



Department
for Transport

Review of the Public Service Vehicles Accessibility Regulations 2000

Consultation

June 2023

Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR



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Foreword



We have always been at the forefront of transport accessibility innovation. The Public Service Vehicles Accessibility Regulations 2000 (PSVAR) were created to deliver equality of opportunity for disabled bus and coach users, enabling all passengers to travel easily, confidently, and safely. The PSVAR informed the development of the [United Nations Economic Commission for Europe regulations for the construction of buses and coaches](#), which set the international benchmark for accessibility standards.

Progress has been made over the last two decades, with 99% of local buses in Great Britain complying with these regulations, but our transport network operates within an everchanging environment. New technology and the effects of the Pandemic have sped up the pace of change. The population is also ageing, bringing greater impetus to the need for fresh thinking, not only in relation to public service vehicles, but also with respect to how passengers access these vehicles at bus and coach stations and stops.

It is vital that government thinking is informed by a depth of data, experiences, and perspectives. I am seeking responses to this Call for Evidence from a diverse cross-section of stakeholders across the country, including disabled people, the public, manufacturers,

operators, and service commissioners. This is a significant opportunity to inform the government's understanding of the accessibility of our public service vehicles, and your insight is crucial. I strongly encourage you to respond.

Richard Holden MP, Minister for Roads and Local Transport

Executive summary

About this Call for Evidence

[The 2021 National Bus Strategy](#) (NBS) committed the government to review key regulations to improve bus accessibility.

This Call for Evidence (CfE) seeks to address the gaps in our understanding by gathering information on the current effectiveness and potential evolution of the Public Service Vehicles Accessibility Regulations 2000 (PSVAR). Evidence supplied can include but is not limited to opinions, experiences using buses and coaches, and data.

The CfE will run for a period of 12 weeks and is open to everyone. You can respond:

- As an individual
- On behalf of someone else
- On behalf of an organisation

The government response to the CfE will be published by the end of 2023 and will set out the next steps for the PSVAR.

Document structure

This CfE is comprised of three sections:

- **Introduction:** the history and context of the PSVAR;

- **Terms of Reference:** the goal, scope, and considerations of the Review; and
- **Call for Evidence:** questions for respondents, including case studies, contextual information, and annexes.

Considerations

The government's commitment to review the PSVAR will be met when its response to this CfE is published. This response will reflect and address the key actions recommended by respondents. It might, for example, suggest areas to take forward with further work, including technical research, Consultations, and impact assessments.

It is important that respondents understand that the **CfE is not a Consultation**, and the government response will not set out what changes there should be, if any. Rather, this CfE is an opportunity to gather evidence and identify where respondents think that change might be needed. This will form the basis of further engagement and policy exploration.

If respondents indicate that they would like to see changes to the PSVAR, the considerations set out below will be relevant:

- Some changes to the PSVAR could be achieved by following standard legislative processes for amending regulations.

- For example, respondents might recommend that the scope of PSVAR should be changed. The government would then conduct further policy development to identify what, if any, changes could be made to the scope of the PSVAR. Our intention would be to consult on any proposed changes before making potential amendments to the PSVAR.
- However, other changes to the PSVAR would be more complex. For example, respondents might suggest that they would like to see changes to some or all of the accessibility features of PSVs.
- The accessibility features of buses and coaches, such as minimum door widths and step heights, are set out in the schedules of the PSVAR. These features are regulated by international agreements.
- The relevant international agreement for buses and coaches is United Nations Economic Commission for Europe (UNECE) Regulation 107 (UN 107). [Annex 8 of UN 107](#) sets out the required accessibility requirements. In addition, [the Trade and Cooperation Agreement \(TCA\)](#), negotiated with the European Union (EU) following the withdrawal of the UK from the EU, requires that the PSVAR does not significantly diverge from UN 107.
- The UK would need to secure changes to UN 107 before it could consider making changes to the parts of the PSVAR subject to these agreements. Changing UN 107 would be a multi-year process and would

require the agreement of the other signatories. This would require a proposal for change, with a body of accompanying evidence demonstrating where improvements to UN 107 could be made.

- For example, if the CfE identifies that bus door widths no longer support the most common mobility aids, we would need to do further work to identify what the 'correct' door size should be, balancing against other priorities such as a desire to increase bus patronage. This work, and the PSVAR review, would provide the government with a body of evidence and a potential proposal for change. Our intention would be to consult on any proposals for change. If it was determined that change would be beneficial, we would then be able to propose amendments to the relevant technical standards set out in UN 107. If the proposals were approved by the signatories to UN 107, we would then be able to follow standard legislative procedures to amend the PSVAR.

The Terms of Reference of this CfE provides further detail on the implications of UN 107 and the TCA for the PSVAR in the 'Scope for amending the PSVAR' section of this document.

How to respond to this Consultation

The Call for Evidence period began in June 2023 and will run until early September 2023. Please ensure that your response reaches us before the closing date. You can contact the PSVAR Review Call for Evidence team via the contact details below if you need alternative formats that are not directly available on the webpage.

If you wish to send a hard copy, please send Call for Evidence responses to:

The PSVAR Review Call for Evidence team

Address

Local Passenger Transport Accessibility,
Accessible and Inclusive Travel,
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Department for Transport,
Great Minster House,
33 Horseferry Road,
London, SW1P 4DR

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PSVAR2000CfE@dft.gov.uk

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When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

Freedom of Information

Information provided in response to this Call for Evidence, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act (DPA) and in

the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

Privacy Information

The Department for Transport (DfT) is carrying out this call for evidence to gather evidence in relation the review of the Public Service Vehicles Accessibility Regulations 2000 (PSVAR). If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the controller for this information.

We process the following information as part of this call for evidence:

Name and email address. This is in case we need to ask you follow-up questions about any of your responses.

Health data, information relating to your age and information about your region of residence. This information will strengthen our analysis of responses and overall evaluation of the PSVAR.

You do not have to give us this personal information. If you do provide it, we will use it only for the purposes outlined above.

Under data protection law, the lawful basis for processing your data is [Article 6\(1\)\(e\)](#) – public interest. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

As information concerning health is a special category of personal information, a further section of the UK GDPR applies – [Article 9\(2\)\(g\)](#) – substantial public interest.

We may contract with a 3rd party supplier to help analyse responses to this Call for Evidence. Data will be anonymised prior to sharing wherever it is possible to do so.

If you respond via our online survey, your personal data is processed on behalf of DfT by SmartSurvey, with respect that they are our current survey collection software provider only.

Personal information provided will only be kept for the purpose of this call for evidence. Your information will be kept securely and destroyed within 12 months after the call for evidence has closed.

For more information about your rights in relation to your personal data, how to complain or how to contact the DfT Data Protection Officer, view our [Personal Information Charter](#).

Introduction

Changing expectations around accessibility

Legislative background

The [Disabled Persons \(Employment\) Act 1944](#) was the first piece of legislation to define the term 'disabled person'. This [established the importance of mobility and access considerations](#) across the UK for generations to come and paved the way for other legislation making special provision for disabled people. The Disability Discrimination Act 1995 (DDA) introduced the concept of the rights of disabled people for the first time and obliged service providers to make 'reasonable adjustments' to remove the barriers they face. The DDA included powers to introduce regulations to make transport vehicles accessible and in 2000, the then government used these powers to create [the Public Service Vehicles Accessibility Regulations 2000](#) (PSVAR). In Great Britain (GB), the DDA was replaced by the Equality Act 2010.

What were the PSVAR's original objectives?

The PSVAR were created to improve access to buses and coaches operating local and scheduled services in GB. These vehicles are collectively referred to as

‘regulated Public Service Vehicles’ (PSVs). The [original impact assessment](#) undertaken as part of creating the PSVAR stated:

“The Government is committed to ensuring that disabled people have equality of opportunity. An essential part of this policy is to enable disabled people to use buses and coaches in safety, with reasonable comfort and without undue difficulty.”

Before the PSVAR, accessibility was not a strong consideration for buses and coaches. For example, buses were high-floor. This meant that it was necessary for passengers to climb one or more steps to board the bus. This made accessing local or scheduled bus services difficult for passengers with mobility impairments. The PSVAR were created to address these types of problems.

To improve access to in-scope vehicles, the regulations set out three schedules. These schedules outline the accessibility requirements for operators of in-scope services and have improved the accessibility of buses and coaches across GB:

- [wheelchair accessibility requirements for buses and coaches](#);
- [general accessibility requirements for single-deck and double-deck buses](#); and

- [general accessibility requirements for single-deck and double-deck coaches.](#)

What do we know about the accessibility of buses and coaches in use today?

PSVs serve a vital function in our transport network, providing local and scheduled services which deliver connectivity across GB. Accessibility for local buses is good: 99% of local buses in Great Britain have been issued with an accessibility certificate. However, the widespread availability of accessible public transport does not mean that all passengers feel equally confident in their use of PSVs. For example, [transport statistics](#) indicate that in 2020 (during the Pandemic) disabled adults in England made 28% fewer trips across all modes compared to non-disabled adults. This compares with 39% fewer trips in 2017 (pre-Pandemic), and 28% fewer trips in 2021 (the latest statistics at the time of publication). Coronavirus restrictions began in England in March 2020, with lockdown ending in July 2021, and final social isolation restrictions lifted in April 2022.

In addition, there is a lack of understanding on the experience of neurodivergent passengers (for example, those with Autism) when using PSVs; and how well the PSVAR support their access needs. This is true of most other non-visible disabilities. There is a similar lack of understanding around how PSVs could be better adapted

to improve the experience of ambulant passengers (passengers with physical disabilities who can move around with accessibility aids, such as crutches). The PSVAR have a strong focus on wheelchair accessibility, but the regulations could also benefit from further consideration of other passengers, such as people with visual and or hearing impairments, and people with restricted growth or short stature.

