

Children's Commissioner for Wales' submission to the Enterprise and Business Committee Inquiry into Integrated Public Transport.

The Children's Commissioner for Wales is an independent children's rights institution established in 2001. The Commissioner's principal aim is to safeguard and promote the rights and welfare of children. ¹In exercising his functions, the Commissioner must have regard to the United Nations Convention on the Rights of the Child (UNCRC). ²The Commissioner's remit covers all areas of the devolved powers of the National Assembly for Wales insofar as they affect children's rights and welfare. They may also make representations to the National Assembly for Wales about any matter affecting the rights and welfare of children in Wales.³

The UNCRC is an international human rights treaty that applies to all children and young people aged 18 and under. It is the most widely ratified international human rights instrument and it gives children and young people a wide range of civil, political, economic, social and cultural rights which State Parties to the Convention are expected to implement. In 2004, the Welsh Assembly Government adopted the UNCRC as the basis of all its policy making for children, and in 2011 Welsh Government passed the Rights of Children and Young Persons (Wales) Measure.

Methodology

As Children's Commissioner for Wales I am aware that transport is an important issue for children and young people. Evidence from numerous consultations and projects on the issue of transport has already been captured by youth networks and by organisations working with children and young people. This submission seeks to consolidate this existing evidence to help inform Committee Members .

I have also directed a piece of work to gather the current views and experiences of young people in relation to the impact of transport on their ability to realise rights and entitlements across areas of their lives. Officers engaged with young people at a North Wales Pride Event in Bangor, where young people were attending a festival celebrating the LGBT community. Officers also visited Flintshire Youth Forum and met with 'Save the Family' a charity that supports young mothers.

¹ Section 72A Care Standards Act 2000

² Regulation 22 Children's Commissioner for Wales Regulations 2001

³ Section 75A (1) Care Standards Act 2000

My submission considers many of the issues noted in the Committee's terms of reference as well as those contained within the on-line questionnaire.

I have included in my response specific examples of good practice, comments regarding integration and suggestions on innovative approaches in the delivery of public transport.

Introduction

I would urge the Committee to consider the provision of public transport from a rights based perspective. From a general public perspective, ascertaining how transport can assist in enabling realisation of the international covenant of Economic, Social and Cultural Rights and, particularly in relation to those under the age of 18, from the perspective of the United Nations Convention on the Rights of the Child (UNCRC).

My submission will focus on the rights of children and young people in Wales and the ways in which public transport can empower children and young people, consider transport as an enabler in realising rights and suggest that, if effectively configured and implemented, it can transform the lives of the most vulnerable in Wales. Conversely, an ineffective transport system can operate as a significant barrier to children, young people and their families in relation to securing goods, services and in realising their rights. Young people are particularly exercised by transport issues as weaknesses in the system are likely to disproportionately impact upon young people negatively as they are less likely or even unable to access private transport.

I suggest that the Committee should seek to ascertain not only the degree to which public transport is integrated, but also to scrutinise how transport can support the delivery of integrated public services as a key driver in the realisation of Welsh Government's public policy aspirations.

Decisions regarding policy and funding allocations should be fully assessed both under the public sector equality duty in Wales via equality impact assessments and also in compliance with the Rights of Children and Young Persons (Wales) Measure 2011.

From May 2012 to the end of April 2014, Welsh Ministers must have 'due regard' to UNCRC part 1 and the optional protocols when making any decision which falls within subsection 1(3) of the Measure.

A decision within subsection 1(3) is a decision about any of the following:

- provision proposed to be included in an enactment;
- formulation of a new policy;
- a review of or change to an existing policy.

I would therefore assume that policy decisions and major funding decisions would fall within the scope of the Measure.

During the summer of 2009, the National Assembly for Wales' Children and Young People Committee balloted 2700 children and young people about issues of concern to them. Transport was in the top 10 issues listed and received 7.1% of the vote.

