

## Respondent Information Form and Questions

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

### 1. Name/Organisation

#### Organisation Name

Guide Dogs Scotland

Title Mr ☐ Ms ☐ Mrs ☐ Miss ☐ Dr ☐ **Please tick as appropriate**

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### 3. Permissions - I am responding as...

Individual

☐

Group/Organisation

☒

**Please tick as appropriate**

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

**Please tick as appropriate** ☐ Yes ☐ No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

**Please tick ONE of the following boxes**

Yes, make my response, name and address all available ☐

or

Yes, make my response available, but not my name and address ☐

or

Yes, make my response and name available, but not my address ☐

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

**Please tick as appropriate** ☒ Yes ☐ No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**

☒ Yes

☐ No

## Guide Dogs Scotland

We will not rest until blind and partially sighted people can enjoy the same freedom of movement as everyone else.

Visual impairment is a fact of life for thousands of people, and with an aging population, many more will be affected by sight loss in the future. Guide Dogs Scotland provides guide dogs and other mobility services that increase the independence of blind and partially sighted people. We campaign for rights that most sighted people take for granted. These include access to services, streets and transport.

## Consultation Questions

The answer boxes will expand as you type.

### Procuring rail passenger services

1. What are the merits of offering the ScotRail franchise as a dual focus franchise and what services should be covered by the economic rail element, and what by the social rail element?

Q1 comments:

A merit of offering a dual focus franchise is it is a perceived way of securing what in commercial terms could be vulnerable routes/stations, for example, stops in rural areas that provide a high impact to local residents and can be used to encourage local economic growth of business, potential tourism and housing development opportunities. However the concepts of economic and social franchises need further clarification. For example, what are the main drivers underpinning each? Is it economic growth or services to maintain communities? Will social and economic franchises cover a large specified geographical area and routes, or will each include many subsections? Will this need to be defined at the beginning of the franchise and be in place for the duration, or will some reasonable amount of flexibility be built into the agreement? In essence we would welcome further development and discussion on the concept of dual franchises.

2. What should be the length of the contract for future franchises, and what factors lead you to this view?

Q2 comments:

The rationale from operators for wishing longer contracts is to make it more attractive for them to invest. Whilst not wishing that any operator's investment is lost to them, we feel that this could be addressed effectively within the franchise agreement drawn up. It is important that competitive edge is maintained. In terms of providing accessible services and infrastructure, design standards and duties to disabled people are already in place and operators should be working to those standards currently. There have been two seven-year contracts with the last one being extended by three years. If

this has been deemed successful, and we have no evidence to say otherwise, then going forward another ten year contract would be appropriate.

3. What risk support mechanism should be reflected within the franchise?

Q3 comments:

No comment.

4. What, if any, profit share mechanism should apply within the franchise?

Q4 comments:

No comment

5. Under what terms should third parties be involved in the operation of passenger rail services?

Q5 comments:

No comment

6. What is the best way to structure and incentivise the achievement of outcome measures whilst ensuring value for money?

Q6 comments:

We approve of outcome based measures. What is an outcome can be interpreted differently. All too often we hear of measurements that are called outcomes but are in fact just number of trips, number of complaints received, and number of people. Whilst some of this is useful, more concerning the quality of journey and service need to be collected for evaluation. For example, can a blind person get the travel information in an accessible format to them to plan their journey? Was it accurate? Can they access the station? Do platforms have the tactile warning slabs? Are the audio announcements accurate on the train?

The consultation mentions passenger satisfaction surveys. This targets people who currently travel, not people who would travel if the station near them was accessible for instance.

We believe that there needs to be a mix of methods of reporting on outcome measures. This is important as blind and partially sighted people are often instantly excluded by the normal methods of engagement, for example, posters at stations.

7. What level of performance bond and/or parent company guarantees are appropriate?

Q7 comments:

No comment

8. What sanctions should be used to ensure the franchisee fulfils its franchise commitments?

Q8 comments:

No comment

### **Achieving reliability, performance and service quality**

9. Under the franchise, should we incentivise good performance or only penalise poor performance?

Q9 comments:

For value of money the public purse should not be used for awards for good performance. Good performance should be the norm. We do agree that the penalty aspect remains. We are mindful that if performance is proven to be affected by something outside of the control of operators, they should not be undeservedly penalised.

10. Should the performance regime be aligned with actual routes or service groups, or should there be one system for the whole of Scotland?

Q10 comments:

A one size fits all approach might not work as different routes and service groups pose different challenges. Whilst we do not wish to see an overburdening on operators the system does have to be fit for purpose.

11. How can we make the performance regime more aligned with passenger issues?

Q11 comments:

Please refer to comments made in question 6.

By taking a passengers whole journey experience, for example, from information, to planning journey, to access to station, to station facilities, to on train comfort, seat booking system, to timing of train, to help needed, and to on board announcements, will ensure that performance regime is aligned to people.

12. What should the balance be between journey times and performance?

Q12 comments:

Performance issues, for example accurate information, running to timetable and information when disruptions occur, are important for blind and partially sighted people.

