

Title: Accessible Information Requirement Consultation on Secondary Legislation IA No: RPC Reference No: Lead department or agency: Department for Transport Other departments or agencies:	Impact Assessment (IA)			
	Date:			
	Stage: Final			
	Source of intervention: Domestic			
	Type of measure: Secondary legislation			
Contact for enquiries: Robert Johnson Robert.Johnson@df.t.gsi.gov.uk				
Summary: Intervention and Options			RPC Opinion: Awaiting scrutiny	

Cost of Preferred (or more likely) Option				
Total Net Present Value	Business Net Present Value	Net cost to business per year (EANDCB in 2014 prices)	One-In, Three-Out In scope	Business Impact Target Status
£2726m	£2.6m	£16.5m		Qualifying provision

What is the problem under consideration? Why is government intervention necessary?

Audible and visible information provided on buses can help disabled people, as well as other passengers to feel confident when taking the bus. Despite this, provision of such services in the de-regulated bus market outside of London is low. There are positive benefits to society from the provision of such services mainly in the form of social inclusion. It benefits people who rely on buses to travel but who are often prevented from using them because of the lack of such services. However, it may not be in the commercial interest of all private operators or private operators may not be aware of the commercial benefits of providing audible and visible information. Government intervention is necessary to address this equity issue.

What are the policy objectives and the intended effects?

The overall aim is to ensure that disabled people have the information they need on board to travel by bus with confidence. Specifically, we wish to ensure that people with a range of impairments, and those who are not disabled, can travel in safety and with confidence, whilst giving bus operators the flexibility to choose solutions which will work for them. The intervention is expected to increase bus patronage by improving the ease of travelling by bus for all people. It will specifically increase the accessibility of buses for disabled people and thereby improve their access to employment and services, and their general independence.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

1. Do nothing: Operators continue to have discretion over all aspects of information provision.
2. Industry led code of practice with Government accreditation to incentivise adherence.
3. Accessible Information Requirement affecting all local services, with delayed requirement for older buses, and small operators (Preferred Option)
4. Accessible Information Requirement with exception for existing buses owned by small operators
5. Accessible Information Requirement with delayed requirement for all operators

Will the policy be reviewed? It will/not be reviewed. If applicable, set review date:						
Does implementation go beyond minimum EU/International requirements?			Yes			
Are any of these organisations in scope?			Micro Yes	Small Yes	Medium Yes	Large Yes
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)			Traded: N/A		Non-traded: N/A	

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister: _____ Date: _____

Summary: Analysis & Evidence

Policy Option 3 (Preferred)

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2014	PV Base Year 2015	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: £1,345m	High: £4,165	Best Estimate: £2,726

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	£12.1m	£8.8m	£100.3m
High	£62.4m	£18.1m	£243.1m
Best Estimate	£36.8m	£14.8m	£184.9m

Description and scale of key monetised costs by 'main affected groups'

Costs to bus operators: Familiarisation costs (£0.04m), Equipment costs (£34.1m), Installation costs (£2.6m), Back office costs (£136.8m) **Cost to government:** Reduction in indirect tax revenue (£11.3m)

Other key non-monetised costs by 'main affected groups'

Traffic commissioners: Costs of enforcing requirement

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0	£143.9m	£1439m
High	0	£439.1m	£4391m
Best Estimate	0	£290.0m	£2900m

Description and scale of key monetised benefits by 'main affected groups'

Bus users: Benefits from improved journey quality (£1,376m-£4,052m) Bus operators: Increased profits as a result of increased patronage (£20m-£175m); Advertising benefits (£35m-£137m). Government: Indirect tax disbenefits (£6m-£17m). Wider society: Impacts associated with net additional bus kms travelled including congestion impacts and infrastructure impacts (£14m to £42m)

Other key non-monetised benefits by 'main affected groups'

Key assumptions/sensitivities/risks

Discount rate (%)

3.5

The biggest uncertainty is around the number of buses in which operators would install audio-visual technology (AV) under business as usual. The evidence on this is weak and so a range of values have been used in the high, low and best estimate scenarios presented to reflect the uncertainty in this key factor. Other assumptions for which there is poor evidence have also been varied between the three scenarios presented.

BUSINESS ASSESSMENT (Option 3)

Direct impact on business (Annualised) £m:			Score for Business Impact Target (qualifying provisions only) £m: 82.5
Costs: 16.5	Benefits: 0	Net: -16.5	

Summary: Analysis & Evidence

Policy Option 4

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2014	PV Base Year 2015	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: £1,674m	High: £4,951m	Best Estimate: £3,272m

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	£13.0m	£11m	£123.5m
High	£64.3m	£21.6m	£280.1m
Best Estimate	£38.4m	£17.8m	£216.7m

Description and scale of key monetised costs by 'main affected groups'

Costs to bus operators: Familiarisation costs (£0.04m), Equipment costs (£35.6m), Installation costs (£2.8m), Back office costs (£164.0m) **Cost to government:** Reduction in indirect tax revenue (£14.3m)

Other key non-monetised costs by 'main affected groups'

Traffic commissioners: Costs of enforcing requirement

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0	£143.9m	£1439m
High	0	£439.1m	£4391m
Best Estimate	0	£290.0m	£2900m

Description and scale of key monetised benefits by 'main affected groups'

Bus users: Benefits from improved journey quality (£1,710m-£4,802m) Bus operators: Increased profits as a result of increased patronage (£26m-£212m); Advertising benefits (£44m-168m). Wider society: Impacts associated with net additional bus kms travelled including congestion impacts and infrastructure impacts (£17m to £49m)

Other key non-monetised benefits by 'main affected groups'

Key assumptions/sensitivities/risks

Discount rate (%)

3.5

The biggest uncertainty is around the number of buses in which operators would install audio-visual technology (AV) under business as usual. The evidence on this is weak and so a range of values have been used in the high, low and best estimate scenarios presented to reflect the uncertainty in this key factor. Other assumptions for which there is poor evidence have also been varied between the three scenarios presented.

BUSINESS ASSESSMENT (Option 4)

Direct impact on business (Annualised) £m:			Score for Business Impact Target (qualifying provisions only) £m: 98.5
Costs: 19.7	Benefits:	Net: -19.7	

Summary: Analysis & Evidence

Policy Option 5

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year	PV Base Year	Time Period	Net Benefit (Present Value (PV)) (£m)		
			Low: £650m	High: £2,338	Best Estimate: £1,504

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant)	Total Cost (Present Value)
Low	£9.6m	£4.2m	£51.4m
High	£54.8m	£10.4m	£114.7m
Best Estimate	£32.1m	£8.3m	£159.2m

Description and scale of key monetised costs by 'main affected groups'

Costs to bus operators: Familiarisation costs (£0.04m), Equipment costs (£29.8m), Installation costs (£2.3m), Back office costs (£77.4m) **Cost to government:** Reduction in indirect tax revenue (£14.3m)

Other key non-monetised costs by 'main affected groups'

Traffic commissioners: Costs of enforcing requirement

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant)	Total Benefit (Present Value)
Low	Optional	£143.9m	£1439m
High	Optional	£439.1m	£4391m
Best Estimate		£290.0m	£2900m

Description and scale of key monetised benefits by 'main affected groups'

Bus users: Benefits from improved journey quality (£650m-£2338m) Bus operators: Increased profits as a result of increased patronage (£9m-£99m); Advertising benefits (£16m-76m). Wider society: Impacts associated with net additional bus kms travelled including congestion impacts and infrastructure impacts (£7m to £27m)

Other key non-monetised benefits by 'main affected groups'

Key assumptions/sensitivities/risks

3.5

The biggest uncertainty is around the number of buses in which operators would install audio-visual technology (AV) under business as usual. The evidence on this is weak and so a range of values have been used in the high, low and best estimate scenarios presented to reflect the uncertainty in this key factor. Other assumptions for which there is poor evidence have also been varied between the three scenarios presented.

BUSINESS ASSESSMENT (Option 5)

Direct impact on business (Annualised) £m:			Score for Business Impact Target (qualifying provisions only) £m: 47.5
Costs: 9.5	Benefits:	Net: -9.5	

Evidence Base (for summary sheets)

1. Background

The Public Service Vehicles Accessibility Regulations 2000 (PSVAR) prompted a revolution in the accessibility of bus and coach services for disabled people and others with reduced mobility. Introducing for the first time, legal requirements for the provision of a designated wheelchair space and boarding facilities, priority seating, colour-contrasting handholds and a range of other features to help disabled people to travel in safety and comfort, it began a process which by 2017 saw 94% of buses in England meeting accessibility standards¹. Unlike its equivalent in the railway sector, the Rail Vehicle Accessibility Regulations, PSVAR did not include any requirement for the provision of accessible information on-board buses – due in part to a lack of development in technological solutions for providing it.

Accessible information can help a range of passengers to feel more confident when using bus services. This includes tourists, people new to an area or bus route, older people, and those who are disabled. For many disabled people in-particular accessible information is not just a nice-to-have, but can be vital in giving them confidence in their ability to complete journeys safely and independently, free from the fear of alighting at the wrong stop and being left stranded in an unfamiliar location.

The Guide Dogs for the Blind Association (“Guide Dogs”) has campaigned for many years for PSVAR to be amended to require the installation on new vehicles of equipment to provide audible and visible next stop announcements. Their “Talking Buses” campaign has focused particularly on the impact that a lack of accessible information has on the ability of blind and partially sighted people to travel independently. A 2014 survey found that seven in ten blind and partially sighted people had experienced a bus driver forgetting to inform them when their stop was reached, and 23% of disabled respondents had been left more than a mile from their intended destination having missed their stop.² More recently Guide Dogs has acted as a conduit for the perspectives of a range of representative organisations interested in supporting an expansion in the provision of accessible information. In so doing, they demonstrated how accessible on-board information has the potential to benefit a much wider group of disabled people, and others with impairments which affect their ability to travel but who might not consider themselves to be disabled. Examples include people with hearing and cognitive impairments, learning disability or mental illness. With a growing population the incidence of both diagnosed and undiagnosed disability will likely increase and the availability of accessible on-board information could help many people to remain independent.

Prior to the Bus Services Bill Government resisted calls to require the installation on buses, existing or new, of equipment to provide next stop information, on the grounds that doing so would place an unjustified and disproportionate financial burden on bus operators, and could potentially jeopardise the viability of marginal routes run by operators which are Small or Medium Enterprises (SMEs). A Real Time Information Group (RTIG) report in 2010 estimated the whole life cost of installing audio and visual equipment on a large operator owned bus to be around £11,500 per vehicle, including both up front and back office management costs³. A large transport operator has subsequently indicated that these estimates remain roughly accurate today, in 2017, though they may be lower when spread across the life of the equipment rather than the vehicle.

¹ DfT bus statistics 2015, Table BUS0603

² Guide Dogs (2014) ‘Destination Unknown: An investigation into bus passenger experiences’

³ RTiG (2010) ‘Audio/Visual on buses: Cost model’

There are however now a range of approaches for providing audible and visible information, using different technologies and at a variety of price points. Whilst traditional systems, either fitted by the vehicle manufacturer or retrofitted for the operator, remain the approach of choice for delivering information in a manner which fits with an operator's brand image, lower cost solutions are also available. These include all-in-one solutions and tablets linked to inexpensive screens and speakers. At least one bus operator has augmented their audible and visible information with advertisements, partly subsidising the associated running costs.

At its most rudimentary however, accessible information needn't involve complex and expensive technology, but rely instead on bus driver announcements and simple visual displays – and bus operators are best placed to determine which solutions work best for them.

Whilst we remain of the view that mandating specific equipment would be burdensome for some operators, we believe that a technology-neutral accessible information requirement will strike an appropriate balance between encouraging bus patronage, particularly amongst disabled passengers, and ensuring that operators and the technology market have the flexibility to innovate in the development of new, low-cost solutions for providing accessible on-board information.

2. Rationale for intervention

The Department for Transport is committed to providing transport networks which work for everyone, including ensuring that disabled people have the same access to transport services as other members of society. As part of this work, it consulted in 2017 on an Accessibility Action Plan to contribute to the Government's stated aim of halving the disability employment gap – the difference between the employment rates for disabled and non-disabled people which, at the end of 2015 stood at 33%.

The Purple Pound, the annual spending power of disabled people and their families, has been estimated at £212bn, yet all too often disabled people are unable to reach the places they want to go. Bus services connect people with jobs, shops, social and leisure activities and for people in rural and isolated communities, and those who are disabled, can provide a lifeline, facilitating economic activity, promoting health and wellbeing.

Yet buses are often seen as difficult to use for those unfamiliar with a route, new to an area, or simply not wishing to spend an entire journey peering out the window lest they miss their stop. For many disabled people, as indicated above, the lack of information on many services outside London can prevent them from boarding in the first place, for fear that the driver will forget to notify them as their destination approaches and that they will be left stranded in an unfamiliar and potentially unsafe location. The inconvenience of alighting at the wrong stop may be exacerbated significantly for some disabled passengers, who may not immediately recognise the mistake or be able to rectify it. For those with sensory and cognitive impairments, learning disabilities and mental illness, consistent accessible information can provide much needed reassurance and a structure for journeys, helping them to gain confidence in their ability to travel independently.

