

## **Mobility and Access Committee for Scotland (MACS)**

Area 2D North, Victoria Quay, Edinburgh EH6 6QQ  
T: 0131 244 0923  
E: [MACS@scotland.gsi.gov.uk](mailto:MACS@scotland.gsi.gov.uk)



### **InterCity West Coast Franchise**

Our ref:  
2016/07

Date:  
17 Jul 2016

### **MACS' response to the InterCity West Coast Franchise**

1. This response sets out MACS' expectations of franchise bidders with respect to its role as an advisory body that may be helpful for potential franchisees when considering their proposals. Our response is structured across the key areas set out within the original consultation document and have opted to summarise our answers only to the parts of the questions that directly bear relevance to travel for disabled people.

#### **Role of MACS**

2. The Mobility and Access Committee for Scotland (MACS) is a Scottish Government Ministerial Advisory body. Our aims are:
  - To give Scottish Ministers advice on aspects of policy affecting the travel needs of disabled people;
  - To take account of the broad views and experiences of disabled people when giving advice on travel needs;
  - To encourage awareness amongst disabled people in Scotland of developments which affect their mobility, choices and opportunities of travel;
  - To work closely with the Scottish Government and ensure the Committee's work programme complements the work being undertaken by the Disabled Persons Transport Advisory Committee (DPTAC), the Scotland Office of the Equality and Human Rights Commission and other organisations and voluntary and statutory agencies;
  - To promote the travel needs of disabled people with transport planners, transport operators and infrastructure providers so that these are taken fully into account in the delivery of services; and
  - To monitor and evaluate the effectiveness of the Committee's work against the above aims in improving travel opportunities for disabled people in Scotland.
3. MACS has a vision for disabled people, for equal access to travel and transportation services, based on the core principles of choice, control, freedom and dignity, if their equality of opportunity and human rights are to be met. MACS vision is under-pinned by an inclusive approach based on co-operation, empowerment, accountability and participation to enhance transport strategies, policy, decision-making and service delivery. We seek practical outcomes

wherever possible to best impact on the opportunities for disabled people and to suggest where change can be most effectively targeted or challenged.

MACS welcomes this opportunity to provide equal and consistent advice in this consultation document on the future of the ICWC franchise. We have structured our advice across the key quality policy areas that have the greatest impact on service provision for disabled travellers based on legislative requirements and statutory or best practice guidance.

## **A – Passengers: Customer experience and satisfaction**

The following areas are identified by MACS as being priorities for improvement:

### **A 1. 1 Getting a seat on trains and making booking reservations**

It is essential for disabled people to be able to get a seat on trains. The process of making reservations should be clear, intuitive, and available in an easy to read format for customers who have difficulty assimilating information in complex formats. In particular, this should include information where changes, including intermodal changes, are required. Journeys, which include short connection times, especially at stations where this may require a long walk, standing or queuing, or where a transfer between stations is necessary, should have these details highlighted prominently. Alternative, simpler journeys should be made known where these are available.

Disabled customers should have the facility to make seat reservations on the same terms as their non-disabled counterparts. This includes where disabled customers are travelling in a group with non-disabled peers, even if they are travelling using a concessionary or non-chargeable card or pass and where a physical ticket is not required. The ability to make seat reservations in these cases should be available via the same channels as for non-disabled customers, and should not require a specific assisted travel booking where assistance is not required. When making a seat reservation, the full range of seating options should be made available to disabled customers with the option to sit with non-disabled customers in the same group as a first preference.

### **A 1.2 Car Parking**

Disabled parking and the monitoring and use of disabled parking bays is an ongoing exercise where much work has already been done by MACS at the two main terminals at Edinburgh Waverley and Glasgow Central. We are still monitoring the usage and access arrangements and have seen improvements over the years. Space and security considerations are the main limiting factors for disabled travellers.

### **A 1.3 Increased staff visibility and a more proactive approach to customer service at train stations**

Customer service should be available as an integral part of the journey planning process and accessible to disabled customers through a variety of channels at all times. This includes in person, by phone and online, through mobile platforms and by post where appropriate. Disabled customers should be made aware of how Customer Service can be contacted at all times. Where such contact is made by phone, charge-free contact numbers should be used to facilitate contact from both landlines and mobile phones. Disabled customers should not incur additional financial penalties for contacting Customer Services where automated mechanisms for doing so cannot be used by way of disability.