The UK Government has already offered a response through *Transport Guidance: Supporting Access to Positive Activities (2007)*.⁴ This was a result of a commitment made by the UK Government' to 'work with the Department for Transport to improve guidance, support and challenge to children's trusts and transport planners to encourage joined up planning and commissioning of local transport'.⁵

While the guidance does not necessarily offer the solutions that can be transferred directly to the Welsh context, the messages conveyed by children and young people regarding transport are consistent across the UK, I believe a coherent response to the barriers facing children and young people in Wales in accessing goods and services for the good of social cohesion and mobility is urgently needed.

Welsh Government's own National Transport Strategy states: '*Our country's system has a vital role to play in ensuring the prosperity and cohesion of 21st century Wales. It is not an end in itself but is vital to achieve many of our objectives for employment, society, health and the environment*'.⁶ We must ensure that clear measures are in place to ensure that our national transport system meets the needs of everyone, including children and young people.

The wider policy context: Integrated public transport and the UNCRC

Flying start in life

Transport has a key role to play in enabling parents to access quality childcare and participate in initiatives aimed at improving skills, either in relation to parenting or improving employment opportunities. This is a vital component of Welsh Government ambitions to tackle child poverty.

A key action within the parenting element of the National Service Framework for Children, Young People and Maternity Services in Wales is: '*Finding creative solutions for*

⁴ https://www.education.gov.uk/publications/eOrderingDownload/DCSF-Transport_Guidance.pdf

⁵ <https://www.education.gov.uk/publications/standard/publicationDetail/Page1/PU214>

⁶ <http://wales.gov.uk/topics/transport/publications/ntp/?lang=en>

*barriers to participation, which may include transport, timing and availability of childcare;*⁷

Research has found that parents of children with special educational need (SEN) are particularly likely to report difficulties in arranging transport to and from childcare settings.⁸ A pilot programme to increase access to childcare for families with disabled children found that access to flexible and affordable transport is a key element in securing access, in particular where families live in rural areas.⁹ An evaluation of major Scottish Big Lottery programme to increase opportunities for quality childcare also found that transport to and from venues, and a lack of flexible transport routes or provision by local authorities acted as a major barrier for some projects.¹⁰

Within Wales findings from the *Evaluation of the Flying Start programme: baseline survey of families – mapping needs and measuring early influence among families with babies aged seven to twenty months*¹¹ identified commonly cited issues by parents who would like more support. A factor mentioned within this work was transport problems.

Access to education, training and learning opportunities

Young people not in education, employment and training face additional and significant barriers if there are access issues in relation to transport, particularly in rural areas. It is crucial that education services consider transport considerations when developing their provision.

The Wales Transport Strategy, *Connecting the Nation* ‘...seeks to improve access to education and training with good transport opportunities’.¹² The strategy also states as an objective:

‘People of all ages are able to access education and training to increase their skills base, thereby contributing to reduced economic inactivity and social exclusion and helping raise opportunities in the labour market, particularly for the most disadvantaged groups.

*Indicator: Access to key education, training and lifelong learning services. Measured by accessibility mapping for public and private access to further education premises’.*¹³

⁸ K.Stanley et al (2006) *Equal Access? Appropriate and affordable childcare for every child* , Institute for Public Policy Research

⁹ Department for Education, (2009) *Disabled Children's Access to Childcare (DCATCH) pilot activity - Information for local authorities*, Research Report DFE-RR168

¹⁰ Big Lottery Fund Research Issue 55, (2009) *New opportunities for quality childcare: evaluation summary*

¹¹ <http://wales.gov.uk/about/aboutresearch/social/latestresearch/EvalFlyStart7-20/?lang=en>

¹² <http://wales.gov.uk/topics/transport/publications/transportstrategy/?lang=en>

¹³ *ibid*

The Children and Young People Committee Inquiry into Implementation of the Learning and Skills (Wales) Measure 2009¹⁴ raised concerns about the cost of travel and transport to local authorities, schools, and for individual learners, particularly in rural areas. Access to good public transport has particular relevance for learners who are over the compulsory age of education.

