Consultation on Mobility as a Service Code of Practice

A Response from CTA

May 2022

Summary

The Community Transport Association (CTA) welcomes the opportunity to respond to the Department for Transport's consultation on a Code of Practice for Mobility as a Service (MaaS), which has significant potential to deliver a more accessible, inclusive and sustainable transport system across the UK through seamless journey planning and integrated ticketing.

The key points of our submission are:

- The Community Transport sector – which delivers accessible, inclusive and sustainable services in urban, rural and island communities across the UK – is an essential partner to deliver 'MaaS for All' and Levelling Up
- The Code of Practice should ensure Community Transport is integrated into MaaS platforms as far as possible to:
    o Expand geographical coverage, including for rural, remote, island and isolated communities without public transport provision
    o Ensure accessibility, especially for older and disabled people who may struggle to access public or private transport
    o Tackling transport poverty to help everyone to access amenities, education, employment, health & social care and other public services
    o Increase consumer choice between operators and modes in journey planning
    o Encourage climate action by facilitating modal shift and behaviour change
- There are some challenges to fully integrating Community Transport into MaaS due to the regulatory environment, a lack of technological capacity and long-term under-investment. These issues can be overcome with:
    o Initial focus on journey planning integration for Community Transport schemes, as achieved by the Go NHS Tayside MaaS pilot
    o Aligning MaaS projects with capacity building programmes for sector
- The Code of Practice should reflect affordability for users and passengers as a key priority
- The Department for Transport should invest in MaaS innovation projects across the UK, learning from the success of the pilots funded by the Scottish Government's MaaS Investment Fund

Introduction

1.1   In your view, how can we ensure the code of practice is relevant for:

- **Commercial MaaS platform providers (for example Citymapper, Moovit, Whim)**

- **Local authorities (local council authorities within the UK)**

- **Sub-national transport bodies (for example, Transport for London, Midlands Connect, Transport for the North)**

- **Transport operators (for example National Express, LNER, Stagecoach)**

- **Transport users (those using transporting systems)**

Introducing Community Transport

The Community Transport Association (CTA) welcomes the opportunity to the Department for Transport's consultation on a Code of Practice for Mobility as a Service (MaaS). CTA champions, connects, supports and grows the UK's Community Transport sector with a mission of accessible, inclusive and sustainable transport for all. Over 1,000 Community Transport schemes operate in urban, rural and island communities in England, Scotland, Wales and Northern Ireland. The sector is all about community-led solutions to local transport needs, playing a critical role in levelling up across the UK.

CTA members deliver a diverse range of adaptable, cost-effective and innovative services, which are always for a social purpose and never for a profit. Our members are practical and passionate problem solvers who deliver services which fight poverty and inequality; tackle isolation, exclusion and loneliness; and reduce carbon emissions, air pollution and congestion.

Community Transport facilitates modal shift away from private cars to more sustainable modes such as buses, minibuses, bicycles, e-bikes and car share. The sector delivers shared transport services – such as dial-a-ride, electric car clubs, patient transport, school transport, 'wheels-to-work', minibus hire and bicycle or e-bike hire – as well as scheduled community bus services on routes which are deemed socially necessary or may have been deemed commercially unviable.

Many older and disabled people, as well as those in deprived households or marginalised neighbourhoods, who are most likely to be underserved or excluded by public transport or least likely to be able to afford or own a private car, rely on Community Transport to access amenities, education, employment, family and friends, health & social care and other public services. Most Community Transport vehicles are wheelchair accessible. Drivers are professionally trained to assist with health or mobility issues and often deliver door-to-door or door-through-door support to passengers.

Role of Community Transport in MaaS

The MaaS Code of Practice must be relevant for Community Transport providers and users. It must recognise the added value which the Community Transport sector can contribute to MaaS. There are some challenges with fully integrating the sector into all aspects of MaaS (*see Q2.1*), but there are successful models (*see Case Study*) and the sector can play an essential role in delivering 'MaaS for all' through accessibility and inclusion.

Integrating Community Transport services into MaaS can deliver significant improvements to operational delivery and significant benefits for users and passengers:

- ***Expanding geographical coverage***: Community Transport is most prevalent and impactful in rural, remote, island and isolated communities where there is little or no public transport provision – 52% of schemes either exclusively or mostly serve rural communities. Community Transport can extend the reach of MaaS to bring more journeys within scope; better connect

non-urban communities; and offer more comprehensive journey planning across the UK for residents and visitors, including for more complex 'trip chaining' or 'last mile' journeys – 55% of passengers are socially or geographically excluded

- **Ensuring accessibility**: Disabled people and others in the community often depend on Community Transport, because they are excluded from inaccessible public transport services or require greater levels of personalised support to travel. Community Transport can deliver a more accessible form of MaaS which meets the needs of disabled people and the wider community experiencing barriers to accessing transport to prevent MaaS from excluding a significant proportion of the population

- **Tackling transport poverty**: Many communities in the UK suffer from a lack of affordable public transport provision, which damages the ability of local people to access amenities, education, employment, health & social care and other public services. These unmet local transport needs are often plugged by Community Transport schemes. Community Transport can support MaaS to tackle transport poverty by raising awareness of these services and facilitating access for all