It is also important that the government improves its understanding around how people with multiple conditions or impairments experience PSVs, such as might be the case for some older passengers. Research in this area is being conducted, with a particular emphasis on the accessibility of bus and coach stations and stops.

Case study: Brighton and Hove Buses and Metrobus “dementia-friendly” buses

Brighton and Hove aims to become an age and “dementia-friendly” city. Over 7 years ago, Brighton and Hove Buses and Metrobus introduced dementia awareness training for their staff. All bus staff have now achieved ‘dementia-friendly’ status. This has enabled their bus drivers to understand the range of challenges that passengers with dementia must overcome when travelling. It also supports them with the knowledge they need so they can take effective action to help.

Brighton and Hove Buses and Metrobus have found that dark flooring can look like a pool of water, or a hole, to people with dementia. This can cause these passengers to avoid taking the bus. Consequently, the operator has worked with manufacturers to introduce light flooring to the design of their buses to counter this issue, delivering a more accessible and inclusive service.

Brighton and Hove Buses and Metrobus have also recently invested in a fleet of 56 new single-deck hydrogen buses. Half of these will have double wheelchair bays without the loss of any seats. This provision goes beyond the standards outlined by the PSVAR. The other half, owing to a shorter length of chassis, will have single bays with a separate pushchair or buggy area.

Source: Brighton and Hove Buses and Metrobus. 2021. *Making Brighton & Hove a dementia friendly city.*

While full compliance with the PSVAR was expected by 1 January 2020, many coach PSVs have not achieved the required level of accessibility.

Engagement with a variety of stakeholders, including industry trade bodies and disabled people's organisations, suggests that scheduled coaches are broadly compliant. However, there have been specific compliance issues with rail replacement (RR) and home-to-school (HTS) services provided by coaches.

Unfortunately, the exact levels of compliance for HTS services, and the coach sector more broadly, is unclear. This is due to a lack of data. In addition, the patchy data that does exist is insufficient for drawing reliable conclusions.

The exception is the provision of rail replacement (RR) services, where the Office of Rail and Road (ORR) collect train operating company compliance data. For the period 2021 to late 2022 (when data was last reported), the percentage of planned RR bus and coach duties deemed 'accessible' was reported as not dropping lower than 93%. We do not have data for unplanned RR, but we would anticipate that the compliance rates are likely to be lower than for planned RR.

An ageing population

The population of the UK is ageing. The Office for National Statistics (ONS) projects that more than 24% of people living in the UK will be aged 65 or older by 2042, up from 18% in 2016.

With an ageing population, addressing mobility impairments will only increase in importance for the bus and coach industry, and service commissioners. Subsequently, it is important that this CfE gathers evidence on how well the PSVAR supports older and disabled people, and what potential changes to the PSVAR might support their access needs.

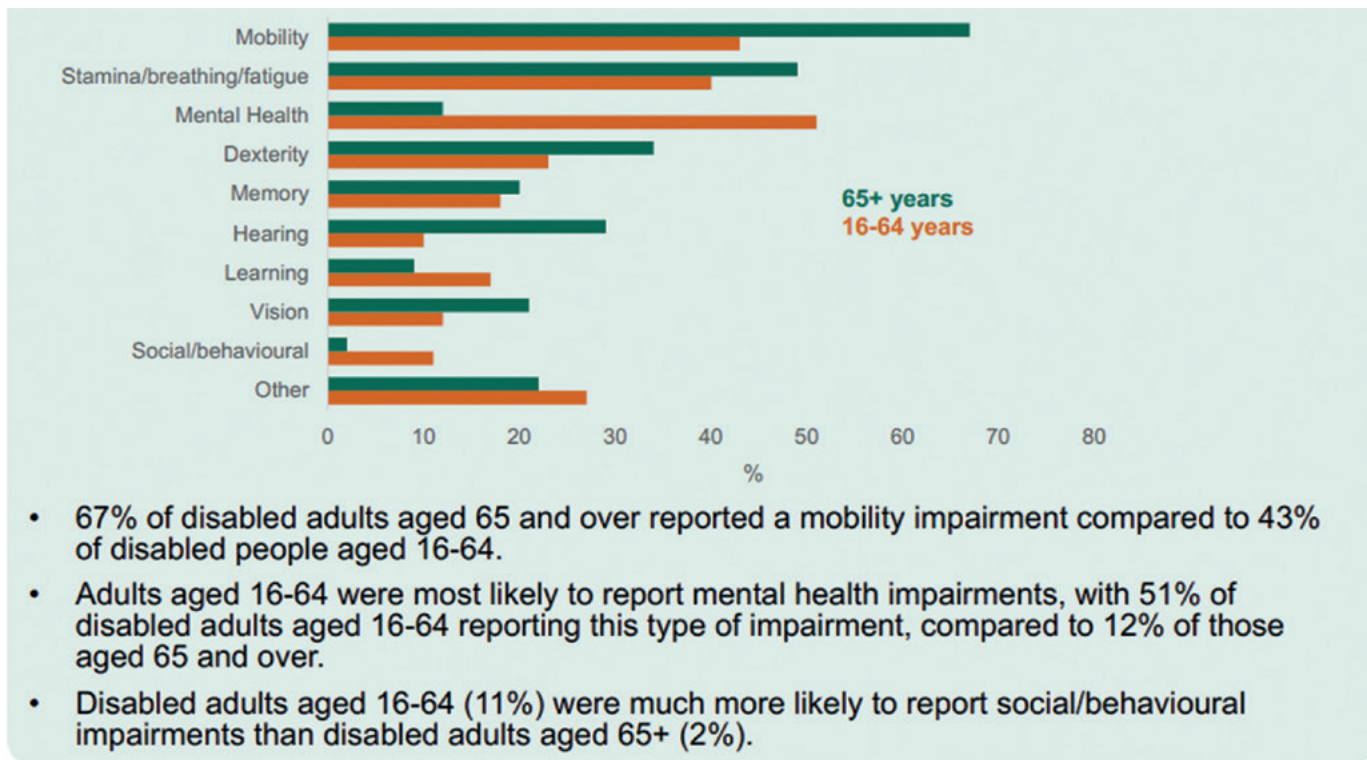


Figure 1 Impairment prevalence by age group for disabled adults. (Transport: disability and accessibility statistics, England: 2020.)

Terms of Reference

Aim

The government is committed to building a fairer society for all. The Department for Transport (DfT) has a particular focus on enhancing the transport network by improving journeys, safety, and inclusivity for all.

This means that disabled people should be able to travel easily, confidently, and without additional cost in line with the ambitions of the [2018 Inclusive Transport Strategy](#) (ITS).

A key element of realising this ambition is the government's intention that future decisions on the accessibility of Public Service Vehicles (PSVs), such as buses and coaches, should be based on an up-to-date understanding of passenger need.

Consequently, the government is reviewing of the PSVAR ('the Review'), which came into force over 20 years ago. The Review will consist of a Call for Evidence (CfE), and the government's response to it.

Objectives

The government's objectives for the Review are to:

- Gather evidence that will allow us to understand the efficacy of the PSVAR;

- Understand how the regulations might evolve to better meet the changing needs of disabled people;
- Identify where further policy development might be needed so that future decisions on the PSVAR can be made with a better understanding of the changing needs and expectations of disabled passengers; and
- Understand the perspectives of disabled people who use PSVs, the commissioners of PSV services, the manufacturers and operators of PSVs, and the public on the PSVAR.

This Call for Evidence (CfE), as part of the Review, seeks to:

- Understand the extent to which the PSVAR has enabled disabled people to travel comfortably and safely on PSVs;
- Investigate how passenger need has changed since the PSVAR came into force in 2000;
- Explore how PSVs might evolve to better meet the changing needs of disabled people; and
- Identify any innovation of the accessibility features onboard buses and coach PSVs, for example, innovation of coach wheelchair lifts.

Scope

To deliver the objectives outlined above, the Review will focus on:

- Exploring the range of vehicles that PSVAR applies to;
- Assessing the effectiveness of the PSVAR's current accessibility requirements;
- Understanding whether the current approach to regulating works;
- The relationship between the future of the PSVAR and the transition to zero emissions;
- Compliance with the PSVAR, including inspection and enforcement; and
- Factors that are related to the PSVAR, but not regulated by it, such as the accessibility of roadside infrastructure and the conduct of drivers and passengers.

Governance and Outputs

The Review will include engagement with disabled people, engagement across government, and with various other stakeholders. These will include [the Disabled Persons Transport Advisory Committee](#) (DPTAC), disability and disabled person's organisations, the commissioners of PSV services, and the manufacturers and operators of PSVs.

Scope for amending the PSVAR

The [National Bus Strategy](#) (NBS) commitment sets a clear objective for the Review: to ensure, “future decisions on accessibility standards are based on an up-to-date understanding of passenger need.” The method for achieving this is through delivery of this CfE, and analysis of its responses.

Any potential decisions taken after the conclusion of the Review regarding the PSVAR will be influenced by [United Nations Economic Commission for Europe \(UNECE\) Regulation No. 107](#) (UN 107); and the [Trade and Cooperation Agreement \(TCA\) with the European Union \(EU\)](#).

UN 107 supports consistency across the manufacturing specifications of international contracting parties. This means that buses and coaches manufactured in the UK, the EU, the USA and Japan are constructed to meet the same minimum accessibility standards.

