Mobility and Access Committee for Scotland (MACS)

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**Mobility and Access Committee for Scotland (MACS)
Response to the Williams Rail Review**

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Introduction

This document forms the response to the March 2019 Williams' Rail Review from the Mobility and Access Committee for Scotland (MACS).

Whereas the evidence papers provided as part of the review do not specifically focus on accessibility, it is hoped this response will provide useful information on aspects of rail travel relevant to disabled people, which the review will take into consideration when forming its recommendations.

We believe that it is essential that these aspects be fully incorporated into any changes that are made to promote maximum access and inclusion for everyone. This includes within processes such as ticketing, access to information, passenger assistance and the rolling stock and journey itself.

We hope the review will also be cognisant of the fact that rail travel does not exist as a standalone occurrence but forms part of the larger end-to-end journey, including interfacing with other modes of transport.

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

1.1 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.

1.2 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.

2. Planning for the Journey

2.1 A principled approach

2.1.1 We would recommend that the principles of equality and accessibility 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, those experiencing a range of sensory losses and those experiencing the potential effects of chronic pain.

This approach may equally apply to the projected huge increases of older 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 provision or from bus or ferry stop to station provision.

2.1.2 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 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 or in person at ticket offices.

2.2 Reservations

2.2.1 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.

2.2.2 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.

2.3 Information Communication Systems

2.3.1 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
- In-person by a member of staff on board the train or at stations

2.3.2 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.

2.3.3 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. 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.

Note should be made of any accessibility requirements e.g. ramps or a sighted guide.

2.4 Customer Services

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

2.4.2 Where planning for a journey includes interfacing with third parties or complementary services, these interfaces should be accessible through all communication channels including online and by phone. This also applies where complementary services can be booked as part of the rail journey, such as discounted tickets, inclusive bus passes for the origin or destination location, onward travel by ferry, Underground, subway or express rail, other special offers for hotels or tourist attractions etcetera.

Such complementary services, where under the control of the rail operator, should be accessible without price discrimination for disabled customers.

2.5 Complaints

2.5.1 MACS recommends, when a disabled customer complaints, that they be clearly advised of the procedure for handling the complaint, including timescales for providing a response and avenues for recompense in the event that this timescale is not met.

If required, disabled customers should be provided with assistance to formulate and submit the complaint, either online, by telephone or in person.

Disabled customers should be updated at regular intervals as to the status of their complaint and correspondence regarding the complaint should be sent in an accessible format based on the customer's preferences.

Where a complaint cannot be resolved with a tangible outcome (for example, where the cause of the complaint rests with a third party or where responsibility for the cause of the complaint cannot be determined) disabled customers should be reassured that the complaint will be noted and feedback provided to the appropriate managers or staff concerned.

We feel that it is important to note that some disabled customers may have difficulty assimilating complex information and that therefore the complaints process should be handled with care and due attention.

2.5.2 Where compensation is payable, for example, in the event of a service delay or as the determined outcome of a complaint investigation and where such compensation is paid in the form of rail vouchers, vouchers should be usable through all of the access channels used to book tickets and make seat reservations, including online or by phone.

Disabled customers may be unable to access stations or facilitating access may come with considerable financial cost and use of vouchers by remote means should be implemented as a result.

Where customers are entitled to claim compensation as the result of the delay, disabled customers should be advised of this through appropriate communication methods including

in-person and at the time of the delay entitling them to the claim, along with any necessary information related to this such as the delay duration or service/stock reference. Disabled customers should be provided with assistance to complete any forms required to claim eligible compensation.

2.6 Online Information Accessibility

2.6.1 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.

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.

2.7 Train or Intermodal Change

2.7.1 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.

2.8 Passenger Assistance

2.8.1 MACS recommend expanding the current PassengerAssist 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. We noted that this was recently 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.

2.8.2 MACS recommend for Train Operating Companies (TOC's) that situations such as the following be avoided wherever possible:

- A TOC allows passengers to request travel assistance at the same time as making their original booking. However, details of the booking are not sent to the staff booking assistance, thus requiring them to subsequently contact the customer to request full details of their booking again.

- A TOC allows disabled customers to request travel assistance as well as providing them with the opportunity to add specific details of the assistance required along with any special requests. If there is no interaction between the staff booking assistance and the disabled customer, then they are unaware as to whether or not assistance has been booked for the journey. In addition, owing to the lack of contact the customer is not provided with a reference number for the assistance booking making it difficult or impossible to track them should something go wrong.

