

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

TRANSPORT (SCOTLAND) BILL

SUBMISSION FROM DISABILITY EQUALITY SCOTLAND

Overview

Disability Equality Scotland is a national Disabled People's Organisation (DPO). We are a membership organisation and engage with our 700 disabled members on a variety of issues, to ensure that we are championing on their behalf. Each week we send out a poll question to our members on a topical issue and we gather feedback through surveys and events on accessible travel issues.

For the purpose of this paper, we have collated information and data gathered from a number of surveys, polls and events to present our members' views.

Part 2 - Bus Services

Local Bus Provision

Our members welcome proposals to provide Councils with powers to improve local bus services.

We asked our members about recent changes to bus provision within their local area. The most common changes were to timetables (63%). Some respondents had experienced a bus service withdrawal (30%) while for others, this had been proposed, but not yet actioned (13%). A fifth (20%) of respondents had experienced cancelled bus services in the last six months.

Other issues included route diversions, roadworks and temporary bus stops causing difficulties for disabled passengers.

"The changes and bus withdrawals were done without consulting local residents."

Impact on independent travel

With changes to the bus service, we were interested in exploring the impact these changes had on disabled peoples' ability to travel independently. Below are some of the impacts felt by disabled people as a result of the changes to their bus provision.

Long waiting times, restrict when can travel

“Buses have gone from once every 30 minutes to once every 45 minutes - abysmal service.”

Can't travel on a Sunday

“It restricts travel on a Sunday.”

Fewer services mean busier buses, which makes it more difficult to get into the wheelchair space.

“Much more difficult to manoeuvre into the wheelchair space, especially when the bus is busy.”

Can't travel independently – need support

“I lost my ability to travel independently by bus and had to ask friends and relatives to help by using their cars and the same when coaches were being used on the routes.”

“I can't travel alone, I need someone with me all the time.”

Lost confidence to travel

“Don't have any confidence and lost ability to travel independently.”

Rely on friends and family

“Sometimes you have to rely on friends and family when you don't want to inconvenience them.”

Reliant on private car or expensive taxis

“I have to rely more on a taxi service as our buses are down to one an hour.”

Bus times don't coincide with medical appointments

“Times don't work with appointments, if you need to go to the hospital as the bus has changed route so you need to go into town and get another bus back the way.”

Difficult to make appointments

“It makes it difficult to get to places for a specific time. I have to get there hours early and/or wait for a bus home.”

Can't make spontaneous journeys – have to be planned ahead

“Can't do spur of the moment journeys; only planned.”

Timetables

We welcome the proposals to make regulations setting out what service and timetable information bus operators must make available to passengers and local transport authorities.

To ensure that the Council or bus operator improve the ways it provides this information, it is essential to incorporate the principles of Inclusive Communication. This means sharing information in a way that everybody can understand. When relating Inclusive Communication to bus timetables, this means making sure information is accessible and available in alternative formats; for example, audio, large print, easy read and braille.

Supported by the Scottish Government, Disability Equality Scotland and Sense Scotland the Inclusive Communication Hub: <http://inclusivecommunication.scot>

This website provides tools and guidance on how to make your information accessible.

Part 3 - Smart Ticketing

We asked our members their views on smart ticketing. From our respondents (n=33) 79% indicated that they supported the introduction of smart ticketing. For these respondents the benefits were clear; it could make journeys faster and easier, it reduces the need for carrying cash and allows more flexibility when travelling.

“I like the notion of flexibility and use over a range of options. It would be good to have more community based transport solutions.”

“Journeys are quicker due to no money transactions.”

“I’ve used a smart card for a few years now. A great tool.”

There were some concerns however that would need to be addressed for disabled people to feel confident in the use of smart ticketing. For example, any smart tickets would have to be accessible for use by all disabled people, including those with learning disabilities or cognitive impairments.

“This will transform travel for many people as long as the supporting arrangements are accessible; how do people top up their accounts and will the formats available be accessible to everyone? E.g. accessible websites, accessible payment terminals, etc.”

“The system needs to be accessible to disabled people, but I think that relates to any websites, etc that underpin the system.”

There were concerns that smart ticketing could be open to fraud or abuse, with no way of monitoring how much you are being charged for your journey.

“Not everyone can cope with these new ideas and how do you check that you are being charged the correct fare?”

“I am sure many people might have concerns over security around these types of card, i.e. will they also store bank details with payment, which could then be hacked?”

Those living in rural areas had concerns about whether the technology could be supported to allow them equal use.

“This discriminates against rural stations that have no staff, no smart card readers, no ticket machines and no signal for mobile apps.”

Part 4 Parking

Policy is clear that non-blue badge holders should not park in bays marked for disabled people. That blue badges should not be used by anyone other than the holder.

The Disabled Persons' Parking Places (Scotland) Act 2009 aimed to reinforce this message and made provisions to bring disabled bays to an enforceable standard. It also made provision for enforcement of private off-street disabled parking by placing a duty on all local authorities to enter negotiating with the owners to make the bays enforceable, and, if needed repeat this offer every two years. This Act does not change the actual parking enforcement system or penalty. The overall aim of the Act is to prevent and deter misuse of disabled parking bays by strengthening enforcement opportunities.