The Minister for Local Government and Communities committed to review the situation during 2012-13, reporting back by the end of March 2013. The Minister stated that *'the review will also need to consider the opportunities for greater collaboration between local authorities and other partners'*¹⁵ and I would hope that transport providers will be one of those key partners to ensure that access to education is affordable to all learners and those between 16-18 years of age in particular.

Clust i'r Ifanc, Gwynedd's Children and Young People's forum referred in their annual report 2010-11 to the evidence provided by a Aberdaron Communities First Report which stated that the cost of transport to college or sixth form will stop people from participating in further education. The report states that 'Clust i'r Ifanc' were seeking ways to ensure consistency for all 16-18 year olds to pay half fare on buses and were in discussions with Gwynedd's Integrated Transport Department. This work may be of interest to Committee members.

Enjoy the best possible physical, mental, social and emotional health

The consequences of lack of public transport to health settings can have serious repercussions for children and young people.

The Wales Transport Strategy¹⁶ has a stated outcome in relation to improving access to healthcare with an indicator of *'Access to key health services and facilities'* and that this be measured through accessibility mapping.

Inequalities of power and wealth and wellbeing are at the root of poverty and social exclusion. The most important factors lie in the wider domains of the environment, housing, education, employment and crucially transport. This understanding offers opportunities for governments to improve health and reduce inequalities by investing in sectors other than health and social care.¹⁷

¹⁴ <http://www.assemblywales.org/bus-home/bus-business-fourth-assembly-laid-docs/cr-ld8895%20e.pdf?langoption=3&ttl=CR-LD8895%20>

[Report%20by%20the%20Children%20and%20Young%20People%20Committee%3A%20Inquiry%20into%20Implementation%20of%20the%20Learning%20and%20Skills%20%28Wales%29%20Measure%202009](http://www.assemblywales.org/bus-home/bus-business-fourth-assembly-laid-docs/cr-ld8895%20e.pdf?langoption=3&ttl=CR-LD8895%20)

¹⁵ <http://www.senedd.assemblywales.org/documents/s9828/%20%20%20Response%20from%20the%20Minister%20for%20Education%20and%20Skills%20on%20the%20Implementation%20of%20the%20Learning%20and.pdf>

¹⁶ <http://wales.gov.uk/topics/transport/publications/transportstrategy/?lang=en>

¹⁷ <http://www.childrensrightswales.org.uk/UserFiles/resources/1706-CPHIGChildpovertyadvocacydocument%5B1%5D.pdf>

The group of young mothers who attended the focus group facilitated by my office in Mold were aware of young people who face difficulties in getting to some healthcare settings to keep appointments. The group themselves felt lucky that they were able to depend on a support network of people who did own private transport to get their children to health appointments but recognised the difficulties for those who did not have access to such support.

Access to health services is a vital element of public service in ensuring children develop, are healthy, enjoy good wellbeing and have their needs met. The health service may not be in a position to offer support in a way that addresses the lack of accessible and affordable transport and the impact this has on the ability of parents to get their children to health services

The National Service Framework (NSF) for Children and Young People and maternity services states as an objective, under 'Improving equity of access states:

'Families who have children in hospital, or who have to attend out-patient appointments, are provided with information about eligibility and arrangements for claiming travelling subsistence'; (Standard 7.11)

and standard 3.7 refers to:

'Information and support is given to parents and families on how to access funds for travel to and from specialist centres'¹⁸

The obligation to make people aware of eligibility should rest with various agencies to ensure that families are aware of this source of support. The requirement to claim in arrears can be particularly difficult for families in financial hardship who do not have the funds to meet up front costs and then to claim a reimbursement. Furthermore, unless there are appropriate travel options available to families this commitment may be rendered redundant.

