



Scottish Disability Equality Forum Response:
Transport Scotland: Rail 2014 Consultation
February 2012

The Scottish Disability Equality Forum (SDEF) works for social inclusion in Scotland through the removal of barriers and the promotion of equal access for people affected by disability.

It is a membership organisation, representing individuals with any type of impairment, disability organisations and groups who share our values. It aims to ensure the voices of people affected by disability are heard and heeded. SDEF promotes access in its widest sense, including access to the built and natural environment and access to the same opportunities as are enjoyed by other people in our community.

General Comments

We welcome the opportunity to respond to this consultation. Transport is an important issue for disabled people. Access to transport is key to upholding a disabled person's right to live independently. Ensuring Scotland's railways are fit for purpose means that disabled travellers are able to enjoy the same freedom, choice, dignity and control as others. The consultation is wide ranging, with many questions applicable to consumers generally. However, it fails to ask questions on issues of specific importance to disabled people. Accordingly our response will address four connected areas:

1. Accessibility of stations.
2. Passenger experience.
3. Rolling stock issues.
4. Passenger information.

We have conducted an online survey of our membership (which received 15 responses from individual members and member organisations). The collated responses from our members form the basis of this response. We have also received detailed responses from our colleagues at Sense Scotland and from the Lochaber Access Panel and the Angus Access Panel.

1. Accessibility of Stations

The consultation paper claims that 'of 350 stations in Scotland, the majority (73%) have step-free access to and between platforms and can be considered accessible'. On the face of it this appears to be a reasonable statistic. However, the difference between an accessible station and an inaccessible station is such that an inaccessible station equates to no station for disabled travellers. It is important to be aware that there is much more to accessibility than whether there is step free access to and between platforms. We asked our members for their views on the accessibility of stations and asked how this could be improved.

The responses reflect the mixed experiences of disabled passengers on Scotland's railways.

The most positive comments were that accessibility was mostly reasonable. This opinion seems to reflect a negative view that railways are inherently inaccessible; rather than a positive view that the railways are good and getting better.

A common complaint was that accessibility can be limited by a range of factors, for example:

- Although there may be step free access between platforms, this often involves long distances and at times requires staff to assist in crossing the tracks. This highlights the need for accessibility to be considered in the whole. Step-free access is crucial but the delivery of it too often results in disabled travellers needing to take overly circuitous routes to get to and between platforms. This significantly reduces the benefit derived from the step-free alterations. When improvements are sought to be made to stations local disabled people must be consulted. Local disability Access Panels are well placed to assist and we would like to see a contractual duty to consult with local groups included in the franchise agreement.
- Particular stations on a route not being accessible can have an enormous impact on disabled travellers. The Angus Access Panel pointed out that Montrose Station is not accessible, this is on the main east coast line, serving three of Scotland's six cities. The impact is that disabled people have to go to the next station on the line, or rely on a member of staff being available to escort them across the tracks. Another member pointed out that only one platform at Shotts is accessible, meaning that on return journeys a disabled person must travel to Fauldhouse in order to access alternative travel back to Shotts. The same applies at Haymarket station, with one member pointing out that this impairs his ability to travel to Edinburgh to watch the rugby at Murrayfield. There needs to be transparency in how accessibility improvements are prioritised. This should ideally be done in consultation with

local rail users to properly reflect customer needs. Services must be well planned to account for, and mitigate against, the impact of inaccessible stations along particular lines. This highlights to SDEF that there should be one body responsible for both the running of the trains and the accessibility of the stations. It is our view that the franchisee is ideally placed to fulfil these roles.

- Another big issue is that although a platform may be accessible, through a lift for example, the enabling devices do not always work. One member shared an experience of travelling from Markinch:

‘The lift was broken when I used it. Had I been alone and unable to return quickly to ticket desk, where they could get it going, I’d have missed my train.’

The potential impact of these problems can be significant, particularly on services or routes with infrequent trains or at the weekend. It highlights the importance of well thought out accessibility improvements and of having staff readily available to assist.

Our members support the continuation of the discrete minor access improvement fund. This should be part of the franchise agreement as it helps emphasise the importance of continuous improvement. As previously stated SDEF believes that the franchisee should also have responsibility for managing and maintaining the stations.

