

Respondent Information Form and Questions

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Mobility and Access Committee for Scotland (MACS)

Title Mr ☐ Ms ☐ Mrs ☐ Miss ☐ Dr ☐ Please tick as appropriate

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3. Permissions - I am responding as...

Individual	Group/Organisation
☐	☒
Please tick as appropriate	

(a) Do you agree to your response being made available to the public in Scottish Government and/or on the Scottish Government website?

Please tick as appropriate ☐ Yes ☐ No

(b) Where public access is not requested, we will make your responses available to the public on the following basis:

Please tick one of the following boxes:

Yes, make my response, name and address available ☐

Yes, make my response available, but not my name and address ☐

Yes, and only response and name available, but not my address ☐

(c) The name and address of your organisation will be made available to the public in the Scottish Government Library and/or on the Scottish Government website.

Please tick as appropriate ☒ Yes ☐ No

(d) We will share your response internally with other Scottish Government policy teams and may use the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so only if you consent to Scottish Government contacting you again in future on related issues only.

Please tick as appropriate ☒ Yes ☐ No

Consultation Questions

The answer boxes will expand as you type.

Procuring rail passenger services

1. What are the merits of offering the ScotRail franchise as a dual focus franchise and what services should be covered by the economic rail element, and what by the social rail element?

If the dual approach is chosen, both elements should be very carefully detailed as they would influence the infrastructure investment required over the franchise period. However, two different managed unit under a single franchise is confusing. It is also overly simplistic and might leave out anything that doesn't conveniently fit in either the economic or the social element. Some services offer high economic returns while others provide much less revenue but are nonetheless profitable. Some services are predominantly rural but perform a commuter function for part of their route, such as services to Inverness and in the North-East. Some might not be deliver directly high gains but might have a direct impact on tourism travel.

Disabled travellers are hardly mentioned anywhere in this consultation but must be taken into consideration. Although there is a risk that they might initially be thought of only as an addition to the social element as they might not provide as much of a direct profit to the rail companies (although their travel companions/family/friends certainly would), they definitely have a direct impact on the national economy as easier access to transport means that disabled people are better able to play a role in society and contribute economically, may this be through work, shopping, visiting family and friends, or tourism.

With multiple franchises, there would be a high risk that this could detract from consistency to passengers with too many different systems and lead to less investment by each separate franchise. For example, at the moment, there is already a major issue with concessionary rail travel for companions of visually-impaired passengers, as this is left to the discretion of local authorities. Multiple franchises would make this example far more common and might make travel assistance (and responsibility for it) far more inconsistent.

If a dual approach was to be chosen, some of the targets (possibly of from the social elements) might be more appropriately based on passenger numbers rather than financial target.

2. What should be the length of the contract for future franchises, and what factors lead you to this view?

The franchise length should be long enough to allow for operator investment, and we would therefore favour a long term franchise to encourage greater investment in the network infrastructure and in the rolling stock. However, it must also include regular reviews (for example every 5 years) with break

mechanisms which must be transparent and allow for passenger input.

3. What risk support mechanism should be reflected within the franchise?

Risk and profit sharing should be linked. There should also be clear guidelines on what would happen if things go wrong (i.e. if a franchise must cease trading) to ensure continuity of service and that the passengers (as well as the tax payers and the Scottish Government) don't end up paying the price for the franchisee's failure.

4. What, if any, profit share mechanism should apply within the franchise?

Q4 comments: see Q3

5. Under what terms should third parties be involved in the operation of passenger rail services?

We worry that this might detract from overall integration of the main franchise. Any third parties would have to provide the same consistent and ongoing Disability Awareness Training for its staff and would have to abide by the same requirements for disability access and equality considerations than the franchisee(s).

6. What is the best way to structure and incentivise the achievement of outcome measures whilst ensuring value for money?

There should be a clear outcome measure related to reducing access barriers for all disabled travellers on services and at, to and from the stations. We welcome the commitment in 3.25 to place passengers' interests at the heart of rail passenger services and that passenger satisfaction measures must be a key part of outcome measures. However, it is crucial that this includes disabled passengers (with all range of disabilities, and from all over Scotland, in more and less densely populated areas). There must be a clear mechanism on how to get this view, as Passenger Focus' survey, covering the whole of the UK, has a relatively small Scottish sample, and their survey contains very little information on accessibility. It would be appropriate and advantageous for MACS and Passengers' View Scotland (PVS) to play a role in this mechanism for an overall view, as well as a local access panels and any local, regional or national disability groups for regular feedback and consultations as and when required.

