double deck buses from 1 January 2017. The Committee heard that there was still a lack of low level buses, particularly in rural areas, and smaller companies operating with smaller budgets and older buses tended to have a far lower percentage of low floor vehicles.

47. Another issue brought to the Committee’s attention was that the majority of buses only had space for one wheelchair. Natalie Thomas, Day Service Officer, Physical Disabilities Team told us:

²¹ RoP [para 62], 9 November 2010, Equality of Opportunity Committee

²² Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from Newport Transport, EOC(3) ATS23

“... the fact that you can only fit one wheelchair on any one bus also proves difficult at times if friends who happen to be two wheelchair users or more are unable to provide mutual support as they cannot get on the bus together.”²³

48. The Committee recognises that the limited availability of low floor buses is a significant problem for disabled people but accepts that local authorities and bus operating companies are working towards full fleet compliance.

²³ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from Natalie Thomas, EOC(3) ATS18

Use of Taxis by Disabled Passengers

49. Many people with disabilities or learning difficulties are heavily reliant on using taxi services as they may be unable to hold a driving license themselves. Whilst in urban areas access to bus and rail services is more readily available, in rural areas where public transport services are often less frequent, the dependence on taxis is even greater.

50. Using taxi services can cause significant problems for disabled people. A number of respondents raised concerns over the cost of using a taxi rather than a bus or a train, as doing so on a regular basis could pose a huge financial burden. Representatives from Monmouth People First told the Committee about someone who had to give up many of the activities she enjoyed because the costs of using a taxi were so prohibitive:

“The same journey for that person costs £50 return in a taxi, which cannot happen. So, she has had to give up the things that she likes doing, such as voluntary work, the social stuff that she did and going to an education class.”²⁴

51. The lack of public transport in rural areas particularly disadvantaged people with visual impairments as they had little choice but to use taxis or be dependent on friends or family members for lifts.

52. The Committee heard from many people, both in oral and written evidence, who said that the lack of accessible taxi or private hire vehicles was also a barrier, especially to those with physical disabilities as there was often no way of accommodating wheelchairs. Again, the problem of insufficient accessible taxis would appear to be more acute in rural areas, where there could often be a smaller number of firms in operation.

²⁴ RoP [para 157], 9 November 2010, Equality of Opportunity Committee

53. In his written evidence, Steve Dickinson talked about the difficulties his father had experienced when travelling to Tenby on public transport:

“Regrettably, there was no suitable taxi in Tenby to meet Dad and party at the station, it would appear that there is only one taxi in Tenby in which a wheelchair user can be transported whilst in their chair and the vehicle was having its brakes fixed.”²⁵

54. Travelling to an unfamiliar destination can often be a daunting experience, even more so for a disabled person who might not know what level of accessible transport can be expected when they arrive there. In their written evidence, the Isle of Anglesey County Council said that they provided information on the accessibility of bus services and details of which taxi companies had vehicles suitable for carrying passengers who use wheelchairs.

55. The Committee welcomes this initiative as a means for disabled people to be aware of the accessible transport in an area before travelling there. We believe that this would be a useful tool for everyone to access and would like to see this rolled out across other local authorities.

56. The Committee noted that there were currently barriers preventing licencing authorities from compelling all or even a certain proportion of taxi vehicles in its area from being fully accessible. The Isle of Anglesey County Council told the Committee:

“Whilst each Licensing Authority could set its own standards in respect of vehicle accessibility, until there is legislation requiring all taxis and private hire vehicles to be accessible, the industry is unlikely to be able to meet local requirements.”²⁶

²⁵ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from Steve Dickinson, EOC(3) ATS08

²⁶ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from Isle of Anglesey County Council, EOC(3) ATS15

57. They went on to say that the introduction of national legislation requiring all vehicles used as taxis or private hire vehicles to be accessible could be a way of remedying this. They suggested that this could be phased in a similar way to the legislation regarding buses, which introduced a date by which all new vehicles registered had to be accessible, with a further set of dates by when vehicles which were not accessible could not be used.

Recommendation 6: The Committee recommends that the Welsh Government considers options by which legislation could be used to enhance disabled people’s accessibility to taxi services, and makes representations on a preferred option to the UK Government.

58. Even where accessible taxis were available, the drivers themselves could sometimes pose a barrier to disabled people if they were not aware of how to use the equipment. The Committee received anecdotal evidence from a number of respondents who referred to drivers not being trained to use the ramps or clamp wheelchairs in place, or even refusing to do so.