This provides regulatory consistency for manufacturers of buses and coaches, meaning that they can be confident of selling them to operators across the globe. It also provides a consistency of experience for passengers travelling on buses and coaches manufactured to UN 107.

[Regulation 5 of the PSVAR](#) applies UN 107 to GB law by recognising that vehicles manufactured to

UN 107 Annex 8 are alternative but equivalent to the requirements of the PSVAR.

The [TCA](#) prevents the UK from introducing domestic standards which could make vehicles manufactured internationally to the requirements of UN 107 less commercially attractive in our market.

As the UK is a signatory of UN 107 and the TCA, any vehicles that meet the standards of UN 107 can continue to be sold in the UK as meeting the requirements of the PSVAR.

The collective effect of these international agreements is to limit the pace of changes which might be made to the schedules of the PSVAR. These schedules specify the accessibility features of buses and coaches. For example, they standardise minimum step heights and door widths. Of the accessibility features regulated in the PSVAR, only route and destination displays are not also regulated by UN 107.

Any proposed changes would require successful negotiation with the other signatories to UN 107. This will take time and the outcome is uncertain.

However, these agreements do not prevent the Review from gathering evidence on how the regulations could be improved; or evaluating the efficacy of the PSVAR. Nor does it limit any changes to aspects of the PSVAR that are out of scope of UN 107, such as changes to the type and range of services that the PSVAR applies to.

Call for Evidence

The Call for Evidence section (the third section) explores six topics:

The application of the PSVAR

This section outlines the range of services the PSVAR currently applies to (or are “in-scope” of). For example, most buses and coaches seating 22 or more passengers are in-scope of the PSVAR, so they must meet the accessibility requirements of the regulations. We are seeking views from respondents on if they would like to see changes to the application of the PSVAR.

Accessibility features of Public Service Vehicles (PSVs)

This section explains the requirements (or accessibility “features”) of the PSVAR, such as those that relate to wheelchair spaces and lift systems. We are seeking evidence on if respondents feel that the current requirements support the accessibility needs of passengers, and what alternative or additional requirements they might want to see.

Approaches to regulation

This section explains the current regulatory approach that underpins the PSVAR. Currently the PSVAR requires adherence to a detailed set of specifications. For example, the PSVAR specifies – to the millimetre –

the exact minimum width of priority seats on buses and sets out precisely how they should be measured. We are seeking views on the suitability of this regulatory approach.

Decarbonisation and the PSVAR

This section outlines the importance of decarbonisation and seeks to explore its relationship with bus and coach accessibility. For example, how electric vehicle (EV) technology impacts the design and accessibility of PSVs. We are seeking views on if changes to the accessibility requirements for buses and coaches should be aligned with the transition to zero emission vehicles and, if so, how might this be done.

Enforcement of the PSVAR

This section sets out how the PSVAR are currently enforced. Currently inspection activity is undertaken by the Driver and Vehicle Standard Agency (the DVSA), which can occur during vehicle safety testing or at the roadside. We are seeking evidence on how compliance with the PSVAR might be improved.

Roadside infrastructure, conduct and other issues

This section describes issues that have an impact on the accessibility of bus and coach services that are related to the PSVAR but not regulated by it. This includes roadside infrastructure, such as kerb heights, and the conduct of drivers and passengers. We are seeking views on these

and other related PSVAR issues as they relate to the accessibility of buses and coaches.

Introduction

An up-to-date understanding of passenger need will assist with future decision making on accessibility standards for buses and coaches. [Accessing these services supports people to be economically active](#), boosting local growth, whilst also enhancing social connectivity, health, and wellbeing for disabled and ageing populations. Inaccessible vehicles are direct barriers to these benefits.

The PSVAR

The PSVAR govern the accessibility requirements for buses and coaches providing local and scheduled services with a capacity exceeding 22 passengers, in addition to the driver.



Figure 2 An elder passenger using a sideloading PSVAR compliant coach lift (CPT)

The government's understanding of passenger need should be informed by evidence. The Call for Evidence (CfE) will build on the findings of the [2022 Reference Wheelchair research](#), a study commissioned by the Department that looks at the current standard for wheelchairs and their use on transport. Consequently, it is important that this CfE engages with a wide and diverse range of passengers and potential passengers. For example, one type of respondent we would particularly like to understand the views of are people who would like to use PSVs, but feel that they do not currently meet their accessibility needs.

We are encouraging respondents to answer all questions, or as many as possible. However, we understand that this is a long and at times complex document; respondents are welcome to focus on those sections that they feel are most relevant to their experience, work, or interests.

Case study: wheelchairs and the reference standard research

In March 2022, research commissioned by the Department for Transport found that current International Organisation for Standardisation (ISO) reference wheelchair standard accommodates 60% of wheelchairs and 54% of wheeled mobility aids in the UK.

The study highlighted that demands for mobility aids with increased range and functionality were driving production of larger, heavier, 'hybrid' devices. These typically exceed the dimensions of the reference standard. However, the ability of a bus or coach to accommodate these bigger devices is limited by safety and vehicle design considerations.

The 2018 Inclusive Transport Strategy (ITS) asks the Department to consider how the future needs of disabled people travelling by local and road based public transport should be met in the future. The PSVAR review will use the findings of the reference wheelchair report to explore the efficacy of the reference standard and inform our understanding of how wheelchairs are used on buses and coaches.

Sources: Department for Transport. 2022. *Reference Wheelchair Research: Full Report*; and Department for Transport. 2018. *The Inclusive Transport Strategy*.

The application of the PSVAR

The PSVAR applies to a range of single and double-decker buses and coaches when they are providing local or scheduled services. These are known as “regulated public service vehicles” (PSVs).

In-scope services

This section outlines the services which must comply with the PSVAR. It also introduces other services which are provided by buses and coaches, but are not regulated by the PSVAR.

Local service

A service, using one or more public service vehicles, for the carriage of passengers by road at separate fares.

Scheduled service

A service, using one or more public service vehicles, for the carriage of passengers at separate fares:

- Along specified routes;
- At specified times; and
- With passengers being taken up and set down at pre-determined stopping points, but does not include a tour service.

Local and scheduled bus services are provided by PSVs. The route can be any length, as long as passengers can get off within 15 miles (measured in a straight line) of where they got on.

‘Long distance’ services are not defined in the PSVAR but are captured in part by both the local and scheduled service definitions; meaning they must comply with the regulations in certain scenarios.

Rail replacement service

Services providing alternative transport for railway passengers during periods of planned or unplanned disruption.

With respect to rail replacement (RR) services, the rail contracting process obliges Train Operating Companies (TOCs) to provide alternative accessible transport where

a PSVAR-compliant RR vehicle is not available. The alternative accessible transport must offer the same level of service as transport provided to non-disabled passengers. This means that disabled passengers should suffer no detriment to comfort, safety or waiting times. For planned engineering works, TOCs must make provision for alternative accessible transport in advance. As a condition of licencing by the Office of Road and Rail (ORR), TOCs are obliged to set out such arrangements as part of their accessible travel policies.

Home-to-school service

A 'closed door' home-to-school service is a service providing transport to and from an educational institution providing primary, secondary, or further education.

'Closed door' home-to-school transport services are in-scope of the PSVAR where a fare is paid by at least one passenger. Similar to TOCs providing RR services, there is a legal duty on Local Authorities (LAs) to provide alternative accessible transport for disabled passengers who attend state-funded schools if an accessible coach is not available. LAs do not have a similar duty with respect to non-state schools, unless the pupil has special educational needs and disabilities, and the non-state school is named in the pupil's education, health, and care (EHC) plan. Non-state schools do not have a specific transport duty for their pupils, but transport arrangements

would usually be made as part of a package agreed with the parents or guardians.

Out of scope services

The PSVAR does not apply to all bus and coach services. Services not currently in scope of the PSVAR include charter, tour, or demand responsive services. The PSVAR also does not apply to small buses and coaches that seat 9-22 passengers (in addition to the driver), such as mini-buses.

Tour services

A service where a public service vehicle is used for or in conjunction with the carriage of passengers to a particular location, or particular locations, and back to their point of departure.

Charter services

There is no established definition for charter services across the bus and coach industry. These are typically hired for specific purposes and occasions. Like tour and DRT services, they do not follow a consistent schedule.

Demand responsive services

Demand responsive transport (DRT) is a flexible service that provides shared transport to users who specify their desired location and time of pick-up and drop-off.

Small bus and coach services

Small buses and coaches (SBCs) comprise a wide range of vehicles, including minibuses, van conversions, and small buses designed to carry 9-22 passengers. These are typically thought of as mini-buses, and are used to provide local services, in addition to community or charter services.



Figure 3 A wheelchair user entering an accessible community transport minibus (Community Transport Association)

Questions

These questions are included here so you can read them in the context of this document. To respond to the questions, see the [Ways to respond section of the GOV.UK home page for this call for evidence.](#)

Question 1

Do you think that the current approach towards accessibility in the PSVAR should be changed in some respect? (please select **one** answer only).

- yes for both buses and coaches
- yes for buses only
- yes for coaches only
- no
- don't know
- do not want to answer

When answering questions 2 to 3

- If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.
- If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.
- When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 2

If you think that **change is needed**, how, in your view, should the current approach towards accessibility in the PSVAR change?

Question 3

If you think that change **is not** needed, **why** do you think that change is **not** needed to the current approach towards accessibility in the PSVAR?

Question 4

In your opinion, should the scope of the PSVAR be changed? (please select **one** answer only).

