



Department
for Transport

Summary of responses to the Department for Transport's review of the mandatory disability awareness training exemption applied under EU Regulation 181/2011 (concerning bus and coach passenger rights)

January 2015

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Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR
Telephone 0300 330 3000
Website www.gov.uk/dft
General enquiries <https://forms.dft.gov.uk>

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1. Confederation of Passenger Transport (CPT) – Trade Association

The CPT indicated that a vast majority of bus and coach drivers had now undertaken disability awareness training as part of meeting their training requirements to hold a Driver Certificate of Professional Competence (DCPC).

Since September 2008, in order to hold a DCPC, all bus and coach drivers have been required by law to undertake 35 hours of training ever 5 years.

Therefore between September 2008 and September 2013, CPT estimate that 510 (DCPC approved) disability awareness training courses have been registered and have been run on 26,658 occasions. This means that 153,357 bus/coach drivers undertook disability awareness training between September 2008 and September 2013.

As there are approximately 130,000 drivers currently engaged in the industry, this indicates that some have undertaken the training more than once.

In the 25 week period between September 2013 and February 2014, CPT estimate there were 262 (DCPC approved) registered disability awareness training courses, delivered on 2291 occasions to 17,170 drivers. Based on these figures, CPT estimates that the industry is again on course to deliver disability awareness training to all drivers between in the next Driver CPC period (Sept 2013 – Sept 2018).

CPT remain convinced that regulation to make disability awareness training mandatory is not required and that the current voluntary arrangement is working. They also offered assurances that the bus/coach industry will continue to develop and improve disability awareness training to reflect continually changing circumstances.

2. Bus Operators

2.1 First Group

First are one of the 'Big 5' Bus operators in the UK, in terms of number of staff/services. They estimate that currently around 79% of their drivers have undertaken disability awareness training.

First took the decision in 2011 to make sure their own DCPC training modules contained a customer service refresh and also focussed on disability awareness training, with practical hands on sessions that would improve the capability and confidence of our driving teams in this area.

First run four specific DCPC training modules that contain disability awareness content, including:

- Managing Customers, Yourself and Vehicle Safety (for new recruits as part of their initial training),
- Know your bus, know your business – (practical session assisting customers in wheelchairs and experiencing challenges faced by blind/partially sighted passengers)
- Better Journeys for Life - Playing our Part (introduction to dementia and other unseen mental illnesses and what can drivers can do to assist these customers)
- Better Journeys for Life - Vision and Values - devised in conjunction with Guide Dogs with practical exercises on a bus to practice the guiding of visually impaired people on and off buses)

First intend to deliver the above training listed above to all drivers over the next 9-12 months in order to achieve 100% of drivers disability awareness training. They state that the best examples of disability awareness training courses are those designed in partnership between operators and disability organisations so we can really collaborate and better meet the needs of disabled people.

First state that they are able to track the number of complaints relating to disabled access issues through our Customer Contact System. The volume of complaints in this area is very small at <1% of total complaints and they have seen a slight downward trend. They put this down to their training, as well as other initiatives such as the 'Safe Journey Card'.

Locally, First's Depot Leadership Teams are engaging with a variety of disability organisations to gain feedback, including RNIB (recently signed up to Bus Charter, launched by Baroness Kramer), Guide Dogs UK, Alzheimers Society, Mental Health Action Group, Epilepsy Action UK, Disability Rights and as a member of the Disability Action Alliance.

2.2 Stagecoach

Stagecoach are one of the 'Big 5' Bus operators in the UK, in terms of number of staff/services. They currently employ 14,967 drivers, and including additional staff have a total of 17,008 PCV licence holders.

Of these, 16,839 have completed a specific DCPC course that focusses on disability issues (entitled Disability and Social Inclusion: Valuing the Mix") within the last five years, which represents 99% of their PCV licence holders.

The remaining 169 staff who have not undertaken disability awareness training are either new entrants (who will undertake training shortly) or are not employed as drivers.

In London specifically, out of a further 3668 PCV Licence holders, 98% have undertaken disability awareness training.

In addition to the CPC course referred to above, Stagecoach have further set courses that incorporate elements of disability awareness (Customer Service and Managing Difficult Situations), so each of their drivers receives disability awareness training at the start of their employment and on three of our standard CPC courses.

Stagecoach highlighted that they carried out these courses several years before the Driver CPC requirement was introduced, and can see no benefit from the withdrawal of the exemption from the mandatory training requirement given their current practices.

They therefore urge the Department for Transport to retain the exemption.

2.3 Go Ahead

Go-Ahead are one of the 'Big 5' Bus operators in the UK, in terms of number of staff/services. In responding to your letter to the CPT, Go Ahead reported that 100% of their 12,754 drivers based in London, Go South Coast (Dorset, Wiltshire and Hampshire), Oxford, Brighton and Hove, Metrobus (Surrey, Kent, Sussex), Go North East (Newcastle, Sunderland, Middlesborough), East Anglia and Plymouth had undertaken disability awareness training.