59. Guide Dogs for the Blind told the Committee in written evidence that they were aware of cases where blind and partially sighted guide dog owners had been refused access by taxi drivers. They said that they would wish to see more stringent monitoring and enforcement by licensing officers and more consistent training for drivers. The call for improved training was echoed by the RNID Cymru, who said:

“RNID Cymru believe that there is a clear need for local authorities to ensure that as part of the licencing process that all taxi licence holders are trained in deaf awareness, to ensure a hassle free journey for people with hearing loss.”²⁷

60. Driver training was an issue that many respondents commented upon, so clearly improvements could be made in some areas. The solution might be for disability training to be made mandatory as part of the process of granting licences.

²⁷ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from RNID Cymru, EOC(3) ATS27

Community Transport

61. Many witnesses highlighted the valuable role of community transport in providing services where public transport could not or did not meet passengers' needs, although a number of users did feel that the need to book in advance removed spontaneity.

62. One issue that was brought to the Committee's attention was the difficulty in co-ordinating the use of community transport vehicles. Monmouth People First told us of two problems in this area: firstly there was a shortage of MiDAS (Minibus Driver Awareness Scheme) qualified drivers, and secondly, where these drivers could be found, there was a difficulty in accessing council vehicles. Charlotte Moore said:

“There are instances of buses sitting there all evening that could be used. There are buses unused during the day as well, because there is no volunteer driver available, or getting hold of the keys is a problem, and is not co-ordinated well. There is a lack of communication.”²⁸

63. John Forsey, representing ATCO, supported this, telling the Committee that this situation was:

“...probably one of the most frustrating things that you come across as a local government officer. We are telling everybody that we have less and less money and yet, sometimes, we have these accessible buses sat in social services garages all evening, for example. It is incredibly frustrating.”²⁹

64. The Committee believes this situation is unacceptable. Effectively, disabled and elderly people are being denied access to social activity on weekends and evenings, not because of a lack of suitable vehicles, but because of poor communication and co-ordination.

²⁸ RoP [para 100], 9 November 2010, Equality of Opportunity Committee

²⁹ RoP [para 149], 7 December 2010, Equality of Opportunity Committee

Recommendation 7: The Welsh Government should work with the Community Transport Association to better understand the distribution of drivers and availability of physical equipment to ensure that better use is made of those resources.

Accessibility and Availability of Transport Information

65. Witnesses told the Committee that the lack of accessible information on public transport services could often be a barrier to disabled people using those services.

Timetables

66. Many people told the Committee that timetabling information for both bus and train services was often in a format that was not accessible for people with learning disabilities or visual impairments. Publishing timetables online could be a useful tool, but if the information was published on a website that did not have in-built accessibility features, then it was of little benefit to people with visual impairments. Witnesses cited the Traveline Cymru website as an example of this.

67. The Committee would urge all transport providers to consider publishing information on websites that are compatible and, given the level of Welsh Government funding provided to Traveline Cymru, this might be an issue Welsh Ministers might wish to take forward.

68. Paper timetables could also prove difficult for some people to understand. Many witnesses told us that they struggled to read the information on paper timetables as the font size was too small. This problem was escalated when symbols were used to depict certain variations in services. In their written evidence, Learning Disability Wales said:

“Rail and bus timetables continue to be produced in formats that are difficult to read and often require an ability to interpret obscure symbols and signs.”³⁰

69. Representatives from Mencap Cymru also told the Committee that the use of the 24 hour clock on timetables made it difficult for people with learning difficulties to understand.

³⁰ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from Learning Disability Wales, EOC(3) ATS46

70. The Committee has heard that the availability and accessibility of information provided at bus stops could vary significantly. Some bus stops had just the bus stop sign on the top of a pole which could not be seen by someone with a visual impairment. Where information boards were provided at bus stops, they were often at a height that was not accessible to wheelchair users or those with a visual impairment. Again, the information on the boards was often in a font that was too small. Suzanne Jones, the representative from Scope Cymru, told the Committee that:

“The information needs to be at a level where you can read it, particularly at bus stations. Some of the bus station information is high up, so you have to get someone to read it for you and tell you when the next bus is coming. You do not want to do that.”³¹

71. Martin Griffiths from Deafblind Cymru added that:

“When you go to a bus stop, for example, the information is usually in a place that is hard to see because there are loads of people sitting at the bus shelter, and the information is hidden behind them....They could make this font at least twice the size.”³²

72. The accessibility of information on transport services is clearly an issue which affects people with varying forms of disabilities and learning difficulties.