An important aspect of accessibility is that of the information provided, particularly for those with sensory impairments. This will be discussed separately in the section on Passenger Information.

2. Passenger Experience

The consultation paper identifies a number of factors that are important for passengers based on research carried out by Passenger Focus. We asked if our members agreed with those mentioned¹ and if there were any that had been missed that are particularly important for disabled people.

Our members agreed that the list of factors were important for them as passengers. They would also like to add:

- More wheelchair space
- Greater choice of seating
- Not sitting beside the toilets, which should be accessible and clean

¹ the ability to get a seat; comfort of seating; ease and safety of getting on and off the train; safety in standing areas; provision of adequate luggage space; the on-board temperature; the provision of on-board information and announcements; general cleanliness

- Easier travel through not having to book in advance or an easy and effective booking process
- Accessible trains across the network
- Greater emphasis on keeping priority seats free

An issue many of our members raised was staff availability at stations. The consultation paper states that on-train staff should be sufficient for passenger needs where stations are not staffed. We asked our members if they agreed. Great concern was expressed at this proposal.

The primary concerns were around safety and communication. A range of issues were highlighted, for example what if there is a problem at the station – will an on-train member of staff leave the train to assist? When a disabled person needs assistance to access a train what happens if the on-train member of staff is positioned at the other end of the train when it arrives? This will potentially cause delays and some of our members are concerned about the potential for adverse reactions from other passengers. One member specifically queried whether an on-train member of staff would leave the train to deal with a non-functioning lift, delaying the train; or would the disabled person be left stranded on the platform?

However, as well as pointing out some of the difficulties our members also suggest some ways they could be overcome. For example one member suggested a mobile phone app could be used to contact on-train staff to confirm when and where assistance would be required. Others highlighted that an improved intercom system could be employed. Both of these suggestions have limitations, for example for those with communication support needs, however they must be explored if staffed stations are to be further reduced. The clear preference among our membership is for as many stations as possible to remain staffed – the assistance and reassurance provided by human interaction should not be underestimated.

Cross border and cross provider issues were also raised. Many members point out that it can be difficult to change trains and when booking is involved this difficulty is exacerbated. This is further compounded when you have to change train companies and use multiple booking systems. Many of our members mentioned that they experience such problems when looking to travel to England from somewhere without a direct service. The different franchise operators already have different booking systems and customer service centres. Our members are concerned that were all cross border services were run out of Edinburgh then disabled people wishing to travel to England from elsewhere in the country would find it harder than they do currently. Accordingly SDEF does not support the proposal that Edinburgh should become the hub for cross border services.

3. Rolling Stock issues and the Glasgow to Mallaig line

The Lochaber Access Panel raised some particular concerns about the passenger experience on the Glasgow to Mallaig line.

The panel points out that this is the longest single journey in Scotland, yet suffers from among the oldest and least accessible rolling stock on the network. A significant concern is the placement of the wheelchair space on the 156 stock. This is directly in front of the toilet and results in a number of negative consequences. A wheelchair user is isolated from travelling companions; can be exposed to potential abuse from other passengers seeking to use the toilet; can be struck by luggage when other passengers get on and off the train; and, has to endure the unpleasant odours associated with toilet use.

There are further problems with the toilets on these trains, often the water reservoirs are not filled on departure and the toilet ceases to work not long into the journey. Also the flushing mechanism of the toilets on many of these trains cannot be operated by those with upper body and hand mobility impairments.

The heating, and conversely the air conditioning, on the 156 stock is also strongly criticised by the Lochaber Panel. Travelling conditions that are too cold or (occasionally) too hot are not acceptable for any traveller. However, they can be particularly unacceptable for disabled people given that temperature can have a significant impact on a range of impairments or health conditions.

First and foremost the rolling stock on the Glasgow-Mallaig line is not fit to serve the communities along that route. Secondly, this is also an important tourist route and the inaccessibility of the trains deny disabled visitors the opportunity to experience this part of Scotland.

At para 9.20 the consultation paper notes that:

'We are aware that some of the diesel trains that currently run on the longer inter-city and rural routes within Scotland are not perceived by some passengers as appropriate for these longer journeys. We are currently considering what options there could be for improving this situation, and will be looking for bidders for the next franchise to put forward some solutions.'

