TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

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Equality Impact Assessment - Results

Operation of ferry vouchers and the NEC smart ticketing project

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Title of policy:

Operation of ferry vouchers and the NEC smart ticketing project

Summary of aims and desired outcomes of policy:

To modernise the ferry concession voucher system, to streamline the distribution process and to provide better data about concessionary ferry travel. This will offer Transport Scotland and the transport operators new insight about ferry journeys and (for the benefit of end users) will help to protect the future sustainability of the scheme.

Directorate and Division and team:

Transport Scotland: Transport, Integration and Connectivity (TIC): Smart and Integrated Ticketing

1. Executive summary

Transport Scotland is modernising the national concessionary ferry voucher system to bring it up-to-date with other national concessionary travel services. This will make the system more efficient and will provide us with better information about the journeys people make using ferry vouchers. It will also help ferry operators with data processing and will more generally help to maintain the integrity of the National Concessionary Scheme.

The system provides those who are eligible with four vouchers that can be exchanged for free foot passenger travel and to help pay for a cabin on some services. These are available to people in the Western Isles, Orkney and Shetland.

The update to the ferry voucher service involves replacing the paper vouchers with digital vouchers that are stored on a smartcard. The smartcard used will be the same one used for free bus travel and which everyone who receives ferry vouchers will already have (and for which a process is already in place to handle distribution of replacement and new cards).

The updated service has been introduced to people in Orkney and Shetland initially (phase one) and is now being introduced to people in the Western Isles (phase two).

The ferry vouchers are available to those who receive free bus travel under the National Concessionary Travel Scheme, the eligible cardholders groups differ by island. These are individuals who are aged 60+, disabled, registered volunteers under 26, or those aged 16 to 21.

The above categories mean the primary users of ferry vouchers have protected characteristics (age and disability), making access, inclusion and equality a key consideration. This has been taken in account through the adoption of a user centred design approach to explore the best way to update the system. It has also reduced the risk by introducing the changes to Orkney and Shetland in the first instance, to understand and validate the needs of people there before implementing best practice in the Western Isles.

As the work has progressed, access, inclusion and equality have been investigated and advocated for via a user research workstream. Core project documents have also captured the importance of accessibility and equality, including the RAID log, capturing risks, assumptions, issues and dependencies.

2. Background

The Scottish Government provides National Concessionary Travel Schemes (e.g Young Person's, Over 60 and Disabled), for which nearly half of Scotland's population is eligible.

The majority of these schemes are delivered on a smartcard platform, which aligns with the SG vision '*all public transport journeys…can be made using some form of smart ticketing'* and provides accurate data for reimbursement purposes. These schemes are scrutinized to ensure a quality service to the public, alongside value for public money, and as such we must ensure efficient, transparent and reliable management of these schemes, using smart technology.

Concessionary users entitled to this ferry travel are residents on the Western Isles, Orkney, Shetland. The change to the way ferry vouchers are provided affected people in Orkney and Shetland initially, with those in the Western Isles being migrated at a later date.

The need for the ferry voucher system to be modernised has been driven by a business requirement to mitigate challenges posed by the isles' infrastructure (e.g. connectivity; postal access) and to improve the efficiency and integrity of the National Concessionary Travel Schemes.

The modernisation involves transition from ferry vouchers that are posted out in paper form to ferry vouchers made available in a digital form for storage on a smartcard.

The smartcard to be used is the National Entitlement Card that every individual who receives ferry vouchers already has. It is the same card that their bus pass is held on. Cardholders refer to this card in various ways, with the main ones being: bus pass, Saltirecard and Young Scot card.

The challenge in introducing the digital vouchers has been to ensure they remain accessible to, and usable by, everyone who is eligible to receive and use them. Also, that the transition from paper to digital vouchers is underpinned by a framework of information, help and support that meets the needs of all.

3. The scope of the EQIA

3.1 Policy or decision:

This EQIA is concerned with examination and evaluation of the potential impact of a change from paper ferry vouchers to digital ferry vouchers within the National Concessionary Travel Schemes.