Recommendation 8: The Committee recommends that the Welsh Government ensures transport providers and local authorities work with disabled groups to get a better understanding of how the format and provision of information could be improved.

Information on accessible services

73. Disabled groups told the Committee that their members needed to book their travel arrangements in advance to ensure that the assistance they required was available. Despite this, the Committee heard that when travelling by bus, it was almost impossible to find out any information on whether certain routes used accessible vehicles.

³¹ RoP [para 183], 9 November 2010, Equality of Opportunity Committee

³² RoP [para 219], 9 November 2010, Equality of Opportunity Committee

74. In written evidence, Brecknock Access Group said:

“There is an inconsistency of low level accessible buses on the same routes. You may be able to travel to your destination but there is no guarantee a similarly adapted bus will be available for the return journey. Advance enquiries give no help as telephone operators have no idea which vehicles will be used on various routes.”³³

75. This frustration was shared by Swansea Disability Forum, who told us:

“It’s not easy to find out which bus routes are wheelchair accessible or there is no guarantee of a route being accessible, despite being told the day before it would be.”³⁴

76. The Committee believes that it would be extremely beneficial for disabled people if bus providers and local authorities provided information on their websites and at bus stops of the routes which use accessible vehicles.

Information on trains and buses

77. Deaf and visually impaired people also experienced difficulties in accessing information once on board a train or bus. For those with hearing difficulties, problems occurred when announcements were made over tannoy systems, particularly in relation to delays or route alterations. RNID Cymru wrote that:

“Public information is often relayed by audible means only, leaving passengers with hearing loss without access to relevant up-to-date facts about their journey.”³⁵

³³ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from Brecknock Access Group, EOC(3) ATS13

³⁴ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from Swansea Disability Forum, EOC(3) ATS19

³⁵ Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from RNID Cymru, EOC(3) ATS27

78. Similarly, visually impaired people could experience difficulties in knowing when they were approaching their destination. Martin Griffiths from Deafblind Cymru told the Committee that:

“When you are on a Valley Lines train, you would not have audio-visual information and you probably would not even have a tannoy announcement saying where the train will stop next. A lot of people who are deafblind cannot recognise that they have arrived at the station.”³⁶

79. The Committee heard from both Arriva Bus and Newport Transport that they were installing audio destination announcements on their buses. This development was welcomed, but needed to be rolled out quickly to include as many buses as possible across Wales. However, more could still be done to benefit those passengers with hearing difficulties and we believe that the audio announcements should be accompanied by a visual display showing the next stop and a map of the route.

³⁶ RoP [para 190], 9 November 2010, Equality of Opportunity Committee

Increasing the Confidence of Disabled People using Public Transport

80. Several witnesses stated that one of the ways in which disabled people can be enabled to use public transport is to improve their confidence in using transport services. Monmouth People First told the Committee that, alongside physical barriers to accessing transport:

“It should also be noted that there are issues around people’s vulnerability including using money, fear of bullying, and lack of life experience.”³⁷

81. Dawn Gullis, Mencap Cymru, supported this, telling the Committee of her own experiences of bullying on public transport:

“I sometimes feel safe when using the bus, but I sometimes get bullied a lot on the bus by kids from school, and so on. I try to ignore it or speak to another person. I get off at the next stop after the bullies, or the stop before them; that is the only way that I can see around it.”³⁸

82. Mencap Cymru suggested the idea of “travel training” to encourage people with disabilities to overcome a lack of confidence in using public transport. They stated that:

“Training for children and young people around access to public transport services can make all the difference in their transition from adolescence to living independent lives as adults. In summary, travel training is teaching people with a learning disability about how to access and use public transport safely.”³⁹

³⁷ Equality of Opportunity Committee Paper EOC(3)-14-10, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Submission from Monmouth People First, 9 November 2010

³⁸ RoP [para 113], 9 November 2010, Equality of Opportunity Committee

³⁹ Equality of Opportunity Committee Paper EOC(3)-14-1, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Submission from Mencap Cymru, 9 November 2010

83. John Forsey, representing ATCO told the Committee that:

“The introduction of travel training is a great idea, but finding the people to help roll that out, possibly from the voluntary or third sector, is a challenge.”⁴⁰

84. Arriva Buses Wales told the Committee about some similar work it had started doing in Chester, working with people with learning disabilities to educate them about how to use buses. Michael Morton said:

“It is a big learning curve for us, but if this works in Chester, we are certainly going to try to roll it out in the other areas.”⁴¹

85. The Committee supports the view that training for young people with a learning disability about accessing and using public transport safely could make all the difference in their transition from adolescence to living independent lives as adults.

