

NATIONAL FEDERATION OF THE BLIND OF THE UNITED KINGDOM

“SUPPORT THE VOICE OF BLIND PEOPLE”

Registered charity Number: 236629 (England & Wales); sc 040134 (Scotland)

Scottish Area Council

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17 February 2012

Mr Alan Anderson
Rail 2014 - public consultation's section
Transport Scotland
Buchanan House
58 Port Dundas Road
Glasgow
G4 0HF

Dear Sir

Ref: Response to Consultation on Rail 2014

1. Introduction

1.1. The national Federation of the Blind of the U.K. (NFB) is a self help campaigning pressure group and registered charity. The Federation is none political and its membership is comprised of blind, deaf-blind and partially sighted people and their family or friends who have an interest in the welfare of such people.

- 1.2. The Federation campaigns on all aspects of welfare affecting their life, including Transport matters.
- 1.3. The Scottish area Council of the Federation represents the interests of its members at a Scottish level/dimension.
- 1.4. The Federation welcomes the opportunity to comment and respond to this consultation.

2. Response:

2.1. 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

National Federation of the Blind of the United Kingdom (NFB)

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

Surname

Gilroy

Forename

Douglas

2. Postal Address

25 Park Street

Dumbarton

Postcode G82 1RF

Phone 01389 763091

3. Permissions - I am responding as...

Individual

/

x

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 **x** 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

Yes

Yes, make my response available,

- (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 **x** No

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

(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 x No

National Federation of the Blind of the United Kingdom

Consultation on Rail 2014

Response to the Scottish Government

Introduction

Consultation Questions and Comments

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:

We are not in favour of offering the franchise in this way. One of the merits of the Scotrail franchise is that it operates as a single entity and covers approximately 95 per cent of rail journeys originating in Scotland. The Railway press generally takes the view that railways are better managed in Scotland than elsewhere in the United Kingdom because of the existence of a single national franchise and it is thought that offering the franchise as a dual focus franchise would not be helpful to the unity of that franchise.

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

Q2 comments:

The length of the contract may influence the decision of the franchisee to invest in the franchise. Whilst a longer contract (say 15 years) might be

thought to stimulate investment, franchise length is only one of many factors likely to influence investment decisions.

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:

We are unable to answer this question in detail but in order to encourage investment by the franchisee there has to be a profit share mechanism of some kind.

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

Q5 comments:

We are unable to answer this question in detail, but generally feel that third parties are not encouraged.

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

Q6 comments:

The question seems to assume that all outcomes can be measured. This is not the case. Accessibility is an outcome which cannot be measured by statistics or by using phrases such as value for money. It requires consultation with disabled users and other interested parties and consistent action to ensure delivery. Improved accessibility which enables disabled people to use rail services which they previously could not use greatly improves their freedom and quality of life and may be thought to represent very good value for money.

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

Q7 comments:

No comment.

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

Q8 comments:

Whilst not answering this question in detail, we would point out that any fines levied on a franchisee may impair its ability to deliver services or to remedy deficiencies. The ultimate sanction is termination of the franchise and it is hoped that a good working relationship between the franchisee and Transport Scotland will minimize the risk of this option being resorted to.

Achieving reliability, performance and service quality

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

Q9 comments:

Whilst not answering this question in detail, we feel that good performance should be incentivised.

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:

We are unable to answer this question in detail but it is thought that one system for the whole of Scotland would be easier to operate.

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

Q11 comments:

Passenger issues cannot be assessed solely by statistical analysis but require consultation with groups such as the National Federation of the Blind of the United Kingdom (NFB), Passenger View Scotland, the Scottish Rail Accessibility Forum, the Mobility and Access Committee for Scotland, the Scottish Accessible Transport Alliance and local user groups.

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

Q12 comments:

Journey times are an important performance indicator but are only one aspect of performance

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:

It is believed that a Service Quality Incentive Regime is in principle a good idea and that it should cover all aspects of stations and service delivery.

Again, "Quality" is an assessment that can only be made by the customer and as such should be a measure of outcome, not input or output.

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

Q14 comments:

Trains and stations need to be inspected regularly and comments sought from user groups and other interested parties. See the answers to Questions 11 and 13 above

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:

The assumption behind this question namely that increasing the permitted standing time or increasing train capacity is an acceptable way of dealing with overcrowding is very flawed and disappointing. To a blind passenger standing for ten minutes in an overcrowded train is not only tiring but is a very stressful experience. If overcrowding is to be expected, then surely a priority seating convention should be adopted which gives automatic priority of seats adjacent to doorways to people with disabilities. If no such demand exists on a service, these seats would be available to all.

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:

The assumption behind this question that the number of direct train services should be reduced is again flawed and disappointing. Blind passengers find changing trains difficult, especially at unstaffed stations and therefore tend to prefer direct services rather than risk being stranded at an unstaffed station or in an unfamiliar place due to missed connections. Additionally, involving more changes would place greater demand on the Passenger Assistance Scheme and result in the blind person experiencing a more stressful journey experience. We call for the introduction of a Scotland wide free companion scheme similar to that provided to blind and partially sighted bus/coach passengers.

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:

We are unable to comment in detail, but it is thought that the Government will wish to specify a minimum level of service, particularly for services where demand is unlikely to make such services economically attractive.