3.2 Relevant groups:

Age and disability are the protected characteristics potentially most likely to be impacted by the change being introduced. The ferry vouchers are available to residents on a qualifying island who receive free bus travel under the National Concessionary Travel Schemes. These are individuals who live in the Western Isles, Orkney and Shetland and who are aged 60+, disabled, registered volunteers under 26, or those aged 16 to 21.

3.3 Factors of potential impact:

The EQIA found that the change could potentially have both positive and negative impacts.

Potential positive impacts:

- Removes the burden on disabled people, older people and younger people to keep track of paper vouchers.

- There is further simplification by having ferry vouchers stored on the same smartcard as the bus pass (the National Entitlement Card) and is a smartcard that everyone who receives ferry vouchers already has.

Potential negative impacts:

- Requires the voucher user to take an action where currently they do not need to i.e. they currently receive the paper vouchers through the post, which requires no action on their behalf. Whereas in the future, they will have to download the vouchers or have someone download them on their behalf.
- The change being introduced involves communication of concepts such as ‘download’, ‘digital’, ‘smartphone’ and ‘apps’. These concepts are more likely to be less familiar to older people.
- The requirement to access help if you are unable to download the vouchers yourself will require people seek out support in person or by phone or email. One or more of these options are more likely to be inaccessible to disabled people.

3.4 Steps to reduce negative impact and promote equality:

The EQIA found that solutions identified by the project team would remove or mitigate negative impacts, as follows:

Requirement to download vouchers or have someone do this for them

- For those unable to download themselves and who cannot (or prefer not to) access a channel of help, there is a ‘no-action-required’ route, which is where they simply turn up on the day and ferry staff assist the voucher download for them. They only need to have their National Entitlement Card with them, which is a requirement currently (though no longer need to have the paper voucher with them as this is being withdrawn).

Requirement to understand the concept of a new digital service

- Communications have avoided digital jargon as much as possible
- explanator videos are available
- An information leaflet will be sent to everyone that emphasizes the non-smartphone options

- Localised support is in place via trusted local organisations and charities that we have built relationships with in order that they can help share accurate information and provide in-person assistance.

No smartphone or not confident in using one

- Digital app can be used by someone who does have a smartphone
- Ferry staff can do it at the local office, at the ferry port or when people check in on the day of travel

Restrictions in the way help and support can be accessed

- Help and support channels have been created to cover in-person, phone and email support. The support includes:
    - Transport Scotland phoneline available 24/7
    - email assistance from Transport Scotland
    - website content, including video content
    - assistance by phone, email or in-person by the local council
    - assistance from local charities and organisations, with a mix of in-person, phone, email options
    - in-person assistance from the ferry company (who can provide reassurance over-the-phone about the option of having their vouchers downloaded on the day of travel)

3.5 Data collection and analysis

Data was collected over more than a year from a range of sources. It was primary data gathered first-hand from the people who potentially could be impacted by the change from paper to digital voucher. It was also gathered form representatives of those individuals, as well as from local organisations that provide services and outreach, and from the relevant local councils and ferry operators.

The data was through multiple ‘rounds’ of research. Each round of research build on the learning of the preceding round/s. These research cycles also provided a robust framework for checking and validating solutions that were being considered as remedies to the potential negative impacts.

The research team took the proposed solutions about to the ferry voucher users and other stakeholders and gathered feedback. On the back of that feedback, adjustments were made.

After each round of research, the data was analysed through collaborative processes designed to off-set researcher bias. The main findings were shared with key stakeholders, including the local authorities and ferry operators.

3.6 Stakeholder engagement

The process of examination and evaluation of impact took place over more than a year. It involved more than 100 ferry voucher users. Not all who were involved chose to provide demographic information, but of those who did, 48 were aged 60 plus; 13 were aged 16 to 18; and 32 had lived experience of disability.

In addition to this, there was engagement with organisations that provide services to people in the community, especially to older people, young people and disabled people. There was also engagement with the relevant local authorities and ferry operators.

Once the potential negative impacts were identified, the solutions were developed and then returned to the ferry voucher users and local organisations for review and feedback. This gave the Project Team confidence that the steps being taken to reduce impact and promote equality were appropriate.