Recommendation 9: The Committee recommends that the Welsh Government should include training on accessing transport in the curriculum for SEN students.

⁴⁰ RoP [para 109], 7 December 2010, Equality of Opportunity Committee

⁴¹ RoP [para 29], 7 December 2010, Equality of Opportunity Committee

Issues affecting Disabled Pedestrians

86. During this inquiry, the Committee heard about issues that affect disabled pedestrians in their everyday lives. The two main areas of concern raised by witnesses were the increasing use of shared spaces and the inconsistency in dropped kerbs.

Shared spaces

87. Many witnesses told the Committee about their concerns around the use of spaces designed to be used by more than one group of people, for example the recent increase in the number of pavements shared between pedestrians and cyclists. Without the use of kerbs, visually impaired people were unable to distinguish where the pedestrian area ended and the cycle lane began and could walk into the path of an on-coming cyclist. Similarly, deaf people would be unable to hear a cyclist approaching from behind. Guide Dogs for the Blind Association said in their written evidence:

“...because bikes are so quiet it was very difficult for blind or partially sighted people to be aware of them until too late, or to be able to judge where they were or move to avoid them.”⁴²

88. These concerns were also shared by the Wales Council for Deaf People and Swansea Disability Forum.

89. Suzanne Jones from Scope Cymru suggested that a possible solution might be to use different types of surface to distinguish between the areas, possibly using a rough flat surface where people would not trip over against a smooth surface for vehicles or cyclists.

90. Use of shared spaces is clearly an issue which causes great concern not only to visually impaired and deaf people, but also the elderly and less mobile.

⁴² Equality of Opportunity Committee paper, *Inquiry into the Impact of Welsh Government Policy on the Accessibility of Transport Services for Disabled People in Wales*, Evidence from The Guide Dogs for the Blind Association, EOC(3) ATS22

Dropped kerbs

91. Witnesses told the Committee that often although a dropped kerb might have been introduced on one side of a road; it was not always mirrored on the other side, thereby preventing a person in a wheelchair from crossing directly from one side of the road to the other. Suzanne Jones said:

“There will be a dropped kerb on one side of the road, but there might not be a dropped kerb on the other side of the road. So, you then have to go down the dropped kerb and up in the middle of the road to find the dropped kerb on the other side. They do not tally... Sometimes the gradient on the dropped kerb can be so high on the other side that you have to wait for someone to push you up.”⁴³

Recommendation 10: When developing shared spaces and schemes involving dropped kerbs, the Welsh Government and local authorities should engage with disabled persons groups from the start of the planning process.

⁴³ RoP [para 211], 9 November 2010, Equality of Opportunity Committee

Annex A - Regulatory and Legal Framework

In Wales, statutory responsibility for railway accessibility as well as other public transport services such as buses, coaches, and taxis are currently not devolved to the Welsh Ministers.

The Equality Act 2010 consolidates and also replicates some of the provisions of the Disability Discrimination Act 1995, as amended by the Disability Discrimination Act 2005, relating to increased access to transport services and infrastructure by disabled people.

Transport and the use of transport vehicles are “services” for the purpose of the Equality Act 2010.

Disability and the Equality Act 2010

The Equality Act 2010 (the 2010 Act) contains specific provisions dealing with transport and disability discrimination, aimed at protecting disabled people and preventing disability discrimination, and provides legal rights for disabled people including in relation to access to goods, services, and facilities.

