

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

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RESPONSE TO THE CROSSCOUNTRY FRANCHISE CONSULTATION

Please see attached a response to the consultation on the CrossCountry Franchise provided by the Mobility and Access Committee for Scotland.

Yours sincerely,
Aga Lysak

MACS Secretary

This document provides MACS' response to the Department for Transport's consultation on the next CrossCountry franchise, supported by our members' expert knowledge and lived experience with a view to helping create a railway that is inclusive for everyone, regardless of ability and which makes the best use of modern thinking and technology to do so.

Role of MACS

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.

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-Production, 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 to the Department for Transport. We have structured our advice across the key quality policy areas that have the greatest impact service provision for disabled travellers based on legislative requirements and statutory or best practice guidance. We have, throughout this response, highlighted our expectation that disabled people's customer needs should be viewed in the same way as any other traveller in that the journey experience should be safe, comfortable and barrier-free. We have sought to add value to the requirements of the excellent consultation document and made suggestions and recommendations that we expect to see within any successful bid. MACS greatly appreciates how much this has attempted to address so many issues for disabled people within it.



Department for Transport

- 1.
2. Cross Country rail franchise

There is an online version of this questionnaire that allows you save or print a copy of your response:

<https://www.gov.uk/government/government/consultations/CrossCountry-rail-franchise>

Introduction

Thank you for taking the time to read the consultation document and to respond to the questions. Your views will contribute to the formulation of specification for the next CrossCountry rail franchise.

Confidentiality and data protection

We are not asking for any personal data as part of this consultation. If we receive any it will be securely deleted.

Our [privacy policy is on GOV.UK](#).

Responding

2.1.1 1. Are you responding:

on behalf of an organisation? (Go to question 2)

as an individual? (Go to question 3)

Organisation details

2.1.2 2. Name of organisation

2.1.3

Mobility and Access Committee For Scotland

Your journey

2.1.4 3. Do you mostly travel on the CrossCountry network as:

a leisure passenger?

commuting to and from work?

a business passenger?

2.1.5 4. What is your most frequent journey (station to station) on the Cross Country network?

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2.1.6 5. How regularly do you travel by Cross Country?

Every day

4 to 6 times a week

2 to 3 times a week

Once a week

Once a fortnight

Once a month

Less than once a month

Once or twice a year

Never

2.1.7 6. What type of ticket do you usually buy?

	Season ticket
	Full fare
	Advanced ticket
	First class ticket
	Standard ticket
	Other:

2.1.8 7. How do you buy your ticket?

2.1.9

	Online (Cross Country website)
	Online (alternative operator)
	At station
	On train
	Other:

Awareness

8. How did you hear about this consultation?

	Poster
	Internet
	Station e-board
	On train consultation
x	Other: Dft consultation

Passenger survey

Information on these questions is included in the 'Cross Country passenger rail franchise' consultation document.

9. What are the particular services, routes and times of day where you think crowding on Cross Country services needs to be addressed most urgently?

While MACS has no direct local input into Cross Country routes affected, we have concerns regarding overcrowding on any route. Our experience and concerns are that overcrowding has a detrimental impact on the safe availability of train travel to passengers with disabilities.

For example, where train services do not have the capacity to meet the demand from passengers this often reduces the space available for wheelchair or other mobility aids to be loaded/unloaded as well as having a safe location to remain for the duration of the journey given routes can often operate with 'standing room only'.

Passengers who book passenger assist can often get good help to navigate particularly at busy times of travel. However franchisees need to also be aware that passengers with a disability have varying ways in which they need assistance and some who will travel on their services will be in a position where they do not require the use of booked assistance. This can be problematic at busy times of travel where if no staff member is present to assist a passenger with a disability other passengers may, for example, be less likely to offer seats.

The new franchisee therefore should ensure that on-train staff support is available on all trains to ensure where this is the case, staff are able to support passengers with disabilities who do not normally require booked assistance. Better supply of and clear and unambiguous marking of "priority seating" can also help change other passenger behaviours into offering space for those most in need. As a matter of course we would also suggest that the new franchisee should actively promote PassengerAssist, as those who currently do not book assistance, but require it, are more likely to do so thus enabling station and on-train staff to better plan resource placement and utilisation. This would also spread awareness of the system to those currently unaware of it.

