

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

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To whom it may concern,

RVAR AND PRMTSI DISPENSATION REQUEST: SCOTRAIL

I write on behalf of the Rail Work-stream within the Mobility & Access Committee for Scotland (MACS).

Having reviewed the documentation you provided, I can confirm that we are prepared, in principle, to support the request from ScotRail for a dispensation for an exemption from the Rail Vehicle Accessibility Regulations (2010) and Persons with Reduced Mobility Transport Specifications for Interoperability (PRMTSI) for the reasons detailed below.

We are satisfied that the request is reasonable given the inability to source compliant rolling stock due to a delay on the part of the refurbishment development contractors. However, we do have concerns relating to passenger comfort, on board announcements and the ability of passengers to seek assistance prior to travel using their preferred medium.

We note that ScotRail have an aim to source alternative transport for those passengers who are unable to travel on or do not wish to use non-compliant rolling stock within one hour of the departure time of their intended service. We would urge ScotRail to seek to reduce this timeframe wherever possible particularly given the reduced daylight hours and the likely inclement weather over the winter season, and especially in cases where disabled passengers may need to wait at an unstaffed station without adequate cover. We feel that the latter is particularly important as it may exacerbate existing medical conditions.

We note the mention of manual announcements on some services. We wish to reiterate that staff must, in cases where automated announcements are unavailable, ensure manual announcements are made at all calling points in sufficient time to allow passengers to prepare to alight safely and in addition to providing details of any changes to the stopping pattern in advance. On non-compliant HST services, awareness should also be provided to staff on the importance of assisting visually impaired passengers to board, navigate and alight the service safely. This is as they may have difficulty locating the doors, operating the opening mechanism and may become disorientated. The steps when boarding and alighting these services are also significantly higher and steeper when compared to other ScotRail rolling stock with which they may be familiar.

We welcome the comprehensive communication plan which Scotrail have submitted and in particular the provision of advice to passengers who do not communicate or access information digitally. The ability to book passenger assistance through a variety of methods is also positive. However, we have previously raised concerns with ScotRail directly over the accessibility of the online passenger assistance booking form for those passengers using screen readers or other assistive technologies. These challenges make the online booking form unusable at present to those passengers affected and we would ask ScotRail to investigate this as a matter of urgency given it was first raised in June 2019.

MACS note the particular challenges faced by passengers with disabilities using the Mark 2 train set as currently used on some services on the Fife Circle line. The application notes that the use of these sets is planned to end in May 2020 as new rolling stock is made available - however, this is phrased as potentially delayed depending on delivery of other units. MACS believe it is important that the Mark 2 sets are taken out of service as soon as possible and would submit to DFT that dispensations relating to the Mark 2 trains are only given to 31st May 2020. MACS is aware of significant frustration on the parts of disabled passengers who are currently unable to use these services due to the rolling stock. It should also be noted that the plans for new rolling stock on this line had been delayed a number of times already and MACS believes that any dispensation should not be extended past May 2020.

Otherwise, we appreciate the detail ScotRail have provided justifying the current non-compliance of particular rolling stock and the substantial information on the mitigations plan to resolve them. MACS continue to remain willing to provide advice where this would be helpful.

I trust the above is helpful but please do not hesitate to get in touch if I can provide any additional clarification.

Kind regards and best wishes,

Hussein Patwa
Co-Lead Rail
Mobility & Access Committee for Scotland (MACS)