This iterative and user-centred approach was at the heart of the decisions made on how to remedy potential negative impacts and how to promote equality.

3.7 Legal and policy frameworks

The Scottish Government's vision, set out in the Smart and Integrated Ticketing & payments Delivery Strategy 2018 is, "that all journeys on Scotland's bus, rail, ferry, subway and tram networks can be made using some form of smart ticketing or payment." This strategy sets out the programme of work for Transport Scotland with regards to smart ticketing. It includes, "National Entitlement Card - Ferry Concession" as a deliverable.

Furthermore, the Second National Transport Strategy sets the policy for transport in Scotland, with an aim of reducing inequalities, taking climate action, helping deliver inclusive economic growth and improving our health and wellbeing. Within this, the strategy specifically notes that, "Smart ticketing or payment options have been introduced on a number of rail, bus, tram and subway services across Scotland and these will continue to be key areas for investment to encourage modal shift to public transport." Linked to this, the second Strategic Transport Projects Review recommends continuing with the support and ongoing delivery of fully integrated smart ticketing and payment services across all public transport.

The current paper vouchers for ferry concessionary travel does not align to this vision for smart ticketing across all modes in Scotland. Additionally, the need for the ferry voucher system to be modernised has been driven by a business requirement to mitigate challenges posed by the isles' infrastructure (e.g. connectivity; postal access) and to improve the efficiency and integrity of the National Concessionary Travel Schemes.

The ferry concessionary travel scheme is not legislated, and therefore is not bound to specific legislation on the type of ticket or smart platform utilised. The public sector equality duty in the Equality Act 2010 means Scottish public authorities must have 'due regard' to the need to eliminate unlawful discrimination; advance equality of opportunity, and foster good relations. As such, this must be considered via an Equality Impact Assessment to understand this impacts of this project.

3.8 Resource considerations

The digital vouches and the infrastructure set up to facilitate and support the delivery of them offers value for money on the public purse whilst also providing an accessible and usable service to members of the public.

It is considered that the service design is sustainable for the foreseeable future. This is the case for:

- in person support and assistance provided by local authorities, ferry operators and local organisations that have opted to be 'help spots'
- information materials (and their provision in alternate formats if requested) and provision of a free public helpline number
- maintenance and on-going free availability of the smartphone app that people can be use
- ticket collection equipment used by ferry operators
- on-going engagement with stakeholders involved in the delivery of the digital voucher service
- technical and operational support services provided by Transport Scotland

4.Key findings

The policy to replace paper ferry vouchers with digital ferry vouchers had the potential to negatively impact some people for reasons relating to a protected characteristic, with age and disability the characteristics most likely to be affected.

To overcome this possibility, the project team adopted a user-centred design approach, which underpinned the entirety of the project life cycle. This involved investing considerable time and care towards understanding potential impacts on people receiving and using ferry vouchers.

Where negative impacts were identified, solutions to remove those impacts or mitigate them as best as possible were proposed. Before being adopted, they were taken out to the communities who might be impacted (older people, young people and disabled people) to check and validate their suitability.

As a consequence of the approach taken by the project team, the EQIA finds that there will be no or minimal negative impact on those with protected characteristics. The EQIA further finds that there is also real opportunity for positive impact for equality to be promoted.

5. Recommendations and conclusion

It is recommended that the impact to equality of the changes to the scheme will be monitored during the soft launch period to ensure that understand any unanticipated impacts felt by users.

The Equality Impact Assessment has demonstrated that the transfer of paper concessionary vouchers to a smart platform is taking due regard to equality.

This process has complemented wider user research to ensure that the views of users, and the impacts of the project, are well understood.

Steps taken by the project to ensure accessibility and equality include:

- There is a ‘no-action-required’ route, where ferry staff assist the voucher download for them.
- We have used plain English, created explanator videos, and an information leaflet.
- Localised support is in place via trusted local organisations and charities
- Digital app can be used by someone who does have a smartphone
- Help and support channels have been created to cover in-person, phone and email support, including via website, email, phone, or locally, including in person, via charities and organisations and the ferry companies.

It is anticipated that these mitigating factors will have minimal additional costs.

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