10. Rank the following in order of priority for improvement for your future Cross Country services. Rank 1 for most important to 6 for least important.

more additional summer only services	<input type="text"/>
later times of last trains	<input type="text"/>
more frequent weekend services	<input type="text"/>
earlier Sunday morning services	<input type="text"/>
earlier times of first trains	<input type="text"/>
more frequent weekday services	<input type="text"/>

Which routes and stations and why?

MACS have no specific input into the route demand. However it has been raised by members of MACS that the awareness of CrossCountry services is much lower among Scottish travellers

than other routes. The franchisee should give consideration to how to improve knowledge of CrossCountry service among Scotland based travellers.

11. What changes would you like to see to the way Cross Country currently sells and provides tickets?

We welcome the promotion and use of a variety of methods for passengers to buy tickets and plan for their journey. Improvements for example in online planning and booking systems have made significant improvements in the passenger experience in recent years.

However, 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 (i.e. 'hidden disabilities') and may require some elaboration. Where purely automated systems are in use, alternative methods of obtaining the same information or completing the same process should be available via face-to-face interaction or similar communication methods. In particular, all parts of the journey planning process, which can be completed online, should also be accessible via telephone and in person at ticket offices.

In addition to ticket buying facilities MACS recommend that 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 and where a journey continues overnight. 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.

MACS recommend that 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.

2.1.10 12. What changes would you like to see to the Advanced Purchase on the day (APOD) system?

MACS have no specific input into the design of this ticket type. However, we would stress that in order to ensure that all passengers are able to access the best ticket for their needs at the best price, ALL tickets must be available to buy in a variety of methods.

While operators may make a case that offering online sales can result in cost savings in their processes that allows them to pass that saving onto passengers - any move to offer a cheaper ticket type only available online - could be indirectly discriminating against passengers with certain disabilities who are not able to use and access online facilities. We would recommend that in the franchise agreement it is stipulated that all ticket types can be bought online, by phone and in person at ticket desks.

13. What additional information would be useful to you when planning your journeys or making connections onto other services?

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. Further, our experience shows that where a station is not wheelchair accessible, on taxi service provision can be erratic and subject to unforeseen delays. Passengers need to know which taxi company is going to pick them up and have access to human-interfacing contact numbers should they fail to arrive.

In addition there is a need to improve how information is supplied to disabled passengers in the instances of delay or cancellation (see question 14 for more detail).

14. How would you like the information (in question above) communicated to you?

MACS expects that on-train announcements and text be available in real time in a range of accessible formats, particularly where there are delays or disruptions. Information displayed visually should be visible from all areas accessed by passengers and presented using high contrast and a clearly readable text size and font. Information conveyed using audio should be heard in all areas accessed by passengers, including in toilets and other discreet facilities and should use a consistent volume, pitch and tone in all areas and at all times. Care should be taken to ensure that the volume of audio announcements is sufficient for the operating environment, especially at busy times where this may be overlapped by other background noise. Where announcements are made in person, all staff should be advised to speak in a clear, unrushed manner, without garbling words or sentences and ensuring that key points are repeated particularly where a large volume of information is being conveyed. With the increasing use of mobile devices, MACS expect free Wi-Fi to be available throughout trains as standard as this will allow disabled passengers the ability to check on route updates on devices they are familiar with via Wi-Fi.

MACS recommend that 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; and in-person by a member of staff on board the train or at stations.

Where it is known that a disabled customer is travelling from an unstaffed station, or where a journey to a station from remote areas may be needed, the customer should be advised of any delay or disruption, if known in advance, by telephone as soon as possible.

When delay or disruption necessitates the use of replacement transport, MACS recommend that disabled customers 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.

All online information for all systems (booking, planning, delays etc.) 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. MACS recommend that rigorous

accessibility related testing 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.

15. How do you believe Cross Country staff could be more effective in providing service and assistance that passengers need on a modern railway network?

MACS recommend that customer service be implemented as an integrated part of the journey planning process and accessible to disabled customers through a variety of access 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.

MACS is aware of research from Passenger Focus on passengers' perceptions of personal security on the railways, a lack of staff and anti-social behaviour were the main reasons for concern. 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, there has been input to MACS considerations that staff are not always available on CrossCountry routes and this needs to be improved by the new franchisee.

With regard to additional assistance for disabled passengers MACS recommend 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 PassengerAssist along with the request. 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.

