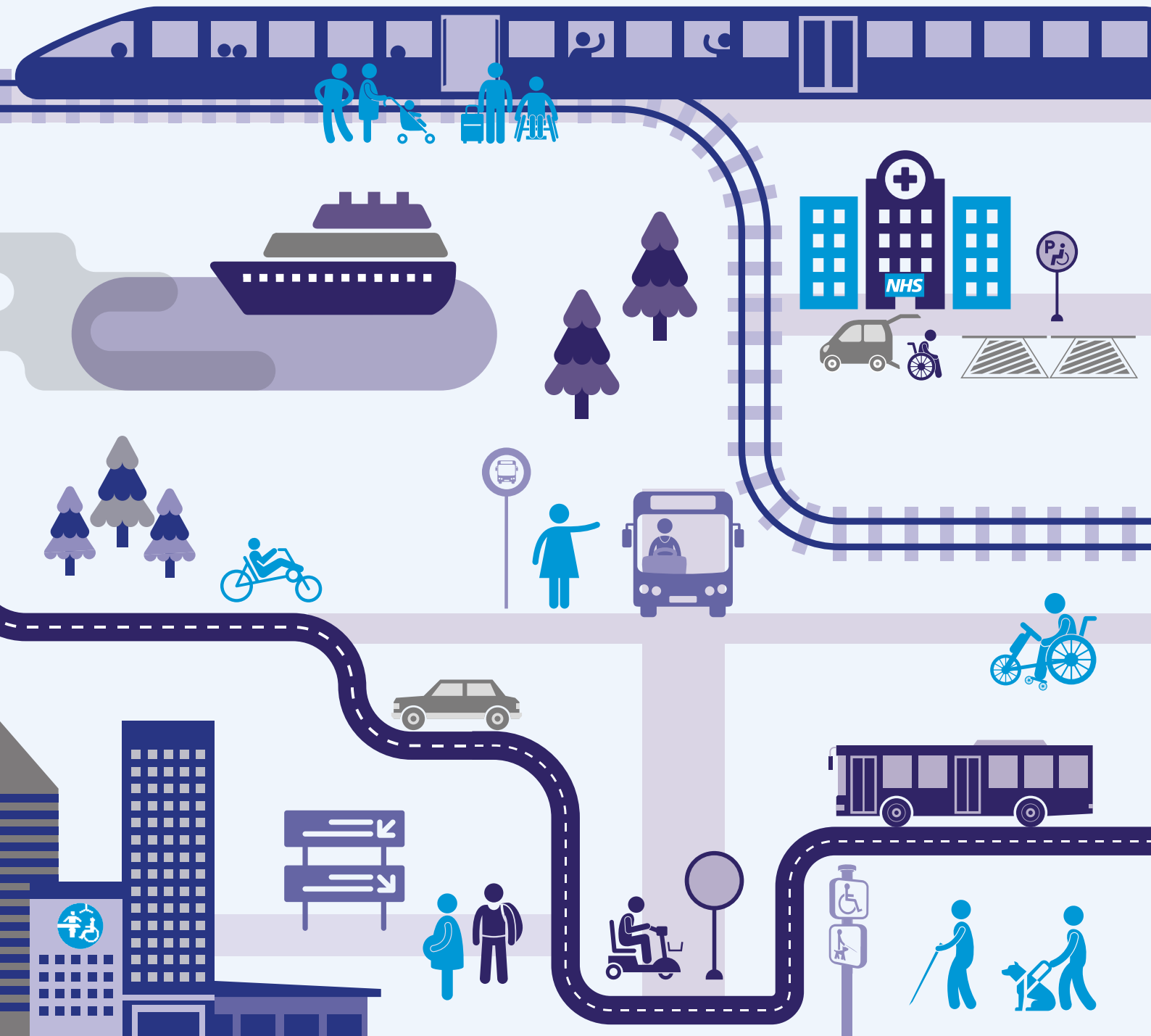
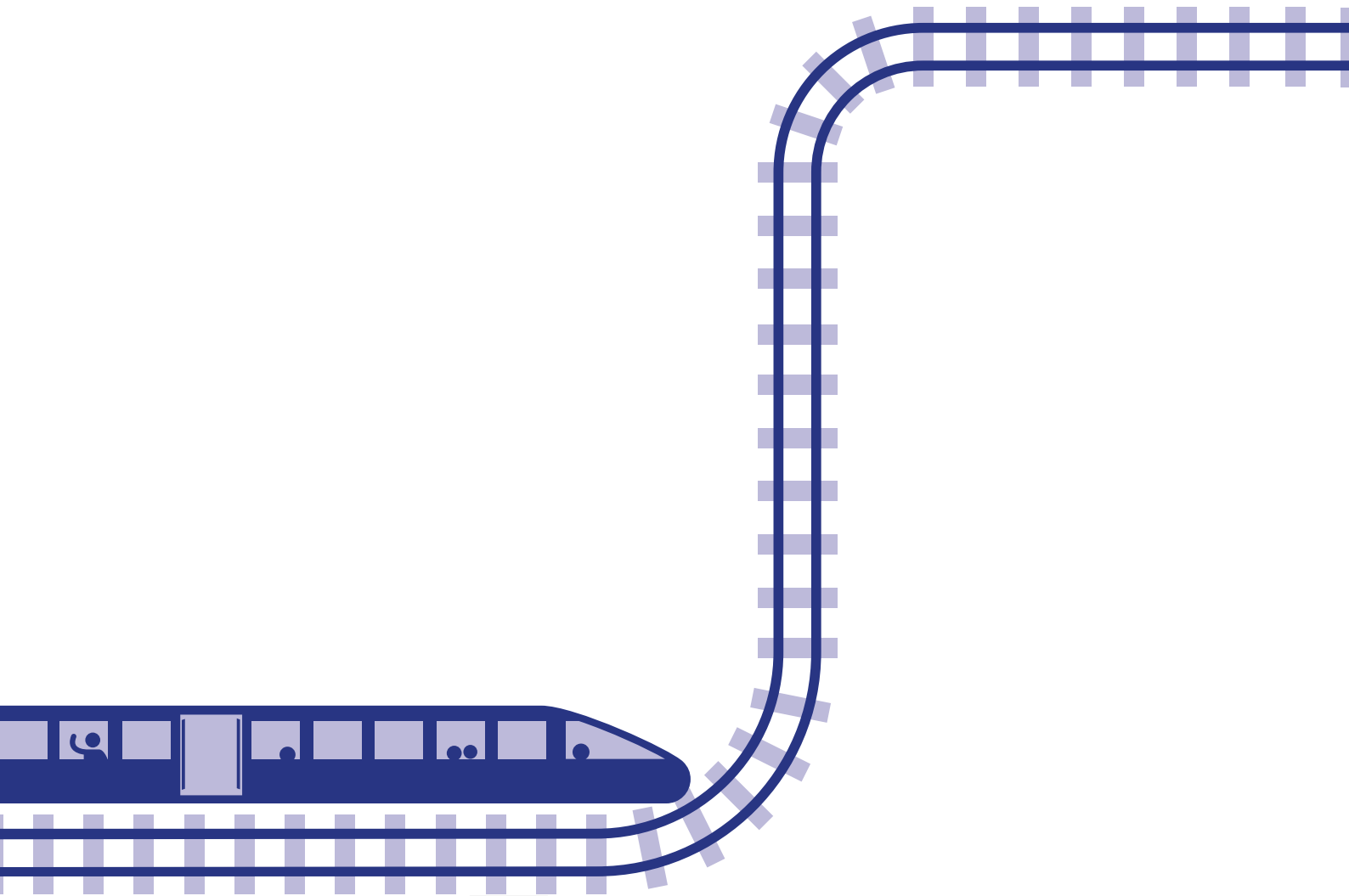
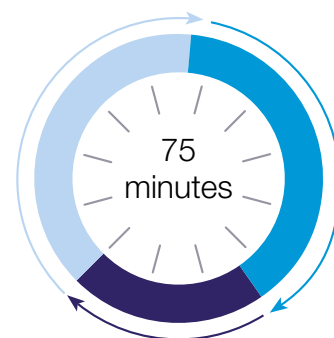


Mobility and Access Committee for Scotland Annual Report 2022-2023





Contents



60
minutes

Focused Read

1: How MACS works	02
2: Conveners Introduction	04
3: Responding to the Climate Emergency	08
a. 20% reduction strategy	09
b. Low Emission Zones	10
c. 20 minute neighbourhoods	10
4: Strategic Plan: key engagements and achievements	12
a. Objective One	15
b. Objective Two	19
c. Objective Three	20
d. Objective Four	21
e. Objective Five	23
5: Workstream Leaders Top 3 Highlights	25
a. Planning and Strategy	26
b. Bus and Community Transport	27
c. Ferries and Aviation	28
d. Rail	29
e. Roads, Infrastructure and Active Travel	30
6: Ministerial Engagements	32
7: Other Key Activities	36
a. Work with Scottish Government on Transport to Health and Social Care	37
b. Fair Fares Review	38
c. Monitoring and Evaluation through improved data collection	40
8: Four Nations	41



10
minutes



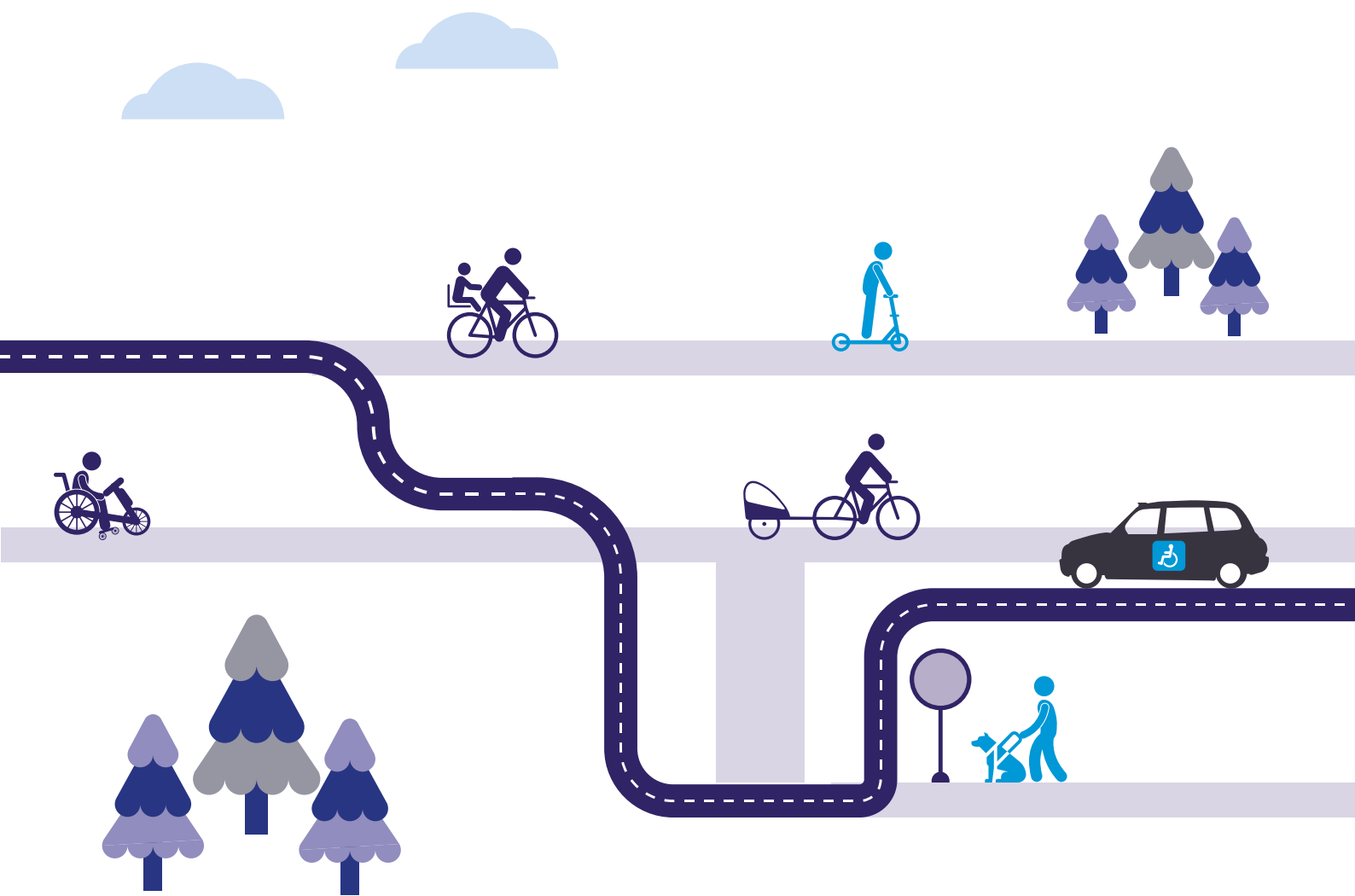
5
minutes

Background Reading and Scoping Activities

9: Development Days	43
10: Scoping Day	45
11: Team Sessions (Knowing me, Knowing You)	48
Finally	
12: To Finish	50
Appendix One: Consultations and Engagements	53
Appendix Two: Committee Structure and Areas of Engagement	54

1

How MACS works



How MACS works

The Mobility and Access Committee for Scotland (MACS) is a non-departmental advisory public body. Within the founding legislation the Scottish Ministers have defined the overall aim for MACS as follows:

MACS consider such matters relating to the needs of disabled persons in connection with transport as the Committee think appropriate and give advice to Scottish Ministers.

In doing so, the Convener aims to ensure, that MACS' policies and actions supports the wider strategic policies of the Scottish Ministers. This aligns with the Framework Document between MACS and Transport Scotland (TS), our Sponsors.