“No-one monitors the use of these spaces by non-blue badge holders”.

“No evidence of enforcement by police or local authority, particularly with off street parking”

Tackling abuse of Blue Badges was strengthened via another Member's Bill, which became the Disabled Persons' Parking Badges (Scotland) Act 2014. This made further provisions for local authorities to more easily tackle abuse of blue badges by improvements to who can check and confiscate badges. In addition, to the process of producing and issuing blue badges to minimise the opportunity for fakes.

Irrespective of these Acts abuse of disabled people's parking bays still occurs. We hear from blind blue badge holders that their drivers sometimes cannot find a free disabled parking bay, but parked cars are not always displaying a blue badge.

“Public mind-set believes they have an option to partake, especially if it's the last place available”

“The Act has helped raising awareness of the issue, but there is still abuse of on-street parking and the blue badges are still misused”.

“Up to a point; there are still people who chance it, thinking they will only be a minute.”

It is often cited, that in private off-street car parks, such as supermarkets and other large retailers, there is no obvious enforcement of disabled parking bays being carried out. We

are aware that it might be uncomfortable for employees to challenge a person's use of a blue badge, particularly since many disabilities are hidden ones. This highlights the need for retailers to invest in equality and disability training opportunities for their staff, so that good disability customer care procedures and policies can be developed and applied.

There is nothing to make us believe that the public who abuse disabled parking bays are doing so unknowingly.

We strongly feel that there are two elements to reducing disabled parking bay abuse, firstly clear enforcement law and secondly effective parking enforcement.

Parking enforcement levels differ across Scotland. Some local authorities now carry out their own schemes via decriminalised parking enforcement (DPE) powers. We believe there are 16 local authorities that have DPE schemes, six are in the midst of gaining DPE, and this leaves a further 10 who are relying on other means to enforce parking. We assume that these 10 rely on Police Scotland to carry out parking enforcement.

In 2014, Police Scotland started to withdraw their Traffic Warden provision, leaving some areas without any, or very limited provision. Some local authority areas brokered deal with Police Scotland who provide a couple of days a week, or agree to target certain trouble spots. This level of enforcement allows abuse to happen, of not only disabled bays but also any other inconsiderate parking, such as on yellow lines.

The majority of our members raised issues regarding abuse or misuse of blue badges. our members felt strongly that the Act does not go far enough to address the misuse of blue badges and that there is a need for a campaign, similar to that of drink driving, to make the use of disabled persons' parking bays as socially unacceptable.

"Local authorities need to be encouraged to make civil enforcement"

"There is a constant abuse of the scheme by people without the blue badge parking in designated disabled bays. There is a misuse of the blue badge by people other than the official holder"

Disability Equality Scotland members suggested that the biggest issue is the lack of enforcement of the illegal use of disabled persons' parking spaces. The most common places for the mis-use of spaces are supermarket car parks and health centres.

"The main abuse of disabled persons' parking bays take place in car parks, as opposed to on-street parking, particularly in supermarket car parks. Management are reluctant to punish offenders in case they take their custom elsewhere"

"At health centres, there are clearly defined disabled parking spaces. However, it is a free for all for taxis and vans. There is no enforcement."

We would also draw attention to the duty that local authorities have in negotiating and offering private off-street owners of car parking to upgrade their disabled parking bays to enforceable standard. We noted from some other responses that the 'offer' is being done by information on the local authority website. No car-parking owners has taken up this offer, which might lead to the decision that those provisions in the Act are not required. Before drawing conclusions, we would reckon that this area requires further thought.

We support views around the requirements for signs and lines on enforceable disabled parking bays. It is often mooted that we have too many poles for signs cluttering up footways. Poles in themselves can hinder the free movement of many disabled people, such as mobility impairment, wheelchair and scooter users, and people with sight impairments. We would query the belt and braces approach to enforcement design for bays needing both lines and a sign.

"Signage put up in our area is too high for people to read, or in places where people can't see them. There is a lack of information about the Act and the consequences of parking in disabled parking bays"

"Wording on the signs is confusing. Signs are dirty and faded, making them hard to read. Use of the blue badge is confusing due to the height and limited information on street signs. There is not enough monitoring. Lineage in the bays is faded"

What is important however is that, the non-blue badge owners know that they should not park in a disabled parking bay, and that the bay has all the features to enable enforcement to occur.

"People are unaware of the Act and that it is enforceable"

"Disabled parking bays are routinely used by non-disabled people"

In addition, more recently (August 2018) we ran a poll with our members, asking about the Scottish Government's proposal to ban on pavement parking. The Scottish Government is introducing new laws that will make it illegal for motorists to park their vehicles more than 50cm over the kerb. If drivers do break the rules they could be fined by councils.

Overall, 96% of our respondents (93 people) agreed that this ban should be in place. However, there were strong views that this should be a complete ban, and not include the 50cm allowance.

"That drivers cannot park over 50cm on the pavement is clearly not a ban at all."

"50cm is NOT a ban! It is pointless and achieves nothing in many rural areas. This will change nothing! This is not what we have been campaigning for."

In summary

Our members have raised important points regarding accessibility in relation to bus services, smart ticketing and parking, which we would urge the Scottish Government to consider when implementing this bill.