2.8.3 When implementing the provisions of Passenger Assistance 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.

The needs of passengers travelling from staffed and unstaffed stations should also be considered, including ways in which passengers can contact Customer Services or the on-train crew directly, noting that the latter suggestion may prove to be more efficient in some cases.

Provision for passengers travelling from request stops must also be considered particularly during times of unforeseen disruption or delay.

2.8.4 MACS recommend that Train Operating Companies seek to standardise operations with respect to the booking and provision of assisted travel to ensure that disabled customers receive an accurate and transparent perception of the service they are likely to expect when booking assistance with any operator.

Any operator, who implements changes from the 'standard' travel assistance operations, should disclose these changes prominently and transparently to customers at the time of booking.

2.8.5 MACS acknowledges that PassengerAssist is an improvement on the previous system and the relatively short two-hour notice period requested by the current ScotRail 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.

2.8.6 Customer service centres and help and information points need to work alongside PassengerAssist. The Customer Service Centre at London Kings Cross provides an excellent example of what can be done, and the mobility point at Glasgow Central Station could usefully be replicated elsewhere.

2.9 Audit

2.9.1 MACS recommend that audit controls be implemented within the booking and planning process with respect to disabled customers.
In the event of a complaint or something going wrong, it would be extremely useful to have the ability to track disabled customers at every stage of the journey. This tracking should include details of any named staff interactions during planning, booking the journey, at stations and on-board trains.

We suggest that this would simplify the process of investigating complaints from disabled customers as well as increasing the effectiveness of disseminating feedback and implementing changes to service provision as a result.

Disabled customers should have the opportunity to request such tracking information at any time and should have the right to subsequently request that this information be removed from operator's records, if they so wish and as mandated within the provisions of the General Data Protection Regulations (GDPR) 2018.

3. Stations, Transfer and Infrastructure

3.1 Anticipating the likely needs of disabled people

3.1.1 Disabled people need to have confidence in undertaking the whole of their journey. A passenger taking a bus to catch a train is dependent on the bus arriving on time, dropping them at the nearest bus stop to the station and getting from there into the station safely. In future, a disabled train passenger who wishes, for example, to take the tram to Edinburgh Airport will be dependent on their ability to manage the tram interchange outside Haymarket.

Unless the disabled person has confidence in their ability to undertake the journey safely, the journey will not be made. If, for example, the passenger fears that they are likely to step unknowingly on to the tram track at the interchange, this may prevent them from making the journey in the first instance.

Despite all the good intentions about customer service, passenger information and passenger assistance, there will be no genuine equality of opportunity between disabled passengers and others unless the confidence of the disabled passenger in making the journey can be increased.

The confidence of an individual in planning a train journey can be undermined in a single incident, e.g. a wheelchair passenger being left stranded at a station without support or a visually impaired passenger unknowingly stepping onto a tram track.

3.2 Monitoring Service Quality

3.1.1 Service Quality Incentive Regimes (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 Transport Focus.

3.1.2 The National Passenger Survey conducted by Transport Focus is used to assess the overall success of TOCS' franchises and therefore its potential significance as a future quality indicator could be invaluable.

However, MACS recommend that an undertaking be made to fund larger ongoing research into the numbers of disabled people and older people using train services in Scotland and the quality of the journey experience.

MACS believe that this research will greatly enhance the data required to plan for future services by TOCs and be an important element in the identification of strategic and operational requirements to meet the likely needs of disabled passengers.

3.2 Access audits

3.2.1 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. For example, the building at Haymarket has level access, however, access to and egress from have been poorly planned.

A disabled person needs to cross the main vehicular trunk road to reach the taxi rank opposite. Haymarket, as the interchange for the Edinburgh Trams has raised yet unresolved issues for disabled passengers leaving the station and unaware that they are crossing tram tracks.

Passenger safety implications are self-evident and likely to grow considering the planned passenger expansion for Haymarket. Train **Operating Companies should be encouraged to use local access panels or disability consultants to advise on the accessibility of stations.**

Simply because a station has a ramp, handrail and lift does not qualify it as accessible. Some ramps are steep or badly positioned and can be difficult to use. It is important that TOCs take their obligations in connection with physical alterations and accessibility of stations and services seriously.

MACS recommend that proper access audits are carried out by TOCs 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 encourages TOCs to establish and support a group of disabled people to work alongside them as mentors to operational and management staff throughout their franchise terms.