MACS' Strategic Remit is:

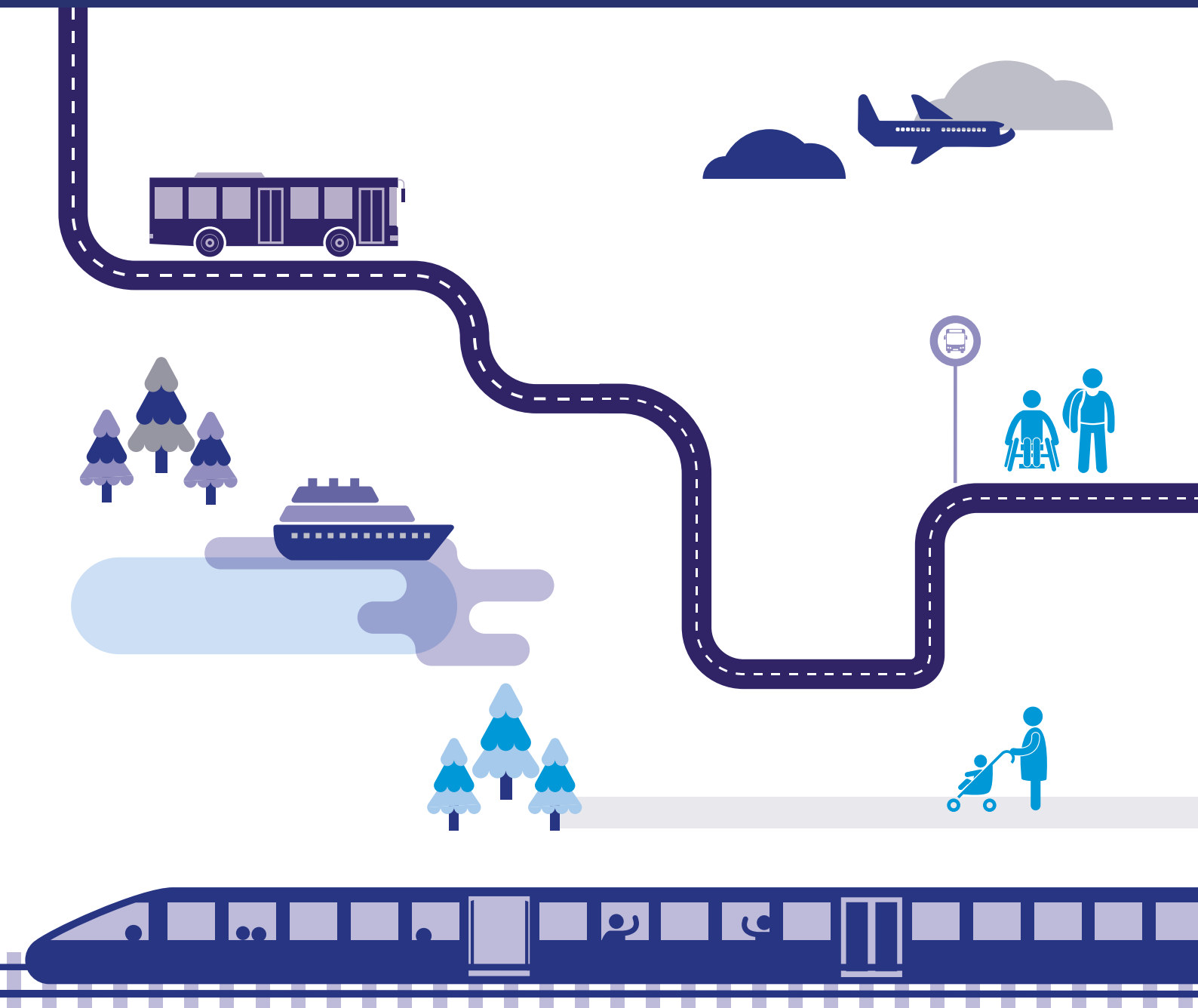
- To give Scottish Ministers advice on aspects of policy, legislation and practice affecting the travel needs of disabled people.
- To take account of the broad views and lived experiences of disabled people when giving advice.
- To encourage awareness amongst disabled people in Scotland of developments which affects their mobility, choices and opportunities.
- To work closely with SG and ensure our work programme complements the work being undertaken by the Inclusive Mobility and Transport Committee (IMTAC), the Disabled Persons Transport Advisory Committee (DPTAC), the Scottish Human Rights Commission, the Equality and Human Rights Commission (EHRC) and other organisations, voluntary and statutory.
- To promote the travel needs of disabled people with designers including transport planners and operators so that these are fully taken into account in the development of vehicles and infrastructure and delivery of services.
- To monitor and evaluate the effectiveness of our work against the above aims and objectives in improving travel opportunities for disabled people in Scotland.

MACS Vision

MACS believes in a Scotland without the barriers that isolate and exclude disabled people from making their choice of successful door-to-door journeys.

2

Convener's Introduction



Convener's Introduction

The Scottish Government (SG) and public bodies in Scotland have committed to meeting their statutory duties under the Equality Act (2010) including through the Public Sector Equality Duty (PSED). MACS has worked tirelessly this year to hold organisations to account and ensure compliance with the PSED, which includes the need to:

- a.** Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- b.** Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it: and
- c.** Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

I feel it is important to pull this message out at the start of this year's annual report, as we have found that organisations normally focus on Part A of the PSED around eliminating discrimination but don't put as much focus on Part B, which is to advance equality of opportunity between persons who share relevant protected characteristics and those who don't and Part C, which focuses on fostering good relations.

The PSED obliges public authorities, and those carrying out certain public functions, to have due regard, when exercising their functions. These 3 areas are known as the general duty.

In many policies and strategies there is recognition of a difference between the policy intent and the reality on the ground for people accessing and using services – a persistent, growing and recognised 'implementation gap'.

Unless the upstream conditions (early engagement in design and agreed success measures, what it will look like/feel like, how it will improve access/reduce inequalities) are meaningfully tackled, progress will be limited to trying to pick up the consequences of consequential inequality.

This 'implementation gap' can be seen to arise in multiple ways and at different points through the continuum of policymaking – between engagement, intent, design, delivery and ultimately – user experience.

Three broad themes normally emerge in relation to policy intent and implementation:

1. Policy design can in isolation be good yet fail to recognise the context in which it is then applied – either in relation to other existing policy strands, the wider deliverables or what is actually delivered for everyone, including those sharing protected characteristics as defined in the Equality Act 2010.

This can result in a lack of confidence and trust between the organisations involved in delivery – across national government, local government, agencies, service providers and the voluntary sector.

2. This appears to be caused in particular by a lack of true empowerment and meaningful engagement with those the policy or strategy is aimed at.

We know this as we frequently see the need for greater evaluation of what has worked, what has not worked and why. We normally see this well into projects, as success measures have not been agreed before project start, as they should be.

3. This would suggest that policymaking is not being led enough by people's needs and by existing evidence, with insufficient effective use of data and evidence (including lived experience) in decision making and policy design. People perceive that there is a lack of an independent voice, scrutiny, and challenge, with a fear of failure throughout the system preventing inclusive and innovative approaches to delivery.

The broader economic and fiscal context does not excuse the persistent **'implementation gap'** in Scotland – between policy intent, delivery and people's experiences.

MACS has focused a great deal of our work this year into raising awareness of the "implementation gap", also parts A, B and C of the PSED.

Only when this approach is mainstreamed and evident in all public bodies' "Equalities Outcomes Reports" can we hope to move forward in a fair and just way and deliver a transport system and network that is **A**vailable, **A**ccessible and **A**ffordable for all. This in turn will "close the mobility gap", while reducing inequalities.

Before moving into the body of this report I would like to thank my Team, a board of 15 individuals who work tirelessly for our cause and whose combined efforts are far greater than the sum of their parts. They know this and they get it!

Each of my 15 team members bring a vast amount of knowledge, experience and skills to their role and combined are a force to reckon with. A board of **"human right defenders"** who take every opportunity to speak up for the needs of disabled people so no one is left behind.

I would also like to thank the policy teams within Transport Scotland and the stakeholders we have engaged with this year, and there are many! Thank you for working so productively with us to deliver much needed change.

I would also like to thank Scottish Government Ministers for always having an 'open door' to MACS and for being so receptive to our asks aimed at improving transport and travel for disabled people and older people.

Our journey continues but we give you our commitment that our work will focus on the delivery of a transport system that is accessible, easy to use and affordable for all. We know that to deliver this we also need to keep our focus on the pedestrian infrastructure and inclusive environments, tackling the barriers within the first and last mile, which will also assist with reducing social isolation and loneliness. To approach this, we have strengthened our workstreams in these areas and our team stands ready to work for you and with you all to get the job done.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Linda Bamford', is displayed on a light grey rectangular background.

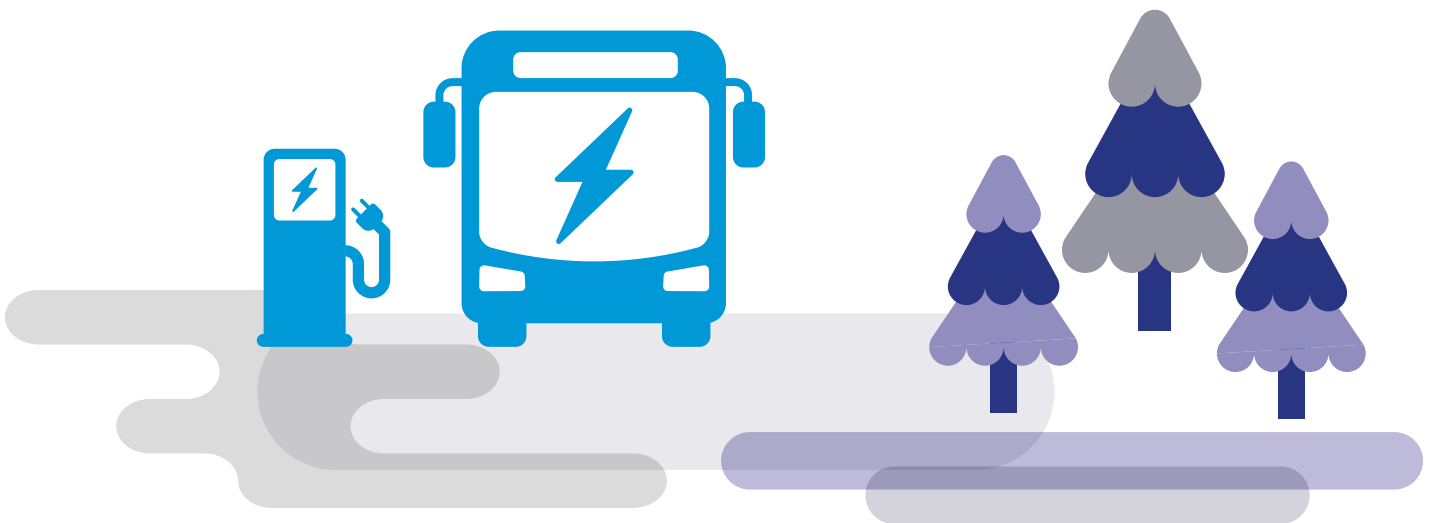
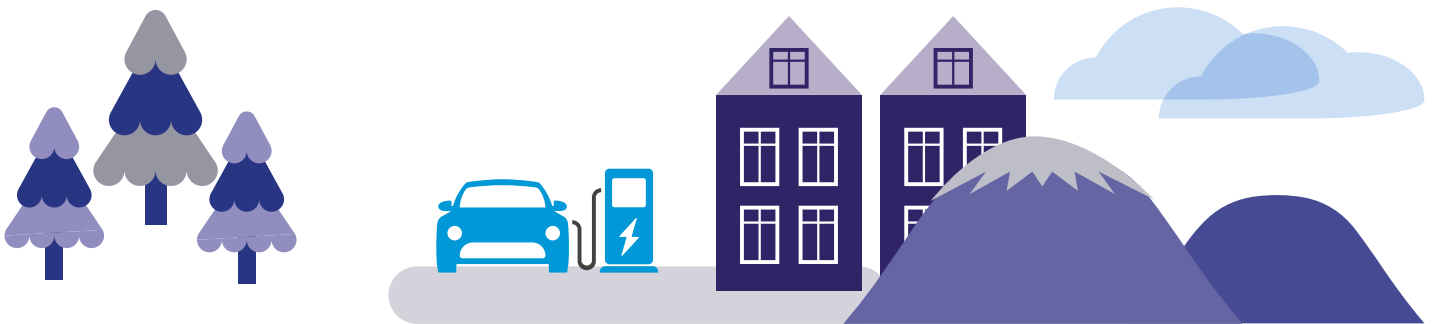
Linda Bamford

National Convener

Mobility and Access Committee for Scotland (MACS)

3

Responding to the Climate Emergency



Responding to the Climate Emergency

Following the previous year's push in terms of addressing the Climate Emergency, which included the hosting of the COP 26 and the Scottish Government (SG) entering a cooperation agreement with the Scottish Green Party (the Bute House Agreement), focus in this area has remained high.

During this period MACS continued to engage across ministerial portfolios to seek to ensure that disabled people are not left behind as we plan for a just transition to a greener future with more sustainable transport options for everyone.

MACS will continue to push that we not only have to look at disabled people's needs as standalone issues but also to ensure that we tackle the climate emergency through the lens of equality and inclusion.

20% reduction strategy

It is well documented that transport is Scotland's biggest contributor to climate change, emitting over a quarter of all our greenhouse gas emissions. Within this, the largest share of transport emissions comes from cars, accounting for 38%.

The SG's Climate Change Plan update in 2020 included a world-leading commitment to reduce car kilometres by 20% by 2030 (against a 2019 baseline). By rethinking how we use our cars and reducing the number of daily journeys we take, we can help make Scotland a healthier, fairer, greener place to live and significantly contribute towards Scotland reaching net zero.

MACS is supportive of the reduction in use of fossil fuels in transport, including the proposed 20% reduction in car km target for 2030. However, alternatives to the car need to be accessible to disabled people. It must also be recognised that many disabled people do not have the option of non-car use because of either poor infrastructure design or inaccessible or unaffordable public transport options. Inclusive designs of infrastructure and service delivery, as well as exemptions, must be made for disabled people where necessary.

As such MACS will continue to ensure that we are vocal that transition plans to reduce reliance on cars (i.e. reduce car kms by 20% by 2030, modal shifts, behavioural change) do not inadvertently disadvantage disabled people who rely on their car as a mobility aid. We need to ensure these plans include accessible walking and wheeling infrastructure (current active travel plans have a heavy focus on the needs of cyclists including in infrastructure design). MACS scrutiny, guidance and advice need to be clear on disabled pedestrians' needs, i.e. the need for accessible infrastructure designs that are well maintained, well lit, have unobstructed paths and pavements with ample dropped kerbs and enforced pavement parking bans.

Low Emission Zones

Low Emission Zones (LEZs) will be formally introduced in the city centres of Aberdeen, Dundee, Edinburgh, and Glasgow. Enforcement in Glasgow will be from 1 June 2023 (with an additional year for residents within the zone), while enforcement in Dundee will begin on 30 May 2024. Enforcement in Aberdeen and Edinburgh are expected to begin 1 June 2024.

MACS, as shown in our consultation response back in 2020, have been fully supportive of the roll out of LEZs. We believe they will positively impact the environment, improving air quality, which can improve health inequalities and encourage people to think about active travel and other public transport options, whilst helping reduce emission and the carbon footprint.

We did however note that for many people, especially travelling from rural areas, public transport may not be an option with the only option for travel being a private car. MACS also suggested the LEZs proposals consider the impact on accessibility for disabled people within low emission zones and the need for local authorities to carry out Equality Impact Assessments (EqlAs) to ascertain the likely impact to disabled people in particular and others within protected characteristics in general.

MACS notes with satisfaction that there is the exemption of the approximately 250,000 Blue Badge holders from the LEZ proposals and MACS members took part in workshops in relation to trialling the exemption process.

MACS attended a virtual session via MS Teams in February where blue badges holders could assess the system at an early stage and provide feedback in order to shape how the final system will look and feel. Testing included using the Exemption System through a website, testers completing a personal feedback form and a group discussion.

20-minute neighbourhoods

The concept of the 20-minute neighbourhoods has been spoken about for a number of years and in the UK Poundbury is one of the first developments to showcase this lifestyle. The benefits of this type of living are many;

- residents can become more active, which can improve their mental and physical health
- general traffic is reduced which improved air quality
- local shops and businesses can thrive with more 'footfall' on their doorstep and residents can mingle and chat with their neighbours (which can reduce social isolation and loneliness).

The global pandemic has changed the way we live and work in a number of ways with more and more people choosing to continue to work from home, using public green (parks) and blue (river/canal) spaces they often didn't realise was within easy reach of their home, walking and wheeling and/or cycling more instead of using their cars and connecting more with friends and neighbours.

Generally, the main characteristics of a 20-minute neighbourhood are ones that include a safe, accessible and well connected network for pedestrians including those walking and wheeling and cyclists. The space will offer high quality, safe open spaces with good access to services that support local living and working.