- yes – it should be expanded
 - yes – it should be reduced
 - no – it should remain the same
 - don't know
 - do not want to answer
-

Question 5

If you think that the scope of the PSVAR should be **expanded**, which services do you think should be brought into scope? (you can select multiple answers):

- free home-to-school services (for example, when no fare is paid)

- tour services
 - charter services
 - demand responsive services
 - small passenger carrying vehicles which carry between 9-22 passengers (for example, minibuses)
 - other (please specify)
-

Question 6

If you think that the scope of the PSVAR should be **reduced**, which vehicles do you think should be **removed**? (please select **one** answer only):

- buses
 - coaches
 - buses and coaches
-

Question 7

If you think that the scope of the PSVAR should be reduced by removing in-scope **coach services**, which type of coach services should be removed? (you can select multiple answers)

- paid home-to-school services
- rail replacement services
- other (please specify)

When answering question 8

- If you are answering this question as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.
- If you are answering this question on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.
- When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 8

Why do you think that the scope of the PSVAR should either change, remain the same, or be reduced?

Public Service Vehicle accessibility features

We are seeking evidence on how passengers experience the accessibility features currently provided by buses and coaches. We are also interested in learning about what features respondents would like to potentially see added, removed or changed.

For the purposes of this CfE, the accessibility features set out in the schedules of the PSVAR have been grouped into categories. Simplified descriptions have also been provided. The regulations provide much more detail on individual accessibility features.

With a dedicated schedule outlining the requirements for wheelchair access, the PSVAR can be perceived to overlook the range of other disabilities (both physical and cognitive) we know to exist in modern society. It is worth considering when engaging with this section how well the regulations currently cater to all different types of disabilities and impairments.

Wheelchair requirements for PSVs ([schedule 1](#))

Regulated PSVs must be accessible for wheelchairs that meet the “[reference wheelchair](#)” standard. This means that buses and coaches regulated by the PSVAR must allow a wheelchair designed to the [International Organisation for Standardization \(ISO\) specifications](#) to enter, move around, and be secured during transit.

The following features enable passengers who use wheelchairs to safely **enter and exit** buses and coaches:

Boarding lifts and ramps: Regulated PSVs are fitted with a lift or ramps stowed on the vehicle. Ramps can be powered or manual. This section of the PSVAR describes the operational, dimensional, spacing, and safety requirements for boarding lifts and ramps.

Entrances and exits: the door widths of regulated PSVs are designed to allow wheelchairs to pass through unhindered. This section of the PSVAR provides for the dimensional and spacing requirements of entrances and exits onboard regulated PSVs.

The following features relate to the **positioning and securing** of wheelchairs inside the vehicle:

Wheelchair spaces: regulated PSVs must have at least one wheelchair space located on its lower deck.

Forward-facing wheelchairs: coaches are likely to be designed for forward-facing wheelchairs. Forward-facing wheelchair space designs require tie-down systems attached to the wheelchair, as well as a suitable restraint, to provide a reasonable level of safety. This section of the PSVAR describes the dimensional, spacing, and safety requirements for forward-facing wheelchairs.

Rearward-facing wheelchairs: buses are usually constructed with a backrest to enable a wheelchair to travel in a rearward facing direction. The design of the rearward-facing wheelchair space helps to prevent

injuries to the wheelchair user as the vehicle is in transit. Restraints are not required when the wheelchair space is rearward facing. This section of the PSVAR describes the dimensional, spacing, and safety requirements for rearward-facing wheelchairs.

The following features enable a wheelchair user to **move around safely inside** buses and coaches and **communicate** with the driver.

Gangways: regulated PSVs must allow reference wheelchairs enough room to make passage between the wheelchair space and the wheelchair entrance and exit. This section of the PSVAR outlines the ease of access and dimensional requirements for onboard wheelable areas.

Signs and markings: visual assistance is provided to wheelchair users onboard regulated PSVs to help with the location and use of the wheelchair space. For example, signs and markings should indicate the direction that the wheelchair and the wheelchair user will face during transit. This section of the PSVAR describes the dimensions and positional requirements for signs and markings.

Communication devices: the audio, dimensional, positional, and spacing requirements for the device a disabled passenger will use to signal the driver to stop, or otherwise communicate with them.

Lighting: the requirements for illumination of the interior and exterior of the vehicle to facilitate safe boarding and alighting for wheelchair users.



Figure 4 A rearward facing bus wheelchair space (DVSA)

Case study: experiences of mobility aid users on public transport services

The Reference Wheelchair report highlights the importance of accessibility features on buses and coaches for disabled people, but also indicates where there are accessibility challenges. For example, one participant in the research explained that when he uses his wheelchair on the bus:

“there’s a big gap to which is hard to negotiate. There is a designated space on board, however, there isn’t means of securing the wheelchair and I find that drivers are rough, so I feel uneasy being unsecured on buses going around corners.”

Source: Department for Transport. 2022. *Reference Wheelchair Research: Full Report.*

Bus requirements (schedule 2)

The following features enable passengers to **identify the bus** they wish to take, in addition to **supporting safe access** to the bus from the kerb or roadside:

Route and destination displays: the dimensional and visual requirements for displays indicating the route number and destination. This information helps passengers identify the correct service.

Kneeling systems: a height control system which enables the driver to lower or raise the vehicle for embarking and disembarking. The regulations set out the requirements for safe operational use of the system.

Steps (external and internal): steps enable access to the bus from outside, in addition to the raised area at the rear of the vehicle and upper-deck. The regulations specify the dimensional, spacing, and safety requirements for these steps.

The following features support **safe movement, seating, and communication** with the driver **inside** the bus.

Priority seats: the dimensional, spacing, and safety requirements for the minimum of four designated seats for disabled passengers on buses. These seats should be vacated by non-disabled passengers if needed.

Floors and gangways: the dimensional and safety requirements for the designated onboard “priority floor” areas which enable movement around the bus. These must be slip-resistant and built to a specified gradient.

Handrails and handholds: these features support safe travel for passengers onboard whilst moving and stationary, and are designed to provide additional stability. These features are built into or connected to the frame of the bus, and will be contrasting in colour from the rest of the bus.

Communication devices: audio, dimensional, positional, and spacing requirements for the device a disabled passenger will use to signal the driver to stop; or otherwise communicate with them.



Figure 5 The inside of a bus showing the wheelchair space, handrails and handholds, seats, and steps (DfT)

Coaches (schedule 3)

The following features enable passengers to **identify the coach** they wish to take, in addition to **supporting safe access** to the coach from the kerb or roadside:

Route and destination displays: the dimensional and visual requirements for displays indicating the route number and destination. This information helps passengers identify the correct service.

Kneeling systems: a height control system which enables the driver to lower or raise the coach for embarking and disembarking. The regulations set out the requirements for safe operational use of the system.

Steps (external and internal): steps enable access to the coach from outside, in addition to the main cabin area, toilet, and upper-deck if present. The regulations specify the dimensional, spacing, and safety requirements for these steps.

The following features support **safe movement, seating, and communication** with the driver **inside** the coach:

Floors and gangways: the dimensional and safety requirements for the designated onboard “priority floor” areas which enable movement around the bus. These must be slip-resistant and built to a specified gradient.

Seats: the dimensional, spacing, safety, and access requirements for seats onboard a coach.

Handrails: these features support safe entry to and alighting from the coach, in addition to providing stability for passengers at gangways. They are built into or connected to the frame of the coach, and will be contrasting in colour from where it is housed.

The schedules of the PSVAR, summarised above, outline the minimum standards for the accessibility features of buses and coaches. However, as the following case study illustrates, it is possible to go beyond these standards.

Case study: IMTAC, Wrightbus, and Translink (Northern Ireland)

The Inclusive Mobility and Transport Advisory Committee (IMTAC) advise the Northern Irish Executive on issues that affect the mobility of deaf, disabled, and older people. In Northern Ireland, PSVAR is devolved, but the regulations are aligned with the GB specifications.



IMTAC have worked with Wrightbus to influence the design of new hydrogen and battery electric buses which now form part of Translink's zero-emission bus fleet.



Notably, both buses have dual door access. This was in line with IMTAC's recommendation that the vehicles should ensure flexible access when both entering and exiting the bus. An additional success



of this work has been to design an above average specification wheelchair user space on the battery electric designs, with dual door access enabling use of the flexible space as an additional wheelchair space.

IMTAC have also engaged with Translink on the trial of a new low floor coach developed for use on inter-urban routes. These vehicles have low floor, step free entrances, and a large section of low floor step free seating. By comparison with a high-floor coach, removal of the high first step into the vehicle significantly enhances the coach's accessibility. This is particularly beneficial for ambulant disabled passengers, and others with mobility impairments.

Source: IMTAC. 2021 Update following site visit to Wrightbus to view zero emission vehicles.



Figure 6 A wheelchair user entering a coach via the sideloading lift. (Redfern Travel)

The Department is aware of innovations in wheelchair lift technology. For example there are internal, [sideloading coach lifts operated in Brazil](#) with remotely controlled seats which do not require the passenger to be lifted high into the air. However, this type of lift would not meet the requirements of the PSVAR as it cannot assist a wheelchair user who cannot transfer out of their chair, for example. PSVAR compliant examples of wheelchair lift and ramp access include the style at figure 6, and [sideloading 'ski-locker' lifts](#). We would like to encourage respondents to provide us with their views and ideas

on any innovative approaches to bus and coach accessibility. This could include suggestions which go beyond the requirements of the PSVAR.