This includes situations where Customer Service contact is required from remote stations and where help points are unusable.

The principles of equality and accessibility should be consistently applied throughout the journey planning process. The expectations and opportunities of disabled passengers should be compatible with that of other rail users. Clearly, reasonable adjustments should be made to cater for passengers with a variety of disabilities including but not restricted to those challenged with mobility, learning or mental health impairments and those experiencing a range of sensory losses. This approach may equally apply to the projected huge increases of elderly people with a range of disabling conditions many of whom may not wish to be described as disabled, and for some parents of children with special needs. For many disabled travellers this will usually require a considerable degree of pre-planning to ensure confidence in their usage of the rail system, and to identify where such arrangements may potentially pose barriers. This invariably arises at the weakest point between changing modal systems e.g. from taxis or drop-off to station concourse.

We would stress the importance of face-to-face help points or staffed telephone customer service wherever possible as the needs emanating from disabling conditions are not always readily apparent and may require some elaboration. Where purely automated systems are in use, alternative methods of obtaining the same information should be available. In particular, all parts of the journey planning process, which can be completed online, should also be accessible via telephone or in person at ticket offices.

#### **A 1.4 Assistance between the trains, concourse and onward journey Passenger Assistance**

We would wish franchisees to consider expanding the current Passenger Assist system to allow travel assistance requests to be linked to the passenger's original booking. This would minimise error or potential delay or disruption to disabled passengers booking passenger assistance for confirmed journeys. This can save considerable time for those booking travel assistance where, for example, a journey requires multiple changes or transfer to replacement transport during times of known disruption. In order to make the booking and planning process as seamless as possible, we also recommend implementing mechanisms, which allow disabled customers to book travel assistance at the same time as the original booking with full details of the booking sent to Passenger Assist along with the request. We noted that this was provided through Virgin. Care should be taken to ensure that response times are as short as possible and that interaction between disabled customers and staff implementing assistance remains established throughout this process.

MACS is aware that there may be differences between booking direct on the phone and using on-line services which may lead to some of these difficulties arising. Whatever booking approach is made the link to Passenger Assist should be evident and promoted by the operator.

When implementing the provisions of Passenger Assist services, we strongly recommend that the needs of disabled commuter passengers (passengers who use the same services on a daily or otherwise routine basis) be considered as the current system fails to consider this. Passenger Assistance services for commuter travelers should be flexible enough to take account of short notice changes, as it may not be possible for commuter passengers to guarantee a presence on their booked journey consistently.

MACS acknowledges that Passenger Assist is constantly improving and with the 24 hour on line notification period requested by the current management is a clear step towards

the minimum period of notice. The provision of an accessible taxi to the nearest accessible station is also welcome.

Customer service centres and help and information points need to work alongside PassengerAssist. Getting to a service point is often the issue particularly, for example, for people with sight loss people who may not see a call button or help phone at the drop off points. Train Operating Companies should provide useful booklets on making rail services accessible to help older and disabled passengers. These are good examples which include basic expectations as set out in Disabled Person's Protection Policy and are regularly updated.

### **A 1.5 Toilet facilities on trains**

Toilets are required which are clean and accessible to all, including carers, and with an easily understandable locking mechanism. In the Which magazine survey of 2014 held Nationally, 11% of passengers said toilets were not in good working order, which directly affects disabled people's dignity and self-esteem. The Executive Director of Which said "It's disappointing to see some train companies consistently falling down on the basics of customer service, with dirty and overcrowded carriages and toilets that don't work. Franchisees should demonstrate how they will address such issues

### **A 1.6 Being kept informed about delays and disruptions**

Disabled passengers need to be informed as soon as possible or in advance about known delays or disruptions if they are to be able to make alternative travel changes. This could include, but is not limited to, talking to customer services, notices at stations, leaflets, voice announcements, information on websites or social media.