The technology to provide automated on-board announcements has been available for over a decade, and is now used on virtually all services in London, as well as in a small number of urban areas, including Brighton, Reading, Nottingham and Blackpool. The introduction of Welsh Quality Standards in Wales has also prompted a gradual increase in the availability of audible and visible information. More rudimentary approaches, relying on drivers to make announcements themselves have been possible for much longer. Yet, the de-regulated bus market outside London has not delivered improvements in accessible on-board information

in any large scale way as provision of such services continues to be viewed as commercially unviable or unnecessary by many operators (unpublished DfT bus statistics show that in 2014, over 95% of buses in London were equipped with AV technology compared to fewer than 15% of buses in England outside of London)⁴. Therefore despite the social inclusion benefits associated with the provision of such services, there is a low level of provision in Great Britain outside of London. This means that those for whom a lack of information presents a barrier to access and those who depend on the bus as their sole mode of transport continue to be disadvantaged.

By intervening to correct for this equity issue we intend to ensure that disabled passengers, and others for whom accessible information supports their travelling experience, have the information they need in order to have confidence in their ability to travel safely by bus – to enable them to reach employment opportunities, visit the shops, meet friends and engage with their local and wider communities. Such an intervention will provide strong support to the Department's overall efforts to improve the accessibility of transport services for disabled people and the growing older population, contributing to efforts to close the disability employment gap and promoting transport options for everyone.

3. Policy Objective

The over-arching objective of the policy is to ensure that disabled bus passengers have sufficient information to travel in confidence when using bus services, to improve access to employment opportunities and economic, social and leisure activities, supporting economic growth and promoting personal wellbeing.

In particular we want to ensure that disabled passengers, including those who are visually impaired, can be sure that appropriate accessible information will be available on-board services, to give them the confidence to travel independently. In doing so, we also want to ensure that bus operators maintain the flexibility to innovate in the provision of accessible information, choosing the right solution for their individual circumstances, and taking advantage of synergies with efforts to increase the availability of open data.

In parallel with the development of the Accessible Information Regulations Government is preparing to consult on Open Data Regulations which will require the collation of specific forms of data relating to the provision of local bus services, and its provision to information service providers through open feeds. In some circumstances the provision of live data will augment static information on upcoming stops provided in standard audible and visible information systems, supporting customers to make informed travel choices. Equipment installed on vehicles to collate live data may also provide information to audible and visible information systems, reducing duplication of functions and the need for parallel systems.

4. Stakeholder engagement

⁴ To date, the statistics relating to this question have not been published by the Department because of concerns about the robustness of the data. The figures presented here, therefore, should only be seen as a broad indication of the large difference in AV provision on buses in England outside of London and London

The original powers to introduce an Accessible Information Requirement were developed as a Government amendment to the Bus Services Bill, whilst it was progressing through the House of Lords. This constrained the scope of consultation undertaken at the time. We gave assurances however, that stakeholders would be engaged in a meaningful manner during the development of the implementing Regulations and supporting guidance. In exercising the Regulatory powers the Secretary of State has a legal duty to consult with Scottish and Welsh Ministers.

We are fulfilling this commitment in two ways.

During the initial phase of policy development for the Regulations we have met with a broad range of stakeholders, including transport operators and authorities, equipment manufacturers, local authorities and disabled people, in England, Scotland and Wales, in order to understand existing experiences of accessible information provision, and expectations and priorities for the new requirement.

In late spring 2018 we plan to undertake a public consultation, in conjunction with a consultation exercise on the implementation of open data powers, also in the Bus Services Act. The consultation will actively seek input from all stakeholder groups affected, with the aim of informing the detailed development of policy relating to the new requirement itself, and the manner in which it is introduced to the market.

Throughout, we will continue to engage with our core partners, including the Disabled Persons' Transport Advisory Committee, the Confederation of Passenger Transport, and the Devolved Administrations in order to ensure that the end solution meets the needs of passengers, can be implemented by operators without endangering marginal services, and reflects the differences in bus markets and passenger priorities between England, Scotland, and Wales.

5. Options under consideration

Five core options have been considered in response to the policy objectives outlined above.

5.1 Policy option 1: Do nothing

Description

Under Option 1, no intervention would be made, meaning bus operators will continue to provide audio visual announcement services where this is deemed commercially sensible, socially responsible or a core element of a quality service. Uptake has been relatively slow under the status quo and is expected to continue to be so under this option.

Effect

In practice this option would likely result in a continuation of the present situation, with accessible information provided, mainly through traditional audio and visual systems by the largest operators and those operating in a buoyant market. Anecdotally we understand that whilst operators see value in AV systems as part of delivering a quality product to customers it is generally felt that the service has little effect on farebox revenue and that it is therefore difficult to make a case for its provision in its own right. This perspective is not shared by every operator however, and it is likely that a small number would continue to maintain existing systems or implement new ones.

As previously indicated we understand that many disabled people, and indeed some non-disabled passengers, lack confidence to travel by bus, because of a perceived absence of information to enable them to identify the route they are on and upcoming stops.⁵ We believe that doing nothing would result in a continued focus on AV provision for premium services and those in strong bus markets, resulting in an inconsistent resolution of such concerns and considerable difference in resulting access to transport for affected groups across the country.

Benefits and Disbenefits

Cost	Not applicable. This option involves maintaining the status quo, and there is therefore no associated cost.
Ease of implementation	Not applicable. This option involves maintaining the status quo.
Policy impact	This option involves maintaining the status quo. This would result in passengers continuing to experience limited benefits owing to the voluntary provision by operators of audible and visible information. However, provision of accessible information is likely to remain inconsistent and at relatively low levels for the foreseeable future. This would in turn continue to inhibit the confidence of some passengers to travel by bus.
Accessibility impact and reaction	Government would be criticised for failing to follow through on a commitment given during the passage of the Bus Services Bill, and repeated subsequently in Parliament and the draft Accessibility Action Plan to use the powers to improve the availability of on-board information across Great Britain. Disabled people would continue to face barriers accessing bus services owing to a lack of accessible on-board information on the majority of services, and the inconsistency of provision across Great Britain.
Bus industry impact and reaction	This option involves maintaining the status quo and there is therefore no intervention-related impact on the bus industry. The bus industry would likely welcome a continuation of the status quo, enabling operators to determine the appropriate level of on-board information provided based on business need.

Conclusion

Whilst doing nothing would not necessarily result in a standstill in the provision of accessible information experience to date suggests that growth in its provision is likely to remain slow and inconsistent, meaning that passengers, including those who are disabled, will continue to face uncertainty about information provided on-board services.

⁵ Guide Dogs (2014) 'Destination Unknown: An investigation into bus passenger experiences'

On this basis we do not feel that doing nothing is a viable option for achieving our policy aims.

Option 1 is the counterfactual against which the other options will be assessed.

5.2 Policy option 2: Incentivised Code of Practice

Description

Option 2 would involve working with industry bodies, such as the Confederation of Passenger Transport (CPT) to develop and implement a Code of Practice on the provision of accessible information on-board bus services. Adherence to the Code would be encouraged through the creation of an accreditation scheme, awarding signatory operators with a “mark” or award to highlight their commitment.

Effect

An existing Code of Practice on the carriage of scooters on-board buses, developed with and marketed by CPT, has had some success in embedding a more consistent approach to the assessment and acceptance of scooters and the training of their users across parts of the bus industry. Adherence with it requires little financial investment on the part of operators however, and nor does it affect their core offering for the majority of customers. Further, whilst adopted widely it is by no means universal in its coverage of the UK bus sector.

Given this, we do not believe that a Code of Practice would achieve the level of coverage sought. It is likely that operators that currently believe the cost of installing equipment to provide accessible information is unjustifiable would continue to do so, and that those which do not see it as an integral aspect of their product would be unlikely to change their minds. Those operators which already take a proactive approach to information provision and accessibility conversely, would likely adopt the Code, and benefit from the accreditation system.

Further, adherence with the Code of Practice would likely be difficult to audit without significant resourcing, with potential negative reputational consequences for Government or other related bodies, if publicly supporting an accreditation scheme seen to be unreliable.

It is possible that a variant of this option could support early adoption of systems providing audible and visible information applying to operators ahead of any legislative requirement taking effect, but the impact of this is likely to be limited.

Benefits and Disbenefits

Cost	Benefit Operators would continue to make decisions about the level of accessible information provided on the basis of business factors, so there would be little cost to the industry. There would likely be some cost to Government or industry bodies from operating an accreditation system.
Ease of implementation	Disbenefit It would take time to develop, consult on and implement both a Code of Practice and accreditation scheme, potentially longer than the

	<p>time required to introduce secondary legislation from this point. It is unlikely that legislation would be required however.</p> <p>It is likely that it would take time for use of the Code to become normalised within the industry, with some operators potentially waiting until the effect of the accreditation scheme has been demonstrated.</p>
Policy impact	<p>Disbenefit</p> <p>Whilst comparable Codes of Practice have had some success in encouraging change we believe this would be unlikely in this circumstance due to the widespread belief amongst some operators of a lack of commercial viability for systems providing audible and visible information. It is possible that a gradual increase in the provision of accessible information may be observed, but coverage would likely remain inconsistent, leaving the policy aims unmet for some time to come.</p>
Accessibility impact	<p>Disbenefit</p> <p>Government would be seen to take some action on the issue of improving on-board information, however it would face significant criticism for failing to follow-through on commitments given during the passage of the Bus Services Bill, and repeated subsequently in Parliament and the draft Accessibility Action Plan. The provision of on-board information would also likely remain patchy, potentially reducing the confidence-improving potential of the overall policy.</p>
Bus industry impact	<p>Benefit</p> <p>Such an approach would likely be welcomed cautiously by the bus industry on the basis that it would provide a framework helping those wishing to improve their on-board information to do so. There would be few negative consequences as the provision of accessible information would remain voluntary, although the industry as a whole would not benefit from the benefits that the consistent provision of audible and visible information would provide.</p>

Conclusion

Whilst this option could prompt and increase in the availability of accessible information on buses this is likely to remain inconsistent across the country, and therefore fail to give passengers confidence in the majority of services providing it. Further, the proposed accreditation scheme, required in order to incentivise adoption of the Code, would require a level of resourcing comparable to that for enforcing Regulatory compliance, but without the benefits that a legislative approach could render.

We therefore do not believe that this option could fulfil our policy aims.

5.3 Policy option 3: Accessible Information Requirement implementation determined by size of operator and age of vehicle

Description

Options 3, 4 and 5 have the same core approach, but are differentiated by the method and speed of implementation.

Core Approach

Option 3 would require the provision of audible and visible information on local bus services throughout Great Britain, except for those operated under Section 19 and 22 Permits, heritage vehicles, tour services and vehicles designed to carry fewer than seventeen passengers, which would be exempted from the requirement (in full for all except heritage vehicles). The points at which information must be provided and the standards that information should meet would be prescribed in Regulations. Services in Wales would need to meet Welsh language requirements but application in Scotland and Wales would otherwise be identical to England.

Implementation Approach

Application of the requirement would be delayed from the date of Commencement for between two and six years depending upon the size of operator and age of the vehicle in question in order to give operators of less profitable routes more time to plan for their compliance. Details of the implementation timescales are summarised below:

- Standard Operators (>20 Vehicles).
 - Vehicles first used after 5th April 2014:
2 years to comply following commencement.
 - Vehicles first used between 6th April 2012 and 5th April 2014:
4 years to comply following commencement.
 - Vehicles first used on or before 5th April 2012:
6 years to comply following Commencement.
- Small Operators (<21 Vehicles).
 - Vehicles first used on or after 6th April 2019:
2 years to comply following Commencement.
 - Vehicles first used before 6th April 2019:
6 years to comply from Commencement.

Subject to the available powers we are proposing that operators moving from being “small” to “standard” by this measure are given an additional six months to comply for vehicles first used after 5th April 2012 in order to cushion the transition and limit disincentives to growing the business.

Effect

Option 3 is intended to introduce the requirement in a proportionate manner, prioritising early compliance by larger operators and those purchasing new vehicles, whilst recognising that smaller operators and those relying upon older vehicles may need longer to prepare for implementation and to reflect any additional costs in their business models. The implementation timescales for larger operators are intended to ensure that vehicles within four years of an average fifteen year vehicle life do not need to comply, unless retained in service beyond this period.

Within six **years** passengers travelling in Great Britain would be able to travel with confidence that virtually every service will incorporate audible and visible information provision, and those travelling with larger operators, or those which use more modern vehicles, will be able to expect it earlier. Whilst provision would be inconsistent between the two and six year points, potentially detracting from some of the benefits, particularly for disabled travellers using a variety of services, the overall implementation period would remain relatively fast.