Differences between the accessibility features of buses and coaches

The principal access difference between regulated buses and coaches is that buses facilitate low-floor, ground level access. Comparatively, passengers are required to climb steps to access a coach. This is because coaches typically provide storage space for luggage under the cabin seating, which requires a raised floor. The low or high-floor nature of a PSV changes the way disabled passengers and mobility-impaired passengers access them. For example, climbing the first step of a high-floor vehicle can be challenging for passengers with arthritis.

The regulations also do not require coaches to provide priority seats. This is because coaches provide a different type of service to buses, with passengers typically booking their seats in advance and staying in place for a potentially long journey. Bus stopping and journey times are generally shorter than on a coach, so it is important that a disabled passenger can quickly locate and leave their seats.

Cost considerations

It is important that the Department gathers evidence on the cost of complying with the PSVAR. For example, this might include the cost to an operator for retrofitting

a vehicle to ensure that it meets the relevant wheelchair requirements. It would also be helpful to gather evidence on potential costs if the PSVAR were to be amended in the future. For example, if the scope of the PSVAR were to be expanded to bring in a greater range of services, or if additional accessibility features were required, this might have cost implications for operators. While these are hypothetical considerations, the CfE includes a question to help the Department to understand potential cost considerations, as well as current ones.

While this question is most relevant to operators and service commissioners, we welcome contributions from all correspondents, who may also have views or insights on what might constitute reasonable, proportionate, or necessary costs.

Questions

These questions are included here so you can read them in the context of this document. To respond to the questions, see the [Ways to respond section of the GOV.UK home page for this call for evidence](#).

Question 9

In your opinion, does the current approach towards the accessibility features of public service vehicles need to change? (please select **one** answer only)

- yes for both buses and coaches
- yes for buses only

- yes for coaches only
 - no
 - don't know
 - do not want to answer
-

Question 10

If you think that the current approach towards **wheelchair accessibility features** on **buses** needs to change, where do you think change is needed? (you can select multiple answers):

- boarding lifts
- boarding ramps
- entrances
- exits
- wheelchair spaces
- forward-facing wheelchairs
- rearward-facing wheelchairs (typical of most buses)
- gangways
- signs and markings
- communication devices
- lighting
- another feature (please specify)

Question 11

If you think that the current approach towards **wheelchair accessibility features** on **coaches** needs to change, where do you think change is needed? (you can select multiple answers):

- boarding lifts
- boarding ramps
- entrances
- exits
- wheelchair spaces
- forward-facing wheelchairs (typical of most coaches)
- rearward-facing wheelchairs
- gangways
- signs and markings
- communication devices
- lighting
- another feature (please specify)

Question 12

If you think that the current approach towards **accessibility features** not relating to wheelchairs on **buses** needs to change, where do you think change is needed? (you can select multiple answers):

- route and destination displays
- kneeling systems
- steps (external)
- steps (internal)
- priority seats
- floors (buses are low floor, allowing for ground level entry and exit)
- gangways
- handrails
- handholds
- communication devices
- another feature (please specify)

Question 13

If you think that the current approach towards **accessibility features** not relating to wheelchairs on **coaches** needs to change, where do you think change is needed? (you can select multiple answers):

- route and destination displays
- kneeling systems
- steps (external)
- steps (internal)

- floors (coaches are usually high-floor, requiring steps to enter and exit)
- gangways
- seats (coaches do not have priority seats)
- handrails
- handholds
- communication devices
- another feature (please specify)

When answering questions 14 to 17

- If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.
- If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.
- Regardless of if you are answering as an individual or on behalf of an organisation, please feel free to make innovative suggestions, or to emphasise current best practice, such as the use of flexible space.
- When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 14

Why do you think the current approach should either change, or remain the same?

Question 15

If you think that change is needed, **what** changes would you like to see?

Question 16

If you think that change is **not** needed, **what**, if any, aspects of the current approach do you think work well?

Question 17

What, if anything, should the Department be aware of when it comes to the financial cost of complying with the PSVAR?

Regulatory approach

The PSVAR currently provides a highly detailed and prescriptive set of regulations that specify, often to the millimetre, the exact requirements that in-scope PSVs must comply with. For example, this extract from schedule 5, which regulates boarding lifts and ramps, is typical:

“(4) Any boarding lift fitted to a regulated public service vehicle shall comply with the following requirements—

(a) a boarding lift platform shall be not less than 750mm in width and not less than 1200mm in length (excluding the device specified in (b) below);

(b) unless a boarding lift platform is in the lowered position and resting on a surface from which a wheelchair user will board, the following shall apply—

(i) along any side of the lift platform from which a wheelchair user will move on to, or move from, the lift platform, a device of a height not less than 100mm measured vertically above the surface of the lift platform shall operate automatically as the lift is raised above the lowered position, except that when in the raised position for a wheelchair user to move from the lift platform to the floor of the vehicle, the device shall permit unobstructed access to the floor of the vehicle;

(ii) along any other side, there shall be a device or structure of a height not less than 25mm measured vertically above the surface of the lift platform; and

(iii) part of the vehicle structure may fulfil the requirements in (i) or (ii) above throughout the operating range of the lift provided that any gaps in the structure are unlikely to cause injury while the lift is in motion;

This approach provides for minimum standards of safety and accessibility, as well as clarity and consistency for passengers, manufacturers, operators, and enforcement agencies such as the Driver and Vehicle Standards Agency (DVSA).

However, innovation of existing features and the creation of new functionality over the last two decades brings the potential for improving accessibility on PSVs. One of the key findings of the Reference Wheelchair report [emphasis added] was that there should be “Engagement with vehicle designers on the challenge of achieving the most inclusive and flexible designs practicable...”. A highly specified approach may act as a constraint on innovations which could lead to more accessible outcomes.

An alternative approach to regulation would be one that is focused on outcomes, or principles, rather than detailing a specific action, process, or feature at the outset.

An example of outcome-focused regulation are the Principles for Business, as set out by the Financial Conduct Authority (FCA) with the principle of ‘Treating Customers Fairly’ providing a useful case study in some of the benefits and challenges posed by taking an outcome-focussed approach.

Case study: applying an outcome-focused approach to banking regulation

In May 2021, Chair of the FCA Charles Randell delivered a speech on “outcomes-focussed regulation” to the Building Societies Association, drawing attention to their experiences with attempting to apply the ‘Treating Customers Fairly’ (TCF) regulatory principle:

“The TCF Principle requires that ‘a firm must pay due regard to the interests of its customers and treat them fairly.’ Five years after TCF came into force in 2001, the Financial Services Authority (FSA) assessed progress in implementing the Principle. It described the picture as ‘mixed’. It also set out how the Principle should incorporate six consumer outcomes. They are quite general: such as ‘where consumers receive advice, the advice is suitable and takes account of their circumstances’. The FSA explained how it would assess whether the desired outcomes were being achieved. In relation to suitable advice, it summarised findings of supervisory work which suggested that an alarmingly high proportion of advice firms did not have adequate processes to assess their customers’ needs or to provide advisers with adequate training. In other words, it fell back to measuring and assessing inputs rather than actual outcomes for customers”.

Ultimately, FCA considered that the principal steps required to deliver effective outcome-based regulation are:

- undertake an appropriate volume of work to define the ‘right’ outcomes;
- develop a variety of metrics for measuring those outcomes; and
- use this enhanced data capacity to enable the introduction of more effective interventions.

Source: FCA. 2021. *FCA: Outcomes-focussed regulations: a measure of success?*

An example of the ‘outcome-focused’ approach that is already present in the PSVAR is the requirement to be able to manoeuvre wheelchairs from the entrance of a bus to the wheelchair space. The regulations do not require that a specific set of steps are taken, or mandate that the wheelchair must move a specific distance in a designated direction. Rather, the requirement is for the *outcome* of getting the wheelchair onboard and into the wheelchair space.

An extension of this approach could, for example, be used to define a disabled passenger’s service expectations, focussing on the “door-to-door” journey, rather than specifying the technical requirements that facilitate onboard access. The trade-offs associated with regulatory flexibility can be a lack of legal or

manufacturing clarity for operators, and potentially increased risk to passengers. It would also be important to consider the appropriateness of the approach to different types of services and vehicles.

Questions

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Question 18

Do you want us to change the regulatory approach towards accessible public service vehicles? (please select **one** answer only)

- yes
- no
- don't know
- do not want to answer

Question 19

If you think that the regulatory approach should **change**, what sort of approach do you think would work best? (please select **one** answer only):

- an 'outcome-focused' approach
- an alternative approach (please specify)

Question 20

If you think that the current approach should **change**, do you think that the approach needs to be altered for (you can select multiple answers):

- in scope buses only
- in scope coaches only
- in scope buses and coaches
- coaches currently out of scope (please specify)

When answering questions 21 and 22

- If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.
- If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.
- When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 21

Why do you think the current approach should either change, or remain the same?

Question 22

If you think that change is **not** needed, **what** aspects of the current approach do you think work well?

Decarbonisation and the PSVAR

The UK is taking forward the decarbonisation of the bus and coach sector, in line with the National Bus Strategy and [2021's Transport Decarbonisation Plan](#) (TDP).

Buses

Since February 2020 nearly 2,300 zero emission buses (ZEBs) have been delivered in England. These include the government providing funding for up to 1,278 ZEBs through the Zero Emission Bus Regional Areas scheme (ZEBRA). Buses funded through the ZEBRA scheme were awarded funding with consideration of them meeting enhanced PSVAR standards.

In March 2022 a consultation was launched on setting an end-date for the sale of new, non-ZEBs. This included [proposing an end-date between 2025-2032](#); with responses currently being analysed. In addition, from April 2022, a new, separate Bus Service Operator Grant (BSOG) payment for ZEBs was introduced at 22p/km – this was calculated to bring payments for ZEBs into line with diesel bus support and should incentivise the take up of ZEBs.