When delay or disruption necessitates the use of replacement transport, disabled customers should be kept advised of the situation at all times. This would include, when waiting for replacement transport to arrive or whether use of replacement transport to connect into alternative train services results in a change of route. Replacement transport operators should be made aware of the presence and the needs of disabled customers and assistance should be provided at all stages of the journey where replacement transport is in use. This would include transfer between train services and replacement transport, and between replacement transport and a customer's desired drop-off point at their destination station. Where replacement transport is unable to drop-off directly outside the destination station either due to engineering works or due to unanticipated circumstances, replacement transport operators or station staff at the destination station should ensure that disabled customers are assisted to their intended drop-off point in a timely manner. In relation to bus or coach transfer MACS is aware that operators may not be able to make available fully accessible vehicles as compliance requirements do not come into force until 2017 and 2020 respectively. In such circumstances other alternatives may require to be provided but note should be made of any other accessibility requirements e.g. ramps or a sighted guide.

All communication systems used for providing information on delays or disruptions must be accessible and that alternative means for providing the same information in accessible formats be made available. Information, where available, should be provided both before and during the journey in real-time as relevant. Methods of conveying such information may include, for example:

- Audio-visual, in the same manner as regular service announcements
- SMS and text relay, particularly where passengers have provided a mobile telephone contact number

- In-person by a member of staff on board the train or at stations
- All online information should be accessible. It should provide the same content regardless of the technology used to access them including but not restricted to screen readers or text-only browsers. Rigorous accessibility related testing should be conducted with a sample of prospective disabled users before content is made live. This should be tested through a variety of access technologies and accessibility related settings in place.

## **B Train Services**

### **Ensuring the train services meet the needs of the areas and passengers they serve**

#### **B 1.1 Connectivity**

It is imperative that any timetabling changes take into account the need for passengers to connect into services for rural/onward destination that may run on an extremely infrequent basis

For example, onward services from Glasgow to Oban/Mallaig run only 3-4 times a day as well as to large urban centres such as Dundee or Aberdeen. It should be noted that whereas the National Reservation System has hard-coded minimum connection times that are used when planning multi-sector journeys, these are often insufficient for disabled passengers who may require assistance (e.g. wheelchair) or for the elderly or those travelling with luggage. For example, Edinburgh Waverley has a minimum connection time of 9 minutes however it may be impossible to transfer to connections within this time frame especially at busy periods or where the connecting service departs from a platform on the other side of the station.

## **C – Communities, heritage and a sustainable railway: Supporting the community**

### **C 1.1 Improve its support and development of its workforce**

Improved staff training and morale often lead to better customer service and staff achieving a feeling of empowerment and positivity towards their role. This includes the facilitation of more proactive management and response to staff suggestions or concerns and an open and customer-focussed etiquette. Strong leadership and initiatives such as the Network Rail Apprentice Scheme can contribute to achieving this.

### **C 1.2 Equality outcomes**

MACS assume that all bidders are cognisant with the requirements for mainstreaming equality considerations in procurement and the requirements of the Equality Act 2010 public sector equality duties as they pertain to Scotland. Further, there are responsibilities under the UN Convention on the Rights of People with Disabilities, which specifically relates to transport. MACS would refer you to the Equality and Human Rights Commission website for further guidance on how the legislative requirements can be achieved.

The Equality and Human Rights Commission guidance is invaluable in making community gains, identifying need, and assessing impact of service provision, performance and change. It could help to establish indicators on service take up or satisfaction levels, identify discrimination or whether services meet the needs of all passengers, including disabled passengers.

MACS draw your attention to a number of areas, which equality requirements can help you to address and understand:

- That the equality duty belongs to Scottish Ministers and that it forms part of their franchise.
- MACS emphasize the points in the general duty including that it is proactive, eliminates discrimination and most importantly, that it is about creating equality of passenger experience, access etc. for disabled people so that they get equal benefit from the services including travel, station, information, and incident resolution.
- MACS suggest raising the issue of hate crime and that bidders produce or review their guidance to staff on how to deal with incidents of harassment, including training staff to recognize and take steps to eliminate it.
- MACS encourage bidders to work with disabled people e.g. to establish and support a group of disabled people to work with them throughout the term of the franchise
- MACS request that all written communication and information be, at a minimum, produced in an accessible format, compatible with access technologies and highlight that many disabled people cannot or do not have access to or use computers or mobile telephones. British Sign Language should be considered when distributing information to ensure equal access by all consumers. MACS recommend that BSL be included as an alternative and accessible format for information distributed online.
- Training and development in disability awareness should be available to all staff and irrespective of position or level of customer engagement.
- Audits, involving disabled people, of plans for refurbishment and new premises of both rolling stock and premises should be undertaken and this should be at the earliest opportunity rather than at a later stage.