We also expect that this option would allow different parts of the industry to adjust to the new requirements, either in updating the specification of new vehicles, or in retrofitting existing ones. The implementation timescales recognise that it is unlikely to be economically feasible to retrofit vehicles nearing the end of their life (assumed to be fifteen years), whilst not providing a blanket exemption for vehicles that remain in service for considerably longer.

Benefits and Disbenefits

<p>Cost</p>	<p>Partial Benefit</p> <p>Overall the Accessible Information Regulations would result in increased one-off and ongoing costs for bus operators, relating to the installation of equipment to provide audible and visible information, its maintenance and associated back office tasks. The benefit to larger operators of providing audible and visible information is however significant, owing in part to consequent increases in patronage. It is also anticipated that options 3, 4, and 5 would stimulate growth in the market for technology providing audible and visible information, and reducing the cost of associated products.</p> <p>. Relative to the other legislative options the timing of this option focuses short term costs on those areas of the industry where it is likely to be manageable. The cost of incorporating systems to provide audible and visible information are likely to be lower as a proportion of the value of new and nearly new vehicles, than as a proportion of the value of older vehicles, and the timescales indicated are intended to reflect this difference. This option would also provide smaller operators and those reliant on older vehicles with more time to comply, enabling them to spread related upfront costs and to build ongoing ones into their business model.</p> <p>There would however remain some risk that the most marginal of services would continue to face disproportionate costs, particularly those relating to the provision of associated back office services.</p>
<p>Ease of implementation</p>	<p>Benefit.</p> <p>This option would use the powers at s17 of the Bus Services Act to make Accessible Information regulations and associated guidance.</p>

	<p>We would subsequently support the bus industry, representative organisations and the Traffic Commissioner to implement and enforce the requirements.</p>
Policy impact	<p>Benefit.</p> <p>The core aims of the policy would be achieved, particularly in relation to the provision of a technology neutral, consistently applied requirement, available to passengers within a relatively short period of time, providing the information necessary for passengers to feel more confident when travelling by bus.</p> <p>It would also support the bus industry to respond to the requirement, requiring those operators able to invest in the provision of information to do so, and giving others longer to comply, mitigating some of the negative effect of the additional costs they would incur.</p> <p>There would however remain some residual risk that operators of the most marginal of services would not be able to absorb the related costs, and that bus networks would contract as a result.</p>
Accessibility impact	<p>Benefit</p> <p>The core approach would be welcomed by representatives of disabled people as it would help to remove a significant barrier preventing many people from accessing bus services and the employment, social and leisure activities to which they facilitate access.</p> <p>Relative to the other legislative options organisations representing disabled people may question the inconsistency of application between years two and six, and the extended implementation period in general. Given that the original ask from some such organisations was only for a requirement affecting new vehicles it is hoped that such criticism will be minimal.</p> <p>The impact of the delay to implementation for “Small Operators” is also likely to be minimal, with the majority of passenger journeys taking place on services operated by “Standard Operators”.</p>
Bus industry impact	<p>Partial benefit</p> <p>The approach is likely to be accepted by those areas of the bus industry where the provision of audible and visible information is becoming a more viable proposition. The industry as a whole will however likely be concerned at the speed of implementation, and on the effects on marginal routes regardless of the size of operator. It is hoped however that the technology neutral approach will enable operators to innovate in the provision of audible and visible information and so constrain associated costs. It is also hoped that the widespread provision of accessible information will make travelling by bus a more natural proposition for many people beyond the target group for this policy, leading to higher bus usage and farebox revenue.</p>

	Relative to the other legislative options this option should be welcomed for its recognition of the challenge that smaller operators and those reliant on older vehicles would face in absorbing additional costs. They may however feel that the extended timescales are insufficient and that, in any case, even larger operators will struggle to justify the related costs for marginal routes that they operate.
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Conclusion

Option 3 balances the need to make swift progress in providing audible and visible information consistently across the Great Britain bus network, with realistic timescales for operators to respond. There may still be some risk to more marginal operators, but it is expected that the technology neutral approach and consequent development of cheaper approaches for providing accessible information would mitigate this.

Option 3 is therefore our preferred option.

5.4 Policy option 4: Accessible Information Requirement excluding smaller operators

Description

Options 3, 4 and 5 have the same core approach, but are differentiated by the method and speed of implementation.

Core Approach

Option 4 would require the provision of audible and visible information on local bus services throughout Great Britain, except for those operated under Section 19 and 22 Permits, heritage vehicles, tour services and vehicles designed to carry fewer than seventeen passengers, which would be exempted from the requirement (in full for all except heritage vehicles). The points at which information must be provided and the standards that information should meet would be prescribed in Regulations. Services in Wales would need to meet Welsh language requirements but application in Scotland and Wales would otherwise be identical to England.

Implementation Approach

Under this option the application of the Requirement would be determined by the size of an operator and the age of vehicles used, with the smallest operators exempted from providing audible and visible information at all. The implementation approach is summarised below:

- Standard Operators (>20 Vehicles).
 - All vehicles:
 - 2 years to comply following commencement.
- Small Operators (<21 Vehicles).
 - Vehicles first used on or after 6th April 2019:
 - 2 years to comply following Commencement.

- Vehicles first used before 6th April 2019:
No requirement to comply.

Subject to the available powers we are proposing that operators moving from being “small” to “standard” by this measure are given an additional six months to comply for vehicles first used after 5th April 2012 in order to cushion the transition and limit disincentives to growing businesses.

Effect

This option requires a consistent level of accessible information provision across medium to large fleets within a relatively short period of time, whilst acknowledging the risk that associated financial burdens could impose on operators of marginal routes, by exempting the smallest operators almost entirely from the requirement. All vehicles used on or after the date of Commencement would still be required to incorporate audible and visible information provision, on the basis that operators able to purchase new or nearly new vehicles are likely to be able to afford the proportionately small additional cost of providing accessible information, regardless of their fleet size.

By focusing predominantly on the size of the operator this option would result in consistent information provision across individual fleets, enabling passengers to be more confident when boarding buses operated by a given company. It would also potentially result in a trickling down of vehicles equipped to provide accessible information as they reach the end of their service life with larger operators. There would however remain a significant number of operators, largely responsible for more marginal, isolated routes, which would not need to comply, potentially withholding the benefits of improved information from passengers in the areas where it is most needed. Whilst a passenger alighting at the wrong location in an urban area may be only a matter of metres from their intended destination, stops in rural areas may be miles apart.

It is also likely that, within the body of operators identified as “Standard Operators” there will be some operating on marginal routes where significant investment in audible and visible information systems would be unfeasible, and likewise, smaller operators which already provide accessible information on their services. The twenty vehicle threshold could therefore appear arbitrary, and may not succeed in mitigating the negative effects of the introduction of this measure.

Benefits and Disbenefits

Cost	<p>Partial Benefit</p> <p>Overall the Accessible Information Regulations would result in increased one-off and ongoing costs for bus operators, relating to the installation of equipment to provide audible and visible information, its maintenance and associated back office tasks. The benefit to larger operators of providing audible and visible information is however significant, owing in part to consequent increases in patronage. It is also anticipated that options 3, 4, and 5 would stimulate growth in the market for technology providing</p>
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	<p>audible and visible information, and reducing the cost of associated products.</p> <p>Relative to the other legislative options this option focuses the requirement to provide audible and visible information, and therefore the cost of doing so, at the sectors of the bus market where this is likely to be most manageable, whilst excluding smaller operators from the requirement except when operating vehicles first used after the date of Commencement. It is anticipated that this approach will result in costs for larger operators, but that these will reduce over time as the market for related technology is stimulated to innovate, and owing to the need to provide information on a large number of vehicles. The exemption of smaller operators will protect the most marginal of bus routes and operators with low profitability from incurring additional cost. .</p>
Ease of implementation	<p>Benefit.</p> <p>This option would use the powers at s17 of the Bus Services Act to make Accessible Information regulations and associated guidance.</p> <p>We would subsequently support the bus industry, representative organisations and the Traffic Commissioner to implement and enforce the requirements.</p> <p>The exemption of smaller operators could make it challenging to manage expectations publicly and to develop a usable complaints process.</p>
Policy impact	<p>Partial Benefit.</p> <p>Some of the core aims of the policy would be achieved, particularly in relation to the provision of a technology neutral requirement, available to passengers within a relatively short period of time, providing the information necessary for passengers to feel more confident when travelling by bus. The exclusion of smaller operators would however lead to a large number of passengers, particularly in rural and isolated areas, not benefiting from the improvements.</p> <p>It would also support the bus industry to respond to the requirement, requiring those operators able to invest in the provision of information to do so, and excluding those for whom the additional costs would be overly burdensome, protecting the routes they operate from potential cuts.</p> <p>There would however remain some residual risk that marginal routes operated by larger operators would become unsustainable.</p>
Accessibility impact	<p>Benefit</p> <p>The core approach would be welcomed by representatives of disabled people as it would help to remove a significant barrier preventing many people from accessing bus services and the employment, social and leisure activities to which they facilitate access.</p>

	<p>Relative to the other legislative options organisations representing disabled people may criticise the exemption of smaller operators, which operate some of the routes where the risk to passengers of missing their intended stopping place is most significant. Given that the original ask from some such organisations was only for a requirement affecting new vehicles it is hoped that such criticism would be minimal.</p>
<p>Bus industry impact</p>	<p>Partial benefit</p> <p>The approach is likely to be accepted by those areas of the bus industry where the provision of audible and visible information is becoming a more viable proposition. The industry as a whole will however likely be concerned at the speed of implementation, and on the residual effects on marginal routes where these are operated by operators still subject to the requirement. They may also criticise the “all at once” approach for larger operators and question the ability of the supply chain and supporting services to meet demand. It is hoped however that the technology neutral approach will enable operators to innovate in the provision of audible and visible information and so constrain associated costs. It is also hoped that the widespread provision of accessible information will make travelling by bus a more natural proposition for many people beyond the target group for this policy, leading to higher bus usage and farebox revenue.</p>

Conclusion

This option would result in the majority of passenger journeys being undertaken on services incorporating audible and visible information provision within a relatively short period of time. However, it could result in inconsistent provision across the country, with passengers in rural and isolated areas potentially not benefiting from the improvements. Whilst it would remove the risk of disproportionate burdens from the smallest of operators this would not necessarily mitigate the risk of network contraction owing to the operation of marginal routes by operators above the twenty vehicle threshold.

Given the inconsistency of application and the variable efficacy of the burden mitigation measures we do not recommend this option.

5.5 Policy option 5: Accessible Information Requirement: Delayed application for all operators

Description

Options 3, 4 and 5 have the same core approach, but are differentiated by the method and speed of implementation.

Core Approach

Option 5 would require the provision of audible and visible information on local bus services throughout Great Britain, except for those operated under Section 19 and 22 Permits, heritage vehicles, tour services and vehicles designed to carry fewer than seventeen passengers, which would be exempted from the requirement (in full for all except heritage vehicles). The points at which information must be provided and the standards that information should meet would be prescribed in Regulations. Services in Wales would need to meet Welsh language requirements but application in Scotland and Wales would otherwise be identical to England.

Implementation Approach

Under this option implementation would be delayed for a set period for all operators, regardless of size, though services operated by new vehicles would still need to meet the requirement from the date of Commencement. The approach is summarised below:

- All Operators:
 - Vehicles first used after 5th April 2019:
2 years to comply following commencement.
 - Vehicles first used on or before 5th April 2019
6 years to comply following commencement.
- *Effect*
- This option is intended to give all operators, except where they are purchasing new or nearly new vehicles, six years in which to comply with the Regulations, enabling them to spread up-front costs and consider how longer term ones can be included as part of their business model. It makes no differentiation between larger and smaller operators and provides the whole industry with time to plan and prepare for implementation.
- For passengers the result of this approach would be a greater level of consistency in the application of the new requirements, simplifying messaging and supporting the targeting of enforcement activity. It would however also lengthen considerably the delay before the requirements apply to the largest operators and the majority of their vehicles, meaning that passengers for whom the lack of on-board information presents a barrier to their independent access to local bus services, would continue to face this disadvantage.
- Whilst the approach would result in a trickle of vehicles being required to provide audible and visible information between the two and six year points, and so fulfilling manifesto and Parliamentary commitments to make progress in providing such information on bus services, the rate would be relatively low, further delaying the timescale for vehicles equipped to provide required information beginning to cascade down to smaller operators reliant on older vehicles.

