Ferries Consultation Exercise

Response from Mobility & Access Committee for Scotland (MACS).

Question 10: What else do you think should be specified in a tender document? E.g, accessibility requirements, integration requirements etc.

Answer: Tender documents should include a requirement to ensure that both the ferry and all connections to shore are fully compliant with the requirements of the Disability Discrimination legislation, and if need be, designers should employ disability access consultants.

Question 15: Do you agree that the ferry service should be designed to meet the most important needs of the community?

Answer: On the assumption that “community” means community of needs as well as the geographical community, then we believe that the ferry service should be designed to meet the needs of the community. The disabled community should be consulted on ferry service design.

Question 28: Do you think that recommendations A-G (below) should be implemented now?

A. The design of new ferries and harbour/shore infrastructure should take full account of the Disabled Persons Transport Advisory Committee (DPTAC) guidance, for example the provision of handrails, ramps and assistance telephones. Consideration where possible should also be given to their use in smaller ferries and ports.

B. The need for regular, recognised disability awareness training is viewed as a relatively cheap and quick solution in helping to reduce many of the barriers faced. Good customer care and assistance by staff is often viewed as the key factor when deciding if ferry travel is possible, practicable or comfortable.

C. Port and ship operators need to plan their communication and information dissemination to take full recognition of people with restricted mobility (PRM). Audio, visual or other disabilities need to be considered, especially when considering passenger safety.

D. Accessibility information should be readily accessible to PRMs in order to aid journey planning. Where possible websites should be improved to take recognition of the needs of PRMs and make it easier to access this information.

E. Disabled Persons Assistance policies should be developed by all ferry and port operators as a matter of best practice.
F. A policy for those passengers which may require additional assistance which fall outside the general categorisation of PRM, for example people travelling with small children, or heavy / awkward luggage or baggage should be encouraged.

G. Provision where appropriate of some form of left luggage facility which would aid those passengers that are waiting onward travel connections.

Answer: Recommendation A – Yes. In MACS’ annual report (2009-10) to the Minister for Transport, Infrastructure and Climate Change, we recommended that Transport Scotland’s Disability Discrimination Act Good Practice Guide be adopted by all local authorities and regional transport partnerships. This should also apply to harbour/shore infrastructure. The Guide includes guidance relating to ramps, handrails and assistance telephones, however, there is also a need to take an holistic approach to disability – mobility, sensory, cognitive, learning difficulties and memory loss are all disabilities which need to be considered when designing new ferries and harbour/shore infrastructure.

Research has shown that the awareness of staff is a crucial issue in relation to travel. We are currently adapting DPTAC’s training guide for operators so that it is appropriate for a Scottish audience. The completed document should be used by all staff and operators working at ports and on ferries. This is part of MACS’ ongoing role to ensure that access and awareness are clear throughout all service provision and that the tools to achieve this are available to all service providers.

Recommendation B - Yes. Given that recommendations A-G do not take full cognisance of many of the disabilities we would hope that when tenders are being drawn up, that those doing so would consult MACS and disability access experts.

Recommendation C – As mentioned previously, there are other disabilities which need to be considered here as well – not just PRMs. Please see the response to Recommendation B.

Recommendation D – As above.

Recommendation E – Please see the response to Recommendation A.

Recommendation F – Yes.

Recommendation G – Yes.

Question 29a: Do you think that an accessibility improvement fund should be set up?
Answer: In principle this is a good idea. However, in reality MACS is not convinced of the practicality of an accessibility fund. The recent cuts in the "Access for All" programme for railway stations demonstrates one of the issues that may arise. It is not clear who would decide on the priorities for such a fund. MACS believes that the best way forward is to ensure that accessibility is a prerequisite for any investment, whether this be in fixed infrastructure or ships. Where ferry routes and terminals are financially supported by central or local government, there is an obligation on these public bodies to ensure that they consider the needs of disabled people and this would apply to any funding stream.

Question 30: Do you think that an information system indicating the degree of accessibility would be useful?

Answer: Yes. In the event of such a system being established, MACS would wish to be consulted further on the nature of the information that it would hold and how it would be made available.