- **Increasing consumer choice**: Integrating Community Transport into MaaS will raise awareness of the sector's services with new audiences and offer passengers a greater level of choice between operators and modes in their journey planning. Community Transport plays an important role in education and employment with 34% of journeys accessing education and 11% accessing work. Community Transport can enable MaaS to be more attractive to consumers

- **Encouraging climate action**: Community Transport schemes encourage climate action by facilitating modal shift away from private car use towards active travel, public transport and shared transport options which, as local, community-led solutions, are often more effective at delivering behaviour change. Community Transport can support MaaS to increase modal shift and reduce carbon emissions

Case Study: Go NHS Tayside

A new MaaS pilot project in NHS Tayside is successfully integrating Community Transport into its journey planning offer to help patients attend appointments at NHS facilities across the region. The Scottish Government's £2m MaaS Investment Fund is supporting the Enable Project by Tactran, the regional transport body, to tailor journeys based on their personal circumstances and by lowest cost or shortest wait.

The scheme was first piloted in Perth Royal Infirmary, where 400 patients used the service to plan appointments to the urology department. Now the Go NHS Tayside website has launched with the service rolled out across central Scotland for all NHS patients, visitors and staff. All appointment letters and information now signpost to the service, which assists with journey planning and allows users to book tickets with operators. The aim is to enable patients, visitors and staff to plan sustainable journeys to all NHS Tayside sites, from GP surgeries to hospitals, by active travel, public transport or Community Transport.

Three Community Transport schemes – Upper Tay Transport in Aberfeldy, Kinross-shire Car Scheme and Elder Voice in Blairgowrie – have already been integrated and are providing accessible, affordable and sustainable patient transport through Go NHS Tayside. Partnerships are pending with a further four Community Transport schemes.[1]

Stakeholder Management

Stakeholder management is a significant challenge for commercial MaaS platform providers, local authorities and transport bodies given the wide range of stakeholders involved from different sectors of our society and economy.

We agree that the Code of Practice should provide advice and highlight best practice in this area from the UK and internationally. Its guidance should strongly encourage commercial MaaS platform providers, local authorities or transport bodies who are exploring or developing MaaS solutions to engage with the Community Transport sector. Community Transport is an essential partner to deliver 'MaaS for all'.

The consultation document does not reference the need for community engagement in developing and implementing MaaS solutions. It is essential that awareness, understanding and trust is built with local communities in order to improve design, secure buy-in and encourage use of MaaS after launch. Community engagement is also important to identifying where there is the greatest need for MaaS and where it can contribute to levelling up. There is a role for commercial MaaS platform providers as well as commissioners in the public sector in this outreach.

CTA stands ready to support this engagement with our members, our sector and its users. CTA's extensive network of Community Transport operators and their partners and users can provide a direct route to market for community engagement.

Affordability

MaaS has to be financially sustainable in the long-term for all partners, including Community Transport operators. However, the Code of Practice should also reflect affordability for users and passengers as a key priority. If MaaS results in the use of public, community and shared transport being less affordable in the midst of a cost of living crisis, low earners without access to private vehicles will be hardest hit and the prospects of achieving our modal shift and carbon emissions targets will be seriously damaged.

Sustainability

MaaS has the potential to increase modal shift and reduce carbon emissions by promoting active travel, public, community and shared transport. We agree that the Code of Practice encourage MaaS platform providers to include carbon data for each route offered, wherever possible, to help consumers choose lower carbon journeys.

---

[1] www.gonhstayside.co.uk

Data

2.1 What, in your view, if any, should be the role of a code of practice in addressing:

- **Data issues overall to facilitate MaaS?**

- **Data sharing arrangements to facilitate MaaS?**

- **Data quality to facilitate MaaS?**

Community Transport has been at the vanguard of innovation in transport for decades. Many Community Transport operators have been delivering Demand Responsive Transport, for example, for many years or are now innovating with electric car clubs and shared e-bike schemes. The sector has proven itself adaptable, flexible and resilient. Nonetheless, there are some challenges with fully integrating Community Transport into all aspects of MaaS.

Integrated journey planning with Community Transport alongside other operators is highly feasible in MaaS, as best practice demonstrates (*see Q1.1 – Case Study*). This could be the initial focus of efforts to integrate Community Transport into MaaS. However, integrated ticketing and booking would prove challenging for many Community Transport operators due to the regulatory environment of the Transport Act (1985) – which restricts the ability of Section 19 schemes to transport defined groups rather than the general public – and a lack of technological capacity in the sector. Moreover, Community Transport schemes tend to be less data-driven and digitally-enabled compared to larger commercial transport operators due to a lack of long-term, strategic public investment in a sector which is not-for-profit and largely survives on small-scale, short-term grant funding.

The Code of Practice should recognise the distinct challenges facing the Community Transport sector in participating in MaaS, as well as the value of integrating Community Transport into MaaS as far as possible. MaaS projects should be flexible and inclusive for operators. They should also be aligned with capacity building programmes for the Community Transport sector which increase the data, digital and technological skills and infrastructure of local operators and their ability to contribute to MaaS.