Benefits and Disbenefits

Cost	Partial Benefit
	Overall the Accessible Information Regulations would result in increased one-off and ongoing costs for bus operators, relating to

	<p>the installation of equipment to provide audible and visible information, its maintenance and associated back office tasks. The benefit to larger operators of providing audible and visible information is however significant, owing in part to consequent increases in patronage. It is also anticipated that options 3, 4, and 5 would stimulate growth in the market for technology providing audible and visible information, and reducing the cost of associated products.</p> <p>Relative to the other legislative options this option seeks to delay the imposition of costs relating to the provision of audible and visible information for a set period for all operators and the majority of their vehicles. Since the costs are lower as a proportion of the price of new and nearly new vehicles than they are for older buses, this option would continue to require vehicles first used following Commencement to comply after two years.</p> <p>The general implementation period of six years may provide the market for related technology more time in which to develop products which are more innovative or priced at a lower level than those used presently, and for in-vehicle local area networks to become more mature as a proposition, potentially supporting a “plug and play” approach to the installation of audio visual technology and the ability to move it between vehicles with relative ease.</p> <p>This option may however have some negative impacts on cost for those operators using older vehicles – with slower uptake by larger operators meaning that vehicles with facilities to provide required information already installed will take longer to cascade down.</p>
Ease of implementation	<p>Benefit.</p> <p>This option would use the powers at s17 of the Bus Services Act to make Accessible Information regulations and associated guidance. We would subsequently support the bus industry, representative organisations and the Traffic Commissioner to implement and enforce the requirements.</p> <p>The almost uniform implementation timetable would make it simpler to manage the expectations of the public, though there would be a need to explain why it was not possible to implement the requirement in full at an earlier stage.</p>
Policy impact	<p>Partial Benefit.</p> <p>Many of the core aims of the policy would be met, including providing information in a technologically neutral, equitable manner, with a requirement which is generally consistent across operators. Implementation, relative to the other legislative options would however be slower, with even the largest operators not needing to comply for six years, except with respect to their newest vehicles.</p> <p>The effect on passengers would be positive, particularly given the proposed consistent approach across operators, however the delay for larger operators, providing the majority of services, would result in the vast majority of passengers not experiencing significant</p>

	<p>improvements in the provision of information until the conclusion of the six year implementation period.</p> <p>By delaying the application of requirements to all operators this approach would provide smaller companies, including those operating marginal routes, with more time to comply, partly mitigating our priority to avoid the contraction of bus networks as a result of the requirement. It is possible that operators of the most marginal routes would not be able to absorb related costs however, despite the technology-neutral approach and longer implementation timescales.</p>
<p>Accessibility impact</p>	<p>Benefit</p> <p>The core approach would be welcomed by representatives of disabled people as it would help to remove a significant barrier preventing many people from accessing bus services and the employment, social and leisure activities to which they facilitate access.</p> <p>Relative to the other legislative options organisations representing disabled people may criticise the six year delay before the requirement applies to vehicles first used before Commencement. However, given that the original ask of Government was for related equipment to become a mandatory requirement for new vehicles only, it is felt that such a response would be unjustified. Whilst this approach would provide more consistency in the application of requirements, compared to the other two legislative ones, there remains potential for criticism at the different timescales applicable to new and old vehicles.</p>
<p>Bus industry impact</p>	<p>Partial benefit</p> <p>The approach is likely to be accepted by those areas of the bus industry where the provision of audible and visible information is becoming a more viable proposition. The industry as a whole will however likely be concerned at the speed of implementation, particularly for newer vehicles, and at the lack of differentiation between marginal and non-marginal routes.</p> <p>Relative to the other legislative options the industry would likely welcome the additional time for larger operators to comply. They may however, also criticise the “all at once” approach and question the ability of the supply chain and supporting services to meet demand. It is hoped however that the technology neutral approach will enable operators to innovate in the provision of audible and visible information and so constrain associated costs. It is also hoped that the widespread provision of accessible information will make travelling by bus a more natural proposition for many people beyond the target group for this policy, leading to higher bus usage and farebox revenue.</p> <p>Finally, it is also hoped that, given additional time to prepare, operators may not wait until legislative requirements take effect before investing in services able to provide audible and visible information aboard their vehicles.</p>

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Conclusion

This option results in a consistently applied requirement to provide audible and visible information covering all local services (except those with specific exemptions) within six years, and within two years for new and nearly new vehicles. This does however mean that the benefits of improved accessible information will remain unavailable to many passengers for a longer period of time, and that the trickle down of suitably equipped vehicles to smaller operators will be delayed. Given this, we do not believe that option 5 is suitable for fulfilling our policy aims.

6. Analysis for mandating that operators provide audio or aural and visual announcements

6.0 Baseline

A key assumption underpinning the potential impacts of this policy is the level of provision of aural and visual announcements in the absence of the policy. Unpublished DfT statistics give a rough idea of the current prevalence of audio-visual technology in buses outside of London. However this data is not of a high quality and has not been fully checked with bus operators that supplied the information which is why it has not been published. We have used this data to estimate the number of audio-visual installations in English buses at present and how this changes over time. Since there is only 4 years of data, there is a significant degree of uncertainty around future take-up of AV technology. We have varied it between the three scenarios presented to demonstrate how sensitive our analysis is to this assumption. Values used for this assumption are presented in the table below.

Table 1: Assumptions for the annual percentage point increase in AV technology installations under business as usual

Scenario	Low	Central	High
Baseline annual percentage point increase in buses with AV	4.4%	2.2%	1.1%

A brief description of the costs and benefits estimated is given below. For a more detailed methodology explaining how these impacts have been monetised and the key assumptions used, please refer to the Analytical Annex. All impacts are in 2014 prices and have been appraised over a ten year period from 2019 to 2028.

6.1 Definition of small operators

Small operators have been defined as operators with 20 or less buses. This category includes 557 operators (75% of all operators and 82% of SME operators.) Despite the majority of operators falling into this category only 3% of buses are owned by operators with 20 or less buses.

We propose to give small operators longer to follow the regulation, in order to ensure that the effects of the regulation are not too costly for small operators. This regulation could be particularly costly to small operators as there are fixed costs of the regulation, mainly due to the back office costs. Since, small operators do not own a large proportion of buses in service, the special measures for small operators will not have a large impact on passenger experience.

The definition of the small operators could change following consultation, which could have some effect on the analysis. It is currently assumed that small operators install a simpler, cheaper version of AV technology, whereas larger operators install a more advanced solution with larger costs. If the definition of small operators was expanded to all operators with 30 or less buses it would cover 583 operators and 5% of buses, while if it was reduced to only include operators with 10 or less buses, 448 operators would be included with 1% of buses.

6.2 Monetised costs

6.2.1 Costs to bus operators

6.2.1.1 Familiarisation costs – for small and large operators in all policy options

Bus operators will face some minor costs of familiarising themselves with the policy changes and understand the steps they will need to take to comply with the new regulations. It is assumed that, for every operator, one employee will have to spend approximately half a day to familiarise themselves with the new legislation. These costs will be a one-off costs in the first year of the scheme only. The overall familiarisation costs are expected to be around £50,000 in the first year of the scheme regardless of the option chosen. The majority are costs to small operators as they make up 75% of all operators.

6.2.1.2 Equipment costs – for small and large operators who have to provide audio-visual announcements

The policy does not specify that operators must install a certain technology in order to comply with the regulation. It only states that operators must provide aural and visual announcements. It is therefore assumed that large and small operators will install different audio-visual (AV) technologies in order to comply with the regulations. Large operators are assumed to install more expensive high-end AV technology which will allow them to automate the announcements by connecting them with their automatic vehicle location (AVL) systems (which they will already have to install as part of the open data provisions in the Bus Services Bill). These more expensive systems will also be able to run adverts from which the operators will be able to earn extra revenue (see benefits section 5.5.1.2). The overall equipment costs to large operators are expected to be between £9m and £43m depending on the price of the equipment and how many buses are expected to install AV in the absence of the policy.

For the policy to mandate that small operators provide AV announcements, small operators are assumed to install more low cost solutions than larger operators such as a simple PowerPoint presentation run from a tablet computer connected to a monitor. Such an installation would still be compliant with the regulation but would not be as costly as the more typical AV technology which is assumed to be installed by larger operators. The overall equipment costs for small operators are expected to be between £1m and £5m depending

on the price of the equipment and how many buses are expected to install AV in the absence of the policy.

6.2.1.3 Installation costs – for small and large operators who have to provide audio-visual announcements

In addition to the costs of the AV equipment, operators will also face costs to install the equipment on their buses. These costs are likely to be smaller for small operators as the equipment being installed is likely to be less complicated. The overall installation costs are estimated to be between £0.2m and £5m for large operators and £0.1m to £0.8m for small operators depending on how many operators are expected to install AV in the absence of the policy.

6.2.1.4 Back office costs – for small and large operators who have to provide audio-visual announcements

Bus operators are expected to incur back office costs in order to monitor and run AV technology on their buses. For large operators, these will include the costs of programming the AV technology with route data, recording the audio announcements, maintaining the technology and ensuring that route data is up-to-date. They are likely to employ at least 1FTE (full time employee) to run the AV technology centrally on a permanent basis. For small operators who install AV technology, back office costs may include the costs of maintaining the equipment and the costs of buying a computer on which to create the slides for each route. It is expected that small operators will employ 0.1FTE (one employee working half a day per week) to run the technology centrally on a permanent basis. The overall back office costs are expected to be between £4m and £19m per year for large operators and £100,000 to £900,000 per year for small operators depending on how many operators are expected to install AV in the absence of the policy.

6.2.2 Costs to government

The regulation will encourage greater bus use, and therefore reduce the number of people travelling by car. Government receives tax revenue from each car user through taxes such as fuel duty. Government revenue will therefore reduce if travellers switch from bus to car. The costs to government range from £5m to £14m across the options.

6.2.3 Non-monetised costs

It is likely that there will be some small enforcement costs for Traffic Commissioners who will have to enforce compliance from bus operators with these policies. These are not anticipated to be very large and so have not been monetised due to a lack of any evidence.

6.3 Monetised benefits

6.3.1 Benefits to operators

6.3.1.1 Increased profits as a result of increased patronage – for small and large operators in all policy options

It is expected that the improved journey quality as a result of the AV technology leads to increased patronage and thus increased revenues and profits for bus operators although these profits are unlikely to be substantial enough to compensate for the initial costs of the

AV technology. This analysis suggests that the benefits for operators as a result of increased patronage could be between £2m and £5m per year. These impacts depend on the number of buses who would install AV without the policy and how responsive demand would be to an improvement in journey quality. This is treated as an indirect benefit to businesses.

6.3.1.2 Benefits from using the AV screens for advertising – for large operators only

It is expected that large operators will be able to run adverts on their AV screens and thus will receive benefits from doing so. This is based on information from the charity Guide Dogs that some operators have been using advertising revenues to offset the costs of installing AV technology. It is assumed that the low cost solutions which are installed by small operators will not be able to do this and so small operators will not receive advertising benefits. The increased advertising income for large bus operators is estimated to be between £2m and £17m per year depending on the number of buses who it is assumed would have installed AV without the policy. This is treated as an indirect benefit to businesses.

6.3.2 Benefits to bus users

Bus users are likely to gain substantial benefits from mandating that bus operators provide AV announcements. Existing bus users will benefit from improved journey quality and some new bus users will also decide to make bus journeys as a result of the policy. The average benefits per journey from the provision of aural and visual announcements have been taken from DfT research on the benefits of bus quality measures.⁶ These benefits have been multiplied by the number of existing bus journeys which will be made on buses with audio-visual announcements as a result of the proposed policy. In order to determine the benefits to new users, the benefits per journey have been multiplied by the estimated number of new journeys and multiplied by a half in line with the 'rule of a half' methodology as explained in the Department's Transport Appraisal Guidance (Unit A1.3)⁷.

The total benefits to bus users are estimated to be between £58m and £518m per year from mandating that bus operators provide AV announcements. The main driver of the variation between the high and low values is the number of buses that are assumed to have installed AV technology under business as usual.

6.3.3 Benefits to government

The increase in demand for bus journeys as a result of the improved journey quality is expected to lead to some passengers switching mode from car to bus. Government will receive indirect benefits from a change in the total amount of fuel duty paid. The lost tax revenue from car fuel tax will be offset by an increase in revenue from bus fuel tax. This benefit is estimated to be relatively minor and to be between £0.4m and £2m annually as a result of mandating that large operators AV announcements and £0.2m to £0.5m annually as a result of small operators being mandated to provide AV announcements.

6.3.4 Benefits to wider society

Transport use can have negative impacts on wider society through things such as congestion, air pollution and road accidents. An increase in bus use will increase the number

⁶ Department for Transport (2009) 'The role of Soft Measures in Influencing Patronage Growth and Modal Split in the Bus Market in England'

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/313222/webtag-tag-unit-a1-3-user-and-provider-impacts.pdf

of buses running, which will increase the negative impacts on wider society. This will be offset by a decrease in car use as some passengers will switch the mode of transport which they use. The net impact is expected to be a benefit of between £1m and £6m per year from mandating that operators provide AV announcements. There will be overall negative impacts on infrastructure costs and road safety, but these are made up for by a large reduction in congestion. There is a large effect of people shifting from car to bus on congestion. The variation between these values can be largely explained by the number of buses that it is assumed would install AV without the policy.