7. What level of performance bond and/or parent company guarantees are appropriate?

Performance bonds should at least cover the cost of refranchising should this become necessary as well as the cost of continuing to operate services fully in the meantime, without affecting disabled passengers or their travel companions.

8. What sanctions should be used to ensure the franchisee fulfils its franchise commitments?

Although we cannot comment of the exact nature and terms of these sanctions and we understand that there is a need to be reasonable to get enough bidders to compete for the franchise, we would hope that the sanctions after appropriate regular reviews would be strong enough to ensure the franchisee(s) will fulfil its commitments.

Achieving reliability, performance and service quality

9. Under the franchise, should we incentivise good performance or only penalise poor performance?

Good performance should be a requirement of the franchise, and therefore should not lead to a reward. Exceeding franchise requirements should be met by increased passenger revenue, in itself a reward for the franchisee. However, there might be circumstances where some sort of reward may be appropriate although this would not necessarily need to be financial.

Penalising poor performance should certainly remain in the franchise terms and conditions. This should include all aspects of rail accessibility for disabled passengers and their travel companions (including friends and family), whether it would be through assistance, stations and rolling stock accessibility, staff training, consistent and easily accessible information, disabled passengers consultations or response to (and actions on) their feedback.

10. Should the performance regime be aligned with actual routes or service groups, or should there be one system for the whole of Scotland?

There should be one system to record punctuality and performance for the whole of Scotland, and that is to say that lateness should be recorded when trains arrive after published arrival times at each station (including intermediate stations). However, there might be a need for slightly different compensation criteria, to cover frequent moderate lateness and single instances of significant delay. Different services will also have different issues.

11. How can we make the performance regime more aligned with passenger issues?

Lateness must be recorded as anytime after the scheduled arrival time at each station (including intermediate stations). Trains should not only be considered late after 5, 10 or 30 minutes, but any time PAST the published schedule [although see Q10 reply for compensation issues, which could understandingly vary between a 5-minute or a 45-minute delay for instance). Punctuality is of extreme importance for disabled passengers, as any lateness

would impact on assistance, follow-on travel plans, etc, which tend to require more time and much more organisation than for other fellow passengers. The same problems apply to reliability. For both punctuality (lateness) and reliability (cancellation), the real time information is crucial for disabled passengers, both on the way to or at the stations and on the trains, in accessible ways to suit every range of needs.

Again, a strong mechanism to obtain the views of disabled passengers regularly and respond to them (see Q6) will be the only way to ensure that the performance regime is more aligned to passenger issues.

The performance regime itself should not only include punctuality and reliability but also service quality, as this is an integral part of the travelling experience. A train might never be cancelled and never be late, but if it or the stations it goes through are not accessible, or if the accessible toilets on the trains are not working, or if assistance is either not available and does not meet the needs of the disabled passenger, or if information for / on these journeys is not accessible to all, these would all be indicators of bad performance. These are just some of the issues that would directly impact disabled passengers using the railway.

12. What should the balance be between journey times and performance?

There should not be a choice between journey times and performance. However, for disabled passengers, performance is of the outmost importance, from punctuality and reliability to service quality, and must always come first.

13. Is a Service Quality Incentive Regime required? And if so should it cover all aspects of stations and service delivery, or just those being managed through the franchise?

SQUIRE has already led to a marked improvement and we believe that such a Service Quality Incentive Regime is definitely required. This should cover all the aspects of the stations and service delivery, including accessibility to all, as all these aspects affect disabled passengers and their travelling companions.. Responsibility should be clearly defined too, to avoid any problems between stations owners and franchisees if they are different so that issues can be dealt with in a speedy manner.

14. What other mechanisms could be used for assessing train and station quality?

Feedback from disabled passengers, as outlined in Q6, is as important as the independent Service Quality Incentive Regime, and could help shape any future changes in the regime. Feedback from disabled people who do not use (or have stopped using) the services would also be very helpful. Physical accessibility as well as accessibility of information, assistance and ongoing disability awareness staff training, both in the stations and on the trains,

should all be considered.