MACS welcomes this approach to designing neighbourhoods. We previously reported (in our work during 2021 to 2022) on the 20-minute neighbourhood concept. We carried this work out in partnership with the Alliance Health and Social Care Academy (the Alliance) and Disability Equality Scotland (DES) and the findings of this focused work remain current and should be used as a reference point as this policy area progresses. A link to this report can be found below:

[Visit Exploring Scotland's 20-minute neighbourhoods: final report](#)

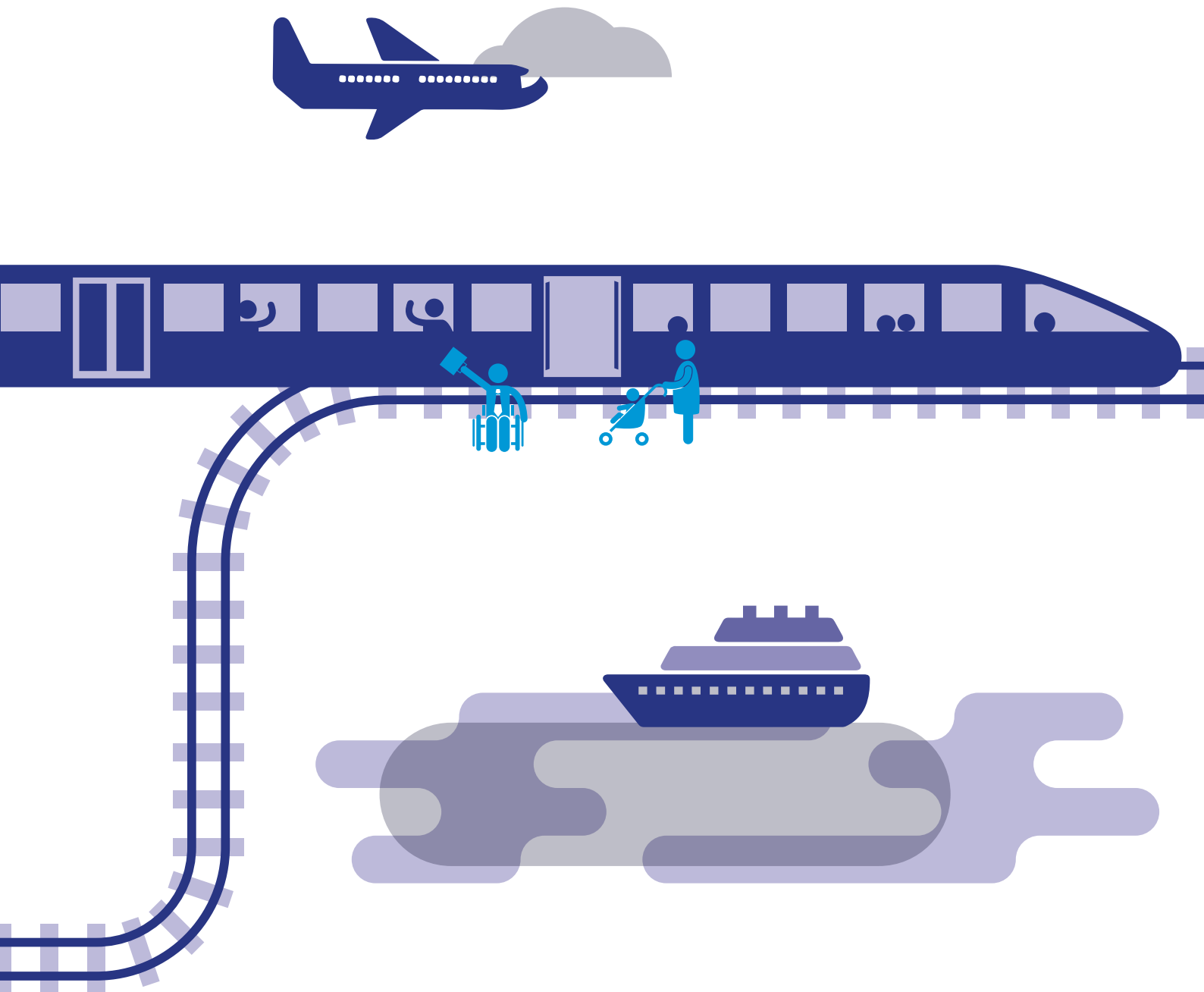
In short, everyone irrespective of age, ability or gender should be able to access the goods and services they need daily and within 20 minutes of leaving their home. Vital services, which were the mainstay of the High Street and are quickly disappearing may prosper within neighbourhoods that are actively used by all the community.

MACS believe the following recommendations need to be considered:

- Appropriate accessible infrastructure must be in place to allow everyone to access the facilities they need within 20 minutes. This includes good quality pavements with dropped kerbs and controlled crossing points.
- Accessible housing needs to be provided to allow disabled people the opportunity to live close to amenities and services and remain in the communities they choose.
- Disabled people are involved in the design and/or guidance associated with 20-minute neighbourhoods within their local area.
- Equitable access needs to be provided to the green and blue spaces within the 20-minute neighbourhood area.
- Any cycle networks are accessible in that they can accommodate non-standard cycles, trikes etcetera and where possible the cycle routes are separate from pedestrian routes.

4

Strategic Plan – key engagements and achievements



Strategic Plan – key engagements and achievements

MACS' work plan sets out an overview of the Committee's planned work for a 12 month performance period (1 April to 31 March) to ensure alignment with Programme for Government (PfG) commitments (to support the wider strategic policies of Scottish Ministers and Government), to give advice to assist with the progress of the National Transport Strategy 2 (NTS2) and the Accessible Travel Frameworks (ATF), and to focus on progressing towards the delivery of the agreed five high level objectives from MACS Strategic Plan.

MACS Strategic Plan: Five High Level Objectives 2021 to 2024

Objective One: To build on the commitments in Programme for Government (PfG) to promote a fair, accessible and inclusive Scotland.

Objective Two: To work across Cabinet and Ministerial portfolios to ensure the need for an accessible transport system is recognised and cited as an enabler.

Objective Three: To ensure that the Scottish Government makes it clear that public bodies and local authorities have a duty to respect the legislation regulating improvements of the accessibility of public transport service provision and the surrounding infrastructures.

Objective Four: To advocate for engagement with MACS when developing or revising policy, plans or contracts by officials to gain expert advice and ensure accessibility is given a priority consideration. This includes using procurement and franchise opportunities when awarding contracts to promote accessibility in transport provisions.

Objective Five: To advocate for an effective and inclusive “just transition” in our review of the National Transport Strategy, the Accessible Travel Framework and supporting strategic plans and route maps. Our reviews will acknowledge progress, identify barriers and gaps and make recommendations to assist with the delivery of these commitments as we make transport more accessible and sustainable.

These five high level objectives are derived from MACS Strategic Plan for 2021 to 2024 and have been agreed by MACS Committee Members prior to seeking approval from the Minister for Transport.

The work plan covers the following areas necessary to deliver on our strategic remits and progress our objectives:

- Engaging with disabled people (listening, learning and advocacy)
- Engaging and collaborating with key stakeholders (providing advice, challenge, and scrutiny)
- Engaging with Scottish Ministers and providing advice on the travel needs of disabled people.
- Responding to consultations and calls for evidence (advocacy)
- Providing guidance and scrutiny to the National Transport Strategy (NTS2) and the Accessible Travel Framework (ATF)
- Developing and learning as a Committee, and
- Monitoring and reporting on our performance.

During 2022 to 2023 MACS prioritised and engaged more intensely in the following areas:

- Closing the Mobility Gap through the National Transport Strategy (NTS2), the Strategic Transport Projects Review (STPR2), the National Planning Framework (NPF4) and the Accessible Travel Framework (ATF)
- Making active travel work for disabled people, including through Transport Scotland's Active Travel Delivery Plan
- Motability and the Scottish Government's Accessible Vehicle and Equipment Scheme (AVES)
- Transport to Health and Social Care, including the NHS Recovery Plan commitments in Programme for Government.
- Demand-Responsive Transport, including highlighting inequalities with the National Entitlement Card (concessionary travel) and taxi schemes (linked to tackling inequalities and reducing the mobility gap)
- The Connected Scotland Strategy and advocating the role of Available, Accessible and Affordable public transport provision to enable human rights, keep people and communities connected and reduce social isolation and loneliness, and
- The National Islands Plan and Islands Connectivity Plan.

The above areas will link to developing policies such as Mobility as a Service and Mobility Hubs.

Objective One

To build on the commitments in Programme for Government (PfG) to promote a fair, accessible and inclusive Scotland.

To help deliver this priority MACS secured a number of cross-portfolio meetings with Scottish Ministers and Officials throughout the year to ensure progress towards PfG commitments. We used these engagement opportunities to amplify the voices of disabled people and give advice on what needs to be done to make transport and travel (and all it enables) Available, Accessible and Affordable (MACS Triple A check).

MACS continue to work from PfG and use these commitments as an anchor and lever for our work and in the scrutiny and advice we provide in supporting Ministerial policies.

As a large part of our work on this we have continued to use external engagements, consultation responses and core key messaging to better understand and work with stakeholders to progress identified areas of PfG. Some key examples of this are below:

- Closing the Mobility Gap through the National Transport Strategy (NTS2), the Strategic Transport Projects Review (STPR2), the National Planning Framework (NPF4) and the Accessible Travel Framework (ATF)

During the year MACS advocated for the revival of the Transport Equalities Network (or similar) to assist and ensure the work to “reduce inequalities”, in line with the first pillar of NTS2, continued to be progressed and was measured through a meaningful performance and evaluation framework, our asks are now being progressed by Transport Scotland (TS).

We also responded to the consultation on the review of the STPR2 and our contribution can be found at the link below:

[View Mobility and Access Committee for Scotland Response to Transport Scotland's consultation on the Strategic Transport Projects Review April 2022](#)

MACS also sought opportunities to build our relationship with the Minister for Public Finance, Planning and Community Wealth, Tom Arthur MSP. This allowed us to influence the National Planning Framework and developing policies. Our approach was well received by the Minister, and we now have a beneficial relationship to work from.

In 2022 to 2023, in discussion with the Accessibility Team within TS, we voiced and noted our continued frustration and concerns at the lack of progress (and evaluation) of the Accessible Travel Framework particularly as it now enters the final third of a ten year strategy. We are hopeful that we will see a more focused approach emerge during 2023 to 2024, which needs to include an evaluation of the previous actions and detail measurable deliverables for the remainder of the framework.

- Making active travel work for disabled people, including through Transport Scotland's Active Travel Delivery Plan

During the course of the year, we explored inclusive active travel initiatives which advocate a just transition for disabled people as we work towards the Scottish Government's Programme for Government commitments to reduce car kilometres by 20% by 2030 to help tackle the climate emergency.

As part of this, a questionnaire regarding the availability of non standard bikes and ebikes for public hire was sent to 32 Local Authorities; to gather information to inform the advice MACS give to Scottish Ministers and TS. This information will also inform our discussion with wider stakeholders and had been requested as a result of concerns that have been raised with us by the disabled community in Scotland. They feel there is a lack of affordable opportunities to hire bikes and ebikes through onstreet hire schemes, including those cited at transport termini, near greenspaces and tourist attractions. We will look to publish the results of this piece of work later this year.

We have also continued our involvement in the **Inclusive Design Guidance in Town Centres and Busy Streets**. We have representation on the working group for this piece of work, which has been reviewed and edited to align with existing Transport Scotland productions. A draft for review was issued in February and a future meeting with the working group will be scheduled later this year. We have submitted comments to the leading officials expressing concerns about a number of changes. It is MACS' opinion that it is important that the original document is not diluted in any way. This is a particularly important document in that it will look to ensure and promote town centre are inclusive – irrespective of age, ability or gender.

MACS have frequently met with Sustrans Scotland to raise concerns about the evaluation of the **Spaces for People (SfP) Programme**, which stated that 53% of people supported the scheme, whereas MACS understand the level of support differs from area to area.

MACS also queried this evaluation with the Office for Statistics Regulation who agreed to contact Sustrans Scotland directly. Future engagement will be arranged with Sustrans Scotland moving forward.

- Motability and the Scottish Government Accessible Vehicle and Equipment Scheme (AVES)

MACS have continued to look closely at the **Motability** scheme over the course of this year. In particular we are concerned that the 10.1% uplift to disability benefits in 2023 will result in another windfall to Motability with disabled scheme customers losing out. As a result, we formally asked Motability and Scottish Ministers to intervene to ensure that this is rectified.

Links below point towards our published briefing on Motability and our letter to the Chairman of Motability Operations:

[View Motability: a Briefing Paper on value for money by the Mobility and Access Committee for Scotland](#)

[View Mobility and Access Committee for Scotland Letter to Chairman of Motability Operations](#)

MACS have also continued our involvement in the Scottish Government AVE Scheme including assisting with the evaluation of potential new delivery partners alongside monitoring and evaluation. More information on this can be found in section 5 under our Planning and Strategy highlights.

- Transport to Health and Social Care, including the NHS Recovery Plan commitments in Programme for Government.

MACS have been somewhat frustrated at the slow progress on this area of work and therefore it remains as one of the areas at the forefront of our thinking and work as we move forward. Over the past year we have had meetings with Scottish Government Health Directorate and Transport Scotland officials, including one with the Cabinet Secretary for Health and Social Care which has appeared to finally have us moving in a more positive and productive direction.

At the meeting with the Cabinet Secretary, we were assured that this work will be taken forward and MACS would be included closely to help shape the workplan for driving much needed change. More information on this area of work can be found later in this report including section 6 covering Ministerial Engagement and section 7, which includes information on our other key activities.

We hope to give a more favourable update in the coming year on further progress as this piece of work develops.

- Demand-Responsive Transport, including highlighting inequalities with the National Entitlement Card (concessionary travel) and taxi schemes (linked to tackling inequalities and reducing the mobility gap).

Under this area of work Committee members have been in continual dialogue with officials from the Future Transport Unit in relation to Fair Fares Review initiative. MACS recognises the importance of this piece of work so are pleased to have been given the opportunity to feed in our comments. In August, we attended a meeting which briefed us on the review. You can read our position on this further in the report under Section 7, which covers key areas of work.

MACS also held a development day focused on Taxis, covered later in this report, which looked at lived experience and the range of transport options in relation to Taxi services and providers.

- The Connected Scotland Strategy and advocating the role of **A**vailable, **A**ccessible and **A**ffordable public transport provision to enable human rights, keep people and communities connected and reduce social isolation and loneliness.

The triple A, Available, Accessible and Affordable, remains at the forefront of the vast majority of the work we do as a Committee. In particular we see transport as a key enabler of progressing equality and human rights. We held an extremely beneficial session focusing on this which included input from members of the Committee and representatives from Human Rights Commissions in Scotland and the UK.

More information on this session can be found in Section 9, which covers our Development day. This session was particularly useful in understanding other organisations roles and where we as a Committee can feed in and work together to promote the critical role transport plays as an important enabler of human rights.

- The National Islands Plan and Islands Connectivity Plan.

MACS attended meetings of stakeholders of the Island Connectivity Plan. Firstly, it is noteworthy that MACS is seen as a stakeholder, and we feel privileged to be involved in such a key development. The Plan will replace the current Ferries Plan but will have a wider scope. The plan will include a range of Key Performance Indicators (KPIs) and will determine the islands connectivity for the next 25 years. At these meetings we considered the responses to recent consultations including looking at issues which need to be developed further. These include transport connections on either side of a ferry journey, community contracts, and future methodology for consultation exercises.