Section 29 of the 2010 Act which prohibits discrimination, harassment, and victimisation in the provision of goods, facilities, services and public functions, does not apply in relation to disability discrimination to land transport unless it falls within the following types of vehicles:

- (a) a hire-vehicle designed and constructed for the carriage of passengers and comprising no more than 8 seats in addition to the driver's seat,
- (b) a hire-vehicle designed and constructed for the carriage of passengers, comprising more than 8 seats in addition to the driver's seat and having a maximum mass not exceeding 5 tonnes,
- (c) a hire-vehicle designed and constructed for the carriage of goods and having a maximum mass not exceeding 3.5 tonnes,
- (d) a vehicle licensed under section 48 of the Local Government (Miscellaneous Provisions) Act 1976 or section 7 of the Private Hire Vehicles (London) Act 1998 (or under a provision of a local Act corresponding to either of those provisions),

- (e) a private hire car (within the meaning of section 23 of the Civic Government (Scotland) Act 1982),
- (f) a public service vehicle (within the meaning given by section 1 of the Public Passenger Vehicles Act 1981),
- (g) a vehicle built or adapted to carry passengers on a railway or tramway (within the meaning, in each case, of the Transport and Works Act 1992),
- (h) a taxi,
- (i) a vehicle deployed to transport the driver and passengers of a vehicle that has broken down or is involved in an accident, or
- (j) a vehicle deployed on a system using a mode of guided transport (within the meaning of the Transport and Works Act 1992).

The 2010 Act also provides rights for people not to be directly discriminated against or harassed because they have an association with a disabled person (e.g. a carer or parent of a disabled person), and also provides that people must not be directly discriminated against or harassed because they are wrongly perceived to be disabled.

Under the 2010 Act, disability is a protected characteristic, and persons have a disability if:

- they have a physical or mental impairment;
- the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities.

People who already have a disability fall within the 2010 Act provided they meet the definition of disability. People with some visual impairments are automatically deemed to be disabled. People with progressive conditions such as HIV, cancer or multiple sclerosis are protected by the 2010 Act from the point of diagnosis. However, some conditions are specifically excluded from the disability definition contained in the 2010 Act.

Discrimination arising from disability

The 2010 Act introduces a new concept of discrimination arising from disability which prohibits service providers from treating disabled people less favourably than other people for a reason arising from their disability.

In summary, the 2010 Act makes it unlawful to:

- refuse to provide services;
- provide a different quality of service that differs from that usually offered to the public;
- offer a service on different terms to those usually offered to the public;
- subject a person to any other detrimental requirements or behaviour.

Discriminatory treatment is potentially unlawful unless the service provider can show that the treatment is a proportionate means of achieving a legitimate aim.

Transport - Reasonable adjustments

Under the 2010 Act, service providers must undertake 'reasonable adjustments' to ensure that their services are fully accessible to disabled people, so that disabled people are not at a substantial disadvantage compared to non-disabled people when using and accessing their services.

The 2010 Act makes special provision for reasonable adjustments in relation to transport and modifies the duty to make 'reasonable adjustments'. The duty varies depending on the nature of the transport vehicle.

The duty to make 'reasonable adjustments' may include:

- providing a service in a different way or making changes to the way services are provided;
- offering extra help such as requiring station or train staff to assist people with mobility impairments;
- adding auxiliary aids or equipment to existing vehicles, priority seating, and contrasting handrails.
- the extent of the application of the duty to make 'reasonable adjustments' in relation to transport vehicles varies depending on the nature of the vehicle.

Regular reviews should be carried out to ensure that services are accessible by disabled people.

Public Service Vehicles

The Secretary of State is empowered to make Public Service Vehicle Accessibility Regulations so that disabled people can get on and off regulated public service vehicles in safety and without unreasonable difficulty, so that disabled people can travel in those vehicles in safety and reasonable comfort.

The Regulations can make provision as to the construction, use, and maintenance of regulated public service vehicles.

A public service vehicle for the purposes of the Public Passenger Vehicles Act 1981 is a vehicle adapted to carry more than 8 passengers.

Railways

The Railways Act 2005 devolved some powers on rail matters to Welsh Ministers which include powers to specify and fund services under the Wales and Borders franchise, power to invest in rail improvements which benefit Wales, and a requirement for the Secretary of State to consult Welsh Ministers before letting franchises which run into Wales.

Rail vehicles / trains

The Rail Vehicle Accessibility Regulations 1998 (1998 Regulations) as amended, made by the Secretary of State, apply to rail vehicles including trains brought into use on or after 1 January 1999. The 1998 Regulations required trains and trams to have wheelchair spaces, accessible door controls, accessible toilets and wheelchair-compatible doorways.