The PSVAR applies to ZEBs as it would do to any other vehicle in-scope of the regulations. For example,

the ZEBRA scheme required that ZEBs include an additional flexible space for a second wheelchair user or passengers with pushchairs, hearing loops, space for assistance dogs, and audible and visible information.

Coaches

The Department recognises that the coach industry faces different challenges to decarbonisation to those of the bus industry, not least in the current availability of zero emission models. A Call for Evidence on coach decarbonisation has concluded, with the Department intending to make further announcements on coach decarbonisation in due course.

Decarbonisation impact

The drive to decarbonise has already significantly influenced bus and coach design and construction, and will continue to do so as industry and government work towards achieving Net Zero and NBS commitments. The transition to zero emissions represents an opportunity to harmonise future bus and coach design with accessibility considerations.

Questions

These questions are included here so you can read them in the context of this document. To respond to the questions, see the [Ways to respond section of the GOV.UK home page for this call for evidence.](#)

Question 23

Should we align the transition to zero emission vehicles with our potential changes to the accessibility requirements of public service vehicles? (please select **one** answer only)

- yes
- no
- unsure
- do not want to answer

Question 24

If you think that potential changes to accessibility and the transition to zero emission vehicles should be aligned, do you think this should apply to (you can select multiple answers):

- buses
- coaches
- buses and coaches

When answering questions 25 to 27

- If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.
- If you are answering these questions on behalf of an organisation, please feel free to include any employee

opinions, insights, or experiences that you deem relevant.

- When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 25

Why do you think we should or should not align our approaches on accessibility and zero emission vehicles?

Question 26

If you think that alignment is needed, **what** would you like to see and **how** should we approach this process?

Question 27

If you think that alignment is **not** needed, **what** alternative approach, if any, would you propose?

Enforcement of the PSVAR

Enforcement of the PSVAR is the responsibility of the DVSA, supported by the Department, Traffic Commissioners for GB, and the Office of Rail and Road (ORR) specifically for rail replacement (RR) services. The DVSA's primary approach to enforcement is for vehicle examiners to undertake checks of accessibility features during roadside checks or MOTs, while Traffic examiners (TEs) will check the vehicle's certification.

PSVAR compliance

A compliant bus is a regulated public service vehicle that meets the requirements set out in schedules 1 and 2 of the PSVAR. A compliant coach is a regulated public service vehicle that meets the requirements set out in schedules 1 and 3 of the PSVAR.

Non-compliance with the PSVAR is a criminal offence (under the Equality Act 2010) and carries a fine not exceeding Level 4 on the standard scale (currently £2,500).

99% of local bus services in Great Britain comply with the PSVAR. We understand from stakeholder engagement that while accessibility for scheduled coach services is regarded as good, some in-scope coaches services are less compliant. This is evident across more rural home-to-school (HTS) and rail replacement (RR) services, although RR service compliance is improving.

To note, HTS services are only in-scope of the PSVAR when a passenger fare has been paid.

Engagement with industry suggests that the COVID-19 pandemic put small and medium sized coach operators, who operate the majority of coaches used to provide local and scheduled services, under significant [financial pressure](#). The Department understands that these pressures have been compounded by more recent challenges, such as high fuel prices, a shortage of skilled labour within the coach sector, and high living costs. Collectively, these have restricted the ability of operators to invest in compliance with the PSVAR.

Since 2019 the Department has offered Short-Term Exemptions (STEs) to the PSVAR for these services. This avoided the risk of essential services being withdrawn. STEs were replaced by qualified Medium-Term Exemptions (MTEs) in 2022, which will last until the end of July 2026. They require operators to take specific steps towards making their fleet compliant within a specified timeframe. This does not alter the fact that the PSVAR has been in force since 30 August 2000, and all in-scope buses and coaches should have been compliant by 1 January 2020.

A key enforcement challenge is the lack of robust data detailing the number of coaches providing local and scheduled services, and their relative compliance. This limits the scope and effectiveness of enforcement action.

Passengers have rights in relation to the accessibility of public service vehicles, stations and stops. For example, Bus Service Improvement Plans (BSIPs) must include a passengers' charter giving bus users rights to certain standards of service; including commitments on their accessibility. However, there is no such comparable plan for coach services, where service expectations are set independently by the company.

The complaints system for buses and coaches can appear complex. Complaints about the physical accessibility of vehicles, i.e. what is regulated by the PSVAR, can be reported to DVSA for further investigation. The conduct of the driver is regulated by the Public Service Vehicles (Conduct of Drivers, Inspectors, Conductors and Passengers) Regulations 1990 (the "Conduct Regulations").

Conduct Regulations related incidents can also be reported to the DVSA, but are more difficult resolve. Complaints relating to the Conduct Regulations should be made to the operator in the first instance. Bus Users UK act as an approved Alternative Dispute Resolution (ADR) Body for bus and coach passengers, where disputes cannot be resolved in the first instance.

The Local Government and Social Care Ombudsman exists for complaints about local authority provision of roadside infrastructure, for example bus stations and shelters.

Questions

These questions are included here so you can read them in the context of this document. To respond to the questions, see the [Ways to respond section of the GOV.UK home page for this call for evidence](#).

Question 28

Do you think that the enforcement approach needs to be altered for PSVAR vehicles? (Please select **one** answer only)

- yes
 - no
 - don't know
 - do not want to answer
-

Question 29

If you think that change is needed, which vehicles do you think that the enforcement approach needs to be altered for? (Please select **one** answer only)

- buses only
- coaches only
- buses and coaches
- do not want to answer

When answering question 30

- If you are answering this question as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.
- If you are answering these question on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.
- When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 30

What, if anything, would you like us to consider about the way that the PSVAR are enforced, including comments about data collection, or complaints about the physical accessibility of buses and coaches?

Roadside infrastructure, conduct, and other issues

The Reference Wheelchair report asked mobility aid users to identify which issues they were most likely to encounter when travelling on public transport in the UK (including but not limited to PSVs). The most frequently encountered issues were: boarding or alighting vehicles (16% of respondents), accessing a seat or space with a

mobility aid (13%), and using ramps or lifts to board or alight vehicles (11%).

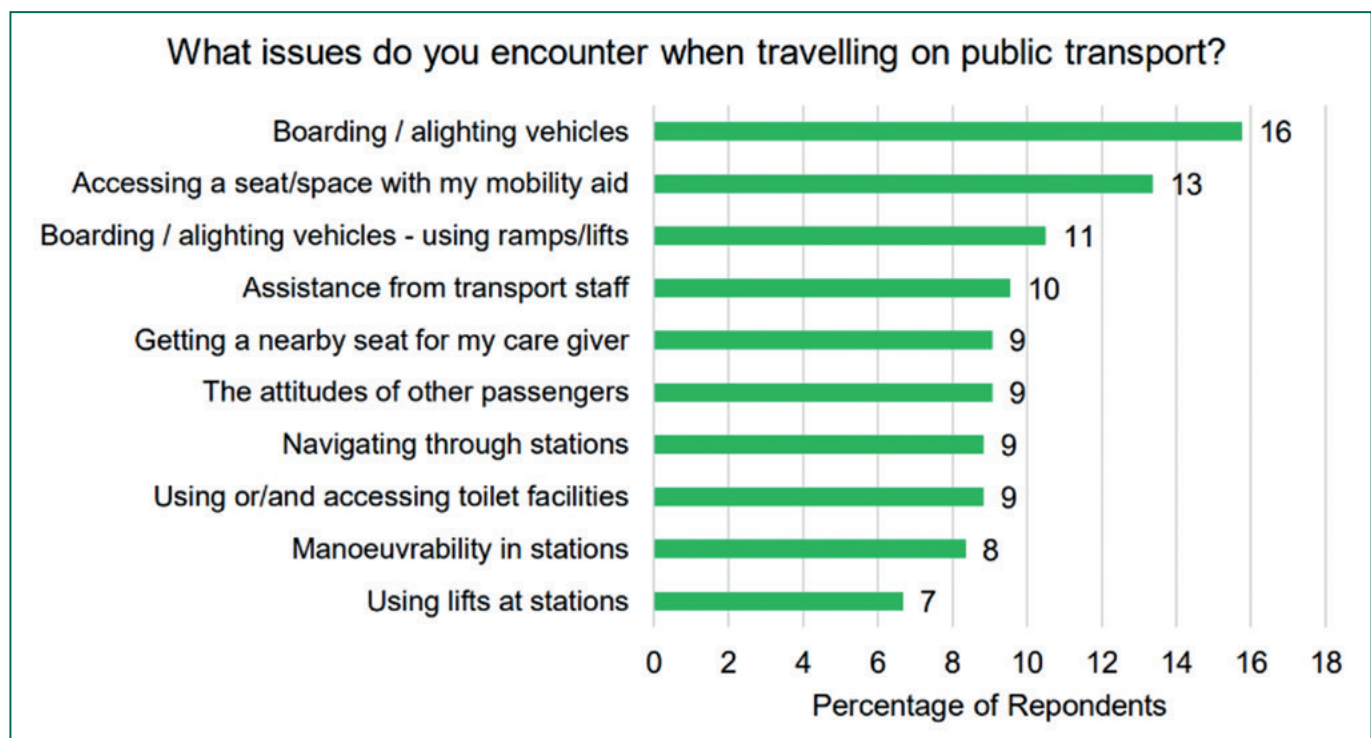


Figure 7 Issues encountered by mobility aid users when using public transport in the UK (Department for Transport. 2022. Reference Wheelchair Research: Full Report.)