Work on the Island Connectivity Plan is progressing and as a stakeholder MACS has been invited to comment on the Draft Long Term Plan for Vessels and Ports. This extensive document includes references to accessibility and inclusion.

MACS also joined the Scottish Parliament Cross Party Group (CPG), which looks at Rural Affairs. The CPG has taken as its theme this year 'doing more for less', and one of the meetings looked at initiatives where the community have led on the development of a project.

Our rural and island communities face the unique challenges of an aging population, a shortage of affordable housing, an absent population where the property is a second home which is visited once a year and poor or no public transport links. The speakers talked about an initiative on Tiree as an alternative to Airbnb, Warm Hubs which are centres for local communities to socialise, grass route planning, net zero agriculture and sustainable agriculture. Whilst not specifically covering transport, all the speakers sited poor transport links as one of their project's key drivers.

We also joined the Scottish Parliament CPG on Disability having led the session on transport, this year's other focus included discussing the proposal for a Disabled Persons Commissioner, travelling with assistance dogs and empowering communities to design places and spaces that work for them and meet their needs.

Objective Two

To work across Cabinet and Ministerial portfolios to ensure the need for an accessible transport system is recognised and cited as an enabler.

Under this objective MACS looked to identify relevant Ministers to inform, advise and gain commitment from alongside working closely with colleagues from Transport Scotland to develop inclusive policies, strategies and plans. Given the close links between Objective Two and Objective One, there was a natural progress of both objectives from various Ministerial engagements and wider engagements with TS policy teams.

In terms of Ministerial engagement MACS continues to have a good relationship with Scottish Ministers across the wide range of portfolios and, through our advisory role, we have been able to raise awareness and push for more progress on issues in relation to the travel needs of disabled people. There is a 'Ministerial Engagement' section within this report (section 6), which gives more detail on who we met and what was discussed and agreed to help improve the travel and journey experiences of disabled people.

Our key message in these meetings has continued to be centred around transport being an enabler of human rights and that it is critical to keeping people connected to ensure everyone has equal opportunities and no one is left behind. This is underlined by MACS's Triple A check, that transport is Available, Accessible and Affordable for all.

Examples of other work based around Objective Two:

MACS attended a meeting with the Project Officer from the Transport Scotland Ferries Unit and the Caledonian Maritime Assets Limited technical designer to discuss accessible features on the new Small Vessel replacement programme. From the discussion, it was clear that they are trying to be fully inclusive for disabled ferry passengers, even to the extent of having a stair lift up an external staircase onto the sundeck of the ferry, which was welcome and refreshing.

MACS also hosted a discussion about the proposed Disabled Person's Commissioner. Jeremy Balfour, MSP attended to set the context. MACS are in full agreement with the premise that disabled people have faced heightened inequalities, in all respects since the pandemic.

It's clear to the committee not enough is being done and this needs to be addressed.

A new Disabled Person's Commissioner needs to have suitable powers and levers to effect change. They must work with organisations like MACS, Disabled People's Organisations (DPOs) and disabled people themselves to ensure their work is informed by lived experience.

Human rights must underpin the work of the Disabled Person's Commissioner ensuring effective working with the Equality and Human Rights Commission (EHRC) and Scottish Human Rights Commission (SHRC) to support this approach.

Objective Three

To ensure that the Scottish Government makes it clear that public bodies and local authorities have a duty to respect the legislation regulating improvements of the accessibility of public transport service provision and the surrounding infrastructures.

MACS continued to hold the Scottish Government to account, as an exemplar, in mainstreaming EqlAs in their own work and enforcing the important nature of including this in any grant funding. We engaged with local authorities, public bodies and transport service providers to advocate compliance with their PSED, including the Fairer Scotland Duty (FSD) and the need to conduct meaningful EqlAs before any services designs, changes, developments or withdrawals.

In general progressing Objective Three remains central to MACS engagements. Our key message during discussions with TS and wider stakeholder groups remains the need for public bodies and local authorities to respect the legislation regulating improvements to accessibility and inclusion as this lies at the heart of a just transition.

MACS continue to strongly advocate the effectiveness of early and meaningful EqlAs as part of the impact assessment process. This must be grounded on the values gained through engagement with people with lived experience and listening to/ responding to their needs and concerns to collaborate and coproduce plans and projects.

Example:

The Bus Workstream members met with the lead from Transport Scotland who is managing the Bus Partnership Fund. The Bus Partnership Fund is a £500 million fund from Transport Scotland to look at investing in bus priority infrastructure, to reduce the negative impacts of congestion on bus services. There are currently 11 partnerships being formed throughout the Country. MACS emphasised the requirement for meaningful consultation with groups and ensuring that EqlAs are being conducted throughout the process. It was agreed that Transport Scotland would attend a subsequent Bus Workstream Meeting to provide a further update on the Fund.

We will continue to advocate this approach to identify, mitigate and manage any negative impacts or consequences to disabled people of any changes and/or service developments.

Example:

The Ferries and Aviation Workstream members were invited by TS Ferries Team to participate and give feedback on the best way to approach the EqIA process that would drive the Islands Connectivity Plan. This early engagement resulted in a bespoke engagement process to ensure islander's voices came through in the EqIAs rather than defaulting to a "desktop" assessment being undertaken, more than likely by someone who did not identify as having a protected characteristic.

Objective Four

To advocate for engagement with MACS when developing or revising policy, plans or contracts by officials to gain expert advice and ensure accessibility is given a priority consideration. This includes using procurement and franchise opportunities when awarding contracts to promote accessibility in transport provisions.

Under this objective MACS continued to seek policy opportunities to give expert advice to ensure accessibility was front and centre to improve transport accessibility and design more inclusive infrastructures. MACS looked to work constructively with officials and wider stakeholder groups to design inclusive plans, which would form the frameworks for future developments such as the NTS2, STPR2, Islands Delivery Plan and Islands Connectivity Plan to name a few.

Example:

MACS were representative on the Island Plan Delivery Board, where we advised and discussed how forthcoming financial opportunities/investments could ensure they meet the PSED, have meaningful EqIAs and ensure lived experience and the needs of people sharing protected characteristics was captured in the submissions for funding and the assessment of the funding applications. This was an interesting piece of work in terms of talking to Scottish Government officials on this topic and explaining some of the challenges faced by disabled people living on our islands.

MACS was also represented on the Transport Equality Network (TEN), attending meetings where we were given an update on work that is coming forward over the next few months. This group has not met for quite a while, but it was pleasing to see that they have a robust plan of work ahead of them including the Transport Just Transition Plan, Mission Zero, NTS2 and Transport Inequalities and poverty report. Through MACS persistence a group with a similar remit to the TEN will be revitalised in 2023. More information on these reports can be found at the links below:

- [View Just Transition A Fairer, Greener Scotland: Scottish Government response](#)
- [View Mission Zero for transport](#)
- [View National Transport Strategy 2](#)
- [Read Transport and Poverty in Scotland Report Poverty and Inequality Commission](#)

Example:

Our Rail Workstream Members also met with a number of designers over the past year including Cameron Bridge and Leven stations on the new Levenmouth line to assess and advise their accessibility. The Rail Workstream Members also visited the Glasgow subway depot to examine the new rolling stock due to come into service this year. The designs were a marked improvement on the existing ones, although we noted access issues remain at 13 of the 15 stations.

Of note in relation to rail, MACS was offered and accepted a seat on the National Rail Advisory Group, which will advise The Transition Team on an accessibility policy for the new Great British Railways.

The Convener attended the first Scottish Rural and Islands Transport Community (SRITC) Board meetings. The agenda included finalising the terms of reference, scope, and skills of the board, receiving an update of the developing strategic plan with a focus on the 6 Big Asks.

The full report can be viewed at the link below:

[View Spotlight on Rural Islands Transport by SRITC June 2022](#)

The report was prepared in response to the launch of the NTS2 consultation phase and contains the findings that emerged from 3 virtual workshops convened and facilitated by SRITC between March and April 2022. MACS participated in these workshops.

The full report concludes by presenting six “Big Asks” of the Scottish Government. The Board will meet formally every quarter (and ad hoc if required), which will provide the opportunity for board members to influence and advise on the work of the SRITC, which focuses on the transport needs of rural and island communities.

The Planning and Strategy Workstream Leads also met with the Chair of the Poverty and Inequality Commission to discuss how both public bodies can work together to address the Value for Money (VfM) aspects of the current Motability Scheme including what options are available to put further pressure on Motability Operations to return profits to customers and revisit the lease cost model to generate less profits (from overcharging customers).

The timeframe for this work was key to influence the need for those in receipt of Adult and Child Disability Payments, Disability Living Allowance and Personal Independence Payments to retain the Cost of Living 10.1% uplift to their disability support payments, rather than Motability Operations automatically taking this and adding further to their profits and reserves. People need this money 'in their pockets' to help with current financial pressures.

Under this umbrella, MACS also supported Scottish Government officials with the process to consider new accredited partners to deliver the Accessible Vehicle and Equipment Scheme in Scotland (AVES) alongside Motability. MACS were invited by the SG to form part of this group and with monitoring and evaluation of customer experiences.

During this year we also met with the Scottish Director for the Community Transport Association (CTA) and discussed the CTA's Sector Report that includes recommendations on transport to health, the future development of Minibus Driver Awareness Scheme (MiDAS) and the importance of ensuring those with lived experience are part of the training, the Bus Taskforce and the current issue around the reimbursement rate for volunteer driver expenses.

Objective Five

To advocate for an effective and inclusive 'just transition' in our review of the National Transport Strategy (NTS2), the Accessible Travel Framework (ATF) and supporting strategic plans and route maps. Our reviews will acknowledge progress, identify barriers and gaps and make recommendations to assist with the delivery of these commitments as we make transport more accessible and sustainable.

MACS continued its work to review and scrutinise the progress of the ATF and the NTS2 on an annual basis to help identify progress, barriers and make recommendations aimed at escalating the delivery of the commitments. MACS have always made themselves available to work closely with Transport Scotland policy areas to input to the scope and design of their work. We will continue to work across TS Policy Teams to promote that accessibility and inclusivity is at the heart of their work to reduce inequalities.

Under this objective, several members attended the Transport Scotland and Disability Equality Scotland (DES) Webinar looking at defining the next delivery plan for the remaining three years of the ATF.

This followed on from one to one meetings with the MACS Convener and the Project Lead from DES (sponsored by TS) looking at the last 6 years of the ATF, if outcomes matched expectations and discussing what the future of the framework should prioritise. The draft report is due at the end of March 2023 and a further meeting is scheduled for May, before the final report is produced.

On attending the webinar on the ATF in early Feb 2023 (hosted by Transport Scotland and DES), MACS shared their findings and feedback from engagements with the disabled community. This included voicing their frustrations at the lack of progress around ATF and the lack of direction or measures.

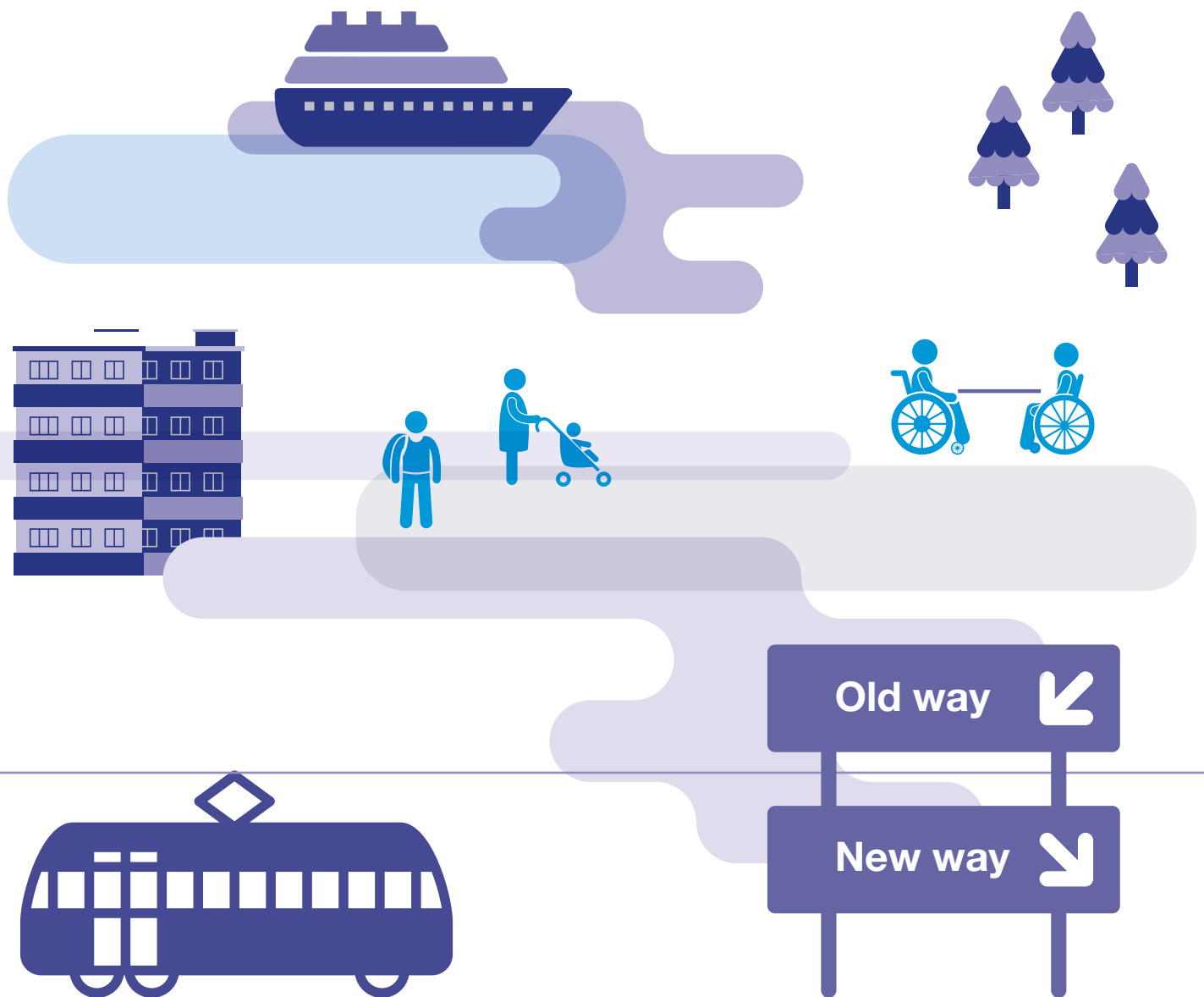
In terms of the ATF Annual Delivery Plan, MACS will continue to offer our assistance in terms of advice and helping structure the delivery plan to see out the final three years of the 10 year framework. We will also continue to offer our advice and scrutiny through the ATF Steering Group attended by both MACS Convener and Vice Convener.

Finally, following discussions with the TS Director of Strategy and Analysis it was agreed that the TS Team would further explore how MACS links into the work of around NTS2 and the role of the previous Transport Equalities Network including the need to resurrect a “format” of this group.



5

Workstream Leaders Top 3 Highlights



Workstream Leaders Top 3 Highlights

Planning and Strategy

This work stream is co led by David Hunter and Linda Bamford and the membership is made up from all Workstream Leads.

