Respondent Information Form and Questions

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

1. Name/Organisation

Organisation Name

Scottish Accessible Transport Alliance (SATA)

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3. Permissions - I am responding as…

Individual   **/**   **Group/Organisation**   **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		**(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).

(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, but not my name and address
	
	          or
	 Yes, make my response and name available, but not my address
				Are you content for your *response* to be made available?
				
				 Please tick as appropriate Yes **x** No

SATA

Scottish Accessible Transport Alliance

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Scottish Charity No SC027600

Consultation on Rail 2014

Response to the Scottish Government

Introduction
SATA is an independent self-funding Scottish Charity with over 70 individual and corporate members active in the voluntary, public and private sectors. It is led by disabled people, works for improvements in transport services, and makes representations on issues of concern to disabled people.

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 is a matter which 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:

We prefer not to answer this question

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 it is important that third parties such as open access operators are not discouraged from providing services.

6. What is the best way to structure and incentivise 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 so. 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 quality of life and may be thought to represent very good value for money,

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

Q7 comments:

We prefer not to answer this question

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

Q8 comments:

We are unable to answer this question in detail, but 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:

We are unable to answer this question in detail but it is thought 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 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 disappointing. To a disabled passenger standing for ten minutes in an overcrowded train is a tiring and stressful experience. If overcrowding is to be expected, then a priority seating convention should be adopted which gives automatic priority of seats adjacent to doorways to people with physical disabilities. Of course, if there's no such demand on a service, these seats are available to all.
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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 disappointing. Disabled passengers find changing trains difficult and tend to prefer direct services rather than risking being stranded in an unfamiliar place due to missed connections. More changes would place greater demands on the Passenger Assistance Scheme, which would incur additional cost and potential for failure

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. 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:

We are unable to comment in detail, but is thought that   the contract should be structured to encourage innovation. Again the profit-sharing approach could offer something here.

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.

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:

We are unable to comment in detail but it is thought that there should be only one system at any one time for setting fares. The fare structure should also be easy to understand. The concessionary fare scheme should also be consistent across Scotland and should no longer be left to the discretion of local authorities. This concern is raised with particular reference to the Companion Scheme which is not universally implemented.

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 disappointing. It is thought that fares should not be increased beyond RPI plus 1 per cent. If we aim to promote modal shift, then fares clearly influence individuals' decisions.

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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:

Again, the assumption that passengers can choose to travel off-peak is questionable. Someone travelling for a particular purpose such as to attend a meeting may have very little choice of travel times. However, there should be an incentive to spread demand, the figures quoted are a good start

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 disappointing and will discourage social inclusion and reduce access to rail services. However, as mentioned, some stations are very close together and there needs to be consultation amongst interested parties as to which stations are still useful. times have changed, people have moved, some stations are more accessible/usable than others, these factors and more need to be considered.

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:

We are unable to comment in detail but it is thought that in principle third parties should be encouraged to promote services and manage station facilities, on behalf of an overall management organisation. There are precedents for this in England.

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:

We are unable to comment in detail, but can see 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:

We are unable to comment in detail but obviously community involvement should be encouraged. See Prestwick Town (Scotland) and Rochford (England) to name but two.

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

Q28 comments:

We are unable to comment in detail because 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.

The consultation mentions that 'of 350 stations in Scotland (73%) have step-free access to and between platforms and can be considered accessible'. Whilst we can't vouch for all stations, in our experience some of the so-called step-free access is via steep ramps which would require a fit wheelchair user to use safely. There are several examples cited in the www.describe-online.com website. At Prestwick Town, the ramp up to platform 1 is particularly steep. This is by no means unique, nor is it the steepest one we've found.

Attention has been drawn to difficulty of finding push buttons to open train doors from platforms, these buttons should 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 and are gratified to find 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 as 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.