While we acknowledge this recognition of the problem, we feel it does not represent a sufficient commitment to finding a solution. SDEF would like to see a contractual provision of the franchise agreement that all older rolling stock will be replaced or refurbished before the implementation of the accessibility directive in 2020. Disabled passengers do not want to see a franchisee putting forward *some* solutions; they want to see a solution being delivered.

4. Passenger Information

Accurate, timely and concise information is important for any traveller. It is particularly so for disabled passengers for reasons such as planning for the extra support often needed at a destination. We asked our members to rate the information provided to passengers on train, at the station and through the customer service contact centre. Respondents were asked to consider this in terms of accessibility, usefulness, etc.

| Train | Station | Contact Centre |
|------------------------|------------------------|-----------------------------|
| Excellent: 7.1% (1) | Excellent: 7.1% (1) | Excellent: 7.1% (1) |
| Very Good: 21.4% (3) | Very Good: 21.4% (3) | Very Good: 35.7% (5) |
| Good: 14.3% (2) | Good: 28.6% (4) | Good: 28.6% (4) |
| Fair: 42.9% (6) | Fair: 21.4% (3) | Fair: 28.6% (4) |
| Poor: 21.4% (3) | Poor: 21.4% (3) | Poor: 14.3% (2) |

Further comments from members adds to the picture provided by the above data. Many members acknowledge that information provided has improved in recent years. However, on-train information remains the area of most concern.

Information on the train: inconsistency and staff awareness were highlighted as the main issues. For example, automated announcements combined with visual displays can be excellent for those with sensory impairments. However, it is not uncommon for one or both of these to cease to work. Furthermore when trains are delayed or routes changed the automated systems do not currently relay this information. This then means it is down to announcements by on-train staff which tend not to be particularly clear and no information is provided visually. This leads to the second concern that on-train staff do not appear to be trained in communicating with disabled people. A number of our members suggested that training in basic BSL might be appropriate. However, regardless of this disability equality training should be considered at a minimum. This will help ensure that staff know how to ensure disabled people are treated with dignity and respect.

One of our members highlighted the interplay of some of these factors:

'While the information on trains is generally good there is a tendency for public information systems to sometimes be switched off. When this is the case the train guard does not always make audio announcements regarding which station you are approaching. Also some education of other travellers on why these systems are required would be helpful. On more than one occasion I have heard somebody ask for the announcements to be switched off as it is "Doing their head in".'

The last point is where on-train staff could play an important role. We would like to see the franchisee at the forefront of driving and promoting respect for all travellers, and indeed staff, on the railways.

Information at the station: the main complaint is that tannoy announcements are not sufficiently clear. Our members would like to find accessible information available as standard, be this audio/Braille etc. It is crucial that the information provided must be of consistent quality. It should be concise and easy to understand. This consultation document was not available in an easy read format until SDEF and other organisations requested it. This is unacceptable. The fact that information is technical in nature is not sufficient, of itself, to mean easy read cannot be used. We would like to see continuing improvement in the information provided at stations in Scotland.

Information through the customer contact centre: The customer contact centre received the most positive reviews from our members. This is to be welcomed and is a reflection of the work that has been put in to improve the service. However, one member did say they found the contact centre to be 'very poor'; highlighting that there is always work to be done to ensure consistency.

6. Conclusion

As a final question we asked our members if they did travel by train and if not was this for a reason connected to disability.

Between our members who did and did not travel by train the same issues were raised: spontaneity, accessibility and comfort.

Being able to enjoy spontaneous travel by train remains a distant prospect for disabled travellers. To improve the responsiveness of the rail network to the needs of disabled people SDEF would like the following areas to be prioritised by the post-2014 franchisee:

1. Continuous accessibility improvements at all stations, with franchisee responsible under a duty to consult local disabled people.
2. Continuous accessibility improvements to all rolling stock before 2020, including priority replacement of the 156 and other older stock.
3. Staffing of all stations as far as possible and the development of communication systems with on-train staff.
4. Improved training for all rail staff including communicating with disabled people and disability equality.
5. All information provided to be comprehensive, consistent and accessible.

Currently many of our members take the decision to avoid rail travel as far as possible. This is unfortunate and unnecessary. If steps are taken to address the

issues raised in this consultation response then significant progress will be made in improving Scotland's railways.

Thank you for the opportunity to contribute to this consultation.

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