- Audits should take account of onward journeys through proactive liaison with planners, other transport providers, car park operators, local authorities etc.
- Ticketing should be compatible with concessionary travel provisions. In Glasgow Central, rail tickets purchased with concessionary cards (Strathclyde Partnership for Transport area only) do not work on barriers until 9.30 am and between 4.30 and 6.30pm, so people have to wait for a platform assistant to override the system. Automated ticket machines in SPT area do not include provision of concessionary tickets. The franchisee should work with other responsible parties to identify and overcome issues.
- Accessibility should be a constant element of station management throughout all operational hours e.g. mainline station shop deliveries, signage blocked, transitional arrangements during refurbishment. Franchiser should work with other responsible parties to identify and overcome issues.
- Passenger assistance services should bear in mind the dignity and choice of train users.

We would draw your attention to the revised European Technical Specification Interoperability: Persons with Reduced Mobility. We presume that now they are made law, a new franchisee would implement these regulations designed to enhance the accessibility of rail transport to persons with disability and reduced mobility.

### **C 1.3 Monitoring Service Quality**

SQUIRE is a customer-focused tool used by Transport Scotland to monitor the service quality of the franchisee and measure the quality of facilities at stations and on trains. It includes many aspects of interest to disabled travellers e.g. help points, booking offices and train toilets. MACS wish to see this research expanded, publicised and linked with the survey information from Passenger Focus.

### **C 1.4 National Passenger Survey**

This is conducted by Transport Focus and will be used to assess the overall success of the West Coast Franchise and therefore its potential significance as a future quality indicator could be invaluable. However, MACS recommend that the successful bidder undertake to fund larger ongoing research into the numbers of disabled people and elderly people using train services from/to Scotland using the West Coast, and the quality of the journey experience. MACS believe that this research will greatly enhance the data required to plan for future services by the franchisee and be an important element in the identification of strategic and operational requirements to meet the likely needs of disabled passengers.

## **D – The whole journey: Make the railway more accessible for all**

### **D 1.1 Access audits**

Accessibility at stations involves much more than simply improving the physical internal layout of the main building. The accessibility of the whole station area including access to and egress from the station building requires investigation. Train Operating Companies should be encouraged to use local access panels or disability consultants to advise on the accessibility of stations. Just because a station has a ramp, handrail and lift does not necessarily make it accessible. It is important that bidders take their obligations in connection with physical alterations and accessibility of stations and services seriously. Proper access audits should be carried out by the new franchisee in partnership with local

access panels or independent access consultants and that these reports are publicised and shared with key stakeholders, particularly local disability bodies and others who may be affected. Further, MACS strongly encourage bidders to establish and support a group of disabled people to work alongside them as mentors to operational and management staff throughout the franchise term.

## **D 1.2 Train or Intermodal Change**

Additional considerations should be taken into account for disabled customers undertaking journeys requiring a change of train or intermodal change. The minimum change time for each station has been implemented into the National Reservations System. However, this is often too short a time scale for disabled customers, particularly those experiencing mobility challenges or where personal assistance is required to navigate around the station and onto the connecting service or onward transport. Walking even short distances may take considerably longer than for non-disabled passengers. Additional assistance may be required for passengers changing at busy stations, as they may be unable to stand for even short periods when queuing at ticket gates or whilst waiting to board trains.

## **D 1.3 Signage**

Signage at stations is variable, often inconsistent and is a key area for most travellers to guide their way through the station environment and for access and egress. Good signage is often the first tangible aspect of the rail journey experience and must encompass a wide range of differing traveller needs: from the regular commuter, to the passing tourist and business trade, to the infrequent traveller, to those with a range of disability challenges.