Most severely affected are those with a chronic illness or disability which requires frequent in-patient admissions and/or visits to outpatient and other departments¹⁹. Transport impacts both in terms of affordability of public transport as well the frequency of services (if at all) to health settings.

The Association for the Welfare of Children in Hospital (AWCH) note that there is limited statutory assistance and the cost of visiting children in hospital has escalated enormously, given the extremely high costs of transport and the longer journeys

¹⁸ ibid

¹⁹ <http://www.awchwales.org.uk/nsltrFeb2012.pdf>

necessitated by the policy of transferring children to centres of excellence which may be hundreds of miles away²⁰. This puts undue additional stress upon families that are already dealing with extremely challenging circumstances.

AWCH also refer to the fact that a child's Disability Living Allowance (DLA) is stopped after 84 days in hospital and subsequently the parents' Carer's Allowance is suspended, despite the extra costs to a family when their child is in hospital²¹.

Research²² also suggests that young people in rural areas face additional difficulties in accessing health services, for instance sexual health, drug and alcohol services so access to public transport can be invaluable in enabling young people to be healthy and safe.

Have access to play, leisure, sporting and cultural opportunities

The National Assembly for Wales' (NAfW) Children and Young People's Committee (CYP) report on their inquiry into the *Provision of Safe Places to Play and Hang Out* is a rich and relatively recent source of information available to the Committee.

During the inquiry, the Deputy Minister for Children stated:

*"There is a structural problem in how Wales organises its public transport system. My personal view is that while we continue with the current regulatory setup, particularly in relation to buses, we will never be able to do anything other than ameliorate this problem"*²³

The Deputy Minister then went on to say that meanwhile, short term improvements may be possible, for instance through the provision of community transport, in order to address the needs of children and young people.

It was clear during the Children and Young People's Committee deliberations that some pupils are missing out on extra curricula activities because school transportation is not available at the activity end time.²⁴

These issues are not being resolved as evidenced by the statements made by the young people my officers met as part of the exercise undertaken to inform this response.

'To come to activities I have to rely on getting picked up.

²⁰ ibid

²¹ ibid

²² <http://www.childreninwales.org.uk/areasofwork/childpoverty/endchildpovertynetwork/index.html>

²³ <http://www.assemblywales.org/bus-home/bus-third-assembly/bus-guide-docs-ub/bus-business-documents/bus-business-documents-doc-laid/cr-ld8301.pdf?langoption=3&ttl=CR-LD8301%2020Children%20and%20Young%20People%20Committee%3A%20Provision%20of%20Safe%20Places%20to%20Play%20and%20Hang%20Out>

²⁴ ibid

'Living here - it's hard to get to places unless you drive'

[Quotes from the young people's session in Mold]

'It's not fair how it depends on where you live – if you can get to places or not'

'I use the bus to get to college; it's busy but ok. But on weekends, I miss out on some things because of when the buses run'.

[Young people at the north Wales Mardi Gras]

Post-graduate research undertaken in Wales and published on the Sport Wales website illustrates the importance of travel to enable participation. It also specifically refers to particular challenges for more rural areas and those from disadvantaged communities.

Both the availability and affordability of transport are clear issues outlined below:

'The rural locality of the school partly explains why some pupils attended at lunch-time and found more difficulty after school...The additional challenges such as transport faced at Meadow Bank were similar to findings in rural areas in Norway, Scotland and Sweden (Hendry et al., 2002) and also included the length of time to travel to the nearest town/sports club and a lack of things to do.'

'The whole philosophy behind E3 is to remove barriers to participation. Some of the biggest barriers for our students are cost of activities and transport...We provide those at the end of our school day from 2.45- 7.45pm with free transport, a healthy meal option available, and no charge for the activities'²⁵

The CYP Committee recommended that:

'Welsh Government issues guidance to local governments to ensure that pupils are not excluded from extra curricular activities because of difficulties in securing transportation home at the end of the activity'.²⁶

The Llais Ni Youth Forum on Ynys Mon²⁷ undertook research regarding after school clubs with a substantial number of years 7, 8 and 9 pupils stating that getting home from their after school clubs in Holyhead would be a problem for them.