16. What comment do you have on improving the overall passenger experience before, during and after the journey?

Other issues not raised in our previous comments that need consideration are:

Catering: As CrossCountry routes are long distance passenger need to access catering services is higher than on shorter journey routes. However it has been highlighted that CrossCountry services in particular have often faced supply issues with catering. This has led to a number of services where no catering is being provided on a long distance service with no prior notice. This could impact on some disabled passengers more acutely than other passengers due to medical requirements to eat or drink at certain times of the day. In addition catering staff should be aware of where disabled travellers are seated on the train and should be readily identified by name, carriage and seat number through the PassengerAssist system.

Punctuality: 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.

2.1.11 17. How could the way in which Cross Country deals with your complaints and provides compensation to you be improved?

It must be ensured that complaints procedures are available in a variety of methods to ensure all passengers can access the complaints service equitably.

It has been raised as a concern in the past where operators have utilised telephone complaints procedures only, and this clearly has an unfair impact on individuals with hearing loss. We are not aware of this being a specific issue with Cross Country but the franchisee should ensure they will take complaints in writing and by telephone and e-mail as well as exploring new opportunities such as using SMS or online chat systems.

2.1.12 18. Rank your priorities for improvement to the carriage layout for long distance inter-city Cross Country trains? Rank 1 for most important to 7 for least important.

More seats	2
More table seats as opposed to 'airline' seats	
More comfortable room for short distance standing	
Cycle storage	
Seats that align with windows	
Greater leg-room	1
Extra room for luggage	3

Where and when do you think these facilities are most required?

MACS has had concerns raised regarding the availability and size of accessible seating. For people with assistance dog's legroom and space for their assistance dog is very poor on long distance trains, even in accessible seating. Ideally there should be some single seats available with space beside them so that dogs aren't crushed into being under another person's seat. Typically guide dog users are expected to use the wheelchair space. However, this then deprives a wheelchair user of having the space intended for them. It also deprives them of the option of sitting with non-disabled companions, as noted earlier in our response to this consultation.

In line with our earlier comments we believe that better marking and way finding to accessible seating is needed on a large amount of rolling stock and the new franchisee for CrossCountry should ensure this happens on their routes.

19. Rank your priorities for improvement to the carriage layout for local trains on Cross Country? Rank 1 for most important to 7 for least important.

More seats	
More table seats as opposed to 'airline' seats	
More comfortable room for short distance standing	
Cycle storage	
Seats that align with windows	
Greater leg-room	

Extra room for luggage

20. What other comments or suggestions do you have about the on-board experience?

The same as Q18.

21. Do you have any other views on how the future Cross Country franchise could be improved that have not been captured in the questions above?

Qualifying question

22. The rest of this survey is mainly designed to be completed by rail industry stakeholder representatives, however you can complete this if you wish.

2.1.13

Crowding issues and ideas to respond to

Use the consultation annex to help inform your response.

23. Which of the following potential measures do you think could overcome crowding caused by short distance commuters using long distance Cross Country trains, assuming that suitable alternative services are available?

Removing calls from towns closest the conurbation centre either completely or just at peak times.

Yes or No?

Retaining calls at such stations but restricting them to pickup/set down only?

Yes or No?

Removing the validity of multi-modal tickets on long distance trains?

Yes or No?

Other:

Provide specific instances where these may be applicable.

24. If it were possible would you agree with transferring these local routes to the West Midlands franchise:

	Yes	No
Birmingham to Nottingham		
Birmingham to Leicester		

Why?

To improve the service pattern and network to offer journeys that better meet your needs

Use the consultation annex to help inform your response.

2.1.14 25. Would you like to see any other routes or stations transferred to or from the Cross Country franchise?

Yes	
No	

Routes to transfer

2.1.15 26. Which routes and stations and why?

While MACS have no specific comments on route planning for the franchisee we would like to ensure that any planned changes are communicated with passengers at the earliest possible opportunity to ensure they are able to make adjustments for future travel plans.

Changes

The East Coast service north of York aspirations are listed in the consultation document.

2.1.16 27. If the network was unable to cope with all the service enhancement aspirations north of Northallerton on the East Coast mainline, would a:

curtailment of one of the existing CrossCountry services be acceptable (with the resources redeployed to enhance other existing or new routes)?

diversion of one of the existing CrossCountry services be acceptable (with the resources redeployed to enhance other existing or new routes)?

Yes	No

Why / why not?

2.1.17 28. Do you think the department's minimum specification should preserve exactly the existing pattern of services and station calls rather than offer an opportunity to change?

	Yes
	No

Comments:

Extremities of the network changes

The extremities of the network information are listed in the consultation document.