Accessibility and Inclusion

4.1 How, in your view, can MaaS platforms ensure:

- **Their systems are accessible and inclusive to all users?**

- **The journeys they provide are accessible and inclusive to all users?**

It is important that MaaS is utilised to increase access to transport, improve the ability of people to travel and support a more accessible, inclusive transport system across the UK. For example, Disabled people in the UK make 38% fewer journeys every year than non-disabled people due to inaccessible transport. 60% of disabled people have no household access to a private vehicle.

Accessibility and inclusion in MaaS platforms can be ensured by:

- *Integrating Community Transport services*: Community Transport services should be integrated as far as possible into MaaS, because of the sector's capacity to connect people and communities who would otherwise be excluded, from disabled people to rural communities
- *Inclusive design*: MaaS platforms such as websites and apps should adhere to the principles of inclusive design set out by the Central Digital and Data Office, including by providing easy read style platforms.[2] Although MaaS will be a primarily online offering, offline non-app-based alternatives should also be provided so that anyone who needs to plan their journey or book tickets with human face-to-face or on-the-phone support, including people with visual impairments or learning difficulties, can do so
- *Engaging communities*: MaaS platforms should be developed in partnership with local communities to understand the needs of all users. Community Transport operators can support this process. They are at the heart of their local communities and understand the transport needs of the people they serve
- *Protecting affordability*: Journey planning and ticketing via MaaS must be affordable, especially those who rely on public, community and shared transport the most. If the costs of MaaS systems and technologies are significant and passed onto users, many people are likely to be priced out

4.2   How, if at all, do you think a code of practice can help to ensure that MaaS is inclusive for those who may struggle with access, such as those without a smartphone or access to a bank account?

The Code of Practice should stipulate that MaaS platforms adhere to the principles of inclusive design. Offline, non-app-based alternatives should be available to enable those without a smartphone or access to a bank account to plan their journey by phone or make cash payments.

MaaS platforms could be co-produced in partnership with communities of users following user-led design principles, such as disabled people, older people, people with learning disabilities or people with sensory impairments.

Assistance users to access MaaS platforms could also be provided through existing networks of charities, community hubs, libraries or other similar facilities in communities which support people locally to access online services or improve their digital skills. These are often safe and trusted environments for the most vulnerable members of the community.

Other questions on MaaS

What do you think we should be doing to monitor the effectiveness of the code of practice?

---

[2] www.gov.uk/guidance/make-things-accessible

Accessibility and inclusion will need to be key criteria. Monitoring of the effectiveness of the Code of Practice will require ongoing engagement with CTA and the Community Transport sector to ensure that commercial MaaS platform providers and pilots are engaging with Community Transport and integrating their services as far as possible.

It should be kept under review whether regulation and legislation of the MaaS sector is needed in the long-term, rather than a voluntary Code of Practice, as the technologies and market develops to ensure the delivery of 'MaaS for all'.

Are there any other ways you think we should support MaaS in the future?

In addition to developing the Code of Practice, we believe that the Department for Transport should increase public investment to support the development of MaaS across the UK. There is an opportunity to learn from the success of the MaaS Investment Fund in Scotland, which has been critical in boosting MaaS innovation north of the border by investing £2m in six pilots with cross-sector collaborations (*see Case Study*).

This kind of investment could be replicated in England, Wales and Northern Ireland. There is an important leadership role for government and the wider public sector to harness the potential of MaaS for a more accessible, inclusive and sustainable transport system and to ensure that MaaS progresses in the public interest.

Case Study: Scotland's MaaS Investment Fund

In its 2018 Programme for Government, the Scottish Government committed to £2 million of funding over three years to support the testing of the MaaS concept. The aim of the MaaS Investment Fund is to test, in a practical application, the viability of MaaS in Scotland.

MaaS was identified as supporting the Scottish Government agenda for a 'healthier, more sustainable Scotland'. It is hoped that better and more comprehensive travel information will empower more people to travel more sustainably, thereby reducing car use, private car ownership and carbon emissions.

Funding was open to public, private and/or third sector organisations looking to undertake a MaaS pilot in Scotland. The first round of applications closed in September 2019 with three projects awarded funding. The second and final round closed in February 2021 with a further three awards being made. CTA sits on the Fund's Working Group.[3]

*Projects include the **GO-HI app** which gives residents of and visitors to the Highlands & Islands instant access to information on buses, trains, taxis, car hire, car clubs, bicycle hire, air travel and ferries. Users can plan their journeys and find, book and pay for all modes of transport all in one place via their smartphone.[4]*

---

[3] www.transport.gov.scot/our-approach/mobility-as-a-service/maas-investment-fund-mobility-as-a-service
[4] https://gohi.app/

Further information

David Kelly, Director for Scotland, Community Transport Association:

david.kelly@ctauk.org

The Community Transport Association (CTA) is the UK charity that represents and supports providers of Community Transport. We have over 1,000 members in England, Scotland, Wales and Northern Ireland. They are local charities and community groups which provide transport services always for a social purpose and never for profit. We believe in accessible, inclusive and sustainable transport for all.