²⁵ <http://www.sportwales.org.uk/media/937078/five60thesis201103.pdf>

²⁶ <http://www.assemblywales.org/bus-home/bus-third-assembly/bus-guide-docs-ub/bus-business-documents/bus-business-documents-doc-laid/cr-ld8301.pdf?langoption=3&ttl=CR-LD8301%20Children%20and%20Young%20People%20Committee%3A%20Provision%20of%20Safe%20Places%20to%20Play%20and%20Hang>

²⁷ http://www.gwyneddni.org.uk/gwyneddni/1116/gn_11_16_dogfen.asp?cat=6325&doc=25963&p=1&c=0&Language=1

Unless parents have access to private transport, the ability of children and young people to access after school activities is severely hindered. This is especially true of rural Wales as noted in the End Child Poverty Network (ECPN) report '*Child Poverty and Social Exclusion in Rural Wales*'²⁸.

ECPN note that one solution would be to extend the hours on school passes, although this would be dependent on the availability of transport during those hours.

Policy makers and those responsible for designing services clearly need to consider these issues so that there is equity of access to important initiatives which can play an important part in the health and wellbeing of children and young people. There are numerous options in relation to affordable and flexible transport such as Demand Responsive Transport and Community Transport schemes available to policy makers. Additionally, there may be opportunities to engage directly with transport providers. One such example was brought to the attention of the CYP Committee:

*'The Committee was pleased to hear that Ysgol Ardudwy in Harlech had taken a proactive role in ensuring its pupils were able to access public transport at suitable times to allow them to travel to and from school by train. Having discussed the problems faced by pupils with Arriva Trains Wales, the school made adjustments to the timing of the school day and Arriva Trains Wales made adjustments to its timetable. These changes, among others, meant that trains were available both before and after school, and after extra curricular activities. Children are now able to access various school-run activities out of hours.'*²⁹

School Holidays and meeting friends

Public transport also plays an important role in the lives of children and young people as a means of tackling social exclusion and isolation and in offering pro-social opportunities.

Very often the cost of public transport is prohibitive and the lack frequency or complexity of routes make it difficult for children and young people to maintain social links which is a well accepted component for maintaining good mental health.

A welcomed initiative from Welsh Government was the delivery of free swimming to all school aged children and young people. This positive policy intervention is undermined and hindered by lack of public transport options for many young people.

²⁸<http://www.childreninwales.org.uk/areasofwork/childpoverty/endchildpovertynetwork/index.html>

²⁹ *ibid*

Treated with respect and to have their race and cultural identity recognised

Children and young people's participation in the planning and delivery of services has developed substantially in Wales over recent years. This has culminated in a commitment within the Children and Families (Wales) Measure 2010 to ensure that the participation agenda was embedded in law.

In evaluating current provision and in examining options regarding planning and transport, Welsh Government and all stakeholders should engage with children and young people to ensure that the views of children and young people are given appropriate consideration.

I am aware that the Public Transport Users Committee (PTUC) for Wales undertook a consultative exercise with children and young people in early 2011 and they are to be commended for that.

The Committee concluded:

- 1. It was agreed that further surveys were not the best way of engaging with young people as the results to this questionnaire did not cover every local authority area and were difficult to analyse even at a regional level due to the number of responses received. The Committee agreed that in future they would engage with young people through sub-committees. This would provide an opportunity to hear more directly from young people their views on the issues the Committee are considering.*
- 2. This type of engagement will allow Committee members to gain a substantive knowledge of the issues and opinion of young people throughout Wales today³⁰.*

It is clear that the Committee felt that there were lessons to be learnt in ensuring the voice of children and young people are heard within transport discussions and I look forward to further development in this field.