29. Should bidders be given flexibility to make limited changes to the extremities to the network so that benefits such as reduced crowding in the centre of the network can be provided?

- Yes
- Yes, but only if alternative services are provided by other operators
- No

Comments:

30. Do you agree that the current level of Cross Country services to the following routes are the minimum that must be specified for:

- West of Plymouth to Penzance?
- Exeter to Paignton?
- Newton Abbot to Paignton?
- North of Edinburgh to Aberdeen?
- Southampton to Bournemouth?
- Guildford? (N.B. this could be complete removal of the one-a-day Cross Country service)
- Bath? (N.B. this could be complete removal of the one-a-day Cross Country service)
- Cardiff to Bristol Temple Meads? (N.B. this could be complete removal of the one-a-day Cross Country service between these points, and Patchway and Filton Abbey Wood may no longer be served by Cross Country)

Yes	No

31. Do you agree that the changes to the following routes would be acceptable if a similar or improved service was provided by another operator:

- West of Plymouth to Penzance?
- Exeter to Paignton?
- Newton Abbot to Paignton?
- North of Edinburgh to Aberdeen?
- Southampton to Bournemouth?
- Guildford? (N.B. this could be complete removal of the one-a-day Cross Country service)
- Bath? (N.B. this could be complete removal of the one-a-day Cross Country service)
- Cardiff to Bristol Temple Meads? (N.B. this could be complete removal of the one-a-day Cross Country service between these points, and Patchway and Filton Abbey Wood may no longer be served by Cross Country)

Yes	No

2.1.18

Bidder station stop flexibility

2.1.19 32. Should bidders have some flexibility to make fewer calls at some stations, for example if that enabled them to accelerate services?

- Yes

<input type="checkbox"/>	No
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2.1.20 33. On what routes could this be introduced?

Minimum specification

2.1.21 34. Should the minimum specification have the number of trains from each station to Birmingham but give bidders the flexibility to decide where the trains go after Birmingham?

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

2.1.22 35. Are there stations within the geography of the Cross Country network that should receive calls that they currently do not receive (include examples and supporting evidence)?

2.1.23 36. Are there stations beyond the geography of the Cross Country network that should receive calls that they currently do not receive (include examples and supporting evidence)?

To improve and simplify fares and ticketing

The current Cross Country fare structure is mentioned on page 26 and 27 of the consultation document.

37. What changes would you like to see to the current Cross Country current fares structure?

As previously highlighted ALL tickets must be available to buy in a variety of methods.

While operators may make a case that offering online sales can result in cost savings in their processes that allows them to pass that saving onto passengers - any move to offer a cheaper ticket type only available online - could be indirectly discriminating against passengers with certain disabilities who are not able to use and access online facilities. We would recommend that in the franchise agreement it is stipulated that all ticket types can be bought online, by phone and in person at ticket desks.

To improve access, information and making connections

38. What more could be done to improve access and provide facilities for those with disabilities or additional needs?

We have highlighted a significant number of improvements in answers to specific previous questions.

However as a catch all comment we would like to see consideration of disabled passenger needs at all points of planning and service provision. Often it is too late to think about disabled passenger needs once something has been agreed and then poor “make do and mend” adaptations are made. There needs to be consideration of how any changes or service offerings impact on disabled passengers at an early planning stage.

To improve the on-board experience

2.1.24 39. Which initiatives would you suggest to try to reduce the disturbance caused by the ‘churn’ of passengers alighting and boarding at frequent station calls?

2.1.25

Engagement improvement

Stakeholders are explained on page 30 of the consultation document.

2.1.26 40. Are there any improvements to the level stakeholder engagement by Cross Country that you would like to see and how could stakeholder engagement be improved?

It is important that all operators have good communications with each other and other modes of transport providers that intersect with station calling points. A major frustration for passengers is

when modes of transport to not “join up” or transferring times are too short.

2.1.27 41. Does Cross Country provide a sufficient level of support to relevant Community Rail partnerships in your experience?

2.1.28

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

Community Rail partnerships engagement

2.1.29 42. Has their support improved in the last year to 18 months?

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

2.1.30 43. Provide ideas on what more you feel the franchise could do to help the relevant Community Rail partnerships?

2.1.31

Final comments

2.1.32 44. Any other comments?

Return your completed questionnaire

Save this file and email it to crosscountry@dft.gov.uk

Or post it to:

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