Go Ahead have also provided details of how the effectiveness of this training is monitored in each of these areas. This ranges from mystery shoppers, verbal feedback, feedback forms, additional customer service training and trainers attending meetings with disability groups to discuss impact. However, no consistent approach seemed to be in place.

Go Ahead maintain regular contact with local disability groups in all areas (except East Anglia where this will be initiated soon) on the issue of training.

2.4 Trent Barton

'Trentbarton' is an independent bus operator in the East Midlands. It is owned, managed and staffed by local people. 100% of their drivers have undertaken disability awareness training.

TrentBarton have reported that disability awareness training will remain a key training delivery priority for the next 5 year DCPC training cycle, and beyond.

They monitor the effectiveness of their training through a number of methods, included passenger interaction, mystery shopper audits, and feedback from drivers who are all asked 'what will they be doing differently as a result of this course?'

TrentBarton state that the best disability awareness training courses are developed with interaction from local and national disability groups. With this in mind, they have worked with a number of groups including RNIB, Sight Support Derbyshire, the Mental Health Action Group and Home Instead (Alzheimer's Care Group) to design disability awareness training.

TrentBarton firmly believe that the current disability awareness training exemption should remain in place as it allows them to design, deliver and modify training appropriate to the needs of their drivers and passengers.

2.5 Nottingham City Transport

Nottingham City Transport is the major bus operator of the city of Nottingham.

Nottingham City Transport indicated that the following numbers (in brackets) of staff had completed some form of disability awareness training year by year – 2008 (313), 2009 (520), 2010 (103), 2011 (149), 2012 (654) and 2013/14 (936).

Although no percentage figures is provided, CPT are confident that these figures suggest all their drivers have undertaken disability awareness training and will continue to do so.

2.6 Ipswich Buses

Ipswich Buses is a major bus operator in the town of Ipswich, owned by Ipswich Borough Council.

In response to your letter to the CPT, Ipswich Buses responded directly, indicating that 100% of their drivers had undertaken disability awareness training as part of their Driver CPC and this would continue.

2.7 East Yorkshire Motor Services (EYMS)

East Yorkshire Motor Services (EYMS) is one of the largest UK independent bus operators and is the largest family owned bus and coach business in the UK. They are based in Hull, East Riding and the Scarborough area. EYMS has its own training academy which is fully accredited to deliver Driver CPC training to their own staff, as well as third parties.

EYMS indicate that 93.27% of their drivers have completed Disability Awareness training and that additional courses are planned as part of ongoing CPC training with the aim to be 100% completed by no later than the end of this year, or earlier.

EYMS state that their disability awareness training course is constantly evolving and recently added an element on awareness in respect of visual impairment. They are currently in contact with the Dementia Academy Project in Hull to see how this aspect can be included in future training, and they have worked with several local disability groups to develop their courses and ensure that the training is fit for purpose.

2.8 Blackpool Transport

Blackpool Transport is a bus and tram operator running within the boroughs of Blackpool and Fylde and into the surrounding area. It is owned by Blackpool Borough Council.

Blackpool Transport state that 100% of their drivers have received disability awareness training and this process will be continued into the second Driver CPC period.

In response to your letter to the CPT, Blackpool Transport stated that they offer a significant range of Disability Awareness Training and that induction courses for Drivers and Conductors include several modules covering the subject.

It is also included as a specific aspect of their driver CPC programme, as well as in their in house programme for NVQ level 2 in Road Passenger Transport.

In devising their training programmes, Blackpool Transport have built working relationships with various disability groups including the Princess Alexandra home for the blind, High Furlong School for disabled children and the Alzheimer's Society.

2.9 Western Greyhound

Western Greyhound is a local bus operator based in Cornwall. It operates many services throughout the county and also into Devon.

Western Greyhound indicated that all their staff with PCV licences undertook Disability Awareness training as a module in their CPC training last year. This training has been built on by meetings with representatives of disabled groups to build on what has already been learnt.

3. Disability Groups and other stakeholders

3.1 Guide Dogs

'Guide Dogs for the Blind' welcomed the opportunity to have input into this review and stated that their latest passenger survey data indicates that the current provision of disability awareness training is insufficient. They argue that mandatory training for all bus drivers would considerably improve the lives of blind and partially sighted bus passengers.

Their passenger survey consisted of 1085 responses and highlighted that 83% of disabled respondents said their experiences with bus drivers had stayed the same or got worse over the past 12 months. Also, only 15% of disabled respondents said bus drivers always respond appropriately to their needs as a disabled passenger.

When asked about the bus driver on their most recent bus journey, only 26% of disabled respondents believed they had received disability training.

Guide Dogs also provided some of the comments left by survey respondents. These passenger testimonies include bus drivers being verbally abusive and passengers being physically hurt through bus driver actions. Due to the number of contributions provided and the sensitive nature of some of the comments, I have attached them separately at Annex B.