6.4 Impacts for policy options 3, 4, 5

Analysis has been carried out for policy options 3, 4, 5. Option 1 is the do nothing option against which all other options are compared so it would not make sense to monetise this. Option 2 has not been monetised due to a lack of evidence however the impacts would likely be substantially less for a voluntary scheme than for a mandatory requirement like options 3, 4, 5. The effects of the three monetised options differ based on the different implementation timelines.

Our assessment of the impacts aural and visual announcements is presented in three (High, Low and Central) scenarios. The central scenario represents our best estimates of the impacts of the policy. The high and low scenarios reflect the inherent uncertainty in the effects of this policy due to the weak evidence base on the current prevalence of audio-visual (AV) provision in the industry. All impacts stated below are impacts which are additional to policy option 1 of doing nothing. All impacts have been assessed over a 10 year period starting from 2019, and all figures are displayed in 2014 prices and are discounted to 2015 unless otherwise stated.

A summary of the impacts is shown below:

Table 2: Summary of impacts of options 3, 4 and 5 (2019-2028)

	Option 3	Option 4	Option 5
<i>Impacts on bus operators, £m, discounted, 2014 prices</i>			
Familiarisation costs	£0.0	£0.0	£0.0
Equipment costs	£34.1	£35.6	£29.8
Installation costs	£2.6	£2.8	£2.3
Back office costs	£136.8	£164.0	£77.4
Direct costs to business	-£173.6	-£202.4	-£109.6
Increased profits as a result of increased demand	£86.7	£105.7	£47.0
Increased advertising benefits	£89.5	£111.0	£47.8
Net impact	£2.6	£14.2	-£14.8
<i>Impacts on bus users, £m, discounted, 2014 prices</i>			
Benefits from improved journey quality	£2,707.2	£3,239.5	£1,504.3
<i>Impacts on government, £m, discounted, 2014 prices</i>			
Indirect taxation benefits	-£11.3	-£14.3	-£5.2

<i>Impacts on wider society, £m, discounted, 2014 prices</i>			
Congestion benefits	£49.7	£58.4	£29.2
Infrastructure benefits	-£17.9	-£21.6	-£9.8
Accident benefits	-£2.0	-£2.3	-£1.1
Local air quality benefits	-£0.3	-£0.3	-£0.1
Noise benefits	-£1.0	-£1.2	-£0.6
Greenhouse gases benefits	-£0.7	-£0.7	-£0.6
Net impact	£27.8	£32.3	£17.0
Net Present Value, £m, discounted, 2014 prices	£2,726.4	£3,271.8	£1,501.4

This table shows that the Net Present Value is highest for policy option 4. However, as well as having the highest NPV it also has the highest costs to business. The preferred option is option 3, which also has a very large NPV, but has lower costs to business as it provides more time for bus operators to install the technology. It will also have non monetised benefits as the costs of installing the technology are likely to reduce over time, due to improvements in technology. Policy option 5 has the lowest NPV, as it does not require any operators to install AV until 2025. There are therefore considerably lower costs to businesses, but this comes at the cost of much smaller benefits to passengers.

6.4.1 Impacts of policy option 3

For option 3, both large and small operators will be required to provide audio and visual announcements on their buses.

Application of the requirement would be delayed from the date of Commencement for between two and six years depending upon the size of operator and age of the vehicle in question in order to give operators of less profitable routes more time to plan for their compliance. Details of the implementation timescales are summarised below:

- Standard Operators (>20 Vehicles).
 - Vehicles first used after 5th April 2014:
2 years to comply following commencement.
 - Vehicles first used between 6th April 2012 and 5th April 2014:
4 years to comply following commencement.
 - Vehicles first used on or before 5th April 2012:
6 years to comply following Commencement.
- Small Operators (<21 Vehicles).
 - Vehicles first used on or after 6th April 2019:
2 years to comply following Commencement.
 - Vehicles first used before 6th April 2019:
6 years to comply from Commencement.

Subject to the available powers we are proposing that operators moving from being “small” to “standard” by this measure are given an additional six months to comply for vehicles first used after 5th April 2012 in order to cushion the transition and limit disincentives to growing the business.

It is expected that large operators will seek to comply with this by installing more hi-tech solutions on their buses which will be automated, linked to their location and be capable of displaying adverts. We expect that small operators will comply with this requirement by installing lower cost solutions which will not be automated and will not be able to display adverts. A summary of the expected impact of this option is shown in table 3 below.

Table 3: Estimated impacts of policy option 3 (preferred): (2019-2028)

	Low	Central	High
<i>Impacts on bus operators, £m, discounted, 2014 prices</i>			
Familiarisation costs	£0.0	£0.0	£0.0
Equipment costs	£11.8	£34.1	£55.6
Installation costs	£0.3	£2.6	£6.7
Back office costs	£82.3	£136.8	£164.1
Direct impacts on business	-£94.4	-£173.6	-£226.4
Increased profits as a result of increased demand	£20.2	£86.7	£175.5
Increased advertising benefits	£34.6	£89.5	£137.2
Net impact	-£39.6	£2.6	£86.3
<i>Impacts on bus users, £m, discounted, 2014 prices</i>			
Benefits from improved journey quality	£1,376.8	£2,707.2	£4,052.9
<i>Impacts on government, £m, discounted, 2014 prices</i>			
Costs of subsidy to government	£0.0	£0.0	£0.0
Indirect taxation benefits	-£6.0	-£11.3	-£16.7
Net impact	-£6.0	-£11.3	-£16.7
<i>Impacts on wider society, £m, discounted, 2014 prices</i>			
Congestion benefits	£25.0	£49.7	£74.5
Infrastructure benefits	-£9.2	-£17.9	-£26.6
Accident benefits	-£1.0	-£2.0	-£2.8
Local air quality benefits	-£0.1	-£0.3	-£0.4
Noise benefits	-£0.5	-£1.0	-£1.5
Greenhouse gases benefits	-£0.3	-£0.7	-£1.1
Net impact	£13.7	£27.8	£42.1
Net Present Value, £m, discounted, 2014 prices	£1,344.9	£2,726.4	£4,164.6

Over the ten year appraisal period, this policy is expected to deliver substantial benefits to society ranging from an overall benefit of £1.3bn to £4.2bn. The largest benefits are those to bus users as a result of improved journey quality brought about by audio-visual announcements (which range from £1.4bn to £4.1m). The direct impact on business is expected to be -£98m in the low scenario, and -£244m in the high scenario, although we expect these estimates to be conservative as they do not take into account reductions in costs over time. The net impact to operators is expected to range from a net cost of around £40m in the low scenario to a net benefit of £86m in the high scenario. This difference is driven by the variance in the expected advertising benefits for larger operators with small operators being expected to incur a cost of between £4m in the low scenario and £6m in the high scenario.

6.4.2 Impacts of policy option 4

For policy 4, all standard operators are required to provide audio visual announcements 2 years following the commencement date. Small operators will have to provide audio visual announcements 2 years following the commencement date for vehicles first used after the commencement date. Small operators will be exempted for all vehicles first used before the commencement date. A summary of the expected impact of this option is shown in table 2 below.

Table 4: Estimated impacts of policy option 4 (2019-2028)

	Low	Central	High
<i>Impacts on bus operators, £m, discounted, 2014 prices</i>			
Familiarisation costs	£0.0	£0.0	£0.0
Equipment costs	£12.6	£35.6	£57.4
Installation costs	£0.3	£2.8	£6.9
Back office costs	£102.6	£164.0	£194.7
Direct impacts on business	-£115.6	-£202.4	-£259.1
Increased profits as a result of increased demand	£25.6	£105.7	£211.9
Increased advertising benefits	£44.6	£111.0	£168.3
Net impact	-£45.4	£14.2	£121.1
<i>Impacts on bus users, £m, discounted, 2014 prices</i>			
Benefits from improved journey quality	£1,710.9	£3,239.5	£4,802.4
<i>Impacts on government, £m, discounted, 2014 prices</i>			
Costs of subsidy to government	£0.0	£0.0	£0.0
Indirect taxation benefits	-£7.9	-£14.3	-£21.0
Net impact	-£7.9	-£14.3	-£21.0
<i>Impacts on wider society, £m, discounted, 2014 prices</i>			
Congestion benefits	£30.4	£58.4	£86.7
Infrastructure benefits	-£11.5	-£21.6	-£31.6

Accident benefits	-£1.3	-£2.3	-£3.3
Local air quality benefits	-£0.2	-£0.3	-£0.5
Noise benefits	-£0.6	-£1.2	-£1.7
Greenhouse gases benefits	-£0.3	-£0.7	-£1.1
Net impact	£16.5	£32.3	£48.5
Net Present Value, £m, discounted, 2014 prices	£1,674.1	£3,271.8	£4,951.0

As with policy 3, over the ten year appraisal period this policy is expected to deliver substantial benefits to society ranging from an overall benefit of £1.7bn to £5bn. The largest benefits are those to bus users as a result of improved journey quality brought about by audio-visual announcements (which range from £1.7bn to £4.8bn). The direct impact on operators is expected to range from a net cost of £116m to a net cost of £259m. The net impact to operators is expected to range from a net cost of around £45m in the low scenario to a net benefit of £121m in the high scenario.

This scenario shows that all small operators can be exempted with a limited effect on the total effects of the regulation. Small operators make up 559 of the 743 bus operators, but they only own 7% of the 30,000 buses in circulation. Since small operators only have an exemption on older vehicles it is forecast by 2030 77% of buses owned by small operators will have to comply with the regulations.

6.4.3 Impacts of policy option 5

Option 5 involves providing a leniency period of 6 years for all operators. All operators will be mandated to provide audio visual announcements in 2025 (6 years following the commencement date of 2019.)

This option has the smallest net present value, as for the majority of the appraisal period the regulation is not in effect. This means there are smaller benefits to passengers (between £650m and 2.3bn), and smaller gains in revenue for operators. However, it does reduce the direct costs to business, which fall within a range between £49m and £151m.

Table 5: Estimated impacts of policy option 5 (2019-2028)

	Low	Central	High
<i>Impacts on bus operators, £m, discounted, 2014 prices</i>			
Familiarisation costs	£0.0	£0.0	£0.0
Equipment costs	£9.4	£29.8	£48.9
Installation costs	£0.2	£2.3	£5.9
Back office costs	£39.5	£77.4	£96.4
Direct impacts on business	-£49.2	-£109.6	-£151.2
Increased profits as a result of increased demand	£9.3	£47.0	£98.8
Increased advertising benefits	£15.8	£47.8	£75.9
Net impact	-£24.0	-£14.8	£23.4

<i>Impacts on bus users, £m, discounted, 2014 prices</i>			
Benefits from improved journey quality	£650.3	£1,504.3	£2,337.9
<i>Impacts on government, £m, discounted, 2014 prices</i>			
Costs of subsidy to government	£0.0	£0.0	£0.0
Indirect taxation benefits	-£2.3	-£5.2	-£8.0
Net impact	-£2.3	-£5.2	-£8.0
<i>Impacts on wider society, £m, discounted, 2014 prices</i>			
Congestion benefits	£12.5	£29.2	£45.4
Infrastructure benefits	-£4.3	-£9.8	-£15.1
Accident benefits	-£0.5	-£1.1	-£1.6
Local air quality benefits	-£0.1	-£0.1	-£0.2
Noise benefits	-£0.2	-£0.6	-£0.9
Greenhouse gases benefits	-£0.3	-£0.6	-£0.9
Net impact	£7.2	£17.0	£26.7
Net Present Value, £m, discounted, 2014 prices	£631.2	£1,501.4	£2,380.0

6.6 Risks and assumptions

1. The assumption which has the biggest impact on the scale of the costs and benefits is the assumption for the number of buses on which bus operators install AV over time under business as usual. We have some data from the Department's PSV survey on the number of buses with AV installed for two financial years (2013/14 and 2014/15) but this data has not been published because the quality is not considered to be good enough. This is due to concerns about the wording of the question in the survey and it something which we are looking to improve in future editions of the PSV survey. We have used the average annual change over the four years of data to forecast the baseline trend. There is considerable uncertainty around this forecast, as it is only based on four years data, and assumes a linear trend. The annual increase has been varied across the three scenarios to reflect this uncertainty. Given the low levels of AV installations at present - AV is installed in around a third of buses in England (around 12,000 out of 33,000 buses) but less than 15% of buses in England outside of London (around 3,000 out of 23,000 buses - the growth values presented in this analysis appear reasonable.
2. The definition of an SME for the purposes of this analysis is a business with 250 or less employees. Based on PSV survey data, we have also assumed that an SME is an operator with less than 90 buses. These definitions do not perfectly overlap, (i.e. there are some operators who are considered to be SMEs by one definition but not by another) but this simplifying assumption has been made for modelling purposes. Less than 1% of the operators are affected by this assumption so it is considered to be an acceptable simplification.

