

UNISON Cymru/Wales response to Welsh Government consultation on Improving Public Transport

1. UNISON is the largest public sector trade union with 1.2 million members working across public services in the UK who rely on public transport, in particular buses. We are a key trade union for transport support staff, with many members involved in supporting the work of Cardiff Bus in particular. We welcome this opportunity to respond to Welsh Government's consultation on Improving Public Transport. As we have no representatives in the taxi sector, we have chosen to only respond to issues affecting buses.
2. This consultation follows recent consideration of these issues by both the UK and Scottish Governments, in which we have participated. Our guiding principle in all cases has been to support responsive, comprehensive bus service arrangements in which publicly owned and municipal operators can play a full role; and to seek legislative arrangements that guard against a race to the bottom on worker terms and conditions in the bus sector.

General comments

3. We strongly welcome the positive statement of commitment expressed by Welsh Government on bus service provision, which plays a very important social as well as economic role. We welcome the intention of Welsh Government to establish new arrangements in Wales to promote better integration and integrated thinking across existing local authority boundaries, and consistency of experience for the travelling public.
4. It is important at the same time that the very different needs of different parts of the country should be recognised in how administration is organised and services provided. What will be appropriate for the South East is not likely to work in other parts of the country, and too powerful central functions would risk creating a monolithic conception of service provision.

This wouldn't be likely to meet the needs of citizens who use or might use bus services. For that reason, we support below the more decentralised options.

Joint Transport Authorities - questions 1-5

5. We strongly support the proposal for a JTA structure, capable of establishing common standards across the country where that is appropriate. In addition, the JTA must have the ability to establish floor standards of worker terms and conditions which those in the sector might expect, irrespective of their employer, when engaged in providing bus services in Wales. The model of a national strategic JTA with three other JTAs discharging regional and locally specific functions would be a preferable model, ensuring that solutions meeting needs outside the main centres of population are able to emerge and be considered. It would be right for Welsh Ministers to be represented on the main JTA, but for the three regional JTAs, it would be more important for local/regional interests to be properly reflected, and these might be crowded-out if Ministers were represented at that level. UNISON Cymru/Wales believes it is right that Ministers should have the powers to intervene where a JTA was not performing effectively, but the scope for their intervention should be set out in clear and transparent criteria.

Questions 6-7

6. JTAs should also have powers to establish floor standards for terms and conditions for bus operators in Wales.

Enhanced Quality partnerships (questions 8 and 9)

7. We share the view expressed in the consultation document that the existing regime has failed to deliver effective arrangements and that additional powers could enable much better results. The existing regime is similar to that which applied in England before 2017. We saw

there that a major impediment to improvement was that the arrangements basically gave a veto over improvements to operators in a given area.

8. It is essential in framing new arrangements that local authorities should be given the ability to form partnerships with operators who are able to commit to the levels of service provision aspired to by the authority, even if that is a subset of operators in a given locality, and that as part of the EQP schemes, authorities should be able to prevent operation within their area by operators who are not part of the partnership.
9. We think it important that there should be no requirement that a majority of bus operators must be involved, the process of deciding what constitutes a majority then becomes an expensive and needless complication in what will anyway be a complicated task. We would see that legislation would be necessary as this is not the approach currently available to authorities.

Franchising (Q10-15)

10. Franchising should be made available to authorities, provided that they would be able to form EQPs if that best met local demands. Franchising schemes need to contain floor standards on workers terms and conditions as well as on service levels if they are to avoid becoming a mechanism for companies to bid low, then secure their profit by driving down staff pay and conditions, and staffing levels crucial to providing the service levels promised in winning the franchise bid. While we see the potential promise of franchising, the details of given schemes are critical and we could not support any which were not properly designed.

Local Authority bus services

11. We strongly support municipal service provision, and would back the removal of the prohibition on establishing municipally-owned bus operators. UNISON Cymru/Wales believes that rules concerning when a bus company might be formed should be a matter for local governments, who are more accountable to their electors locally than Welsh Ministers.

The sole purpose of national legislation should be to remove the present prohibitions. For that reason, we take no view on when it might be appropriate for a local authority to set up arms length or direct service operations. No safeguards are required to protect private operators.

Concessionary Fares

12. UNISON Cymru/Wales believes that the current concessionary arrangements should remain as they are. The current arrangement applies equally to both men and women, and provides everyone over the age of 60 with the possibility of free travel.

13. There are many people who use public transport to get to work past the age of 60, and the proposed age requirement of 68 would remove concessions for many of those people aged 60-67 who still participate in voluntary or part-time work for low or no remuneration, the large majority of whom are women, where the pass proves very economical.

14. UNISON Cymru/Wales also has concerns over the transition period if the new changes are brought in. We question whether there would be protections in place for those people currently in receipt of concessionary fares who currently meet the age requirements but who would not meet the proposed age requirement should the new requirements be established.