## **D 1.4 Engagement with disability organisations**

MACS welcome early dialogue with the successful bidder to consider how they will engage with disability organisations as they have much to contribute.

## **D 1.5 Journey Assistance Card**

Some operators offer a Journey Assistance card, a credit card sized card, which is recognised by staff, alerting them that the holder requires additional assistance. Space is provided allowing the passenger to write the details of the specific help required. The cards can be downloaded and printed from the operator's website or are available at staffed stations. It is suggested however that the design of the card could be improved to increase its prominence and visibility, and that greater efforts could be made to spread awareness of the card amongst both passengers and staff.

The successful bidder should collaborate with other rail operators, RTPs and other train and bus operators to offer a card, which can be used on trains and buses.

It is suggested that staff could actively promote the Journey Assistance card when encountering passengers requiring additional assistance, such as through SESTRANS. The Regional Transport Partnership in South Edinburgh SESTRANS has a very good and successful Thistle Assistance card designed to make using public transport easier for older people and those with disabilities or illness. SESTRANS is making the design files for the card available at no charge to interested local authorities. Perhaps this could be amalgamated with the Journey Assistance card for use on all public transport?



## **D 1.6 Tickets machines**

These should be easily usable by all disabled people and transparent ie restrictions need to be simplified. It is not always apparent which seats are available and the printing is too small where often booked seats are not used

## **D 1.7 Complaints by those with a hearing loss**

There are reported difficulties in accessing the complaints procedure and avenues for making a complaint by people with hearing loss. It was suggested that train operators could develop a mobile app allowing complaints to be submitted by text or via a chat-style service. There is apparently a text relay service already available from one operator, which people with hearing loss could use. It is understood that this is only available via a landline and therefore unsuitable for passengers on the move. Mobile smart phones offer future possibilities. MACS recommends a consistent standardised approach to making complaints at any stage of the journey and that a clear audit trail is identified. MACS welcome early engagement on this issue.

## **Other areas not addressed**

### **D 1.8 Punctuality and reliability**

MACS wish to emphasise that punctuality and reliability are vital for disabled people. Disabled people are disproportionately more like to be severely affected due to the nature of such impacts on their travel plans with resulting inconvenience and financial detriment.

### **D 1.9 Capacity**

In the Which 2014 survey, one-fifth of commuters were likely to have had to stand and 35% wanted more carriages at peak times. MACS wish to ascertain what plans operators have to increase capacity at peak times. Disabled people who work may not have the option to travel off-peak. ( as referred to in B Q6- MACS wish to know if the operator would permit disabled people to use first class carriages when the train is overcrowded rather than current discretionary arrangements. )

### **D 1.10 Security**

In the Passenger Focus survey on passengers' perceptions of personal security on the railways, a lack of staff and anti-social behaviour were the main reasons for concern. In practice this often means moving disabled people or the disruptive passengers to alternative carriages. This requires appropriate staff training in conflict management resolution to help them deal with difficult circumstances. Staff members also need to be identifiable. According to a Passenger Focus survey, "A limiting factor could be the experiences of staff and perceptions that they have of risks to their own safety, which can impact on their willingness to engage with the public at problematic times and take action to deter and diffuse situations" (Passenger Focus 2009). MACS wish to be appraised as to how a future operator will address this issue.

## **Conclusion**

MACS hopes this response will prove helpful to ensure that the successful franchisee delivers a service that is fit for purpose, meets the needs of all users and generates added value by innovatively developing current infrastructure in Scotland.

The additional innovation required to ensure service provision completely meets the needs of all disabled people is a complex minefield and are too numerous to detail in one document. We also hope this document will create an ongoing dialogue with the successful bidder for the West Coast franchise. Other questions will undoubtedly arise as part of that discourse that we have not been able to include within the contents of this document but we welcome that opportunity to work with them over the duration of the franchise term.

MACS will respond to any written queries you may have through our e-mail address at [MACS@scotland.gsi.gov.uk](mailto:MACS@scotland.gsi.gov.uk) for the attention of Hussein Patwa, Rail Work Stream.

**MACS Rail Workstream**

July 2016