We suggest, for busier/bigger stations, that alternative signage to automatic gates could be provided. This would be in a similar style to that found at airports. Such signs often have white or off-white text on a black background, with the entire signed being Illuminated internally, although the reverse colour scheme is also quite common. Large symbols could be used to distinguish between the different lanes, for example a circle to denominate automatic barrier access and a picture of a person to signify manual barriers are in operation. Such symbols are also universally recognised so this would also benefit international travellers.

We draw attention to the following, cited by one of our members:

"I wanted to raise an issue about the challenges posed by unmanned stations as I feel that this is an area where more work needs to be undertaken. There is currently an issue with unmanned stations on pivotal routes which reduces choice and serves as an inequality for disabled passengers. As a case in point, I would draw your attention to the ScotRail Caledonian sleeper, which

calls at several stations north of Edinburgh which are unmanned at its scheduled arrival or departure time.

As an example, I am currently in the process of arranging assistance for a severely disabled passenger who is travelling on the sleeper service which then connects to an onward local service to her final destination. The passenger has a ticket for the service as far as Stonehaven, however due to the station being unmanned at the scheduled arrival time, she risks being left stranded on the station platform without assistance at a peak time for local commuters. Her only alternative if she wishes to receive assistance is the travel onward to Aberdeen, thus risking missing her connection, or to disembark at Dundee and face an unacceptably long weight relative to the total journey time. Fortunately on this occasion, during conversation with ScotRail personnel, the staff who usually man the station have generously offered to come in early in order to offer the passenger the assistance they require. This is of course a gesture of goodwill, and not something which passengers could rely upon as a precedent for future journeys. I have also been advised by ScotRail that they would normally be unable to provide assistance at times when stations are unmanned, and the next best alternative would be to book a taxi for the passenger to travel to the final destination or point of change. This would of course result in additional costs being incurred by ScotRail, particularly for passengers who regularly travel on the sleeper service and who would face the above situation. Although this resolves the issue of the passenger being able to continue their journey, it does not, and should never be considered a substitute for passenger assistance. In the above example, the passenger will be left to the tender mercies of taxi drivers who may or may not be suitably skilled or inclined to assist disabled passengers.

My point in giving the above example is to illustrate that there is definitely a gap in the service available to disabled passengers, and whereas I have used the Caledonian sleeper as an example, the same could hold true for other local services calling at stations which are either permanently unmanned, or which are only staffed during restricted hours. I feel that this is definitely something which should be considered when determining the services offered by the new franchisee and its accountability to the needs of passengers, although I would equally be pleased to see current cases similar to the above looked at in more depth at the present time."

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.

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 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. Whilst the call centres take contact numbers, we've never known this to be used. In particular, when for whatever reason, assistance can't be provided, passengers should be told so they can make alternative arrangements as necessary. Of course blind people can often 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 left stranded.

Rolling stock

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

Q31 comments:

We are unable to answer 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 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 of trains before they travel. This would be a one-off exercise for each type of train, which would be relatively inexpensive and would add value for vision impaired customers and others who may have difficulty following graphic maps or with orientation in unfamiliar surroundings. Rolling stock should be fit for purpose and should be suitable for the journey being undertaken. One of our members has suggested that, for long journeys, there should be at least an automatic door between the seating area and the accessible toilet. This would reduce the discomfort experienced by wheelchair users throughout a journey which could last several hours.

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:

We are unable to answer this question.

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:

We are unable to answer 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:

We are unable to answer this question specifically but 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 those of 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 are unable to answer this question in detail but would be disappointed to find the sleeper services reduced or discontinued. These constitute a "flagship" service which also happens to be of great benefit to people with disabilities. We understand that there are many such services throughout Europe and the UK should not be seen to lag behind others in this regard. Rather than reduce the service, perhaps it could be extended to serve continental destinations?
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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:

We are unable to answer this question

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 the correct destinations, for example would Oban provide better connectivity?

   3   What facilities should the sleeper services provide and would you pay more for better facilities?

Q39 comments:

We are unable to answer this question in detail but 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

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:

We are unable to answer this question in detail but are in favour of reduced carbon emissions.