1. The **'just transition'** has increasingly become the key theme of our strategic work. Scotland has adopted ambitious targets for reducing carbon emissions and embracing a 'net zero' economy. The 'just transition' means that it must work for everyone. A key component of this transition is that disabled people and their mobility needs are properly taken account of.

For example, the Scottish Government has set an ambitious target to reduce private car kilometers by 20% by the year 2030: we need to ensure that disabled people who are reliant on private cars are not disadvantaged by measures to meet this target. And equally important, alternatives to the use of private cars are accessible to everyone so that disabled people can also switch to sustainable travel and contribute to reduced emissions. We initiated useful discussions with the Just Transition Commission on these themes and have undertaken to collaborate with them as new plans for a Just Transition for transport develop.

We commented in detail to the consultation in 2021/22 on the **STPR2**, which sets out the Scottish Government's priorities for capital investment in transport. In December 2022, the final STPR2 was published, with the next steps being to develop detailed business cases and a Delivery Plan.

2. We wrote to the Transport Minister asking that the accessibility and inclusion are key criteria in establishing delivery priorities and preparing these business cases. Many of the STPR2 recommendations have significant potential to improve mobility for disabled people, including improved pedestrian infrastructure, better access to trains and stations and improved ferry and port accessibility giving much more seamless connectivity to island communities.
3. We have continued to seek to influence the **Motability** scheme, which is currently the sole accredited provider of services to the Scottish Government's AVE Scheme. Our concerns over value for money of the scheme were heightened with the publication of Motability Operations' 2022 Annual Report, which showed a profit of £922.9 million as well as a £200 million donation to the Motability charity. We consider it unacceptable that Motability Operations is making a surplus of well over £1 billion, especially at a time of a deepening cost of living crisis.

Moreover, we are particularly concerned that the 10.1% uplift to disability benefits in 2023 will result in another windfall to Motability. The disabled scheme customers do not receive any financial assistance as the whole increase will go to Motability, not the individual. We formally asked Motability and Scottish Ministers to intervene to ensure that this is rectified.

We are also continuing to work alongside Scottish Government Social Security officials to help shape the Scottish AVE scheme. In particular, we are assisting with evaluation of potential new delivery partners, which might be accredited to offer services and with monitoring and evaluation. We have proposed that a Motability Users' Association is established to give Scottish customers a channel to give feedback and influence the developing scheme.

Bus and Community Transport

Audrey Birt led up the Bus and Community Transport Workstream and was joined by Graham Dunn as co lead for this reporting year. Workstream members are Joanne Devitt, Lesley Macinnes and Catherine Barile.

1. In the summer, workstream members met with the Community Transport Association (CTA) to discuss issues around community transport. MACS has a keen interest in community transport as we note that it is a key provision for many disabled people to access their communities including access to support services like health and social care. We were made aware there are concerns centred about rising fuel costs and its impact on costs for members, volunteers and especially users of the service. In many cases in Scotland that increase is not being passed on however this is putting pressure on resources. We learned that volunteers have been disincentivised by the reimbursement of mileage has not having kept up with fuel costs. Unfortunately this is having an adverse effect in relation to the services that can be offered, many of which will be Transport to Health related.

As part of these discussions, we also learned CTA are mapping the Community Transport provision across Scotland which should prove a valuable resource. The first year will only be members but after that they hope to include provision by other community groups who are not members.

They are also working with MiDAS on training for drivers and volunteers:

[View Driver training transformation](#)

We recognise the need for this and reinforced the need for people who live with disabilities to be part of the training.

These meetings have been extremely beneficial in terms of broadening our understanding of issues and have met with CTA on a more regular basis as a result strengthening our stakeholder relations.

2. Members of the workstream attended a successful Development Day session involving Transport for All, Uber, CTA Scotland and Transport Scotland looking at issues for taxi users resulted in some short term and longer term ideas for further action.

Issues included discussing the training criteria/requirements for taxi drivers designed by involving disabled people, influencing legislation regarding taxi provision and how it's implemented in Scotland, amplifying the voice of taxi users and removing barriers for private hire firms like Uber crossing geographical boundaries.

Also, on taxis MACS worked closely with TS and SG officials providing feedback and attending meetings to help feed into the creation of Accessible Taxi guidance for operators.

3. Work stream representatives attended a number of workshops hosted by the Department of Transport (DfT) in relation to preparatory work in relation to the Public Service Vehicle Access Regulations (PSVAR) Review focusing on accessibility features, decarbonisation and the application of PSVAR. These workshops were utilised to seek views and discussions will be ongoing through a Steering Group that MACS will be part of going forward. We look forward to feeding into further discussions this year to progress this.

Ferries & Aviation Workstream

The Ferries and Aviation Workstream continues to be led by the Vice Convener, Hilary Stubbs. Workstream members are Linda Bamford, Naghat Ahmed, Lynsey Shovlin and Heather Still. The members of the Workstream work well together and their interest and knowledge complement each other.

1. The work-stream remained available to assist colleagues in the Ferries and Aviation Teams at Transport Scotland and contributed to several consultations relating to aspects of Aviation.

For example, the work-stream commented on Aviation Consumer Policy and Reform consultation. In this we were able to emphasise the importance of lifeline links to our island communities, the need for safe carriage of wheelchairs, the need to include carers in all decisions and the need to reform the compensation if a wheelchair or other aid is damaged.

2. We were also approached as a stakeholder of the CAA to comment on their consultation about their future role. Unlike many other strategic documents there was little reference to the needs of disabled traveller, so we had scope to advise on these points.

The CAA reviewed the level of service for disabled people and passengers with reduced mobility at 16 of Britain's largest airports over a seven month period to October 31 and reported that only 6 were rated as 'Very Good'. These included Aberdeen, Edinburgh, and Glasgow. This is a pleasing rating and demonstrates the services for travellers with reduced mobility given by these Scottish airports.

3. In last year's annual report the Ferries and Aviation Team reported on the initial progress of the National Island Plan and the Islands Connectivity Plan. During this year MACS has been represented on the strategic development of both initiatives by Hilary Stubbs.

The two initiatives are intrinsically linked and form a 'Golden Thread' which links them to the STPR2, the Programme for Government (PfG), National Transport Strategy 2, Fair Fares Review, and the Just Transition programme.

In all these areas the Triple A (Available, Accessible, Affordable) perspective for disabled travellers is prominent in the development of transport options of the future.

In September 2023, Hilary Stubbs steps down from MACS when she completes her 8 year appointment. Her final piece of work for MACS will be a Development Day for her colleagues and the MACS sponsor team around the theme of accessible ferries.

Rail Workstream

The Rail Workstream is led by Simon Watkins. Workstream members are Michael Tornow, Lynsey Shovlin and Catherine Barile

The past year has continued to be one of change, with the publicly owned ScotRail establishing itself and the third UK Government of the year confirming the creation of Great British Railways (GBR) to succeed the current arrangements UK wide.

1. Last year we reported on our successful bid to get ScotRail to monitor the return of disabled passengers (via Passenger Assist numbers) to rail travel post Covid, as against the return of passengers as a whole. The latest figures that we have shown that, whilst 70% of ScotRail's passengers have returned overall, only 30% of disabled passengers have. We will continue to monitor this situation and use it as a lever to encourage improvements for disabled rail travellers.
2. Platform train ramps have become a big issue over the past year. For safety reasons ScotRail have had to stop using a single ramp for boarding wheelchair passengers and replace them with five different ones, which lock into the five distinct types of rolling stock they possess. Initially the ramps were only deployed at a limited number of stations, but adverse reaction from MACS and other bodies has led ScotRail to propose a second phase of the rollout of ramps, which will incorporate most of the stations that held them before.

3. The Rail Workstream has also been investigating the issue of future rolling stock and level boarding. Level boarding does away completely with the need for platform based ramps as carriages are designed to be lower and have extendable ramps that deploy from the doorways to assist all passengers. We were very encouraged to learn that level boarding would be possible at 90% of Scottish stations without any alterations and that Scottish Government is committed in principle to this for most future rolling stock. A public announcement will be made in due course.

Roads, Infrastructure and Active Travel Workstream

The Roads, Infrastructure and Active Travel Workstream (RIAT) is led by Susan Fulton. Workstream members are Naghat Ahmed, Michael Tornow and Lesley Macinnes.

The team worked to reinforce the need for accessible and inclusive public transport including places and spaces that everyone can access and use – irrespective of age, ability, or gender.

Members of the team worked hard again this year focusing not only on issues relating to the Roads Infrastructure and Active Travel agenda but also helping colleagues in other work streams in terms of delivering change in relation to **Transport to Health and Social Care** and also researching and challenging the amount of profit made by **Motability**, which has a direct discriminatory and adverse effect on disabled people.

Members of the team continued to support colleagues within Transport Scotland providing advice and lived experience on various working groups including but not limited to Roads for All Forum, Safer Speed Limit of 20mph by 2025 Task Group, Cross Party Group on Sustainable Transport, Inclusive Design and Busy Town Centres and Living Streets Inclusive Design Reference Group.

1. An area the team have collaborated closely with colleagues within Transport Scotland is the introduction of LEZs (across 4 cities in Scotland) and in particular the exemption process. MACS was instrumental in ensuring that the registration process for exemptions was not only online but available to phone users as well to offer choice and flexibility. Members of the RIAT team were also involved in the testing of the exemption registration process to ensure that it is accessible.
2. Lived experience of negotiating barriers in relation to transport is something that team members have to resolve on a daily basis, and they brought this experience to various pieces of research; for example, **kerb height study**, **zebra crossings** and **floating bus stops**.
3. The team continues to respond to requests from partner agencies to work collaboratively and share knowledge and best practice; for example, providing

input into the Sustrans Active Travel Strategy. They were also busy responding to numerous consultations and when required challenge identified delays in legislation being brought forward e.g., the **Pavement Parking Bill**.

Throughout the year the team have provided responses to a number of consultations and below shows the diverse range of subjects the team covers.

- PAS 1899:2022, Electric Vehicles – Accessible Charging – Specification
- Tribunals (Scotland) Act 2014 consultation on regulations allocating the new Transport Appeals to the General Regulatory Chamber
- Review of Permitted Developments Rights
- Law Commission – Remote Driving
- Draft Cycling Network Consultation
- National conversation to inform a new dementia strategy: discussion paper.

6

Ministerial Engagements



Ministerial Engagements

MACS again continued its engagement with Scottish Government Ministers across portfolios. This included focused and committee wide discussions.

These meetings are detailed below:

MACS meeting with the Minister for Transport, Jenny Gilruth MSP

At the meeting with the Minister for Transport, MACS raised the issue around the proposed exemptions to the pavement parking ban and restated their position that no streets should be made exempt referring back to our advice note to the Minister (March 2022) and submission to the consultation.

The Minister confirmed that it was her intention to permit local authorities to exempt streets and that December 2023 was the appropriate time for the ban to take effect.

However, she gave assurances that it would only be possible to exempt streets from the coming ban in exceptional circumstances and that no blanket bans would be permitted. The Minister also offered an open door for MACS to come back and discuss any issues when the ban was in force.

In advance of the consultation on the Fair Fares Review, MACS asked that consideration be given to extending concessionary travel to include journeys by rail explaining the background rationale, the benefits to disabled people and the links to other PfG commitments (as well as the links to the Affordable Travel policy within Annex 5 of the Child Poverty Delivery Plan for 2022 to 2026: Bright Start, Best Futures). The Minister welcomed the discussion and explained the fare structures for rail travel, including what was reserved and what was devolved and the challenges facing the industry. The Minister welcomed MACS responding to the Fair Fares Review, which would also capture some of these issues.

Further to the meeting, MACS made a request that “Accessible Travel” be added to the Minister’s portfolio as described on the Scottish Government website, to give a clear line of sight to this area. This was agreed.

Meeting with Cabinet Secretary for Social Justice, Housing and Local Government, Shona Robison MSP

The Cabinet Secretary attended one of the full committee board meetings. The Convener gave an overview of Committee’s work and previous engagements with Ministers linked to the Cabinet Secretary’s Portfolios.

A general discussion took place around the 20-minute neighbourhoods’ aspirations, linked to 2021 Programme for Government, MACS work in this area with the Alliance and DES and also on the consultation on the review of the PSED.

All parties agreed on the importance of accessible pedestrian spaces.

Meeting with Minister for Public Finance, Planning and Community Wealth, Tom Arthur MSP

This meeting covered discussions on 20-minute neighbourhoods and the Town Centre Action Plan Review. MACS set out that they were supportive of SG work on 20-minute neighbourhoods, highlighting the importance of access to local services to disabled people, and asked for detail on how this will be delivered.

The Minister stated that the Revised Draft NPF4 laid at parliament contains a revised policy on local living and 20-minute neighbourhoods and that, subject to adoption, this will form part of the development plan and will be an important factor in planning decisions and key to delivering 20-minute neighbourhoods. The Minister emphasised the importance of acknowledging different contexts and of including the voice of communities to take an inclusive approach and achieve consistency of outcomes.

MACS expressed interest in the potential of developer contributions to support this agenda, helping to deliver local access improvements, particularly for disabled people. Particularly against the backdrop of concerns that appropriate, accessible infrastructure provision is not being delivered with housing development.

The Minister emphasised the importance of inclusion as a central component of 20-minute neighbourhood delivery and the need to deliver places that meet the needs of all members of communities. The Minister confirmed that inclusion and accessibility are being closely considered in the preparation of developing guidance on 20-minute neighbourhoods.

NPF4 Policy 18 – Infrastructure First – addresses the importance of infrastructure provision as a priority and the Minister emphasised that this will be key to the delivery 20-minute neighbourhoods. On developer contributions, the Minister stated that a review of this issue is underway to support the delivery of infrastructure required to create successful places.

MACS noted that the Town Centre Action Plan Review response highlighted the importance of working across multiple sectors and asked how Scottish Government will work with others to improve outcomes.

Key collaborative processes were highlighted as ways to address this including, new local development planning processes, participation requests, participatory budgeting, and community wealth building. The Minister stressed that everything depends on the economic model which can be addressed via a community wealth building approach and the five-pillar model; community ownership and cooperative models as ways to support town centres, local living, retain money within local communities and reduce supply chains, supporting net zero.

The importance of engaging with people with lived experience was collectively agreed and the Minister emphasised the need for planning to move from conflict to collaboration, listening to real voices within communities.

The Minister expressed his desire to keep engaged with MACS on the topics discussed and thanked MACS for their valuable input and role.

Meeting with Cabinet Secretary for Health and Social Care, Humza Yousaf MSP

MACS' Transport to Health and Social Care subgroup met with Humza Yousaf, Cabinet Secretary for Health and Social Care in January, along with officials from the Health Directorate and Scottish Ambulance Services.

The aim of the meeting was to discuss the lack of progress and plan a way forward since the MACS report into Transport for Health and Social Care from December 2019 and the follow up report in March 2020 that made a number of recommendations, as well as the workshop in 2021 organised by the Scottish Government Health Directorate.

Links to these reports can be found below:

- [Read MACS subgroup Transport to Health report](#)
- [Read MACS March 2020 Development Day Final Report Transport to Health and Social Care](#)

It was agreed there would be a draft delivery plan, outlining how to implement the recommendations will be shared with MACS. This would be shared with MACS to discuss, including the possibility of an advisory board or alternatively an implementation group.