I understand that there are members of the PTUC who have a keen interest in relation to young people's issues and are advocates for their needs, however, it may well be worth the Committee considering having a young person's representative. The same could apply to Regional Transport Plan Committees / Boards who should identify ways of engaging actively with local children and young people's participation fora.

The PTUC may even wish to consider affording observer status to those who represent particular interests, for instance the Older People's Commissioner, the EHRC and the Children's Commissioner for Wales.

³⁰ <http://wales.gov.uk/topics/transport/public/ptuc/reports/?lang=en>

Work undertaken in Gwynedd offers an example of good practice within a local authority via the 'Yellow Card' project. 'Clebran' who are a group for disabled young people in Gwynedd have identified some of the difficulties it's members have encountered when using public transport.

Gwynedd County Councils' Integrated Transport Unit in collaboration with Clebran, a group ran by Barnado's have created an identity card which is available by request for disabled people within the local authority.

The card will hold contact details and information on what help they require e.g. 'I need more time to get on and off the bus' 'Please speak clearly and let me know when my stop is'. Bus drivers are being made aware of the card, and an initial pilot has been really valued by young people, one young person saying *'it does help, and has helped make it feel safe'* resulting in young people feeling empowered and making it more accessible to use public transport independently. On the 10th of November 2012 the card is being launched by the Integrated Transport Unit, and a group of disabled young people are travelling from Caernarfon to Porthmadog using the yellow card.

This is an excellent piece of participatory practice with service users having a voice resulting in practical policy solutions. Young disabled people in Gwynedd have expressed how empowering this small step has been in enabling the young people to live fuller lives. I would urge that this project be promoted and that it is made as accessible as possible to those in Gwynedd who require additional support.

There have been numerous projects over many years which have enabled young people to voice concerns about transport provision and the messages have been consistent. It is disappointing that in engaging on these issues once more, the same issues persist.

Specific Issues raised by the young people:

Lack of integration:

'Bus stations and train stations should be closer together.'

'We should have tickets to destination that can be used on both buses and trains - Oyster Card Style system.'

'Buses and trains never synced and you have to wait a long time'

'Suppose to be able to use train ticket on bus – but bus drivers don't know about it – Better training/ partnership work is needed'

'When you have different companies on the same routes, it's confusing and tickets are not valid – this is unclear'.

Transport experience:

Young people have consistently referred to having negative experiences with bus drivers and the fact that they are not treated with respect.

Young people told us:

'They (drivers) need to believe our age when we tell them how old we are'

'Drivers short of change. Tell you to wait till you get off and will let you get off without your change.'

'Bus drivers are rude to everyone'

'Bus drivers driving while on phone and even smoking out the window'

'Bus drivers need better attitudes. I've complained numerous times about being spoken to like rubbish and nothing has changed. Is it part of their job not to be friendly to the public?'

This chimes with the recommendation made by the PTUC in their report on provision of information where they stated the need for:

'Consistent customer care training including a demonstrable understanding of equality and diversity, and practical guidance on disability awareness should be included in this training requirement'³¹

Other issues:

'Taxis won't come to travellers site because of the bad reputation.'

'Don't feel safe on buses and trains'.

'timetables change and we don't know about it'

'timetables are confusing'

It is worth reiterating that these messages are consistent with numerous previous opinion gathering exercises, including those undertaken by the PTUC.

³¹ <http://wales.gov.uk/docs/det/report/120531provisionptien.pdf>

Provision of information appears to be an issue of concern and I note the PTUC report on provision of public transport information from April 2012³² and recommendations into this particular issue. I would support those recommendations but also urge specific engagement with young people in addressing these concerns.

Not disadvantaged by poverty

Young people told us:

'You aren't adult at 16 so why should we pay for an adult fare!'

'The prices are ridiculous'

'Stopping return tickets is bad idea! People can't afford to pay day ticket prices for short journeys i.e. getting children to school and back.'