Scottish train services

15. Can better use be made of existing train capacity, such as increasing the permitted standing time beyond the limit of 10 minutes or increasing the capacity limit? What is an acceptable limit for standing times on rail services?

Although we do recognise that there is a capacity issue on many services, the consultation ignores the difficulties caused to disabled passengers by crowding, lack of appropriate seating or space, restrictions of train access and movement within the train as well as on the platforms and in the station. In our view, capacity limits should certainly not be increased. Standing time of any length, as well as the related crowding, is simply not acceptable for disabled passengers.

16. Should the number of services making use of interchange stations (both rail to rail and rail to other modes) be increased to reduce the number of direct services? What would be the opportunities and challenges of this?

No, direct services are very important. Each additional change in a disabled person's journey adds difficulties related to access, complicated even further if this is between two modes of transport rather than from one train to another. Buses/coaches and trains do not have the same assistance services, and while one mode of transport might be accessible, the other one might not. Interchange should ideally be reduced rather than increased, and a great deal of work needs to be done at current interchange hubs to make them easier to use for disabled passengers. We would also like to highlight that this concern from greater fragmentation will also affect other passengers, such as elderly people and those travelling with children or carrying substantial luggage. There is also always a greater risk of delays and disruption with consequences on subsequent legs of the journeys.

Where interchanges cannot be avoided, particularly between different modes of transport, support from staff should be available throughout at all times.

We would also like to point out that table 4 on page 34 of the consultation is missing Inverness as an interchange station.

17. Should Government direct aspects of service provision such as frequency and journey time, or would these be better determined by the franchisee based on customer demand?

We agree targeted specification will be the best solution, but this must still come with rigorous requirements, including on the frequency of trains and core journey times as well as first and last trains, particularly for rural services. In the Central belt and where services are more profitable, first and last train journeys as well as weekend services should still be set as minimum requirements, along with a restriction on forced interchanges. Requirement for

the presence of trained staff to provide assistance throughout the day on weekdays and at weekends should be set for all lines.

18. What level of contract specification should we use for the next ScotRail franchise?

See Q17

19. How should the contract incentivise the franchisee to be innovative in the provision of services?

There should be enough flexibility together with the essential requirements described above to give the franchisee enough freedom to provide innovation, particularly when using collaborative working. We would hope that the new franchisee will consider innovative ideas (in consultation with disabled passengers) to make sure all stations and all trains eventually become accessible to everyone, bringing the franchisee more business and more revenue. Incentives to achieve this target of total accessibility throughout the network would be appropriate, particularly for proactive rather than merely reactive approaches to make railways more accessible.

Scottish rail fares

20. What should be the rationale for, and purpose of, our fares policy?

There should be a consistent fare policy across Scotland and for all passengers. Fares need to cover a fixed proportion of train operating costs across Scotland while maintaining basic affordable accessibility on life-line routes. Any companion scheme in Scotland, such as concessionary travel for companion of visually-impaired passengers, should be regulated so that they are consistent nationwide. Split fares should not be cheaper, or shorter journeys more expensive than longer ones, regardless of any commercial basis. This makes understanding tickets and fares more complicated and less accessible. Some concessions, such as 50% of fares for people travelling in their wheelchair, can only be purchased at (staffed) stations (during working hours). This can be very restrictive for wheelchair-users who live from their closest stations, or whose local stations are not accessible. Other fares are only available online, which is problematic for passengers unable to use the internet. There should be a much greater consistency between fares, with no distinction between what is available online or at the station. If this was to be regulated, it would certainly increase accessibility to rail travel for disabled passengers and their travel companions.

21. What fares should be regulated by government and what should be set on a commercial basis? Do your recommendations change by geographic area (the Strathclyde area example), or by type of journey (for example suburban or intercity)?

See Q20.

22. How should we achieve a balance between the taxpayer subsidy and passenger revenue contributions in funding the Scottish rail network? At what rate should fares be increased, and how feasible would it be to apply higher increases to Sections of the network which have recently been enhanced?

There should be no link between fare increase and improvement work. Enhanced sections / stations will increase revenue by providing a better service.

23. What should the difference be between peak and off-peak fares? Will this help encourage people to switch to travelling in the off-peak?