It was also agreed MACS and Scottish Ambulance Services will meet for a roundtable discussion on the review of patient transport service data, patient needs assessment, escort criteria and development of a new care strategy.

7

Other Key Activities



Other Key Activities

Work with Scottish Government on Transport to Health and Social Care

This area of work remains a high priority of the committee and whilst there has been a level of frustration at the distinct lack of progress on this, MACS have, this year had promising and productive meetings with Government officials one of which included Humza Yousaf, the then-Cabinet Secretary for Health and Social Care.

The background on this goes all the way back to MACS Report into Transport for Health and Social Care from December 2019 and the follow-up Report in March 2020 that made a number of recommendations as well as a workshop in 2021 organised by the Scottish Government Health Directorate. This event was based on the end of the phase one work and culminated in 9 recommendations.

Following discussions between MACS and Ministers in 2020 it was agreed that the Scottish Government Health Directorate would lead on how best to take forward and implement these recommendations with the formation of a Task Force/Advisory Group being established. This was then explored further with the Cabinet Secretary for Health and Social Care the meeting in 2023.

The first Recommendation of the MACS Report in Dec 2019 was that the Scottish Government should review the operation of patient transport services to promote consistency, quality, and affordability, while ensuring that disabled and older people are not being unfairly excluded from accessing healthcare. This should align with the 4 priorities of the National Transport Strategy and in particular priority areas 1 and 4 (Promotes Equality/Reduces Inequality and Improves Our Health and Wellbeing).

The overarching recommendation of all this work is that **Transport should be built in as an integral part of the care pathway**. The goals are ensuring access to health and social care by better joined up transport and care planning, which needs to include joint working with NHS Boards, Local Authorities, the Scottish Ambulance Service and with the Community Transport Association as key partners planning and care pathway.

The following themes were identified as needing specific focus for future work.

- Accessibility
- Booking Information
- Availability (current procedure and availability of resources)
- Community Transport
- Affordability.

MACS will continue with the work on Transport to Health and Social Care as a priority.

We have had follow up meetings with officials, including one with the Cabinet Secretary for Health and Social Care, which we have been assured that this work will be taken forward, and as such, we look forward to feeding into and helping shape the workplan for driving much needed change, particularly as the NHS remobilised and recovers.

Fair Fares Review

The Fair Fares Review aligns very much with one of MACS' key principles, that transport should be Available, Accessible and Affordable.

From conversations with various Ministers (Minister for Transport, Minister for Active Travel, Cabinet Secretary for Social Justice, Housing and Local Government, Minister for Equalities and Older People) and officials, the Fair Fares review has been cited as the vehicle to deliver affordable transport, to assist with keeping people connected (reducing social isolation and loneliness, improving health and wellbeing) and enabling the modal shift from private car to public transport.

This approach also supports various government policies (Child Poverty Delivery Plan, A Fairer Scotland, National Transport Strategy 2, Low Traffic and 20 minute neighbourhoods, the Sustainable Transport Hierarchy, 20% reduction in car kms by 2030, tackling the climate emergency etcetera).

MACS' position is that to enable the delivery of the commitments and ambitions from these policies and strategies the "Review" needs to keep in scope actions that are bold and break down the financial inequalities between urban, rural and island areas, the cost variance between modes of public transport and assist with making transport more available, accessible and affordable for all. In particular, there should be a focus on delivering affordable public transport options for those who rely on and currently struggle the most to use public transport (disabled people, older people, people on low incomes, island and rural communities).

Of course, the review can also make a vital contribution to tackling the cost crisis, the over riding theme of the recently published PfG.

We recognise that the national bus concession scheme for older people and disabled people is a huge benefit for people in Scotland. It is simple, free and has few limitations in time of travel or geographical limitations (dependent on the availability of bus services). People who require companions to travel can also travel free.

In contrast, concessions for most other modes of travel e.g. rail, taxis (including private hire cars), tram/subway, community transport, ferry, and domestic air, are either a postcode lottery or are largely absent. Moreover, information on what is available is extremely difficult to find in one place.

We appreciate that this is because most concessions applying to such modes are the responsibility of local authorities rather than national scheme although there are of course exceptions; for example blind people travel free by rail nationally (although whether the companion can travel for free too depends on the local authority area).

However, one of our chief hopes for the Fair Fares review is to see a coherent, consistent, and logical set of concessions for all modes in place across Scotland, to remove the 'postcode lottery' and to provide a simple set of concessions, which apply everywhere.

We would also want all concessionary schemes to take a consistent approach to discounts or free travel for carers/assistants as a matter of course. We appreciate that this would be easier to introduce for some modes of travel than for others.

Concessionary travel schemes are of course only one tool to aid affordability of travel. Commercial transport providers have always structured fares to provide a range of discounts and incentives including discounts for:

- return fares,
- child fares,
- family tickets,
- season tickets,
- a range of rail cards (including of course, for disabled people), etcetera.

More recently, the widespread use of smart ticketing has enabled daily fare 'capping' to become common. For example, Lothian Buses' 'tap tap cap' system has a daily cap of £4.40 and a weekly cap of £20.00. Some of these fare arrangements can offer significant savings but may not help some people who are least able to afford them. For example, people who cannot afford to pay the upfront cost of season tickets, or people who use cash, rather than smartcards. This may be similar to the well known problem with energy costs where people who have the lowest incomes may rely on prepayment meters, which exclude them from cheaper tariffs. The distribution of these kind of fare benefits of such commercial schemes is something which Fair Fares Review needs to explore.

We appreciate that the viability of many public transport services, especially but not exclusively in rural areas, is fragile. While we accept this is outwith the scope of Fair Fares Review, it is vital that other measures to boost public transport ridership should be encouraged, which will enhance our aspirations for 'available' as well as 'affordable'.

Most obviously this would involve effective plans to stop buses getting caught in traffic congestion, for example through new Bus Partnership arrangements, which extend and better enforce bus lanes.

No doubt the Fair Fares review will encompass opportunities presented by smart and integrated ticketing, which has the potential to especially benefit many disabled people by allowing seamless ticketed travel, whether this is simply changing from one mode to another or a more fully developed 'Mobility as a Service' (MaaS) type system.

The Fair Fares Review will no doubt take full account of the distinctive needs of rural and island communities, but a full Island Inequality Impact Assessment (as well as Equality Impact Assessment) should form a core part of the Review. This will need to take account of ferry and domestic air fares for both passengers and vehicles and consider the place of Road Equivalent Tariffs (RET).

Finally, we note some ambitious national schemes to promote free or discounted public transport, for example in Luxembourg, Germany and Spain. We hope that Scotland will match such ambitions, and be alert to opportunities for learning from elsewhere, while being bold in its approach.

MACS look forward to hearing more about Fair Fares Review soon.

Monitoring and Evaluation through improved data collection

To assist with monitoring the progress of NTS2 and the ATF, the Planning and Strategy Workstream, had a further meeting with Transport Scotland Analytical Services team.

MACS has collaborated with them previously to determine what data was missing/ needed to be collected as a baseline to monitor disabled people's travel behaviours and to track progress of several transport policies (NTS2, ATF, STPR2, 20% reduction strategy). This built on the initial work to produce the TS Report, 'Disability and Transport' in 2021.

The chief conclusion from the meeting was an explicit request that Transport Scotland publishes a separate version of 'Disability and Transport' every year, to aid longitudinal monitoring of trends, especially on 'closing the Mobility Gap'. MACS also followed up with a letter outlining all the specific suggestions for data improvement we have made.

Moving forward, it is intended to form a small subgroup to continue monitoring evidence, developing MACS' research asks, and to aid continuing liaison and dialogue with Analytical Services.

Four Nations

The Accessibility 4 Nations (A4N) Liaison Group was established by, and involves:

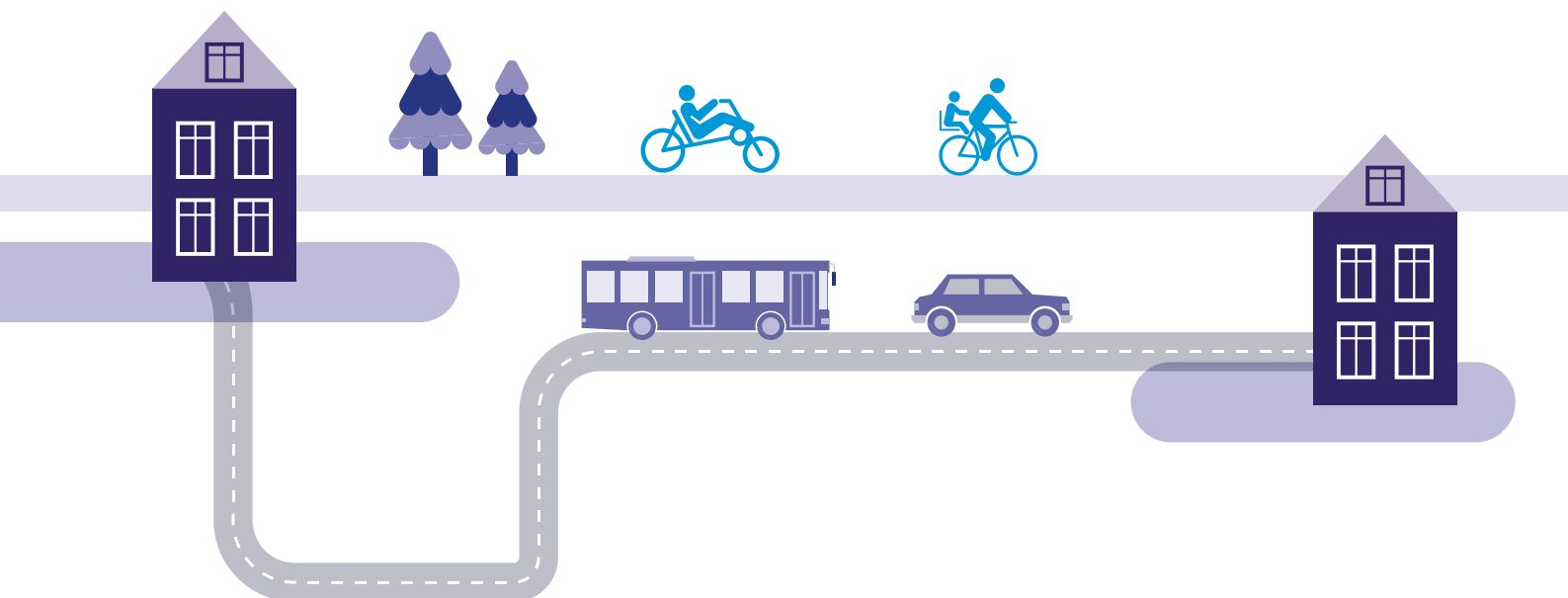
- The Mobility and Access Committee Scotland (MACS)
- The Inclusive Mobility and Transport Advisory Committee (IMTAC).
- The Disabled Persons Transport Advisory Committee (DPTAC)

All three organisations are advisory committees established by Government(s) to provide advice on the travel needs and mobility issues of disabled, and, in Northern Ireland, older people. The Group is also attended by the supporting Government Departments and representatives from Wales. The aim of the Group is to develop closer working relations to ensure the committees can collectively make a significant change and to establish a more joined up approach for working on transport accessibility in the UK.

The group also provides a network and forum for sense checking, sharing ideas, learning from each other and for pulling resources, knowledge and experience to 'push' key areas of work.

DPTAC chaired the last Four Nations Meeting which was held in October. This meeting included updates from DPTAC, MACS and IMTAC alongside updates from the respective government officials in attendance in terms of policy developments and workstreams.

Key areas for cross nation discussion and support included the objections to the continued extensions to Public Sector Vehicle Access Regulations (PSVAR), discussions on pavement parking, taxis and Motability.



9

Development Days



Development Days

Our first Development Day of the reporting year was held on 12 April 2022 and led by the Bus, Taxi, and Community Transport Workstream and looked at lived experience and the range of transport options in relation to Taxi services and providers. Attendees included MACS members, Transport Scotland officials, TAS Partnership (Passenger Transport Specialists), Transport for All, Uber, and the Community Transport Association.

This event included a number of presentations and updates from attendees including the Accessible Travel Framework update, Mobility as a Service (MaaS), Demand Responsive Transport and a lived experience discussion.

The session was enjoyed by all participants and a number of follow-up meetings were arranged to further discuss some of the topics on the day.

The second annual Development Day took place on 13 December 2022 with the theme focused on Progressing Equality and Human Rights. This included members of the Committee and representatives from two Scottish based human rights organisations.

The agenda for the day included three sessions:

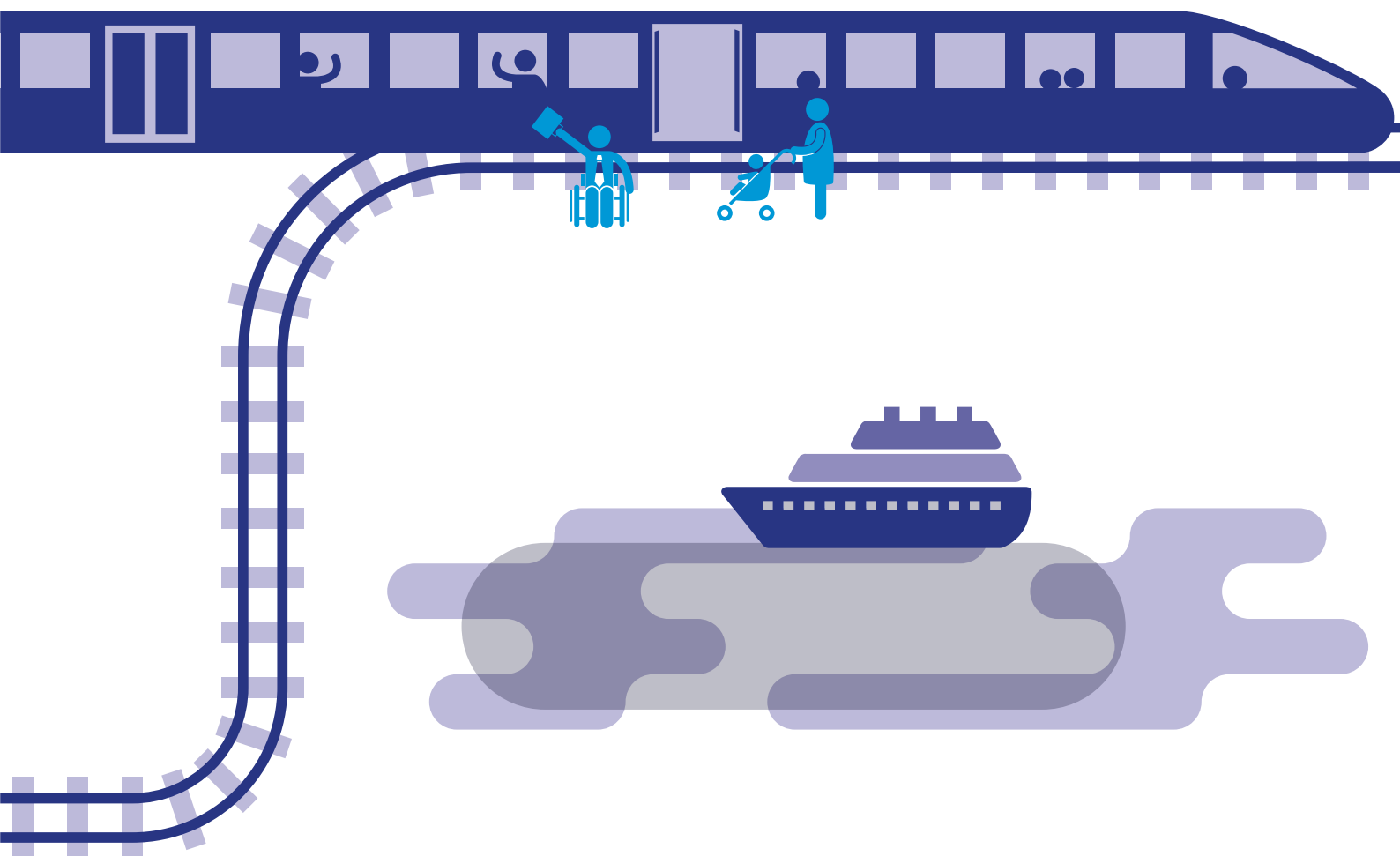
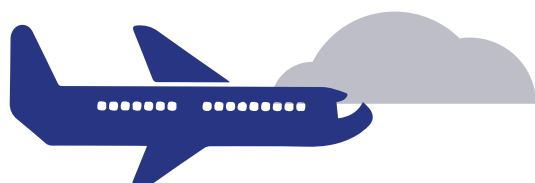
- Session One: Scottish Human Rights Commission (SHRC) – This included an introduction to the SHRC in terms of their role and purpose and then current focus and strategy, especially where it might interface with MACS areas of interest.
- Session Two: Equality and Human Rights Commission (EHRC) – This included an introduction to the EHRC in terms of their role and purpose and then current focus and strategy, especially where it might interface with MACS' areas of interest.
- Session Three: This session acted as a discussion session to see where MACS and these organisations could support and impact shared work.