Subsidised bus and train fares for children and young people would, in my opinion, have the potential to transform access to goods and services.

Within the National Tackling Poverty Action Plan, a critical statement of intent made by the Welsh Government was that they would develop a screening tool that will enable Government to *'assess the socio – economic impact of transport policy and investment options and to make policy and investment choices that will contribute to tackling poverty.'*³³

The briefing 'Access Denied'³⁴ calls for smarter targeting of public transport subsidies. Young people often ask me why it is that there is free bus travel on registered local bus services for those aged over 60 but not for young people. I am clear as to the rationale and benefits for older people but would be interested to seek Welsh Government's position on why this should not also apply to young people. I would not wish to pitch different generations against each other, but would appreciate being in a position to communicate to young people why they do not benefit similarly.

The report by the NAFW's Children and Young People's Committee stated:

'Young people from Funky Dragon told the Committee that from the age of 15, young people are charged adult fares on public transport. This makes accessing the limited

³² <http://wales.gov.uk/topics/transport/public/ptuc/reports/provisionpti/?lang=en>

³³ <http://wales.gov.uk/topics/socialjustice/publications/tacklepovactionplan/?lang=en>

³⁴ <http://www.sustrans.org.uk/resources/in-the-news/access-denied-transport-poverty-in-wales>

*public transport even more problematic to those young people who can't afford full fares*³⁵

The Committee report recommended,
*'...that the Welsh Government prioritises the provision of concessionary fares on public transport for 16 – 18 year olds to enable them to access leisure and recreational facilities as well as educational and training opportunities in their wider locality.'*³⁶

The inquiry also heard that:

*'...The WLGA recognises the importance of transport enabling children and young people to access play provision and would welcome a re-examination of the idea of concessionary fares for young people.'*³⁷

Young people's poverty is a very real issue, especially when considering the fact that benefit eligibility and levels are low for 16 and 17 year olds and also that the minimum wage for those under the age of 18 is significantly lower than the rest of the population at £3.68. The cost of transport therefore disproportionately impacts on those under the age of 18 wanting to work due to the lower wage threshold.

In the Clywed report the cost of public transport was identified as an issue for children and young people and Clust i'r Ifanc were working on plans to seek to address this issue.

This has also been reflected in a recent report by the British Youth Council:

We consider it unacceptable that young people might be excluded from education, training or local communities as a result of high transport costs," the report states.

*"These costs are often increased as a result of young people being asked to pay adult fares. The government should provide a clear lead to transport operators by defining when adult fares should be applicable."*³⁸

There have been steps in the right direction through a number of short term pilots. These examples include Welsh Government's half fares scheme in Bridgend and Flintshire.

³⁶ <http://dera.ioe.ac.uk/2046/1/cr-ld8301-e.pdf>

³⁷ <http://www.assemblywales.org/bus-home/bus-third-assembly/bus-guide-docs-ub/bus-business-documents/bus-business-documents-doc-laid/cr-ld8301.pdf?langoption=3&ttl=CR-LD8301%20Children%20and%20Young%20People%20Committee%3A%20Provision%20of%20Safe%20Places%20to%20Play%20and%20Hang>

³⁸ <http://www.byc.org.uk/news/all-full-'adult'-fares-should-start-at-18,-concludes-youth-select-committee.aspx>

We have also seen free bus travel for young people over school holiday periods and the feedback I have received is very positive, especially in relation to the positive impact for households with a number of young people.

Within the section on young people not in employment, education or training, the Welsh Government's Tackling Poverty Action Plan states that they are developing pilots in respect of smart cards for public transport. The aspiration is that the technology could enable different fare offers for particular groups, for instance young people needing to access employment and training.

The Committee may want to consider the application of pilots in Newport and Mon a Menai because we know that lack of transport options is a significant factor in exclusion from the job market.