However, the research also showed that there are other issues, related to but not within the remit of the PSVAR, that create challenges for mobility aid users. Notably this includes getting assistance from transport staff (10%), the attitudes of other passengers (9%), and navigating through stations (9%).

The Department understands that regulated wheelchair spaces on buses are often occupied by prams, luggage, and passengers who do not use wheelchairs. Non-wheelchair users should vacate this space if required, but this might be challenging for some

passengers. For example, a passenger standing with the aid of crutches in the wheelchair space may be disabled themselves, and it might be difficult for them to move to another part of the vehicle. As a result, wheelchair users continue to report being left at the kerbside.

[The Conduct Regulations](#) set out the duties and behaviours expected of staff and passengers onboard PSVs. The regulations require that where a wheelchair user wishes to use the wheelchair space, and that it is available, the driver should facilitate access to it. Like other service providers, bus operators have a legal duty under the Equality Act 2010 to make reasonable adjustments to enable disabled people to access their services. In 2017, the Supreme court clarified that in relation to access to the wheelchair space for wheelchair users, making a reasonable adjustment includes doing more than simply asking other passengers to vacate the space.

Roadside infrastructure such as bus and coach stations and stops are the responsibility of local councils; and are not regulated by the PSVAR. However, roadside infrastructure is critical in enabling passenger access to PSVs, and goes hand in hand with delivering an accessible bus or coach service. For example, our understanding from engagement with stakeholders is that a prevalent issue for the deployment of bus ramps in rural areas is the variability of curb heights.

It is not possible for the PSVAR to be extended to regulate roadside infrastructure because it is either regulated by other legislation, or responsibility lies outside of the PSVAR. However, as part of the evidence gathering function of this Call for Evidence, it would be useful for us to understand respondents' views and experiences of these areas. The feedback that we receive will be considered alongside research being undertaken by the Department that explores the impact of roadside infrastructure on passenger convenience, comfort, safety, security, and accessibility.

Questions

These questions are included here so you can read them in the context of this document. To respond to the questions, see the [Ways to respond section of the GOV.UK home page for this call for evidence](#).

When answering questions 31 to 36

- If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.
- If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.
- When providing answers to questions, please do not provide any data concerning your health and/

or disability or any details that would enable the identification of a third party.

Question 31

What, if anything, would you like us to consider about the conduct of **public service vehicle staff** (such as drivers), which is regulated by the Public Service Vehicles (Conduct of Drivers, Inspectors, Conductors and Passengers) Regulations 1990?

Question 32

What, if anything, would you like us to consider about the conduct of **bus and coach passengers**, whose conduct is regulated by the Public Service Vehicles (Conduct of Drivers, Inspectors, Conductors and Passengers) Regulations 1990?

Question 33

What, if anything, would you like us to consider in relation to the accessibility of **bus stations and stops**, which are generally the responsibility of local authorities, and not regulated by the PSVAR?

Question 34

What, if anything, would you like us to consider in relation to the accessibility of **coach stations, and places where coaches stop**, which are not regulated by the PSVAR?

Question 35

What, if any, comments do you have on the review of the PSVAR, including any relevant evidence you might want to supply?

Final comments

Question 36

Any other comments?

What will happen next

The Department intends to publish the PSVAR Review, which will include a summary of responses and next steps, by the end of 2023. Paper copies will be available on request.

If you have questions about this Call for Evidence please contact:

The PSVAR Review Call for Evidence team

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Annex A: list of Call for Evidence questions

APPLICATION

Question 1

Do you think that the current approach towards accessibility in the PSVAR should be changed in some respect? Please select **one** answer only.

- yes for both buses and coaches
- yes for buses only
- yes for coaches only
- no
- don't know
- do not want to answer

When answering questions 2 to 3

If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.

If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.

When providing answers to questions, please do not provide any data concerning your health and/or disability

or any details that would enable the identification of a third party.

Question 2

If you think that **change is needed**, how, in your view, should the current approach towards accessibility in the PSVAR change?

Question 3

If you think that change **is not** needed, **why** do you think that change is **not** needed to the current approach towards accessibility in the PSVAR?

Question 4

In your opinion, should the scope of the PSVAR be changed? Please select **one** answer only.

- yes – it should be expanded
- yes – it should be reduced
- no – it should remain the same
- don't know
- do not want to answer

Question 5

If you think that the scope of the PSVAR should be **expanded**, which services do you think should be brought into scope? (you can select multiple answers):

- free home-to-school services (for example, when no fare is paid)

- tour services
- charter services
- demand responsive services
- small passenger carrying vehicles which carry between 9-22 passengers (for example, minibuses)
- other (please specify)

Question 6

If you think that the scope of the PSVAR should be **reduced**, which in-scope vehicles do you think should be **removed**? (please select **one** answer only):

- buses
- coaches
- buses and coaches

Question 7

If you think that the scope of the PSVAR should be reduced by removing in-scope **coach services**, which type of coach services should be removed? (you can select multiple answers)

- paid home-to-school services
- rail replacement services
- other (please specify)

When answering question 8

If you are answering this question as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.

If you are answering this question on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.

When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 8

Why do you think that the scope of the PSVAR should either change, remain the same, or be reduced?

ACCESSIBILITY FEATURES

Question 9

Do you think that the current approach towards the accessibility features of public service vehicles needs to change? (please select **one** answer only)

- yes for both buses and coaches
- yes for buses only
- yes for coaches only
- no
- don't know
- do not want to answer

Question 10

If you think that the current approach towards **wheelchair accessibility features** on **buses** needs to change, where do you think change is needed? (you can select multiple answers):

- boarding lifts
- boarding ramps
- entrances
- exits
- wheelchair spaces
- forward-facing wheelchairs
- rearward-facing wheelchairs (typical of most buses)
- gangways
- signs and markings
- communication devices
- lighting
- another feature (please specify)

Question 11

If you think that the current approach towards **wheelchair accessibility features** on **coaches** needs to change, where do you think change is needed? (you can select multiple answers):

- boarding lifts

- boarding ramps
- entrances
- exits
- wheelchair spaces
- forward-facing wheelchairs (typical of most coaches)
- rearward-facing wheelchairs
- gangways
- signs and markings
- communication devices
- lighting
- another feature (please specify)

Question 12

If you think that the current approach towards **accessibility features not relating to wheelchairs on buses** needs to change, where do you think change is needed? (you can select multiple answers):

- route and destination displays
- kneeling systems
- steps (external)
- steps (internal)
- priority seats

- floors (buses are low floor, allowing for ground level entry and exit)
- gangways
- handrails
- handholds
- communication devices
- another feature (please specify)

Question 13

If you think that the current approach towards **accessibility features not relating to wheelchairs on coaches** needs to change, where do you think change is needed? (you can select multiple answers):

- route and destination displays
- kneeling systems
- steps (external)
- steps (internal)
- floors (coaches are usually high-floor, requiring steps to enter and exit)
- gangways
- seats (coaches do not have priority seats)
- handrails
- handholds

- communication devices
- another feature (please specify)

When answering questions 14 to 17

If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.

If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.

Regardless of if you are answering as an individual or on behalf of an organisation, please feel free to make innovative suggestions, or to emphasise current best practice, such as the use of flexible space.

When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 14

Why do you think the current approach to accessibility features should either change, or remain the same?

Question 15

If you think that change is needed, **what** changes would you like to see?

Question 16

If you think that change is **not** needed, **what**, if any, aspects of the current approach do you think work well?

Question 17

What, if anything, should the Department be aware of when it comes to the financial cost of complying with the PSVAR?

REGULATION

Question 18

Do you want us to change the regulatory approach towards accessible public service vehicles? (please select **one** answer only)

- yes
- no
- don't know
- do not want to answer

Question 19

If you think that the regulatory approach should **change**, what sort of approach do you think would work best? (please select **one** answer only):

- an 'outcome-focused' approach
- an alternative approach (please specify)

Question 20

If you think that the current approach should **change**, do you think that the approach needs to be altered for (you can select multiple answers):

- in scope buses only
- in scope coaches only
- in scope buses and coaches
- coaches currently out of scope (please specify)

When answering questions 21 and 22

If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.

If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.

When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 21

Why do you think the current approach should either change, or remain the same?

Question 22

If you think that change is **not** needed, **what** aspects of the current approach do you think work well?

DECARBONISATION

Question 23

Should we align the transition to zero emission vehicles with our potential changes to the accessibility requirements of public service vehicles? (please select **one** answer only)

- yes
- no
- unsure
- do not want to answer

Question 24

If you think that potential changes to accessibility and the transition to zero emission vehicles should be aligned, do you think this should apply to (you can select multiple answers):

- buses
- coaches
- buses and coaches

When answering questions 25 to 27

If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.

If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.

When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 25

Why do you think we should or should not align our approaches on accessibility and zero emission vehicles?

Question 26

If you think that alignment is needed, **what** would you like to see and **how** should we approach this process?

Question 27

If you think that alignment is **not** needed, **what** alternative approach, if any, would you propose?

ENFORCEMENT

Question 28

Do you think that the enforcement approach needs to be altered for PSVAR vehicles? (please select **one** answer only)

- yes
- no
- don't know

- do not want to answer

Question 29

If you think that change is needed, which vehicles do you think that the enforcement approach needs to be altered for? (please select **one** answer only)

- buses only
- coaches only
- buses and coaches
- do not want to answer

When answering question 30

If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.

If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.

When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 30

What, if anything, would you like us to consider about the way that the PSVAR are enforced, including comments about data collection, or complaints about the physical accessibility of buses and coaches?