3.2 RNIB

The Royal National Institute of Blind People (RNIB) state that their recent 'Stop for Me, Speak to Me' campaign highlights many of the problems blind and partially sighted people face on a daily basis when trying to use bus and that changes to bus driver behaviour can have a big impact.

RNIB claim that bus companies already investing in good quality disability awareness training have a reputation for being the better bus services amongst blind and partially sighted people, including Kinch and Trent Barton buses, Reading buses and the companies operating through TfL in London.

The RNIB suggest their 'Swap with Me' events have demonstrated the vital role engaging with blind and partially people has in educating drivers as RNIB members have reported improvements in bus driver behaviour after swap with

me events are held and First Group have used their experiences to develop a case study to promote to other regions.

Although they welcome the introduction of disability awareness training to the Driver CPC training programme, RNIB do not feel this goes far enough as it is not compulsory and the quality and consistency of the CPC based disability training is not monitored.

They are concerned that there is no nationally recognized accredited disability awareness training for transport providers and therefore believe it is especially important that bus operators consider the quality of their training carefully. Their view is that best practice would be to involve disabled people and their organizations in the creation of, development and delivery of disability awareness training.

RNIB do not believe that mandatory disability awareness training will disadvantage UK bus operators as they claim that France and Slovakia have already enacted the EU regulation. Also, some smaller bus companies are already meeting the EU regulation and are being put at a disadvantage by some of their larger competitors who can get away with not providing this kind of training. By removing the exemption, a level playing field would be created within the UK meaning that all bus companies no matter how large or small would have to invest in supporting their staff to meet the needs of blind and partially sighted passengers.

3.3 Action on Hearing Loss

Action on Hearing Loss (AHL) is the UK's largest membership charity supporting people who are deaf or hard of hearing.

AHL have stated that adequate training in disability awareness is essential in order for bus drivers to understand the barriers that different passenger groups face when traveling and to equip them with the confidence and the skills to provide a high quality service to their passengers.

AHL have pointed out that bus drivers play an important role in the passenger experience and are a vital point of contact for passengers to access travel and journey information. When they have asked for feedback from their members and supporters, AHL have been told that there can be a great deal of variation in the attitudes and awareness of bus drivers towards the issue of hearing loss.

AHL research suggests that bus drivers do not always know how to communicate well with people with hearing loss and in some cases complaints have been made by members concerning the unhelpful attitude of drivers and their unwillingness to offer assistance.

AHL feel it is likely that the non-mandatory approach to disability awareness training contributes to the variation in standards experienced by people with

hearing loss when travelling by bus. They feel the exemption sends a message that this type of training is not a priority and question whether the exemption encourages operators to undertake sufficiently comprehensive disability awareness training.

While CPT have previously indicated that 75% of drivers have undertaken this training, AHL are concerned that an indication of the level of comprehensiveness of this training is not provided.

In considering how disability awareness training is delivered, AHL would like to see some consistency, for example through establishing minimum requirements for disability awareness training and an emphasis on effective communication. They are also keen for bus and coach operators to involve disability stakeholders and specialist providers in the provision of disability awareness training wherever possible.

AHL themselves are able to offer a variety of training with flexible course options to meet the specific requirements of individual organisations including an introduction to British Sign Language communication.

3.4 Trailblazers

Trailblazers is a group of disabled campaigners from across the UK who tackle the social issues affecting young disabled people.

Trailblazer's members across the UK are reporting that they are experiencing problems when trying to use the bus in their local area. They believe that problems would be minimised if public transport staff, and in particular the drivers had more awareness of disability and could be held accountable for their attitude towards disabled passengers.

Some of the issues that Trailblazers are reporting include:

- Bus drivers claiming that the bus is full and so will not let a wheelchair user on board even when there is space
- The bus driver refusing to insist that the owner of a pram folds it up to accommodate a wheelchair user even if this is the bus operator's policy
- Bus drivers claiming that the ramp is not working and not checking if it works
- Drivers not stopping close to the curb making it difficult for ambulant disabled people as well as wheelchair users to board and alight
- In one third of journeys undertaken by Trailblazers the respondents said that the driver was not helpful.
- In one in three of the journeys made by Trailblazers the survey respondent was unable to board the first relevant bus to arrive at their stop.

If bus drivers had mandatory disability training, Trailblazers feel that disabled people would find fewer barriers and better attitudes when they choose to take public transport. Also, disabled people would feel more confident in exploring the use of buses as a potential transport option, and not feel deterred in using the bus if the journey doesn't go smoothly.

As buses become more accessible, Trailblazers feel it is imperative drivers know how to utilise this new equipment. Training for disability awareness should be central part of the driver role, as an integral part of customer service and passenger experience.

3.5 Mobility and Access Committee Scotland (MACS)

In the personal view of John Ballantine of the Mobility and Access Committee Scotland (MACS), the case for the continuation of the exemption has not been made.

He states that the need for disability awareness training continues to be demonstrated by the number of complaints from disabled people regarding the poor attitudes displayed towards them by bus and coach drivers.