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

Q18 comments:

We are unable to comment in detail but it is hoped that accessibility improvements will be included in the specification – see our foregoing answers above. This should formalise the approach to legal obligations and deadlines set out in the DDA 2005 and other relevant legislation

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

Q19 comments:

Whilst not commenting in detail, we feel that the contract should be structured to encourage innovation.

Scottish rail fares

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

Q20 comments:

Fares policy needs to have more than one rationale but affordability and social inclusion need to be considered. Please refer to our answer to question 16 above.

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:

Whilst not commenting in detail, we believe that there needs to be only one simple and easy to understand system at any one time for setting fares. Additionally, there should be a free Scotland wide blind person's free companion concessionary scheme introduced and not left to the discretion of individual local authorities. Please see our answer to question 16 above.

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:

The assumption behind this question that fare increases are a good thing is flawed and disappointing. We believe that fares should not be increased beyond RPI plus 1 per cent. If we are aiming to promote modal shift, then fares clearly influence individuals' decisions.

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?

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Scottish stations

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

Q24 comments:

The assumption behind this question that station closures should be encouraged is extremely flawed and very disappointing. We believe that all stations should be staffed and open at all times, otherwise this will only discourage social inclusion and freedom of movement and reduce access for blind, deaf-blind and partially sighted people to rail services.,

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:

Whilst not commenting in detail, in principle third parties should be permitted to promote services and facilities, on behalf of an overall management organisation.

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

Q26 comments:

Whilst not commenting in detail, there may be advantages in having only one organization being responsible for the management and maintenance of stations.

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

Q27 comments:

Community involvement should be encouraged. Please Refer to Prestwick Town (Scotland) and Rochford (England).

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

Q28 comments:

It is not clear what designation means. Accessibility should be one of the facilities provided at each category of station. As above, there should be a

drive to meet relevant legislation within the specified deadlines.

We would draw your attention to difficulties experienced by blind, deaf-blind and partially sighted people in finding push buttons to open train doors whilst on platforms and some system of being able to find doors and open them is required. Buttons should also be clearly marked and in a consistent position relative to train doors. There is also a need for tactile paving along the edge of platforms and at the top and bottom of flights of steps; nosings on steps should also be clearly marked. We also require clear, consistent audio announcements on board and at stations and are pleased to note that the availability and quality of these is improving. There should be some form of text guide to each station which would enable those who can't follow graphic maps to familiarise themselves with each station prior to their visit. This would complement the Stations Made Easy facility which is available to most customers, but which has no meaning to vision impaired people. This requirement is particularly acute for unstaffed stations where a customer could be left on a platform with no knowledge of where to go next.

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:

Cross border services are needed north of Edinburgh as they are of great benefit to passengers. Surely the department for transport and Scottish ministers should be able to agree on the specification for such services. We would refer you to our foregoing answers.

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:

The assumption that cross-border services should terminate in Edinburgh is illogical and disappointing. Customers who wish to travel on a direct service between London and Aberdeen should be able to do so and not be forced to change trains in Edinburgh with a risk of becoming stranded due to a missed connection. As mentioned above, additional changes put extra load on the Passenger Assistance Service and causes additional stress. A blind person may ask a member of the public to help. But if they wait for assistance that doesn't arrive and the public have dispersed they are then left stranded.

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Rolling stock

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

Q31 comments:

No comment to this question.

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

Q32 comments:

It is important that facilities on a train should continue to be designed to comply with accessibility requirements such as for example the Rail Vehicle Accessibility Regulations.

Accessible toilets, handrails and handholds, good lighting, contrasts on steps and audible passenger information systems are all important. Information should include audio and visual indication of next station; Some kind of text information could also be provided to allow individuals to familiarise themselves with the layout and emergency evacuation of trains before they travel. This could be relatively inexpensive and would add value for blind, deaf-blind and partially sighted customers and others who may have difficulty following graphic maps or with orientation in unfamiliar surroundings.

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 comment.

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:

Whilst not answering this question in detail. It is not clear that removing first class seats would increase seating capacity by more than a small amount.

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

Q35 comments:

Research by the Equality & Human Rights Commission shows that harassment of disabled people takes place on trains and is often fuelled by drink.

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

Q36 comments:

There is always a need to have more than one source of available information as for example the information needs of deaf passengers are different from blind or partially sighted passengers, see answer to Q32 above.

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:

We believe that sleeper services should be retained.

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

Q38 comments:

No comment to this question, please see our answer above.

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

- 1 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?
- 2 What is the value of sleeper services to Fort William, Inverness and Aberdeen and are these correct destinations, for example would Oman provide better connectivity?
- 3 What facilities should the sleeper services provide and would you pay more for better facilities?

Q39 comments:

The existing sleeper services provide considerable benefit to Fort William, Inverness and Aberdeen. In principle a sleeper service to Oban would be a good idea. Providing earlier and later train services is a good idea and would be welcomed by some but is not the alternative solution to providing sleeper services for a range of reasons.

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:

In general We are in favour of reduced carbon emissions.

Please do not hesitate to contact me if you have any questions on this or if I can be of assistance to you on any other matter.

Yours sincerely

Douglas Gilroy
NFB Vice-president

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