The 'School Gates Programme'³⁹ in Blaenau Gwent and Merthyr Tydfil was set up to support parents/guardians to look at what goal they would like to achieve for a brighter future for themselves and their families. In developing the work, a key barrier for non-working parents in low income families in accessing training and employment included limited public transport.

Young people in our workshop in Mold stated that seeking jobs in areas where there are more options for retail employment opportunities is impossible because of infrequency and timing of public transport into hubs such as Chester.

Conclusion

It is clear that the Welsh Government's commitment to an integrated public transport system as envisaged in the Wales Transport Strategy faces significant barriers.

It is worth considering the various ways these can be overcome, such as demand responsive services, community transport and open dialogue with public transport providers.

Welsh Government must ensure that transport requirements are considered across all service developments. Recommendation 20 by the CYP Committee is one which Welsh Government and all stakeholders should give due consideration:

'The Committee recommends that the current public transport system should be re-assessed against the needs of children and young people, alongside those of other users. If the re-assessment highlights systemic problems with public transport provision in

³⁹ <http://research.dwp.gov.uk/asd/asd5/rports2011-2012/rrep747.pdf>

*Wales, then further steps should be taken by the Welsh Government to ensure that those issues are resolved.*⁴⁰

A powerful quote from the report states:

*‘..you might be dealing with transport, but if your transport policy or approach to transport means that someone cannot access a local play opportunity or an open space, that is a problem that needs to be addressed and you have a role in addressing that.’*⁴¹

This is a message that should reverberate as local service boards develop their Single Integrated Plans.

Engagement with children and young people is critical in establishing new and innovative solutions to the challenges facing the public transport agenda. Stakeholders also need to listen to what young people have to say regarding their experiences of public transport and respond accordingly. There is a danger of negative experiences impacting on future use of public transport.

Possibly the biggest issue facing the integration agenda is funding cuts. I noted in January 2012 that the Local Transport Services Grant and Bus Service Operators Grant was to be cut by 25% in Wales in 2012/12.

Very often it will be the less well patronised services which are likely to be cut. Whilst I understand that difficult funding decisions are to be made, Welsh Government must ensure that the most vulnerable in society are protected from the worst and that they are not disproportionately impacted by such decisions.

We would again draw attention to the briefing paper *Access Denied – Transport Poverty in Wales*⁴² which outlines the cost of maintaining funding levels. Whilst significant, Welsh Government must consider the wider implications and cost benefits in relation to general public services. We know that it can often be the case that the least popular routes/modes of transport can also be the most critical to people’s lives.

To this end, Welsh Government should ensure that they both equality impact assess major decisions (including allocation of resources) relating to transport funding as well as complying with the Rights of Children and Young People (Wales) Measure 2011. Bearing in mind the critical importance of public transport, I would strongly urge the

⁴⁰[http://www.assemblywales.org/bus-home/bus-third-assembly/bus-guide-docs ub/bus-business-documents/bus-business-documents-doc-laid/cr-ld8301.pdf?langoption=3&ttl=CR-LD8301%2020Children%20and%20Young%20People%20Committee%3A%20Provision%20of%20Safe%20Places%20to%20Play%20and%20Hang](http://www.assemblywales.org/bus-home/bus-third-assembly/bus-guide-docs%20ub/bus-business-documents/bus-business-documents-doc-laid/cr-ld8301.pdf?langoption=3&ttl=CR-LD8301%2020Children%20and%20Young%20People%20Committee%3A%20Provision%20of%20Safe%20Places%20to%20Play%20and%20Hang)

⁴¹ ibid

⁴² <http://www.sustrans.org.uk/resources/in-the-news/access-denied-transport-poverty-in-wales>

Committee to scrutinise the application of the due regard applied to the UNCRC in making important transport decisions.

A handwritten signature in black ink that reads "Keith Towler". The signature is written in a cursive style and is underlined with a single horizontal line.

Keith Towler
November 2012