3.3 Community and Stakeholder Engagement

3.3.1 It is important that buses, trams, taxis and private cars have easy access and interchange with stations at all times, particularly during periods of disruption due to engineering work or changing regulations.

Increasingly however, this is becoming problematic, as there is sometimes incongruence at the planning and consultation stage between station operators and others prior to changes being implemented.

For example, at Edinburgh Waverley regulations prohibit vehicles and taxis from entering the station. The implementation of such regulations through poor communication with stakeholder bodies has resulted in considerable confusion and uncertainty for disabled and older people rail users and greatly extended walking distances.

Another example is Haymarket where the new modern station building was completed without designing a passenger drop-off area as it was unclear whether responsibility for this lay with Network Rail, the Edinburgh City Council or the Edinburgh Tram Project. In both these situations, therefore, the potential future pressures on passenger assistance resources will be considerable.

This could have been better managed if handled differently at the design, planning and implementation stages and if addressed much earlier in the overall development process.

3.4 Signage

3.4.1 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 and way finding 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.

3.4.2 Stations such as Glasgow Central and Edinburgh Waverley are key terminal points for access to their respective cities or for ongoing transfer to elsewhere. Other stations have far simpler requirements.

It is increasingly evident that the need for clear direction and information will become more complex in the future and that the design of such systems will require adaptation accordingly given the predicted increases in passenger traffic.

Edinburgh Waverley, through its current consultation into major redevelopment, is subject to severe scrutiny from MACS due to the deficiencies within its signage and way finding and offers much learning for those embarking on a similar exercise within what is a very complex environment.

3.4.3 The requirements on TOCs regarding announcements and electronic information displays at stations are welcomed but do not go far enough.

MACS recommend that an undertaking be made to develop a more consistent strategic approach to guidance, direction finding and information throughout all Scottish stations.

3.5 Disabled Parking

3.5.1 Disabled parking and the monitoring and use of disabled parking bays are an ongoing exercise. In some larger stations, car parking may be distant from some platforms.

There appears to be inadequate or unclear monitoring of how disabled parking bays are used. A recent situation in Bathgate has established that ScotRail undertakes monthly monitoring at that station but not necessarily throughout the network. It may be that some stations are hot spots for parking difficulties, which is probably why they are being scrutinised more closely.

The fundamental question however is that we do not fully understand why some stations and their parking bays are underutilised and why some places do not manage and eliminate the abuse of disabled parking bays.

The potential risk is that if disabled people stop using marked disabled bays through lack of access to trains and stations, they will be declassified as parking bays. Some TOCs have

offered a welcome recognition that the number of disabled spaces can be increased where this is supported by evidence.

There is also a risk that the number of disabled parking bays will be reduced in response to the need for electric vehicles charging points.

An example of this can be seen at Bathgate station where 2 of the closest disabled parking bays have been reinstated as electric vehicle charging points (this also means disabled people have to park further away from the station access than those charging their cars).

MACS recommend that in reviewing the arrangements for passenger assistance that use of reserved parking spaces for disabled people are included within these considerations.

3.6 Integration between service providers

3.6.1 Integration between different transport operators remains a challenge particularly in rural, highland and island areas where transport options diminish the further one moves out of the main urban areas.

Even then, co-operation between operators through integrated timetable scheduling and ticketing is not the norm or seen as a necessity.

Disabled people are particularly at risk of being stranded in such circumstances and consequently often face a tougher range of challenges than their non-disabled counterparts. It is difficult to see how TOCs independently could address this issue where other public and private sector operator are present.

MACS however would be willing to support a credible initiative by the successful franchisee to address this matter particularly where there may be traction with other publicly funded transport operators and where our advice to Scottish Ministers may suggest an improvement on the current position.

3.7 Safe Station Environments

3.7.1 For disabled people, the issues of a safe station environment and visible staff presence at stations are closely linked.

In 2009, Transport Focus published a Report into "Passenger perceptions of personal security on the Railways" and recommended that where ticket offices have been closed, staff should be redeployed onto stations to provide help and assistance to passengers and offer a reassuring presence.

They emphasised the need to provide a more reassuring environment and that good lighting would make stations less threatening places for waiting passengers.

CCTV on its own was regarded as far from ideal, its main value apparently being as a tool to gather evidence of criminality. Transport Focus also referred to the sense of isolation passengers feel at smaller stations.