13. Is a Service Quality Incentive Regime required? And if so should it cover all aspects of stations and service delivery, or just those being managed through the franchise?

Q13 comments:

Yes it is required and should cover all aspects of stations and service delivery.

The consultation makes comments on work currently ongoing to review the options for ensuring passenger services continue to improve. This is welcomed and out of the three options named, the second one of development of SQUIRE to be flexible and link to other surveys is more favourable. However, we would require seeing accessibility of stations and service delivery featuring within this regime. While new stations and new trains have to comply with design standards, there is no end date given for current stations to be accessible. Some work towards step-free access (Access for All) has made useful improvements, as has the Minor Works fund. There is no end date to the requirement to have all platforms fitted with tactile warning strips for blind and partially sighted people. There needs to be a requirement to set targets and report back on improvement for across the whole network.

14. What other mechanisms could be used for assessing train and station quality?

Q14 comments:

As in question 6 and 13, the ability to move around freely and safely and access to accurate information are all important to blind and partially sighted people. Frequent use of trains and station is a useful source of on the ground information of performance, as are mystery shopper exercises.

### **Scottish train services**

15. Can better use be made of existing train capacity, such as increasing the permitted standing time beyond the limit of 10 minutes or increasing the capacity limit? What is an acceptable limit for standing times on rail services?

Q15 comments:

For blind and partial sighted people, as well as many other disabled people, corridors and door areas that are crowded with standing people pose real difficulties for them in trying to move around the train.

16. Should the number of services making use of interchange stations (both rail to rail and rail to other modes) be increased to reduce the number of direct services? What would be the opportunities and challenges of this?

Q16 comments:

Whilst we appreciate the need to get value for money across the whole

network, we also appreciate that for disabled people in general, including blind and partially sighted people, a direct service is preferred. Blind and partially sighted people often need help with the journey at interchange stations. We receive many comments of the Passenger Assistance Scheme (PAS) that is offered at stations and where it works well it enhances a journey's experience. Where it does not, it often poses real difficulties with people missing onward trains or being stranded on platforms negotiating help with whomever is present. Some blind people often choose not to undertake complex routes, that involve train changes, independently. If this idea was to go ahead then further PAS provision would be required.

17. Should Government direct aspects of service provision such as frequency and journey time, or would these be better determined by the franchisee based on customer demand?

Q17 comments:

To ensure some routes, for example rural lines, are maintained to an adequate level to support and grow communities, we think frequency is a matter for the Government to reach agreement on.

18. What level of contract specification should we use for the next ScotRail franchise?

Q18 comments:

The third option - targeted specification – as outlined in the consultation is the one we think should be used.

19. How should the contract incentivise the franchisee to be innovative in the provision of services?

Q19 comments:

The question could be what should be incentivised? We agree with the Government's initial approach at the beginning of the consultation that rail services need to be framed around passengers needs. Any incentives framework would require to include focus on the needs of blind and partial sighted people. This is important against the background - as highlighted in question 13 - that there is no end date for making stations accessible. Therefore, milestones and incentives need to be built into the agreement to create and keep a momentum. With an aging population, and the expectation that there will be more people with a sight loss and disability, rail services will need to meet these needs in the future.

## Scottish rail fares

### Questions 20 to 23

We have added in no specific comments to the fare questions. We do however have comments in general on concessionary travel for blind people. Registered blind people have since 1999 benefited from free rail travel within Scotland under the blind person travel scheme. This provision is very valued by blind people. At the initial discussions of the composition of travel concessions to be provided via the blind person travel scheme, unlike other modes, provision for a free concession for a travel companion was left to local authorities to decide if they wished to provide this or not. This situation has left travel companion provision across mainland Scotland, inconsistent, susceptible to change, and people both staff and passengers confused. Blind people do not always need to take a companion when travelling on trains. They may choose to, for example, when more complex routes are undertaken, or going into unfamiliar towns. The current reimbursement system is administered by ATCO and the franchisee, and by agreements on annual payment based on notional trips and costs. Consistency of provision of rail travel and travel companion concessions could be achieved if it were included in the franchise agreement, such as part of a social franchise agreement with the aim of addressing social inclusion.

20. What should be the rationale for, and purpose of, our fares policy?

Q20 comments:

No comment

21. What fares should be regulated by government and what should be set on a commercial basis? Do your recommendations change by geographic area (the Strathclyde area example), or by type of journey (for example suburban or intercity)?

Q21 comments:

No comment

22. How should we achieve a balance between the taxpayer subsidy and passenger revenue contributions in funding the Scottish rail network? At what rate should fares be increased, and how feasible would it be to apply higher increases to Sections of the network which have recently been enhanced?

Q22 comments:

No comment

23. What should the difference be between peak and off-peak fares? Will this help encourage people to switch to travelling in the off-peak?

Q23 comments:

No comment

## Scottish stations

### Comments

#### Page 45 Accessibility of stations

“7.12 We are currently working to improve access to the rail network for all potential passengers. Of the 350 stations in Scotland, the majority (73%) have step-free access to and between platforms and can be considered accessible.”