3. The data that we have on the equipment and installation costs of AV technology may be slightly outdated. As the market for AV technology is growing, it is likely that there will be more competition and prices will be driven down over time. We have therefore included a range of costs in the three scenarios but we consider the values used in the central scenario to be conservative.
4. The benefits to operators from increased patronage are calculated using an assumption for the average operating margins of operators. For large operators, the central operating profit value has been taken from the Competition Commission's investigation into the UK bus market⁸, but this has been varied in the high and low scenarios to reflect the likely differences in operating profits for different operators. It has been assumed that profit margins for small operators are half those of large operators. This is not based on evidence but is felt to be a sensible and conservative assumption.
5. The advertising revenue which can be generated from AV screens is uncertain as reliable cost estimates are not readily available. We will ask stakeholders for information on this as part of the consultation. Two methodologies have therefore been used to calculate the potential advertising revenue: one using estimates from a bus company for the average time taken to regain the initial capital investment in AV through advertising, and another trying to compare the costs of traditional bus advertising with the expected uplift that could be generated using electronic advertising boards. The lower value from these two methodologies has been used for this analysis in each of the three scenarios in order to be more conservative. While the revenues from advertising are quite unclear, they do not constitute a significant proportion of the overall benefits to society and have only been included in the large operator analysis.
6. While the analysis has been assumed to apply to all of Great Britain, figures from Great Britain outside of London have been used throughout. This is because virtually 100% of London buses already have AV installed and so the additional effect of this policy in that area is expected to be negligible.
7. We currently cannot monetise the effects of:
 - Reduced costs from installing AV on new buses as opposed to retrofit
 - Reduced costs from installing AV further in the future due to improved technology, and increased demand.These impacts are important for our choice of the preferred option and therefore, we will ask for more information on them as part of the consultation.
8. Small operators have been defined as operators with 20 or less buses. This category includes 557 operators (75% of all operators and 82% of SME operators.) Despite the majority of operators falling into this category only 3% of buses are owned by operators with 20 or less buses.
9. The definition of small operators could change following consultation, which could have some effect on the analysis. If the definition of small operators was

⁸ Competition Commission (2011) 'Local bus services market investigation'

expanded to all operators with 30 or less buses it would cover 583 operators and 5% of buses, while if it was reduced to only include operators with 10 or less buses, 448 operators would be included with 1% of buses.

10. We assume that the age distribution of buses for small operators is the same as for large operators.

7. Preferred option

The preferred policy option is option 3. This provides a wide range of coverage, and also mitigates the impacts of the policy on operators for whom it would be most expensive. It allows operators with older buses and small operators a longer time to comply with the regulations. Buses which are older than 7 years old in 2019 will only need to fit AV in 2025. These account for 49% of buses in circulation. This reduces the direct costs to business from installing audio-visual announcements. A large proportion of these buses will be out of use by 2025, and will therefore never have to retrofit AV systems. The buses which will have to install audio-visual are likely to do so at a lower cost, due to technological improvements between now and 2025.

We currently cannot monetise the effects of:

- Reduced costs from installing AV on new buses as opposed to on retrofit
- Reduced costs from installing AV further in the future due to reduced costs.

Therefore the benefits of the preferred option is underestimated by the cost benefit analysis. As part of the consultation we will ask for evidence on these two topics

The table below summarises the impacts of the different options. It shows that option 3 has the most beneficial impact across all stakeholders:

	Impact on standard operators	Impact on small operators	Impact on operators with old vehicles	Impacts on passengers
Option 1	No direct costs to operators	No direct costs to operators	No direct costs to operators	Limited coverage with baseline growth
Option 2	Low direct costs to operators, due to industry led approach	Low direct costs to operators, due to industry led approach	Low direct costs to operators, due to industry led approach	Limited coverage, as there is no legal enforcement
Option 3 (preferred)	Moderate direct costs from 2021, although	Low direct costs, as all existing vehicles only have to meet	Low direct costs, as they only have to meet requirement in 2025	Wide coverage gradually increasing

	increased revenue.	requirement in 2025		between 2021 and 2025
Option 4	High direct costs from, although increased revenue.	Low direct costs, as all existing vehicles are exempted	High direct costs, as they have to meet requirement in 2021	Wide coverage by 2021
Option 5	Low direct costs, as they only have to meet requirement in 2025	Low direct costs, as they only have to meet requirement in 2025	Low direct costs, as they only have to meet requirement in 2025	Limited coverage before 2025, so low benefits to passengers

7.1 Direct costs and benefits to business calculations (following OI3O methodology)

As defined in the [Better Regulation Framework Manual](#) section 1.9.5, One-In, Three-Out (OI3O) applies to all changes in, or introduction/removal/expiry of, measures that require RRC clearance. Because the details of the chosen option will not be finalised until the consultation is completed the effects of the policy on SMEs are uncertain at this stage. For this reason, the EANDCB has not been validated at this stage however we expect the value the EANDCB to be between £9.5 and £16.5m depending on the exact scenario that is taken forward. The EANDCB policy will not be validated until the consultation has been completed. The EANDCB has been calculated in line with the guidance in section 1.9.32 of the [Better Regulation Framework Manual](#) (p46).

8. Wider Impacts (TO BE UPDATED)

8.1 Economic / financial impacts

8.1.1 Competition assessment

We expect that this policy will not have a significant impact on competition between large operators as all will have to meet the requirements to provide aural and visual announcements and it will be up to them to determine the best way for them to comply. This policy will place a lower burden on small operators and so it may actually make it slightly easier for them to compete with larger operators as they will face lower costs. It is likely that operators around the 20 buses threshold may suffer a loss of competitiveness with respect to other slightly smaller operators but we believe that this will be a small cost which will be more than outweighed by the benefits of not exposing small operators to disproportionate burdens.

8.1.2 Small and micro business assessment

This policy explicitly mitigates the negative impacts on small operators (operators with under 20 buses.) The preferred option involves more generous timelines for small operators. Small operators will have 6 years to install AV on buses already in use in 2019. This significantly reduces the direct costs on these operators. Operators with under 20 buses make up 82% of

SMEs operators, so these provisions will reduce the impacts on small and medium sized businesses. Furthermore, the regulations are technology neutral and allow for small operators to use low cost solutions. This option therefore protects small and micro businesses from significant regulatory burdens but still provides a significant benefit for bus users.

8.1.3 Justice impact test

The Accessible Information Requirement is likely to result in the creation of an offence of failing to provide accessible information, which will be enforced in the first instance through the Traffic Commissioner, who will be able to fine, or apply licensing Commissioners' standard processes and range of sanctions to operators found to have failed to comply without reasonable excuse. Operators will however have a right of appeal to the Administrative Chamber of the Upper Tribunal however, and it is likely therefore possible that some cost to the Tribunal Service will therefore be incurred.

We anticipate that very few cases will reach appeal, as operators will likely wish to settle early in order to risk damage to their business, particularly given the relatively low cost of complying with the requirement when compared to other operational costs. We will in any case complete a Judicial Impact Test prior to the commencement of accessible information related provisions.

8.2 Environmental impacts

8.2.1 Greenhouse gas assessment

It is not expected that these proposals will have a significant effect on emissions of greenhouse gases. While bus patronage may increase, it is unlikely that there will be a substantial increase in the total distance travelled by buses. Any additional distance driven by buses will likely be offset to some extent by a decrease in the distance travelled by cars. Our analysis suggests that the net impact of greenhouse gas emissions will be an increased cost of around £1m over 10 years.

8.2.2 Wider environmental issues

If the policy proposals lead to a greater total distance travelled by buses, there may be some additional noise and air quality pollution. These impacts will be partly offset by a reduction in noise and air quality pollution by cars and the net impact is expected to be a small cost of between £1m and £3m over 10 years. Some sound may be emitted outside buses from on-board audible announcements but these will not be significant and are unlikely to be audible beyond one or two metres from the entrance to a waiting vehicle.

8.2.3 Sustainable development

It is not expected that this policy will have any impact on sustainable development.

8.3 Social impacts

8.3.1 Equalities impact

The Accessible Information Regulations are intended to help disabled passengers to feel more confident when using buses, and so support them to use services to play, or continue playing, an active role in society. In developing the policy underpinning the Regulations we have considered the perspectives of people with a range of impairments, including those with more than one impairment.

We have also considered the impact of the policy on people with other protected characteristics, and our conclusions are detailed below.

Age

It is our intention that information provided in accordance with the Accessible Information Regulations should be available to any passenger using a bus. In practice this means that it will be available to passengers who may not consider themselves to be disabled, but due to age or related ill-health nevertheless face information-related barriers when accessing bus services. In particular, older passengers may find it difficult to identify their location visually, to communicate orally with bus operator staff and hear their response, or to undertake a journey without becoming confused or risking missing their stop.

By requiring the provision of information in both audible and visible formats, without relying upon passengers possessing smartphones, and by setting standards for the timing and standard of information which are informed by the needs of a range of passengers, we expect this policy to be of considerable benefit to many older people.

It is possible that the policy will also result in bus services being viewed as a more modern, user-friendly form of transport by younger passengers, potentially prompting them to choose to use buses rather than private vehicles and locking in patronage for the future.

We have not identified any other age related impacts.

Disability

Section 17 of the Bus Services Act 2017 allows the Secretary of State to make Regulations requiring the provision of information on-board local bus services with the expressed aim of enabling disabled people to travel by bus.

Access to private transport is lower amongst disabled people, owing to average incomes which are lower than those for non-disabled people, and to restrictions on the driving of motor vehicles by people with certain categories of impairment. One consequence of this is an increased reliance on public transport, including local bus services.

Since 2000 considerable improvements have been made in the physical accessibility of buses and coaches, with a wheelchair space and boarding facilities, priority seating and other features now provided on virtually every bus used for local and scheduled routes. A renewed emphasis on driver training, prompted in part by the mandating of disability awareness training for drivers and other staff by EU Regulation 181/2011, is also helping to mitigate some of the challenges disabled people still report facing when seeking assistance from drivers. In many areas however, a lack of on-board information continues to inhibit some disabled people's confidence to use bus services independently.

The Accessible Information Requirement has been developed specifically to address this information barrier, and to ensure that those passengers who may otherwise be hindered in their use of buses are helped to access them. In doing so we have considered the potential impact on people with a range of impairments.

Visual impairment

Efforts to improve the availability of accessible on-board information have been informed to some degree by the Guide Dogs for the Blind Association's "Talking Buses" campaign, which initially stressed the importance of clear, accessible information predominantly for visually impaired people. In particular they highlighted the challenge that people have in

identifying their location whilst travelling on a bus, their reliance on and the inconsistent response from drivers, and the significant impact of alighting in an unfamiliar location.

The Regulations will aim to assist visually impaired passengers by requiring the provision of audible information, providing reassurance that passengers are travelling on the correct route and helping them to identify the appropriate point to alight. The concerns of passengers regarding the ability of drivers to switch off or reduce the volume of announcements will also be reflected in a legal requirement focusing on the provision of information rather than the installation of equipment and prescribing minimum standards that information must meet.

Our intention to define the standard that visible information should meet in terms of the ability of a person with average vision to discern it at the furthest extent of the vehicle is aimed at ensuring that people able to read larger typefaces may be able to access information when seated or standing closer to it.

We have also recognised the generally low rate of smartphone ownership by visually impaired and other disabled people with our proposal to prevent operators from meeting the legal requirement by relying on passengers using pre-purchased equipment, but will not prevent operators from providing such facilities as an additional service.

It is likely however, that our proposal to exempt certain categories of vehicle, including those operated under Section 19 and 22 permits, will be perceived by some as disadvantaging those disabled people who rely on demand responsive and Community Transport services, which usually operate under such permits. Likewise, the same may be claimed of the decision to exempt vehicles designed to carry fewer than seventeen passengers. In both cases the aim is to apply the requirements in a proportionate manner, recognising that such services fulfil a vital need which could be jeopardised by a requirement to provide information on-board vehicles where the cost of doing so would be significantly out of proportion with their value, and that the drivers of such vehicles are likely to be better placed to provide a personal service, understanding and responding to the needs of individual passengers. An alternative to this approach would be to make the requirement less onerous, such as by requiring information only in audible formats, however this would make it more difficult to manage the expectations of passengers and would also disadvantage people who are deaf or who have dual sensory loss, and who may rely upon the provision of visible information.

Hearing impairment

Whilst many people with hearing impairments may be able to identify visually where they are, as a non-disabled person might, they report that the challenge of confirming their location, or of changes to their journey, either with the driver or other passengers, makes it difficult for them to use bus services with confidence.

This issue is compounded for people with dual sensory loss, who may be unable to identify their location visually or communicate consistently or accurately with those around them.

It is proposed that the Accessible Information Regulations will require information to be provided in both audible and visible formats in all circumstances, apart from one. This will ensure that information identifying the route and direction, upcoming stops and diversions are always provided visibly as well as audibly, helping to give people with impaired hearing more confidence when using bus services.

People with dual sensory loss have advised us that those with some residual hearing will often rely on the presence of an audible induction loop system and the “T” setting on a

personal hearing aid in order to access spoken information. With this in mind it is our intention that audible information should be provided in such a way that a person using a suitable hearing aid with an audible induction loop should be able to discern the information. Furthermore, for people with residual hearing, the specification of the standard that audible information should meet, such that it can be discerned by a person with average hearing at the furthest extent of the vehicle, will help some to discern information when sitting closer to its source.