The Directive 2008/164/EC applies Europe wide standards of rail accessibility, and has superseded the 1998 Regulations.

The Rail Vehicle Accessibility (Non interoperable Rail System) Regulations 2010 are the extant Regulations which set accessibility standards aimed at improving accessibility for disabled persons for passenger vehicles used on light rail systems or which are otherwise not subject to EU accessibility specifications.

The 2010 Act also includes provisions dealing with rail vehicle accessibility so that disabled people can get off regulated rail vehicles in safety and without unreasonable difficulty so that they can travel in vehicles in safety and reasonable comfort, compliance certification, enforcement regime, penalties for non-compliance, and requires the UK Government to make Rail Vehicle Accessibility Regulations for certain rail vehicles to ensure that:

- disabled customers can get on and off regulated rail vehicles safely and without unreasonable difficulty;
- by 1 January 2020 all rail vehicles must comply with accessibility standards or have an appropriate exemption;
- Exemption Orders can be made authorising a regulated rail vehicle to be used for passenger services even though it does not comply with accessibility standards. The procedure for making Exemption Orders is prescribed by the 2010 Act.

Buses and coaches

Accessibility requirements for buses and coaches are provided for by the Public Service Vehicle Accessibility Regulations 2000 (the 2000 Regulations) as amended, made by the Secretary of State, which require certain buses and coaches to have wheelchair-accessible spaces, priority seats, handrails, and slip-resistant floors.

The Regulations enable disabled people to get on and off buses and coaches in safety, without unreasonable difficulty and to be able to be carried in such vehicles in safety and reasonable comfort. The Regulations apply initially to new vehicles, and no Regulations were made covering buses with fewer than 22 passengers. The 2000 Regulations require all buses to comply from 2017, and coaches from 2020.

The 2010 Act also provided for accessibility certificates to be issued, and accessibility requirements to be included in the type approval procedure.

Taxis

The 2010 Act fundamentally changes the service that disabled passengers can expect from taxi drivers when the relevant sections are brought into force. These gradual changes will be introduced between October 2010 and April 2011.

The Secretary of State has power to make taxi accessibility regulations to ensure that it is possible for disabled people to:

- (a) get in and out of taxis in safety;
- (b) do so while in wheelchairs;
- (c) travel in taxis in safety and reasonable comfort;
- (d) do so while in wheelchairs.

The Regulations may require a regulated taxi to conform with the provisions of:

- the size of door opening for the use of passengers;
- the amount of headroom in the passenger compartment;
- the floor area of the passenger compartment;
- The fitting of restraining devices designed to ensure the stability of the wheelchair while the taxi is moving.

Sections 165, 166 and 167 of the 2010 Act impose duties on the drivers of wheelchair accessible taxis to assist passengers who use wheelchairs.

The duties include:

- to carry the passenger while in the wheelchair;
- not to make any additional charge for doing so;
- if the passenger chooses to sit in a passenger seat to carry the wheelchair;
- to take such steps as are necessary to ensure that the passenger is carried in safety and reasonable comfort; and
- to give the passenger such mobility assistance as is reasonably required.

The 2010 Act provides for taxi drivers who drive designated wheelchair accessible taxis to apply for exemptions from the duties to assist passengers who use wheelchairs including:

- if it is appropriate to do so on medical grounds; or
- because the driver's physical condition makes it impossible or unreasonably difficult for him or her to comply with the duties.

The 2010 Act also allows licensing authorities to maintain a list of "designated vehicles", that is, a list of wheelchair accessible taxis licensed in their area. The consequence of being on such a list is that the driver must undertake the duties outlined above.

The driver of a taxi hired by a disabled person who has a guide dog or a hearing dog, or hired by someone accompanying them, is in most circumstances under a duty:

- to carry the passenger's dog and allow it to remain with the passenger, and
- not to make an additional charge for doing so.

A driver who fails to comply with these duties may be liable to a fine.