Although we understand the need for peak/off-peak in busy areas, which might help ease overcrowding, there should still be regulations for peak as well as off-peaks fares, as travelling off-peak might not be an option for many people. At some stations in order to get staff assistance, disabled passengers who might have otherwise tried to travel during off-peak period might have to travel closer to peak times. Peak times should also not get so expensive that commuting to work will cease to be a viable option.

Scottish stations

24. How should we determine what rail stations are required and where, including whether a station should be closed?

Any station closure would have to be considered very carefully and with consultation of regular users, disabled passengers and the local community. Proximity or usage of stations should not necessarily be used as criteria. Any replacement would need to be fully accessible to all to ensure its long term viability. It would also need to be fully integrated with accessible means of transport and be situated in an accessible location.

25. What are the merits or issues that arise from a third party (such as a local authority or local business) being able to propose, promote and fund a station or service?

Final responsibility for the station should remain with the franchisee. Any third party would need, like the franchisee, to adhere to the Equality Act. The third party should consult potential disabled passengers/customers, take into consideration disabled access and offer a fully accessible service and/or station. All their staff would also need ongoing disability awareness training.

26. Should only one organisation be responsible for the management and maintenance of stations? If this was the franchisee how should that

responsibility be structured in terms of leasing, investment, and issues relating to residual capital value?

Only one organisation should be responsible for the management and maintenance of the stations, to ensure the best service and care, and to provide more consistency.

27. How can local communities be encouraged to support their local station?

They should be encouraged to integrate the station fully in the community. Parking at and bus services to and from the station, as well as accessible services in the station and accessible local amenities close-by can make a big difference.

28. What categories of station should be designated and what facilities should be available at each category of station?

Stations do not fall easily into separate categories. Regardless of which categories they would be considered in, they should all strive to be fully accessible, including physical access to the building and the trains, as well as providing accessible information and assistance.

Free accessible parking should be available at all stations, as well as drop-on/off facilities, regardless of the station categories, as many disabled passengers have no other way to get to and from the station.

Accessible toilet facilities should be provided in (or as close as possible to, and then very well sign-posted,) all stations, regardless of any category or type of trains/lines. Some disabled passengers might need more frequent access to such facilities, or might have been on trains where accessible toilets were either unavailable or out of order.

Information boards are indeed very useful but should always be accompanied by voice announcements, and both should be kept updated. The information given through both these means should be consistent. Help points should be available and clearly marked at each station, particularly if the station is not staffed at all/certain times or gets very busy.

Integration of public transport is indeed very important, but in order to do this, all modes of transport involved must be accessible. There must also be very clear signage in and around rail stations to indicate where the bus stops, taxi ramps, drop-on/off areas and parking are located.

Although this section of the consultation briefly commented on the accessibility of stations, there is no question directly related to this in the consultation document.

We note that "of the 350 stations in Scotland [...] 73% have step-free access to and between platforms and can be considered accessible". 73% is unacceptable. This shows a severe restriction in access to railway for disabled passengers. It must also be pointed out that this only refers to step-free access, and not full accessibility for all, including hearing and visually-impaired customers. There are also major regional differences, where some

lines may have several accessible stations, while others have hardly any, such as the line between Inverness and Aberdeen. Some important stations are still only barely (if at all) accessible, such as Aviemore. There is a considerable amount of work needing to be carried out to get the Scottish Rail Network accessible to all of its population and visitors.

Access improvements should be prepared and decided on after consultation with relevant disability groups. They should be checked and monitored after completion to ensure that they indeed improved accessibility, and are maintained adequately. The franchisee, with responsibility for minor access improvements, would have to consult fully not only on the work that had been decided, but in the process of selecting which improvement works should be carried out. It would be appropriate and advantageous for MACS to be involved in this process and in the setting of priorities. Disabled passengers, disabled groups and relevant local access panels should always be consulted directly as well, and might be able to give valuable insights before, during and after the improvement works have taken place.

Cross-border services

29. Should cross-border services continue to go north of Edinburgh? In operating alongside ScotRail services, how do cross-border services benefit passengers and taxpayers? And who should specify these services, the Department of Transport or the Scottish Ministers?

Yes, cross-border services should continue to go North of Edinburgh.