The one area where people with impaired hearing will be treated disadvantageously is in relation to the application of requirements to heritage vehicles. It is intended that vehicles built before 1973 should be exempted from the requirement to provide visible information, on the basis that the provision of audible information might be accomplished with only minor modifications to the passenger cabin, depending upon the approach chosen, but that the provision of visible information would generally require the installation of equipment which could detract from its aesthetic appeal and historical integrity. Whilst requiring only audible information in such circumstances would disadvantage some people with impaired hearing, it is felt that the only viable alternative would be to exempt such vehicles entirely, potentially disadvantaging every passenger who relies upon the presence of accessible information.

Cognitive impairments

We understand that, for many people with cognitive impairments, the unstructured nature of bus journeys, with few clues as to the vehicle's route or direction, can make travelling by bus disorientating and unsettling. As a result, such passengers may rely on the assistance of drivers more often than other passengers, and that they may be disadvantaged significantly if that help, such as an indication of when to alight the bus, does not materialise.

Audible and visible information may help to add a sense of structure and familiarity to journeys, and so help some people with cognitive impairments to use bus services. It will however be important for information to be accurate and consistent, and we will use guidance to recommend approaches for ensuring that this is the case.

Learning disability and Autism Spectrum Disorder

Some people with a learning disability or Autism Spectrum Disorder (ASD) may struggle to undertake journeys independently where there is a risk of unfamiliarity or unexpected occurrences. A lack of structure, such as the "signposting" of points along a route may be a source of anxiety and prevent people from having the confidence to travel.

The provision of audible and visible information in a consistent and predictable manner may help some people with a learning disability or ASD to travel independently and safely by bus, by providing reassurance as to their present location and direction of travel. It may also provide a sense of familiarity which can aid with route learning and the building of confidence. Whilst the Accessible Information Regulations will not require the provision of detailed information on diversions, alerts at the beginning and end of such deviations from the normal route might help a person with a learning disability or ASD to understand why a different route is being taken or when to seek assistance from the driver.

Some people with ASD also experience a sensory overload in certain circumstances, which may inhibit their ability to understand the world around them and to react to it appropriately. It is possible that the provision of audible information, particularly on a bus route with frequent stopping places, could prompt such a reaction in some people. In producing guidance to support the implementation of the Accessible Information Regulations we will seek advice on how the negative impacts of audible information might be mitigated for people with ASD.

Mental Illness

Some people with mental illness may struggle to use bus services for a variety of reasons, including being in close proximity to other people or in a space which they cannot easily leave when they wish to, difficulties communicating with drivers when they need help or advice, or keeping track of the vehicle's location along a route.

In some cases the provision of clear, accurate, predictable audible and visible information may help to mitigate some of these issues, by "signposting" key points in journeys, indicating when it will next be possible to leave the vehicle, or by removing the need to interact with the driver.

It is possible that the provision of such information may also contribute to some people's negative experience of using buses, by adding to a sense of sensory or information overload, or by causing discomfort and insecurity where information is inaccurate or inconsistent. We will seek advice and consider how we can use guidance to encourage operators to provide audible and visible information in a manner which minimises the negative consequences for some people.

Mobility impairments

Developments in the accessibility of buses and coaches have, over the past fifteen years, made a significant difference to the ability of many people with mobility impairments to travel. The provision of wheelchair spaces and boarding facilities, priority seating, and strategically placed handholds have made it easier to board, alight and travel in safety and comfort – however many still face barriers.

In particular, wheelchair users may find that they are unable to identify the location of a vehicle whilst facing backwards in the wheelchair space, and that often screens providing visible information are mounted above their heads, obscuring the information from view. Others may find that even where information is provided accessibly they are unable to signal to the driver their intention to alight in sufficient time to do so.

It is our intention to specify within the Accessible Information regulations that both audible and visible information should be discernible to passengers in wheelchairs situated in the wheelchair space, and to require that information is provided at points during the course of a journey to enable passengers to take appropriate action, such as ringing the bell or standing up, as a result.

It is therefore expected that the Regulations will support some people with mobility impairments to travel with more confidence.

Gender reassignment

We have not identified any gender reassignment related impacts.

Marriage and Civil Partnership

We have not identified any marriage or civil partnership related impacts.

Pregnancy and Maternity

We have not identified any pregnancy and maternity related impacts.

Race

It is intended that the Accessible Information Requirement will be implemented to a timetable based on the size of bus operators and the age of their vehicles. Often, smaller operators provide services in less populous, more isolated areas. Where there is a correlation between race and urbanisation the requirement may disproportionately benefit those more likely to be resident in cities and towns than in rural areas. This effect is not expected to be marked however, owing to the reach of larger operators' networks into more rural areas, and the temporary nature of the initial exemptions.

People who do not speak English (or Welsh and English in Wales) fluently, or at all, may not benefit from the provision of audible and visible information as comparable people who are fluent in English (or Welsh or English in Wales), as the Regulations will require only that information is provided in English, or in accordance with Welsh language requirements in Wales. In some cases this may mean that people for whom a lack of information inhibits their confidence to travel independently, may continue to lack confidence to travel. Whilst it would be overly burdensome and complicated to require operators to provide information in languages other than English and Welsh we will consider how we can use guidance to encourage operators to reflect the needs of potential customers when planning to provide audible and visible information.

We have not identified any other race-related impacts.

Religion or Belief

We have not identified any religion or belief related impacts.

Sex

Women travelling alone on bus services at night, or during times of the year when the windows may become obscured by condensation, have reported feeling more confident when using services with audible and visible information provided, on account of being able to be sure that they are alighting at their intended destination. There may therefore be some benefit to women generally from requiring the provision of such information.

We have not identified any further sex-related impacts.

Sexual Orientation

We have not identified any sexual orientation related impacts.

Whilst the overall policy objective described in this Impact Assessment is to ensure that everyone has the information they need to travel by bus in confidence, there is a particular emphasis on those who, because of a particular impairment, find that the lack of accessible information on-board bus services presents a barrier to their use of that service and to other services access to which is facilitated by the bus service. By requiring that a minimum level of information is provided on-board bus services, and in the majority of cases rely neither solely on audible or visual media channels, we will help to minimise the challenge faced by some disabled people when travelling independently and to meet the different needs that

some have in such circumstances. The overall policy will therefore contribute directly to Government's work to advance equality of opportunity between those who are disabled and those who are not.

The need to avoid disproportionate costs on some areas of the bus industry have however led to us explicitly seeking to ensure that operators which are micro, small or medium (MSEs) are not unduly burdened by the requirements of this policy. This will be done either by providing financial assistance to help SMEs to provide information in both an audible and visible format or, if government is unable to provide financial assistance, by reducing the requirement that they have to meet, from one which relies neither solely on audible or visual media, to one which does not rely solely on visual media. In practice this will mean that bus services run by such operators may legally run with information provided through aural announcements which are not replicated on visual displays. This will result in people who have impaired hearing not benefiting from the improvement in on-board information that will be available to those who do not have a hearing impairment. The cost of requiring information to be provided in a manner that would be accessible to such passengers is very significant, and in our view would potentially jeopardise the viability of the very routes that the requirement will help people to use unless we are able to provide financial support to these operators. If government is unable to provide this support, the only alternative to the chosen approach would therefore have been to exclude such services from the Accessible Information Requirement altogether, leading to improved information not being made available to any passengers on such routes.

On balance we believe that, if we are unable to provide the necessary financial support to help SMEs to provide aural and visual information, the assistance provided to those passengers, disabled and non-disabled, who can access information which is not provided in an aural format justifies the disadvantage that people with a hearing impairment may continue to face when compared to them, and that this assessment demonstrates our commitment to considering this issue, and seeking the most appropriate solution. We will keep this position under review with a mind to improving the requirement for those people who continue to be disadvantaged, should the opportunity arise.

Turning to the other protected characteristics, we do not believe that this policy will have a significant impact on any of the categories specified. Accessible information, whether using the definition for operators with more than 250 employees, or that for SMEs, will be provided on a non-discriminatory basis on all bus services subject to the requirement. It is possible that the difference in demographics between isolated and rural communities, and urban areas, will inadvertently lead to people with certain protected characteristics, the incidence of which is higher in such areas, receiving a different level of information, owing to the tendency for larger operators to focus their services on larger conurbations and trunk routes. We do not believe this effect to be significant however.

8.3.2 Health and well-being

At present people who rely on accessible information in order to access bus services, whether due to disability or other reasons, may lack confidence in their ability to reach their destination safely, and so not travel. This may in turn impact on their ability to access employment, economic and recreational activities, or to play their part in the local community. For those for whom the lack of information presents a significant barrier to access, such as some people with a visual impairment, the provision of such information may make the difference that allows them to look for work for the first time, to shop independently or to meet with friends and relatives without having to rely on others to get them there.

As such we believe the proposed intervention has the potential to promote health and wellbeing for those affected by it by helping to build their confidence to use local bus services, and to remain active as a result.

In some circumstances, where a person does not benefit from the requirement, such as The only exception that we have identified concerns people who rely on visual information, which may not be provided by bus operators which have 250 or fewer employees. Some people with impaired hearing travelling on historic vehicles they will not experience, for instance, may not benefit from the improved accessibility of on-board information, and might not gain the health and wellbeing benefits identified as well.

We believe however that the policy would not result in lower health or wellbeing outcomes for such people, but rather a continuation of their present situation in the absence of accessible information. If government is able to provide the necessary financial support to SMEs as expected, there will not be an exception to the health and wellbeing improvements for people who rely on visual information.

8.3.3 Family life

In helping to give people the confidence to use local bus services we believe that this intervention will enable people to connect, or reconnect with their local communities, to engage economically or community-based social and leisure activities. As such this policy has the potential to promote greater community cohesion.

8.3.4 Human rights

It is not expected that this policy will have any impact on human rights.

8.3.5 Rural proofing

As indicated above, the meaning of “accessible information” may be different for bus operators with more than 250 employees, and those with 250 or fewer. The former will be required to provide information which does not rely solely on audible or visible information, whilst the latter must provide information which does not rely solely on visible media and may be required to provide information which does not solely rely on audible media if the government is able to provide financial support. This policy is driven by the significant difference in the estimated Benefit/Cost Ratio for the affected companies, and our fear that, should SME operators be required to fit and maintain equipment to provide accessible information there would be a serious risk to the more marginal routes that they operate.

Whilst it is not entirely clear-cut, many smaller operators run services in rural and isolated communities, whilst larger operators tend to focus on urban centres and trunk routes. Therefore, the assumed risk to services operated by smaller companies could affect rural areas disproportionately if government is unable to provide the expected financial support to SMEs and hence SMEs face a reduced requirement.

Even where the sustainability of routes is not endangered the proposed implementation approach, focusing initially on larger operators with newer vehicles, and providing smaller operators with six years in which to comply (except when purchasing new vehicles) is likely to mean that the benefits of improved on-board information will likely be experienced by passengers in rural areas more slowly than they will in urban ones. Where people are currently inhibited from travelling, owing to a lack of on-board information, it is possible that this situation will be maintained, at least temporarily – potentially limiting access to employment, education, social and leisure activities.

Often such areas have a dearth of regular bus services and rely more on demand responsive services and community transport, which we plan to exempt from the need to provide audible and visible information. There is therefore a risk that operators of the most

marginal of routes will struggle to justify the costs associated even with a relatively low-cost solution for providing audible and visible information, and that passengers may not benefit at all – potentially impacting on their ability to continue living in more isolated communities.

Our intention in requiring SME operators to provide information which is less accessible than larger operators if they are not given financial assistance is therefore to minimise any detrimental effect on rural communities from the imposition of additional costs on smaller businesses. Unfortunately, the result of this reduced requirement will be a reduced level of benefit for some groups of people, including those with impaired hearing. Needless to say, if the government is able to provide financial assistance, it is expected that there will be no negative outcomes for rural areas.

9. Description of preferred option and implementation plan

Core Requirement

The Accessible Information Requirement will mandate the provision of prescribed information on-board local bus services in England, Scotland and Wales, with the aim of helping disabled passengers, and passengers more generally, to travel by bus with confidence.

Operators of local services will be required to ensure that information identifying the route name and direction of a service, the name of each upcoming stop, and the points at which a service is diverted from its scheduled route, is provided both audibly and visibly. In this instance “audibly” is understood to include information provided in such a manner as to enable a person reliant on using an Audible Induction Loop in conjunction with a hearing aid to access the information.

Operators will not be able to meet the requirement by providing information in such a manner that a passenger would need to purchase, or have purchased, equipment other than personal medical aids (such as spectacles or a hearing aid) in order to access it. This stipulation is intended to prevent sole reliance on user-possessed smartphone applications for the delivery of information, on the basis that smartphone ownership amongst the target group of disabled people remains, and is expected to remain, low.