Annex B – Witnesses

The following witnesses provided oral evidence to the Committee on the dates notes below. Transcripts of all oral evidence sessions can be viewed in full at:

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third1/bus-committees-third-eoc-home/bus-committees-third-eoc-agendas.htm>

9 November 2010

Gary Costas	Mencap Cymru
Dawn Gullis	
Paul Hunt	
James Crowe	Learning Disability Wales
Mary Allan	Monmouth People First
Charlotte Moore	
Martin Griffiths	Deafblind Cymru
Suzanne Jones	Scope Cymru
Pablo Rees Mortby	Swansea Disability Forum

7 December 2010

Michael Morton	Arriva Buses Wales
John Forsey	Powys County Council

18 January 2011

Ieuan Wyn Jones	Deputy First Minister and Minister for the Economy and Transport
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Annex C – List of Written Evidence

The following people and organisations provided written evidence to the Committee. All written evidence can be viewed in full at:

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third1/bus-committees-third-eoc-home/bus-committees-third-eoc-agendas.htm>

Date	Organisation	Reference
9 November 2010	Mencap Cymru	EOC(3)-14-10(p1)
9 November 2010	Monmouth People First	EOC(3)-14-10(p2)
9 November 2010	Swansea Disability Forum	EOC(3)-14-10(p3)
9 November 2010	Scope Cymru	EOC(3)-14-10(p4)
9 November 2010	Deafblind Cymru	EOC(3)-14-10(p5)
7 December 2010	Newport Transport	EOC(3)-16-10(p1)
7 December 2010	Arriva Buses Wales	EOC(3)-16-10(p2)
7 December 2010	Welsh Local Government Association	EOC(3)-16-10(p3)
18 January 2011	Deputy First Minister and Minister for the Economy and Transport	EOC(3)-01-11(p1)

Annex D – Consultation Responses

The following people and organisations responded to the call for evidence. All responses can be viewed in full at:

http://www.assemblywales.org/bus-home/bus-committees/bus-committees-other-committees/bus-committees-third-eoc-home/bus-committees-third-eoc-inquiry/eoc3-inq_trans/transport_services.htm

EOC(3) ATS01	Dorothy Jones
EOC(3) ATS02	L G Lewis
EOC(3) ATS03	Rod Bowden
EOC(3) ATS04	John Skyner
EOC(3) ATS05	M E Williams
EOC(3) ATS06	Arriva Trains Wales
EOC(3) ATS07	Wales Council for Deaf People
EOC(3) ATS08	Steve Dickinson
EOC(3) ATS09	Epilepsy Action
EOC(3) ATS10	Member of North Wales Deaf Association
EOC(3) ATS11	RCT People First Members
EOC(3) ATS12	Deborah Harding
EOC(3) ATS13	Brecknock Access Group
EOC(3) ATS14	Timothy Davies
EOC(3) ATS15	Isle of Anglesey County Council
EOC(3) ATS16	MS Society Cymru
EOC(3) ATS17	Children in Wales
EOC(3) ATS18	Natalie Thomas - Physical Disabilities Team
EOC(3) ATS19	Swansea Disability Forum
EOC(3) ATS20	Shopmobility Cymru / Wales
EOC(3) ATS21	ABCD Cymru
EOC(3) ATS22	The Guide Dogs for the Blind Association
EOC(3) ATS23	Newport Transport
EOC(3) ATS24	Voice – Self Advocacy Group – Wrexham
EOC(3) ATS25	Passenger Focus
EOC(3) ATS26	Wales Council for Voluntary Action
EOC(3) ATS27	RNID Cymru
EOC(3) ATS28	Deafblind Cymru

EOC(3) ATS29	Sustrans Cymru
EOC(3) ATS30	Cliff Croft MBE
EOC(3) ATS31	Disability Wales
EOC(3) ATS32	Powys County Council
EOC(3) ATS33	SWWITCH
EOC(3) ATS34	Barnardo's Cymru
EOC(3) ATS35	Trafnidiaeth Canolbarth Cymru (TraCC)
EOC(3) ATS36	Gwynedd Council
EOC(3) ATS37	The Community Transport Association (CTA Wales)
EOC(3) ATS38	Monmouthshire Council Council
EOC(3) ATS39	Caerphilly County Borough Council
EOC(3) ATS40	Neath Port Talbot Disability Network
EOC(3) ATS41	Age Cymru (PDF, 215KB)
EOC(3) ATS42	The Association of Transport Co-ordinating Officers Cymru (ATCO Cymru)
EOC(3) ATS43	The Confederation of Passenger Transport Wales (CPTCymru)
EOC(3) ATS44	Railfuture Wales
EOC(3) ATS45	Ceredigion County Council
EOC(3) ATS46	Learning Disability Wales