This day was well received by all who attended. It not only gave all in attendance a better understanding of the various remits of the organisations, it also helped us focus in on the approach MACS takes to promote the critical role transport plays as an important enabler of human rights.

Discussions meant MACS looked at the shared agendas of attendees and considered how we might best help each other to support people we collectively represent, including those who share protected characteristics under the Equality Act 2010.

10

Scoping Day



Scoping Day

In November 2022 we held our annual Scoping Day; this also included discussions with Transport Scotland's Accessible Travel Policy Team in regard to the future of the Accessible Travel Framework and the Delivery Plans for this.

The day also included a session on NTS2 progress and next steps available data/ stats including the Scottish Household Survey (SHS) Report from TS (Disability and Transport) and links to 'Closing the Mobility Gap' as well as the usual review of our workplans to help shape our Work Plan for 2023 to 2024.

NTS2

One of MACS most important roles is to ensure that the NTS2 delivers improvements in accessibility. In launching the second annual Delivery Plan, Minister Jenny Gilruth MSP said:

"Our aim is to continue to work across the country to build and grow a sustainable, inclusive, safe and accessible transport system, helping to deliver a healthier, fairer and more prosperous Scotland."

[View National Transport Strategy](#)

Initially, MACS had a place on the NTS2 Delivery Board, which is chaired by the Minister and oversees its implementation. In addition, MACS were represented on TEN.

However, representation on the Delivery Board ended in 2021 when its membership was re-organised. In addition, the TEN has also not met for some months and is no longer mentioned on Transport Scotland's NTS2 pages. MACS therefore sought clarification from TS on how MACS can perform its key task of 'critical friend', ensuring that the NTS2 delivers for disabled people.

In the role of monitoring progress, MACS previously formally asked TS to commit to publishing 'Disability and Transport' (first published in 2021) as well as carrying out a programme of other research. This is essential if we are able to tell if Scotland is succeeding in 'Closing the Mobility Gap' over time.

Accessible Travel Framework

The ATF published in 2016 remains a critical component of the transport strategy. This has also produced Annual Delivery Plans, and Disability Equality Scotland is assisting with monitoring progress in its implementation, which is due to report initially in March 2023. However, over the past year, MACS has confirmed that it would welcome proposals to replace the ATF with a new, more ambitious, and comprehensive accessible transport strategic plan.

MACS noted such a plan would bring the ATF up to date in the context of more recent developments such as NTS2 itself, the concept of the 'just transition' and associated major initiatives such as the target to reduce private car traffic by 20% by 2030.

MACS members should have a significant role to play in assisting TS officials to consider the form and content of such a plan, which must be both ambitious and effective in delivering accessible transport and mobility for disabled people in Scotland.

MACS agreed to support and offer further advice on the ongoing development in terms of their reworked delivery plans with a firm view on seeing out the end of the ATF lifecycle.

Workplan review

The annual review of the work plan is intended to afford the full committee opportunity to revisit and discuss the previous year's work, areas of engagement and discuss progress made against the five objectives.

This review gives members the opportunity to consider any other issues arising throughout the year (mainly from PfG, the STPR2 projects aimed at delivering our transition to Net Zero and NPF4) and decide where the Committee should target and prioritise its finite resources to achieve maximum impact on the accessible travel agenda for the following year's work plan (2023 to 2024).

It was noted that this year's PfG took a unique and different approach due to the cost of living crisis and the SG's focus on support during this (including through budget setting and spending reviews).

PfG was published against a backdrop of the most severe economic upheaval in a generation, already impacting people, businesses, public services and the third sector across Scotland. For that reason, the immediate focus and nature of this year's PfG was different. It was be acknowledged that the 2022 to 2023 PfG builds on the long term commitments made in previous publications and on the Bute House Agreement that restated commitment to the importance on delivering the ambitions on Active Travel and the climate.

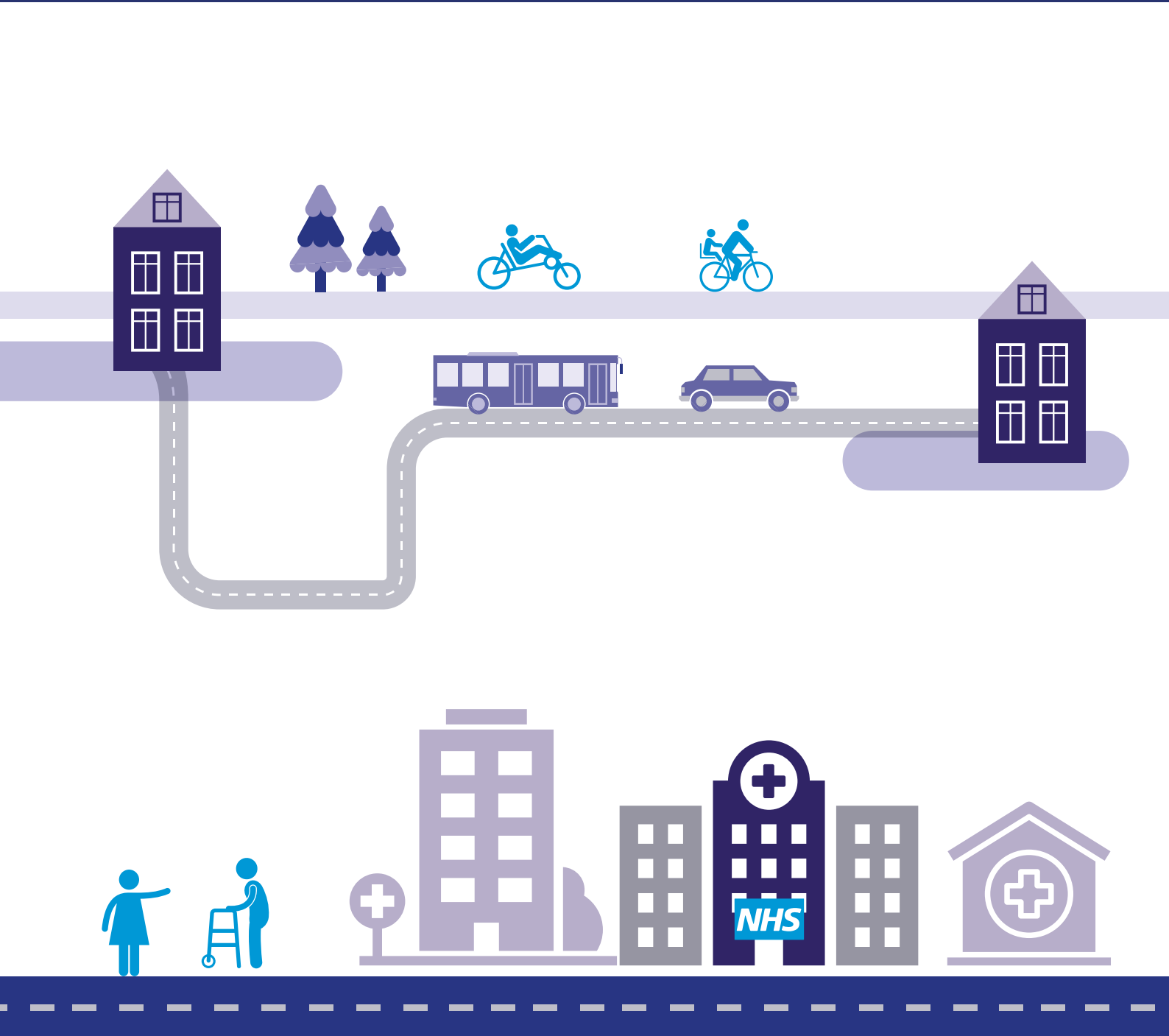
The Convener tabled a discussion paper, from this year's PfG, to agree the main areas of focus for the 2023 to 2024 Work Plans. Outputs from this paper and the discussion were used to refresh the work plan to gain committee wide agreement for the following years work areas.

The finalised Work Plan following these discussion for 2023 to 2024 can be found at the link below:

[View Work Plan April 2023 to end March 2024 Mobility and Access Committee for Scotland](#)

11

Team Sessions (Knowing Me, Knowing You)



Team Sessions (Knowing Me, Knowing You)

A Knowing Me, Knowing you (KM, KY) “team session” took place in November 2022 with the focus on Inclusive Communication. This was set up to grow the knowledge base of Committee members, the Secretariat and Transport Scotland attendees to give a better understanding on how to communicate more inclusively and effectively with audiences taking into account all forms of communication including written information, online materials, audio such as telephone conversations and face to face discussions.

Guest speakers included both Inclusion Scotland and Disability Equality Scotland. This session included:

- presentation and Q&A session around Inclusion Scotland’s Accessible Social Media guide and Inclusive Formatting guidance
- presentation and Q&A session around the Inclusive Communications Hub including the learning toolkit and case studies.

The session was very informative, interesting and well received by all in attendance. As a follow-up to this session MACS have created their own best practice guidance on Inclusive communication, including a top 10 tips; we have fully reviewed several documents to ensure they are screen reader friendly as well as introduce an inclusive communications session as part of our induction process for new members to the committee.

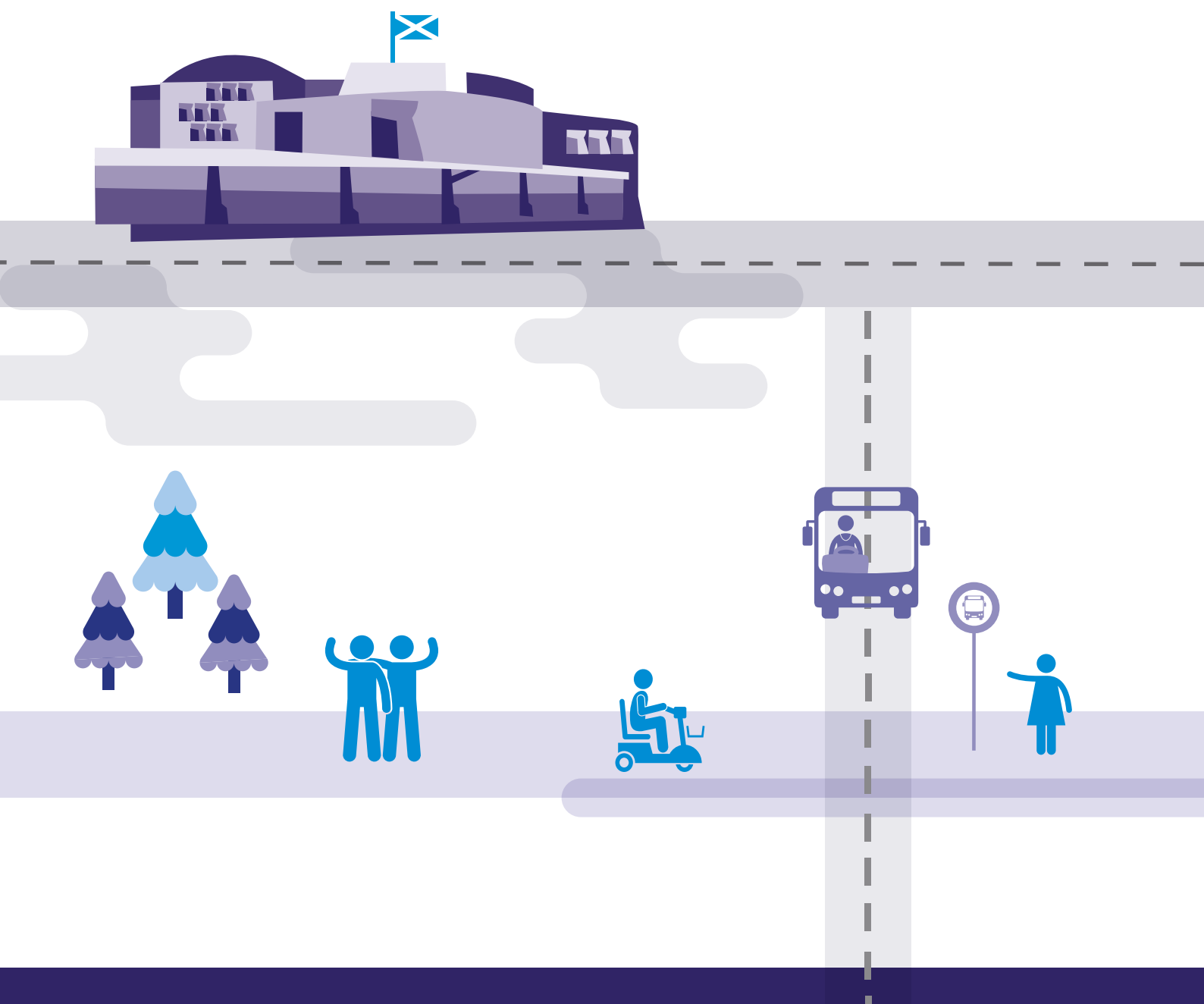
All in all, this was a very productive session which made us stop, consider and reflect and then take action to ensure we are catering to our audience.

Future KM, KY sessions are planned for the coming year with the committee keen to continue our learning and development as a group. This will include:

- A session on “framing conversations and messages”.
- A getting to know you session which will be designed to help new committee members get to know a little bit more about existing members.

12

To Finish – Say Hello and Wave Goodbye



To Finish – Say Hello and Wave Goodbye

This has been another challenging yet productive year for the committee. We have still been largely operating in the virtual environment with some face to face engagement sessions where members have attended events or conferences to represent and cover off MACS interests.

As with most years, the Committee itself has seen a lot of change. We have welcomed three new members in Elliot Cooper, Catherine Barile and Lesley Macinnes. A little background on our three new members can be found on the next page.