The Regulations will specify the points during a journey at which prescribed information should be provided. In particular, it will require information identifying the route and direction to be provided whilst the service is stopped at stopping places along the route, that information identifying each upcoming stopping place is provided between the previous stopping place and the stopping place being identified, and that the points at which diversions begin or end are identified as close to those points as possible. Where practicable the points at which prescribed information should be provided will be identified in terms of the desired outcome – i.e.: in sufficient time to allow a passenger to take action, such as to alight at a stopping place being identified.

The Regulations will also require that the audible and visible information provided by operators meets basic standards. The aim of this is to ensure that information is usable by passengers whilst avoiding constraining operators in the methods they can use to provide required information while the specific standard will be developed during the drafting of Regulations, informed by consultation with affected stakeholders, it is anticipated that it will be expressed in terms of the ability of a person with average hearing or vision to discern information aurally or visually respectively, from the furthest extent possible from the source of that information on each deck of the vehicle. It is further anticipated that the information

would need to be discernible to a person seated in a wheelchair in any of the designated wheelchair spaces on-board the vehicle and that a person solely using a hearing aid in conjunction with an Audible Induction Loop would be able to access the information from any of the designated priority seats. It is recognised that the latter requirement potentially detracts from our intention to require the provision of information in a technology neutral way, so as to allow operators flexibility in their fulfilment of the new duty, however this is felt necessary in the circumstances in order to ensure that people who are deaf or hard of hearing, and who rely upon the use of induction loops in order to filter out extraneous and irrelevant sounds, are not excluded from the benefits of providing audible and visible information. This may be particularly important for people with dual sensory impairment who may have no other means of accessing information.

Permanent Exemptions

We are conscious that, in order to be capable of being implemented by the local bus industry, across Great Britain, within a relatively short timeframe, the Regulation should be applied in a proportionate manner, conscious of the circumstances in which it might be unreasonably difficult, inappropriate, or expensive to provide prescribed information. For this reason we intend to exclude from the requirement altogether:

- Services provided using permits issued under Sections 19 or 22 of the Transport Act 1985, namely those providing services on a not-for-profit basis, such as schools, clubs or communities, and some forms of community transport;
- Services provided using vehicles designed to carry fewer than seventeen passengers; and
- Tour services, which may be defined as “local services” in certain circumstances, such as when operating under London Service Permits in London.

Whilst it is not our intention to exempt significant sections of the bus sector for longer than is required to enable them to comply with the new requirements, it is felt that the application of the requirements to the above services would be disproportionate, and would not support the stated policy aims.

Applying the requirements to services operated under Section 19 and 22 permits could endanger the sustainability of services essential for connectivity in rural and isolated areas, sometimes providing the only link to other locations accessible to disabled people or available to others without private transport. Such services are often provided using small vehicles and with a personal service ethos, meaning that the challenges of identifying a given route or the location at which an individual wishes to alight, are likely to be mitigated by the nature of the service itself. This would also be true in the case of services provided by clubs and societies, educational establishments and other community organisations, for whom the structured provision of audible and visible information is likely to represent an unnecessary and disproportionate expense.

The exemption of services provided using vehicles designed to carry fewer than seventeen passengers is intended to reflect the nature of services provided by smaller vehicles. Often, the nature of the vehicles providing such services, means that passengers must interact with drivers more than they would in larger vehicles, and that the operators will likely provide a more personal service overall. Further, such vehicles are often used for the most remote services, such as those serving isolated communities on Scottish islands or in rural Wales, where the risk of the application of requirements resulting in the discontinuation of a service would be too great. In exempting such services it is recognised that the impact of using the wrong service or alighting at the wrong stopping place in such circumstances is likely to be

significantly higher in the locations served, however it is also felt that the risk of this eventuality occurring is likely to be significantly lower than for services provided using larger vehicles.

In most areas of Great Britain services which would generally be recognised as providing a tour, namely a service conveying passengers from one or more locations to a single destination and back again, would not fall under the Transport Act 1985 definition of local services, and would therefore not be required to provide prescribed information. In certain circumstances however, such services are operated under local permit schemes and are defined as “local services” as a result. This is true in the case of services operating under London Service Permits, including city sightseeing services. In applying the requirements consistently across Great Britain, wherever possible, we do not feel it necessary or proportionate to require the operators of such services to provide prescribed information. In many circumstances they would in any case be providing a more personal service than on normal local services, including the provision of information in a variety of formats.

In addition to the three exemptions listed above we also intend to exempt vehicles of particular historical interest from the requirement to provide prescribed information visibly. We recognise that such services, including those provided using historic Routemaster buses are of value principally on account of the authenticity of their structure and fittings, and that requiring the provision of visible information, which in most circumstances would involve the use of a screen or display of some kind, could detract from that value. That said, the provision of audible information may be accomplished more discreetly, using hidden speakers or, where available a human conductor, and it is believed that this would not detract from the historical appeal of the vehicle to the same extent as visible information. It is also recognised however that exempting vehicles only from incorporating visible information may detract from our stated intention of applying the requirement in an equitable manner, conscious of the information needs not only for those people reliant on audible information, but those who predominantly use visible information. We feel however that in this specific circumstance the rationale for providing an exemption is strong, but that a total exemption would hinder accessibility for more passengers than would be proportionate. In essence, in this specific circumstance, it is felt that the provision of some information, albeit accessible through only one sensory channel, is better than the provision of no prescribed information at all.

In addition to these permanent exemptions the Secretary of State has powers to exempt specific services, vehicles or operators from the requirement without the need to amend Secondary Legislation. This is intended for the making of ad hoc exemptions, such as where the particular circumstance of an individual service means that it would be inappropriate to require the provision of prescribed information. We do not however intend to use that power at this time.

Implementation Approach

It is however intended that the general exemption powers will be used to stagger the application of the requirement to services depending upon the number of vehicles operated by the respective operator and the age of the vehicles used. The intention in doing this is to apply the requirements initially only to those operators which are most likely to be able to accommodate the related costs, such as operators predominantly using new or nearly new vehicles, or those with larger operations, whilst delaying application to smaller operators or those using older vehicles in order to allow them time to spread the cost of any up-front costs and to build ongoing costs into their business models. Whilst we remain hopeful of being able to support operators further, where the imposition of the costs of providing prescribed information would risk endangering the sustainability of services, this is not

guaranteed, and the longer implementation delay is designed to provide mitigation in place of this.

It is intended that services will be exempted as follows:

- Services operated by Standard Operators (those with more than twenty vehicles):
 - Vehicles first used on or before the date five years before Commencement: Requirement will apply two years following Commencement.
 - Vehicles first used on a date between five and seven years preceding Commencement: Requirement will apply four years following Commencement.
 - Vehicles first used on a date more than seven years preceding Commencement: Requirement will apply six years following Commencement.
- Services operated by Small Operators (operators with twenty or fewer vehicles):
 - Vehicles first used on or after the date of Commencement: Requirement will apply two years following Commencement.
 - Vehicles first used on a date prior to Commencement: Requirement will apply six years following Commencement.

This approach is predicated on several understandings, namely:

- That the upfront cost of providing audible and visible information on-board new or nearly new vehicles is significantly lower as a proportion of the overall value of that vehicle than for older vehicles, and on this basis is more reasonably justified;
- That a slightly increased application period would give operators who rely on purchasing older vehicles on account of their lower market value, time to plan for the application, including spreading any upfront costs across a longer period, and building ongoing costs into their business model and related decisions;
- That the average lifespan of a bus is approximately fifteen years, and that it would not be economically viable to invest in systems for providing audible and visible information on vehicles within four years of that age being reached; but
- That it is unreasonable to exempt vehicles from the requirements in perpetuity after they pass the age at which a vehicle would, on average, be retired, on the basis that a minority of operators may continue to use such vehicles for considerably longer, considerably lengthening the period that passengers must wait to benefit from improved accessible on-board information.

As such, it is felt that the proposed approach strikes the right balance between prompting the market to increase significantly the provision of audible and visible information within a relatively short period of time where this is possible, and mitigating the negative effects of imposing related costs on industry where this is likely to be detrimental to the sustainability of services.

Devolved administrations

We propose to apply the requirement in the same manner, and to the same timetable in England, Scotland and Wales, on the basis that the concerns of stakeholders in Scotland and Wales, expressed during early engagement, have informed the policy for the whole of Great Britain and do not therefore require specific provision. In particular, concern about the effect of applying the requirement to services using minibuses and cars has informed the proposal to exempt all vehicles designed to carry fewer than seventeen passengers, and suggestions relating to the inclusion of passengers with dual sensory impairment has resulted in the requirement relating to the use of hearing aids and Audible Induction Loops.

It is currently understood that the requirement will not need to make specific provision for use of the Welsh language on services operating in Wales, on the basis that existing and planned legal provision would continue to apply regardless, however this position may change as the Regulations are developed and this Impact Assessment will be amended accordingly.

Regardless of how Welsh language requirements are handled legislatively however, prescribed information will need to be provided both in English and in Welsh on services operated in Wales, and on sections of route within Wales for services operated across the Anglo-Welsh border.

Enforcement

Responsibility for ultimate enforcement of the Accessible Information Regulations rests with the Traffic Commissioner, who has been given powers by the Bus Services Act to enforce the requirement and apply sanctions where appropriate, consistent with its other functions. In practice this means that the Traffic Commissioner will be able to investigate alleged incidents of non-compliance and to apply licensing sanctions, including the attachment of conditions to Operator licenses, or the suspension or revocation of those licenses.

Operators will have a right of appeal to the Upper Tribunal.

The details of the process to be followed for reporting alleged incidents of non-compliance will be provided in Guidance, however it is anticipated the following stages will be included:

1. Individuals or organisations report alleged individual incidents to the bus operator concerned;
2. Unresolved complaints or complaints regarding multiple alleged incidents are reported to an appropriate body, such as Bus Users UK or Transport Focus, for arbitration.
3. Complaints that remain unresolved or those alleging systematic non-compliance by individual or multiple operators are escalated to the Office of the Traffic Commissioner, which is expected to take a proportionate approach to applying sanctions for operators found to be in contravention of the Regulations, targeting systematic non-compliance rather than individual and temporary breaches.
4. Operators found to have failed to comply may appeal to the Upper Tribunal.

We are conscious of the need to ensure that the process for reporting apparent non-compliance is as straightforward and user-friendly as possible, and will work with the bodies concerned, and potential users, in order to achieve this.

Whilst the Traffic Commissioner is independent of Government, our intention is that enforcement of the Regulations should not penalise operators whose facilities for

providing audible and visible information become unavailable temporarily, but should focus on systematic and long-term non-compliance. The presence of facilities and/or driver training used to facilitate the provision of required information might be used to evidence an intention to provide required information in lieu of that information being provided, at least for short periods of time. We will discuss with the Traffic Commissioners the enforcement of the Regulations as appropriate.

Guidance

The Secretary of State has a duty to publish guidance to accompany the new requirement, and to review that guidance at least every five years thereafter. When issuing new or revised guidance the Secretary of State must consult Scottish and Welsh Ministers, Transport Focus, organisations representing disabled people and organisations representing bus operators.

Whilst the Accessible Information regulations are intended to impose a technology neutral, information-based requirement on bus operators, the guidance will be used to encourage operators to implement the requirement in a manner which is both cost effective and meets the needs of disabled passengers, and others travelling by bus. This may include options for meeting requirements relating to the timing and standard of information, and for making the most of synergies with work on open data, including using systems to provide audible and visible information that are compatible with those collecting and transmitting data about a vehicle's progress.

We will work with stakeholders in order to ensure that the guidance supports operators and results in information provided in a manner and to a standard which enhances the travelling experience for passengers.

Communications

Following the Commencement of Regulations we will begin a process of engagement and communications activity, supporting bus operators to understand their duties, encouraging technology developers to develop solutions compliant with the Regulations, and informing passengers of the expected improvement in on-board information and how they can help to identify non-compliance.

In addition to the guidance indicated above, we will consider what other channels might be used to disseminate messages regarding the Accessible Information Requirement

Implementation and Review

The Accessible Information Requirement will be introduced using powers at Section 17 of the Bus Services Act 2017, to lay a Statutory Instrument subject to the Affirmative procedure, and therefore requiring debate in both Houses of Parliament.

The Regulation will include a review clause, requiring review initially after six years (in order to allow its undertaking in parallel with that for the guidance), and at five year intervals thereafter. The intention of maintaining an ongoing review requirement is to ensure that the Regulations continue to reflect the nature of technology for providing audible and visible information and do not prevent innovation in the associated market.

Post Implementation Review (PIR) Plan

1. **Review status:** Please classify with an 'x' and provide any explanations below.

<input type="checkbox"/>	Sunset clause	<input checked="" type="checkbox"/>	Other review clause	<input type="checkbox"/>	Political commitment	<input type="checkbox"/>	Other reason	<input type="checkbox"/>	No plan to review

2. Expected review date (month and year):

06	04	/	20	254
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