As we've already pointed out in Q16, connectivity between trains for non-direct services doesn't only add time to the journey of disabled passengers, but has a considerable impact, adding difficulties related to access having to transfer from one train to the other and requiring assistance to do so.

This would also involved two different franchisees, which could complicate matters further.

Edinburgh Waverley is already a difficult interchange hub to negotiate for disabled passengers. Any additional connection there would lead to an increase in the need for assistance, and might cause more crowding at the station, which in itself will also restrict even more accessibility to disabled passengers and their travel companions.

As we pointed out in Q16, many of these issues would also affect other passengers, such as elderly people and those travelling with children or carrying substantial luggage.

There would also always be a greater risk of delays and disruption with consequences on subsequent legs of the journeys (see Q11). Any lateness or cancellation would impact on assistance, follow-on travel plans, etc, which tend to require more time and much more organisation than for other fellow passengers.

We would like to reiterate that any unavoidable interchanges should be supported by assistance from trained staff in sufficient numbers to cover all passengers requiring help.

30. Or should the cross-border services terminate at Edinburgh Waverley, allowing opportunities for Scottish connections? And if so, what additional benefits would accrue from having an Edinburgh Hub?

This option is unacceptable, cross-border services going north of Edinburgh are essential. See Q29 for detailed reasons.

Rolling stock

31. What alternative strategies or mechanisms could be used to reduce the cost of the provision of rolling stock?

No comment

32. What facilities should be present on a train and to what extent should these facilities vary according to the route served?

Some facilities, such as on-board catering, would vary with the route served as this is more applicable to longer journeys. In such cases, at-seat or trolley services should be available, as many disabled passengers would have great difficulty moving along and onto other carriages.

Any "facilities" or features enabling access should be required regardless of the route or the train.

There should be priority seating available for disabled passengers. At least 1 wheelchair space but ideally two should be present in each car. The space should not be used for anything else such as luggage or bikes (as is the case in some types of trains operating in Scotland), but could include folding seating that can be used when the space is not required by wheelchair users. These wheelchair spaces should not be a mere parking area, but should provide the same environment as conventional seating (heated, with a table if available, electric socket if available, etc.). These spaces should also be faced by standard seats to allow for travelling companions/friends/family. Accessible toilets in working order are also a necessity.

The rolling stock should be fully accessible, that is to say not only adapted for wheelchair users, but easy to use for visually- as well as hearing-impaired passengers, with real-time announcements both visual and through the speakers. Sufficient spaces for guide/assistance dogs should also be available in the priority seating section.

When trains break down/are going through maintenance, it is crucial to have up-to-date reliable and accessible information about any replacement buses/coaches, with additional assistance staff. These replacement vehicles must be fully accessible and able to accept guide/assistance dogs as well as wheelchairs on board.

Passengers – information, security and services

33. How should we prioritise investment for mobile phone provision and / or Wi-Fi type high-bandwidth services?

They should both be provided, with as consistent a coverage as possible. These would not only allow passengers to work on the train but would offer additional audio and visual sources of communication and information for disabled passengers.

34. How should we balance the need for additional seating capacity and retain the flexibility of a franchisee to offer first-class services if commercially viable?

As well as being a source of profit, First-class helps to offer a different service on longer journeys (including at-seat complimentary food and drinks in some cases), although this service should also be clearly defined when buying tickets, both for weekdays and weekends. However, this should not come at the expense of second class seating and when overcrowding occurs in second class while some first class seats are unoccupied, second class passengers should be allowed to use first class seats. This would help towards resolving overcrowding on parts of otherwise less busy routes.

35. What issues and evidence should be considered prior to determining whether or not to ban the consumption of alcohol on trains?

A ban on the consumption of alcohol on all trains in Scotland is certainly not a solution, and would affect unfairly reasonable well-behaved passengers who might want an alcoholic drink during long journeys. Bad behaviour and/or excessive drinking often start before boarding the train. We would rather encourage more effective on-train and at-station policing, rather than such a blanket ban. This would help passengers feel safer on trains, at the stations, and travelling using rail in general. Bullying and other types of harassment against disabled passengers would not be solved by a ban on alcohol and should be equally strictly policed.