3.7.2 The Transport Focus survey (Spring 2013) found greater satisfaction with availability of staff at stations, than with seating, car parking or other facilities and services. Their conclusions showed a clear link between concern over personal safety and lack of staff.

Such concerns were greater at smaller stations particularly after 20:00 hours. There is clear evidence that disabled people are at an increased risk of crimes such as hate crime, theft and robbery.

MACS urge Train Operating Companies (TOCs) to take such issues and the Transport Focus Report seriously.

MACS recommend that a 'safe stations' strategy be undertaken beyond the Secure Stations scheme, which is largely focused on the use of ticket barriers.

3.8 Unstaffed Stations

3.8.1 There are many unstaffed stations in Scotland particularly outside the cities and the Central Belt. Some unstaffed stations make passengers feel isolated and remote from any source of help or information. It is disappointing, for example, that the new Borders Railway has many unstaffed stations.

The main issue is not simply fears over personal security more a fear of total isolation and remoteness to which disabled people are particularly subject. There is a tendency to view reducing staff as a financial efficiency exercise and a belief that technology can somehow replace staff.

MACS urge TOCs to focus on improving the passenger experience at unstaffed stations.

A greater priority should be given to improving the accessibility of unstaffed stations because both the Stations for All programmes (funded by Department for Transport) and the Minor Works Programme predominantly focus on stations with higher passenger footfall resulting in unstaffed stations being treated as a low priority.

3.8.2 MACS welcomes the general encouragement to TOCs to propose additional outcomes and build on their engagement with the disabled community. MACS welcome early dialogue with TOCs to consider how they will engage with disability organisations as they have much to contribute**.**

MACS would request early dialogue on proposals to liaise with transport operators, providers, and local authorities where service provision underpins local infrastructure and access to work, education, health and leisure services.

4. Train Services

4.1 Platform surfaces

4.1.1 The current paving used on platforms edges is inadequate as it provides insufficient tactile feedback for those using a long cane or other walking aid.

MACS recommend better tactile surfaces be introduced on platforms. Positive examples of this can be seen at Aberdeen and Stirling, as well as at some unstaffed stations.

Suitable tactile paving at the latter is particularly important due to the lack of a staff presence to provide timely assistance in the event of an accident or emergency. MACS understands that the guidance on tactile paving is currently under review by the Department for Transport (DFT), however we would urge TOCs to keep a watching brief on this and respond to any new guidance in a timely manner.

4.2 Complaints

4.2.1 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.**

4.3 Journey card/ Thistle card

4.3.1 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 was 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.

It is suggested that staff could actively promote the Journey Assistance card when encountering passengers requiring additional assistance, such as through SESTRANS.

The RTP in the South East also have a Thistle card. MACS would caution however that the presence of too many different journey assistance cards has the potential to result in confusion for both disabled passengers and staff, and have an ambition of one, such as the Thistle card that is universally used and recognised across the network.

4.4 Communication with passengers

4.4.1 One acknowledged benefit of improved staff training and better customer service is the gain made by staff through higher levels of confidence and competence in communicating with disabled people.

It is a recognised challenge however that there are sensitive issues at stake when attempting to address disabled people particularly where the impairment may not be readily apparent. For example, a person with sight loss may not see when a member of staff approaches and is speaking to them directly, or a person with hearing loss may not appreciate when they are being spoken to.

MACS acknowledge that some of these examples may not yet be properly addressed particularly where staff, which may be misconstrued and could lead to potential legal action or sanctions, makes inappropriate approaches.

The "touch" issue particularly highlights this that people with sight and hearing loss have previously encountered by staff trying to attract their attention.

MACS wish to clarify what guidance and training is proposed for staff in such positions.

4.5 Visual and auditory information on trains

4.5.1 MACS expects that on-train announcements and texts 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.

With the increasing use of mobile devices, **MACS expect free Wi-Fi to be available throughout trains as standard.**

4.6 Wheelchair access

4.6.1 MACS recognise that there are particular access issues for wheelchair users and their supporters on trains. It would be useful if there were a flip up seat beside wheelchair users for a travelling companion.

Additionally, **MACS underline the necessity for ramps to be readily available for all users on all trains without exception**. This is also a DPTAC recommendation.

4.7 Catering facilities and trolleys

4.7.1 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 PassengerAssist.
It is a recognised challenge faced by disabled people, particularly those with sight or hearing loss, who may not see or hear the catering trolley or assistant as they move through the train and may thus be unintentionally excluded from using these services.