This is inaccurate statement. This is the work of the Access for All Fund. Accessibility should not be judged purely on being step free as there are many other factors that make up accessibility, for example, access to audible and visual information and announcements, tactile warning strips on platforms, ticketing barriers that are accessible. We urge the Government to take a wider approach to access.

24. How should we determine what rail stations are required and where, including whether a station should be closed?

Q24 comments:

We assume that this is not aimed at rural stations, but at stations across the Central Belt. Accessibility by public transport to alternative stations has to be one of the main considerations. We would be disappointed if a station that had good access was closed in favour of a station with poorer access.

25. What are the merits or issues that arise from a third party (such as a local authority or local business) being able to propose, promote and fund a station or service?

Q25 comments:

No comments.

26. Should only one organisation be responsible for the management and maintenance of stations? If this was the franchisee how should that responsibility be structured in terms of leasing, investment, and issues relating to residual capital value?

Q26 comments:

The franchisee should be responsible for maintenance and there needs to be a reporting mechanism on maintenance standards.

We have no comment to make on the processes.



27. How can local communities be encouraged to support their local station?

Q27 comments:

Adopt a station project is purported to be successful, although there are no details of how success is defined. It is important that blind and partially sighted people are included in the establishment of local groups. Much local information is in inaccessible formats and places and they end up being inadvertently left out of consultation opportunities.

28. What categories of station should be designated and what facilities should be available at each category of station?

Q28 comments:

We have no comment to make on categories. Irrespective of category, all stations need to be accessible to blind and partially sighted people.

### **Cross-border services**

29. Should cross-border services continue to go north of Edinburgh? In operating alongside ScotRail services, how do cross-border services benefit passengers and taxpayers? And who should specify these services, the Department of Transport or the Scottish Ministers?

Q29 comments:

We believe that cross-border services do go higher up the country than Edinburgh and the Central Belt in general. Blind and partially sighted people value the ability to travel on direct services as much as possible and reduce the amount of times they need to change trains. They need to rely on the Passenger Assistance System at interchanges and if this is not provided to adequate service, they run the risk of missed onward trains. It is often the case that the more complex the journey is, with variety of interchanges needed, then people choose not to travel that way or, if possible, take a companion with them to help.

30. Or should the cross-border services terminate at Edinburgh Waverley, allowing opportunities for Scottish connections? And if so, what additional benefits would accrue from having an Edinburgh Hub?

Q30 comments:

See comments to Q29.

### **Rolling stock**

31. What alternative strategies or mechanisms could be used to reduce the cost of the provision of rolling stock?

Q31 comments: No comments

32. What facilities should be present on a train and to what extent should these facilities vary according to the route served?

Q32 comments:

Passenger Focus's research in 2010 shows one of the concerns of rail passengers is a suitable list train. We cannot stress enough that access to accurate audible information regarding next stop announcements and of any delays is very important to blind and partially sighted people. Access to toilets and access to catering facilities, particularly on longer routes, is important and this might have to be offered in a different way to blind and partially sighted people who are unable to walk along and find a catering unit. There also needs to be recognition that a bit of floor space is required to accommodate a guide dog.

### **Passengers – information, security and services**

33. How should we prioritise investment for mobile phone provision and / or Wi-Fi type high-bandwidth services?

Q33 comments:

No comments

34. How should we balance the need for additional seating capacity and retain the flexibility of a franchisee to offer first-class services if commercially viable?

Q34 comments:

No comment.

We know of many instances whereby guide dog owners have been taken to the first class section, if space allows, to enable them to have more space for their dogs. We thank ScotRail's staff for this sensible and practical approach and service.

35. What issues and evidence should be considered prior to determining whether or not to ban the consumption of alcohol on trains?

Q35 comments:

No comments

36. How can the provision of travel information for passengers be further improved?

Q36 comments:

It is important that people have access to information and the needs of blind, partially sighted, deafblind, deaf and hearing impaired people are met. We recognise the importance of utilising emerging technology; however that

should not be at the expense of other methods such as audible announcement as well as information on visual screens.

### **Caledonian Sleeper**

37. Should we continue to specify sleeper services, or should this be a purely commercial matter for a train operating company?

Q37 comments: Some disabled people choose to use the overnight train as an alternative to flights, particularly if they live north of the Central Belt.

38. Should the Caledonian Sleeper services be contracted for separately from the main ScotRail franchise? Or should it be an option for within the main ScotRail franchise?

Q38 comments:  
No comments.

39. We would be interested in your views in the level and type of service that the Caledonian Sleeper Services should provide. Including:

- What is the appeal of the Caledonian Sleeper Service, and if there were more early and late trains would the appeal of the sleeper services change?
- What is the value of sleeper services to Fort William, Inverness and Aberdeen and are these the correct destinations, for example would Oban provide better connectivity?
- What facilities should the sleeper services provide and would you pay more for better facilities?

Q39 comments:  
No comments other than stated in Q37

### **Environmental issues**

40. What environmental key performance indicators should we consider for inclusion in the franchise agreement or the High Level Output Specification?

Q40 comments:  
No comments.