ROADSIDE INFRASTRUCTURE, CONDUCT, AND OTHER ISSUES

When answering questions 31 to 36

If you are answering these questions as an individual, please feel free to include any opinions, insights, or experiences that you deem relevant.

If you are answering these questions on behalf of an organisation, please feel free to include any employee opinions, insights, or experiences that you deem relevant.

When providing answers to questions, please do not provide any data concerning your health and/or disability or any details that would enable the identification of a third party.

Question 31

What, if anything, would you like us to consider about the conduct of **public service vehicle staff** (such as drivers), which is regulated by the Public Service Vehicles (Conduct of Drivers, Inspectors, Conductors and Passengers) Regulations 1990?

Question 32

What, if anything, would you like us to consider about the conduct of **bus and coach passengers**, whose conduct is regulated by the Public Service Vehicles (Conduct of Drivers, Inspectors, Conductors and Passengers) Regulations 1990?

Question 33

What, if anything, would you like us to consider in relation to the accessibility of **bus stations and stops**, which are generally the responsibility of local authorities, and not regulated by the PSVAR?

Question 34

What, if anything, would you like us to consider in relation to the accessibility of **coach stations, and places where coaches stop**, which are not regulated by the PSVAR?

Question 35

What, if any, comments do you have on the review of the PSVAR, including any relevant evidence you might want to supply?

FINAL COMMENTS

Question 36

Any other comments?

Annex B: contextual questions

We are asking individuals and organisations to provide details that will help us to understand the experiences and perspectives of different groups. Providing this information is optional and the questions can be skipped. However, any details provided will significantly strengthen our analysis of responses.

Our privacy notice in the 'How to respond to this Consultation' section provides further information on how your personal data is processed.

CONTACT

For **individuals**, for contact purposes only, we ask:

- your name
- your email address

Are you responding:

- as an individual?
- on behalf of an organisation?

If you are responding as an **individual**:

ACCESSIBILITY

Do you have a have a disability, [as per the definition of disability under the Equality Act 2010](#), that affects your

ability to do normal daily activities? (please select **one** answer only)

- yes
- no
- prefer not to say

If you consider that you are disabled, would you describe your disability or disabilities as (you can select multiple answers):

- sensory, such as a visual impairment
- physical and constant, such as a spinal condition
- physical and fluctuating, such as rheumatoid arthritis
- cognitive, such as dementia
- developmental, such as autism
- a learning disability
- a mental health condition
- another type of disability (please specify)
- prefer not to say

Do you use **buses**?

- yes
- no
- don't know

If you use **buses**, how frequently do you use them?
(Please select **one** answer only)

- Often
- Occasionally
- Rarely
- Not relevant – I do not use buses
- Prefer not to say

If you use **buses**, what mobility aids do you use when you use them? (you can select multiple answers)

- a wheelchair
- an electric wheelchair
- a mobility scooter
- crutches or a walking frame
- an assistance animal (such as a guide dog)
- assistance from someone travelling with me (such as a carer or companion)
- assistance from someone else (such as a bus or coach driver or staff)
- another mobility aid (please specify)
- do not use any form of mobility assistance
- not relevant – I do not use buses
- prefer not to say

If you use **buses**, do you experience access challenges that make it difficult to travel? (please select **one** answer only)

- always
- often
- occasionally
- never
- not relevant – I do not use buses
- prefer not to say
- don't know

If you use **buses**, which of the following statements best describes your views on potentially using buses more if you felt that your access needs were better met? (please select **one** answer only)

- I would increase my bus use if they met my access needs
- I would not increase my bus use even if they met my access needs
- Another statement (please specify)

If you do not use **buses**, why do you not use them? (please select one answer only)

- they do not meet my needs
- I prefer alternative transport

- I don't like buses
- another reason (please specify)

If you do not use **buses**, which of the following statements best describes your views on potentially using buses if you felt that your access needs were better met? (please select **one** answer only)

- I would consider using them if they met my access needs
- I would not consider using them even if they met my access needs
- Another statement (please specify)

Do you use **coaches**? (Please select **one** answer only)

- yes
- no
- don't know

If you use **coaches**, how frequently do you use them? (Please select **one** answer only)

- Often
- Occasionally
- Rarely
- Not relevant – I do not use coaches
- Prefer not to say

If you use **coaches**, what mobility aids do you use when you use them? (you can select multiple answers)

- a wheelchair
- an electric wheelchair
- a mobility scooter
- crutches or a walking frame
- an assistance animal (such as a guide dog)
- assistance from someone travelling with me (such as a carer or companion)
- assistance from someone else (such as a bus or coach driver or staff)
- another mobility aid (please specify)
- do not use any form of mobility assistance
- not relevant – I do not use coaches
- prefer not to say

If you use **coaches**, do you experience access challenges that make it difficult to travel? (please select **one** answer only)

- always
- often
- occasionally
- never

- not relevant – I do not use coaches
- prefer not to say
- don't know

If you use **coaches**, which of the following statements best describes your views on potentially using coaches more if you felt that your access needs were better met? (please select **one** answer only)

- I would increase my bus use if they met my access needs
- I would not increase my bus use even if they met my access needs
- Another statement (please specify)

If you do not use **coaches**, why do you not use them? (please select one answer only)

- they do not meet my needs
- I prefer alternative transport
- I don't like coaches
- another reason (please specify)

If you do not use **coaches**, which of the following statements best describes your views on potentially using coaches if you felt that your access needs were better met? (please select **one** answer only)

- I would consider using them if they met my access needs

- I would not consider using them even if they met my access needs
- Another statement (please specify)

AGE

Which of the following age bands are you in? (Please select **one** answer only)

- 16 to 19
- 20 to 34
- 35 to 49
- 50 to 64
- 65 to 79
- 80 or over
- Prefer not to say

DEMOGRAPHICS

Do you live in...(Please select **one** answer only)

- the east of England
- the East Midlands
- London
- the North East
- the North West
- the South East

- the South West
- Wales
- the West Midlands
- Scotland
- Yorkshire and the Humber
- Prefer not to say
- Another location (please specify)

Would you say that you live in...(Please select **one** answer only)

- an urban area
- a rural area
- prefer not to say
- another type of area (please specify)

If you live in an urban area, would you say that you live in...(Please select **one** answer only)

- a city
- a town
- prefer not to say

If you live in a city or town, would you say that you live in...(please select **one** answer only)

- the centre

- outside of the centre (for example, a suburb or the outskirts of a city or town)
- Prefer not to say

If you are responding on behalf of an **organisation** please provide:

- your organisation's name
- the email address you use at the organisation you work for

SIZE

How many staff work in your organisation? (please select **one** answer only)

- 1 to 9 people
- 10 to 49 people
- 50 to 250 people
- Above 250 people (please specify)

WHAT YOUR ORGANISATION DOES

What best describes the primary activity of your organisation? (you can select multiple answers)

- You are a United Kingdom representative organisation
- You are a bus operator supplying local and scheduled services in scope of the PSVAR within Great Britain
- You are a coach operator supplying services within Great Britain

- You are both a bus operator supplying local and scheduled services in scope of the PSVAR plus a coach operator supplying services within Great Britain
- You commission bus or coach services
- You manufacture buses or coaches
- You repair or retrofit buses or coaches
- You manufacture accessibility features for board buses or coaches, such as lift systems
- You manufacture or produce mobility aids such as wheelchairs or crutches
- Another type of organisation (please specify)

If your organisation has a **representative function**, how many members are part of your representative organisation? (please select **one** answer only)

- Under 999 members
- 1,000 – 9,999 members
- 10,000 – 100,000 members
- Above 100,000 members (please specify)

If your organisation has a **representative function**, who are the focus of that organisation? (you can select multiple answers)

- Disabled people
- Bus operators

- Coach operators
- Manufacturers
- Other (please specify)

If your organisation has a **representative function with a focus on disabled people**, who are the focus of that organisation? (you can select multiple answers)

- sensory, such as a visual impairment
- physical and constant, such as a spinal condition
- physical and fluctuating, such as rheumatoid arthritis
- cognitive, such as dementia
- developmental, such as autism
- a learning disability
- a mental health condition
- another type of disability (please specify)

COACH OPERATORS

Does your organisation provide any of the following services? (you can select multiple answers)

- long distance services
- rail replacement services
- home-to-school services
- tour services
- charter services

- demand response services
- Another service (please specify)
- No – our organisation does not provide bus or coach services

Does your organisation use small passenger carrying vehicles (vehicles that carry 9 to 22 passengers, such as minibuses) to provide your services? (you can select multiple answers)

- Yes, for all services
- Yes, for some services
- No

BUS AND COACH OPERATOR DEMOGRAPHICS

In which location are your services **primarily** provided?
(please select **one** answer only)

- the east of England
- the East Midlands
- London
- the North East
- the North West
- the South East
- the South West

- Wales
- the West Midlands
- Scotland
- Yorkshire and the Humber
- Across Great Britain
- Prefer not to say
- Another location (please specify)

In which areas are your services mainly provided?
(please select **one** answer only)

- urban areas
- rural areas
- both urban and rural areas

BUS AND COACH OPERATOR CUSTOMERS

At what frequency would you say that disabled people make use of your organisation's services? (please select **one** answer only)

- daily
- weekly
- monthly
- a few times a year
- not at all
- Prefer not to say

At what frequency would you say that non-disabled people with mobility challenges make use of your organisation's services? (please select **one** answer only)

- daily
- weekly
- monthly
- a few times a year
- not at all
- Prefer not to say