4.8 Security

4.8.1 In the Transport 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 Transport 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" (Transport Focus 2009).

4.9 Toilet facilities

4.9.1 In the latest Which magazine survey held Nationally, 11% of passengers said toilets were not in good working order, which directly affects disabled people's dignity and self-esteem.

4.10 Punctuality and reliability

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

4.11 Capacity

4.11.1 In the Which 2014 survey, one-fifth of commuters were likely to have had to stand and 35% wanted more carriages at peak times.

Disabled people who work may not have the option to travel off-peak.

MACS would ask for consideration as to whether TOCs would permit disabled people to use first class carriages when the train is overcrowded rather than current discretionary arrangements.

People with sensory loss, learning difficulties and those unfamiliar with rail travel may feel particularly anxious at times when trains are especially busy, particularly following popular events or late-night services.

4.12 Experience and Learning from Abroad

4.12.1 MACS highlights existing practice from rail providers in other countries, which TOCs may consider:

- There are video screens on trains in the Bologna area in Italy providing confirmation of the current train, the date, time, how far along the route you are, the next station, scheduled arrival time and a moving map showing current location. Visitors found this very reassuring when travelling in a foreign country.

- The most accessible trains are those, which offer flush access from platform to train. This can be found on local train services worldwide e.g. on the S-bahn in Germany, Perth (Western Australia) and Switzerland. In Perth all platforms have gradually been raised to train height.

- The Hamburg Metro provides an old system where "Harrington" ramps (locally raised areas of platform to give flush access to one coach on each train) have been installed.

- In Sydney, modern trains (all double deck) have flush access and wide doors.

- On Swiss railways, double deck trains have flush access and an automatic flap to fill the gap between train and platform. Clear signage internally and externally indicates wheelchair spaces. There are also wide doors and clearly marked areas for wheelchair users and bicycles.

5. Equalities considerations

5.1 Equality outcomes

5.1.1 MACS assume that all TOCs 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 refer to the Equality and Human Rights Commission website for further guidance on how the legislative requirements can be achieved.

5.1.2 The 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.

5.1.3 MACS draw your attention to several areas, which equality requirements can help you to address and understand:

- That the equality duty belongs to Scottish Ministers but that it forms part of TOCs' franchise.

- MACS emphasise 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 etcetera 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 TOCs produce or review their guidance to staff on how to deal with incidents of harassment, including training staff to recognise and take steps to eliminate it.

- **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 (BSL) must 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. This training should be designed with and delivered with the involvement of disabled people or their representatives.

- 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 conceptual stage of the process rather than at a later point.

- Audits should take account of onward journeys through proactive liaison with planners, other transport providers, car park operators, local authorities etc.

- Accessibility should be a constant element of station management throughout all operational hours e.g. mainline station shop deliveries, signage blocked, and transitionary arrangements during refurbishment. TOCs 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.

Conclusion

MACS hope this document will prove helpful to ensure that the Williams' Rail Review delivers recommendations that ensures all aspects of a rail service that is fit for purpose, meets the needs of all users and generates added value by innovatively developing current infrastructure in Scotland.

This is important for disabled people using the rail network who encounter additional challenges on a daily basis and at all stages of the journey process.

As already stated in the introduction, the Scottish Government is keen to establish how TOCs will comply with and enrich on three key principles related to this:

- How they will deal with disabled people within the overall development strategy as well as how they will generate opportunities to encourage more disabled people to use the rail network?

- How they will measure performance in light of the experiences of disabled people using the rail network and how this will be monitored, audited, and useful qualitative and quantitative information extrapolated therefrom?. This includes how this information will be used to consequentially to improve the quality of service provision.

- How will cultural and attitudinal transformations that see disabled people viewed and treated on the same terms as non-disabled people be affected and what do they need to know as an organisation to make this change?

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.

MACS hope, however, that this document provides a stable, extensible and thought-provoking foundation to which the review may respond. MACS hope this document will create an ongoing dialog.

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 it. MACS hope that the review will find this information of value and that they will incorporate these points and recommendations within their considerations. MACS will respond to any queries you may have through macs@gov.scot for the attention of Hussein Patwa/Marsali Craig, Rail Work Stream.

Thank you.

Hussein Patwa

Mobility and Access Committee for Scotland (MACS)

Rail Workstream Lead