36. How can the provision of travel information for passengers be further improved?

We are concerned with paragraph 10.27 of the consultation describing the on-board displays on trains, and indicating that on trains which do not have such displays, audible announcements are provided. It is imperative in order to provide information to all passengers, including visually-impaired and hearing-impaired customers, that both visual (on-board displays) and audio (audible through PA systems) announcements are made on board all trains. Both systems should be checked regularly to ensure that they remain in working order, and both should provide the same real-time accurate information.

All information in general should continue to be available in alternative formats, with online and printed versions, as well as being available from appropriately trained staff at stations, on the train and on the phone. Information should be accurate, consistent and regularly updated.

There should be much more consistency in providing information about bus

connections, taxis and other services, with clear signage at all stations.

All unmanned stations should be provided with freephones and/or help points to access information, as well as information boards and audible announcements.

All stations in general should use both information displays and audible announcements so that visually- and hearing-impaired passengers, as well as their fellow passengers, can all easily be kept informed.

Caledonian Sleeper

37. Should we continue to specify sleeper services, or should this be a purely commercial matter for a train operating company?

Sleeper services must be specified and both Lowland and Highland sleepers should continue to be provided, stopping in the same stations as they do presently, without any additional requirements for connection. As we have already addressed in Q16, and again in Q29, connectivity and additional changes do not only add to journey times but also seriously impact the journey of disabled passengers, adding difficulties relating to access and additional assistance. This would be further complicated if changes between two modes of transport were required to be made (see our response to Q16 for further details).

38. Should the Caledonian Sleeper services be contracted for separately from the main ScotRail franchise? Or should it be an option for within the main ScotRail franchise?

If a separate franchise was to be established, this franchise would need to abide by the same terms as the main Scottish franchise regarding punctuality, performance, services, disabled access and equality considerations. This separate franchise would have to provide the same consistent and ongoing Disability Awareness Training for its staff. This service should be well integrated with the rest of the network, and might also benefit from the London terminal being moved from Euston to Kings Cross / St Pancras allowing onward travel to the continent.

Should the sleeper services be part of the main ScotRail franchise or be a separate franchise, return tickets offering sleeper services one way and daytime ticket the other way should be implemented (as well as returns using only the sleeper services).

39. We would be interested in your views in the level and type of service that the Caledonian Sleeper Services should provide. Including:

- What is the appeal of the Caledonian Sleeper Service, and if there were more early and late trains would the appeal of the sleeper services change?

- What is the value of sleeper services to Fort William, Inverness and Aberdeen and are these the correct destinations, for example would Oban provide better connectivity?
- What facilities should the sleeper services provide and would you pay more for better facilities?

The Caledonian Sleeper Service is an easier, accessible, and direct mode of transport linking both the Highlands and the Lowlands to London, saving valuable day time, and providing an alternative to air travel.

Additional early and late trains would not discharge passengers in Inverness, Fort William or Aberdeen at a viable time for onward journeys, and would therefore be of limited value. These three destinations are all used by disabled travellers, with further onward travel as required. Current intermediate stops would need to be preserved. Facilities such as parking at destinations and intermediate stops should help to promote the service.

Facilities as well as the services on the train should as ever be accessible to disabled passengers, with staff appropriately (and regularly) trained. If several classes of accommodation were to be instigated, a wheelchair accessible option for each class should be made available, and guide/assistance dogs should remain welcome in all classes.

The current accessible cabins have many positive points. The cabins can fit one wheelchair, and are located next to the accessible toilets. The cabin itself is as accessible as it can be considering the tight space available. Food and drinks can also be ordered from the attendant while staying in the cabin.

These positive aspects should be used as a basis to build on for much needed improvement with the next franchise. The current accessible facilities are often let down by door malfunctions, either of the cabin door or the accessible toilets. This must be remedied not only by daily checks and appropriate maintenance, but by working out a permanent solution so that these problems stop occurring. Accessible cabins are limited to one or two per trains. This must be increased, ideally to one wheelchair-accessible cabin per carriage.

Such cabins do not occupy much more space than standard cabins, and can always be used by non-disabled passengers if not required on a night when the rest of the standard accommodation is fully booked.

Environmental issues

40. What environmental key performance indicators should we consider for inclusion in the franchise agreement or the High Level Output Specification?

MACS cannot comment on this issue.