

Consultation response form – EU Regulation on Passenger Rights

Part 1 - Information about you

Name	Mike Harrison
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Organisation	Scottish Accessible Transport Alliance
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>59 organisations (mixture of transport operators and disability organisations), 26 individual.</p> <p>Input from members of the Committee who represent a wide range of organisations relating to disability.</p>	
<p>If you would like your response or personal details to be treated confidentially please explain why:</p>	

PART 2 - Your comments

1.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
No comment		

2.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
n/a		

3.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
<p>While acknowledging that by September 2013 all drivers will have received 35 hours of training, and knowing that many have already had this, it is obvious that the results are very patchy and incomplete. If all drivers will have had this basic training, there seems no reason why this should not immediately be extended to provide disability. A possible delay of four or eight years is not justifiable or acceptable.</p>		

4.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

5.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
<p>Delay is just an excuse to avoid spending. If changes are required, there should be some pressure to implement them. Four years is a long time. If there has to be a delay, 18 months should be the maximum.</p>		

6.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
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If 75% have already completed disability training (and a majority of existing drivers have completed 'ordinary' training), then operators should be able to transfer training resources to completing disability training with the remainder. Obviously, training needs to be on-going to deal with staff turnover as well as updating. There seems to be no justification in terms of resources (personnel or financial) for a 5-year exemption.

At worst it should be reversed - a one year exemption followed by a review, and not a five-year exemption reviewed after one year.

Quotations from 2 people representing categories of users who are members of our organisation.

1. Visually impaired:

I can only speak with any depth of knowledge as a Vision Impaired Person.

I say that I do not agree that "There is no evidence that disabled people want bus services improved: quite the contrary.

As a member of several Volunteer Campaigning Groups for Vision Impaired People and people with other forms of disability, I have found that the problems and difficulties experienced are very often raised and discussed at meetings of these Groups. These problems range from the quality of, and facilities available in the vehicles themselves, to the attitudes and actions and quality of service provided by the Staff.

These concerns are known widely to be conveyed consistently and very frequently to Bus Operators, Local and National Government bodies, NGO and other Organisations.

I point out that I am a regular bus user, I use buses for routine travel including leisure pursuits, attendance at social and entertainment events, attendance at the above mentioned Groups, hospital appointments, etc.

Concentrating on the subject of drivers' disability awareness training, problems and incidents experienced include:

- 1) Being told by one driver that I had no right to travel unescorted.
- 2) Driver failing to assist me in locating the Travel Pass reader unit.
- 3) Driver moving away from the bus stop before I am seated. This is particularly dangerous when it is necessary to cross the 'No man's land' created by the area allotted to Baby Buggies and wheelchairs. This area is usually between the driver's cab and the main seating area.
- 4) The unavailability of Next Stop Audio/Visual Announcements. If a VIP alights even one stop out of place, it can be very frightening, traumatic and dangerous. Even the most helpful and well meaning of drivers can forget to advise a VIP when approaching their declared destination. Comprehensive disability awareness training of drivers would greatly improve this situation; especially with those drivers to whom the dangers do not occur or are not made apparent.
- 5) Driver not stopping at the bus stop when the bell is rung because they do not see anyone approaching the doorway.
- 6) Driver not lowering the floor on buses which are fitted with the facility.
- 7) Driver not stopping close to the kerb. This can result in falls or injury.
- 8) Driver not stopping at the bus stop, even when I am standing in full and clear view wearing dark glasses and carrying a long white cane.

I close by saying I am surprised, dismayed and appalled at the attitude and self-declared ignorance of the UK Government on this matter. I hope and appeal to them for a change of mind on the subject proposed delay.

Many of these points apply to other types of disabled bus user.

2. Wheelchair user

I use a bus service provided by a company which already trains its drivers well. I'm a tetraplegic wheelchair user and being always nearest to the driver, I hear them speaking to the visually impaired, informing them about the bus, asking where they want to get off (if it's a bus without AVNSA), and making sure they do get off at the correct stop. They also come out of their cabs to assist with a chair if the ramp develops a fault.

People I know in other cities are justifiably envious of the service we receive. Knowing that drivers are trained (not just in the technicalities, but in good manners and attitude to customers) is a great boost to the disabled.

I do not have to face the sort of access problems that disabled people do when trying to use bus services in other places. It is concerning that disabled people still have to face access problems in 2012.

I am convinced that improvements are urgently needed on a statutory national scale. I think many bus operators are not tackling the problems with the right level of commitment or priority and I feel the Government should act now to send a clear message to them.

7.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Don't understand this point, so no comment		

8.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

9.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

10.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

11.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

12.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
No strong preference, but 'penalties linked to specific breaches' is attractive – though complex.		

13.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
n/a		

14.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Reflecting the seriousness		

15.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

16.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
No opinion		

17.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

18.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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