Of course, whilst it is always a happy and exciting time for the Committee to welcome new members I would like to take the time to acknowledge the hard work and commitment to their roles in both Audrey Birt and Heather Still.

Audrey and Heather brought a great deal of knowledge and experience to our team and were influential in their input towards our work on Transport to Health and Social Care.

Audrey also led our Bus, Taxi and Community Transport Workstream and was our lead liaison on equalities and human rights. We wish both members well for their future endeavours.

This coming year will also see both Hilary Stubbs and David Hunter see out their two terms as Committee members (8 years) so the challenging process of finding suitable replacements has begun. What this space for adverts!

Hilary and David have been integral to MACS work since I joined as Convener, and both will be a huge loss to the Committee in terms of experience, ability, leadership and knowledge and will certainly be big shoes to fill.

In signing off this years report I would like to finish where I started; and thank my Team who have once again worked tirelessly throughout the year, during good times and bad, to ensure we progress our work and make transport more **A**vailable, **A**ccessible and **A**ffordable for all.

New Committee Members:

Catherine Barile

Catherine graduated from the University of Dundee with an honours Law degree and Diploma in Legal Practice.

After qualifying as a Solicitor, she worked in private practice for 10 years, specialising in mental health law, before becoming a Children's Reporter for the Scottish Children's Reporter's Administration where she is an active member of the disability group.

Miss Barile grew up in a family with physical disabilities and she is passionate about protecting and promoting the rights of disabled people.

Elliot Cooper

Elliot is a writer and content creator who brings his lived experience as a full-time wheelchair user as well as interdisciplinary academic knowledge to the role. This complements a lifelong commitment to Human Rights and accessibility.

Lesley Macinnes

Lesley has spent most of her career in public service, including a long period in Geneva as the Deputy Support Director of an international NGO responsible for humanitarian demining (landmines and cluster munitions) and for administering the international Secretariat for the Ottawa Treaty.

More recently, she has served as an elected councillor in Edinburgh, leading political efforts on transport and the environment and has led on the City Mobility Plan, the City Centre Transformation strategy, the Low Emission Zone and the Trams to Newhaven project.

After the May 2022 elections, Ms Macinnes became her party's spokesperson on finance.

The rest of the team

The remainder of the Committee's serving members include Linda Bamford, Hilary Stubbs, David Hunter, Graham Dunn, Susan Fulton, Simon Watkins, Naghat Ahmed, Joanne Devitt, Lynsey Shovlin and Michael Tornow alongside the serving secretariat.

You can find out more about our current committee members at the link below:

[View Mobility and Access Committee for Scotland Members' biographies](#)

Appendix One – Our Consultations and Engagement

All of our consultation responses or documents of interest can be found under the Our Work section on the MACS website at the following link :

[Visit Mobility and Access Committee for Scotland web pages](#)

- [MACS - Call for Evidence on Accessible Transport 2023 - Response](#)
- [MACS letter to Daniel Lafferty 28 October 2022](#)
- [MACS response to the effectiveness and efficiency of the CAA](#)
- [MACS response to the Consultation on ‘Cycling framework for active travel’](#)
- [MACS response to the Consultation on ‘A national conversation to inform a new Dementia Strategy’](#)
- [MACS response to: A consultation on the Investigations Manual of the Ethical Standards Commissioner’s office](#)
- [MACS response to the consultation on the draft Scottish National Transport Strategy](#)
- [MACS response to Scottish Carer Allowance](#)
- [MACS response to the consultation on Tribunals \(Scotland Act\) 2014 Consultation on regulations for new Transport Appeals](#)
- [MACS response to the Regional Transport Strategy for the West of Scotland 2022-2037](#)
- [MACS response to the law Commission issues paper on remote driving](#)
- [MACS response to the consultation on an Equality Evidence Strategy 2023 to 2025](#)
- [MACS response to ‘Williams-Shapps Plan for Rail: legislative changes to implement rail reform’](#)
- [MACS response to ‘Scottish Government Review of Permitted Development Rights Phase 2’](#)
- [MACS response to ‘A Modern and Sustainable Ferry Service for Scotland - A major inquiry into current and future ferry provision in Scotland’ - August 2022](#)
- [MACS response to The Need for a Disability Commissioner - July 2022](#)
- [MACS response to Review of the Public Sector Equality Duty \(PSED\)](#)
- [MACS response to ‘Scotland’s Pavement Parking Prohibitions – Consultation on Pre-Implementation Directions and Regulations for Local Authorities’](#)
- [MACS response to consultation on the Strategic Transport Projects Review \(STPR2\) - April 2022](#)
- [MACS response to Consultation on Aviation Consumer Policy Reform - March 2022](#)

Appendix Two – Committee Structure and Areas of Engagement

Jan 2023 – MACS Main Committee					
Planning and Strategy					
Bus, Taxis & Community Transport	Ferries & Aviation	Coordination of Work Plans Parliamentary Liaison Committee Champions & Stakeholder Engagement (Rural & DPOs)	Horizon Scanning Scoping Enhancing Communications Emerging and Digital Technology	Rail	Roads, Infrastructure & Active Travel
Bus & Coaches Demand-Responsive Transport (Including MaaS) Community & Rural Transport Concessionary Fares Accessible Taxis Bus Stakeholder Group Transport to Health and Social Care	Islands Connectivity Plan and Islands Delivery Plan SG Ferries Review Ferries Accessibility Fund New Franchises or Procurements Air Travel CAA Performance Measures Special Assistance	Preparing Ministerial Briefings – LB Annual Report – LB EHRC & UNCRPD – TBC Four Nations & Officials – LB/HS Women & Girls Safety Using Public Transport – LB COSLA, LAs & RTPs – LB/HD Liaison with DPOs, DOs and Stakeholders – LB Committee Developments & MOU with TS – LB	Analysis of PfG and emerging SG Strategic Plans (NTS2, STPR2, IDP & IIP) ATF Delivery Plan Review Motability & AVES Co-ordinating Consultation Responses Undertaking Research & Evidence Gathering including data gathering External Communications (Preparing briefings and managing MACS Twitter presence, reviewing website content and making recommendations to TS Communication Team)	ScotRail on Operator of Last Resort Great British Railways (creation of accessibility strategy through representation on National Advisory Accessibility Group) Major rail station design & improvements Passenger Assistance (including monitoring the return of disabled people to rail travel) ScotRail Equalities Group Glasgow Subways	Parking (including Pavement Parking) Blue Badge Roads for all Forum Road Strategies Engagement Transport Scotland and ORR Walking, Wheeling & Cycling (Active Travel) Electric and Autonomous Vehicles and LEZ's SRWC

The graphic above shows MACS key work areas and engagements by work stream. The Planning and Strategy Work stream over-arches the modal work streams, has two work flows and co-ordinates activities and learning to prevent silo working. The diagram

contents are also displayed in the text below.

Work stream areas of engagement:

Planning and Strategy

Lead – Linda Bamford

Coordination of Work Plans, Parliamentary Liaison, Committee Champions and Stakeholder Engagement, (Rural, IT and DPOs), Preparing Ministerial Briefings, Annual Report, Rural and MaaS, Emerging and Digital Technology, EHRC and UNCRPD, Four Nations and Officials, COSLA, LAs and RTPs, Liaison with DPOs, DOs and Stakeholders, Committee Development Needs.

Co-leads – David Hunter and Elliot Cooper

Horizon Scanning, Scoping, Enhancing Communications, Analysis of PfG and emerging Scottish Government Strategic Plans (NTS2, STPR2 ICP2 and IIP), ATF Delivery Plan Review, Motability and AVES, Coordinating Consultation Responses, Undertaking Research and Evidence Gathering including data gathering, External Communications (preparing briefings and managing MACS Social Media – Twitter presence, reviewing content of website and making recommendations to Transport Scotland Communication Team)

Bus and Community Transport: Lead – Audrey Birt & Graham Dunn

Bus and Coaches, Demand-Responsive Transport (including MaaS), Community and Rural Transport, Concessionary Fares, Accessible Taxis, Bus Stakeholder Group, Transport to Health and Social Care

Ferries and Aviation: Lead – Hilary Stubbs

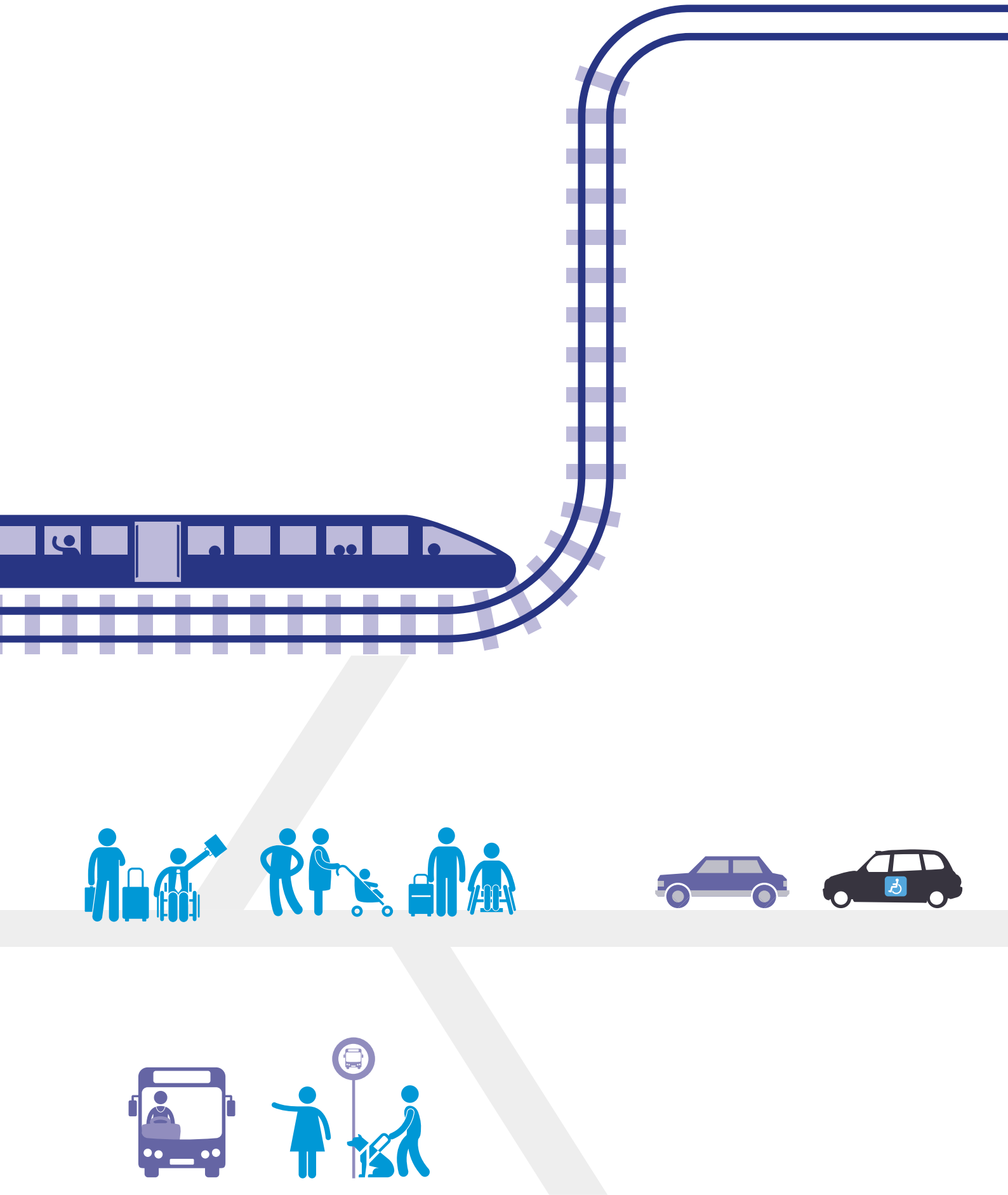
Islands Connectivity Plan and Islands Delivery Plan, Scottish Government Ferries Review, Ferries Accessibility Fund and MaaS, New Franchises or Procurements, Air Travel, CAA Performance Measures, Special Assistance

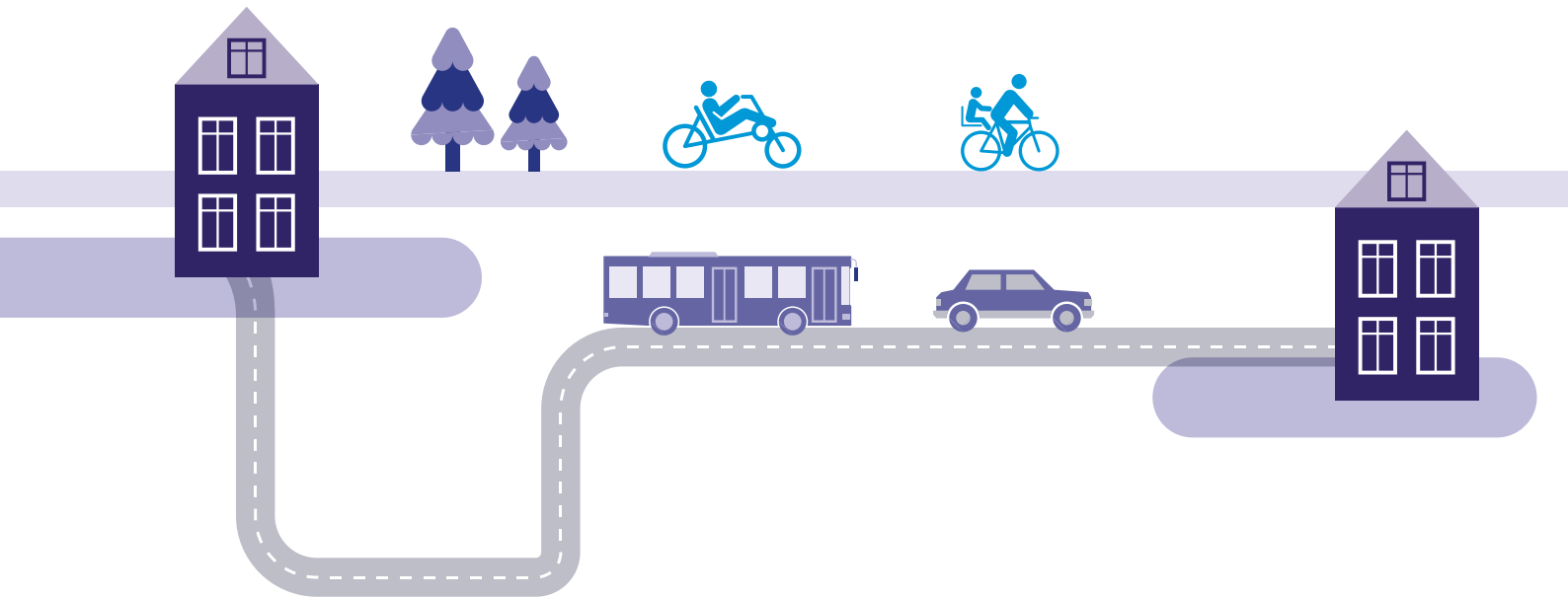
Rail – Simon Watkins

Engagement with ScotRail on Operator of Last Resort, The Williams-Shapps Review (establishment of Great British Railways), major rail station design and improvements, Passenger Assistance (including monitoring the return of disabled people to rail travel), Engagement with ScotRail Equalities Group (SEG)

Roads, Infrastructure and Active Travel – Susan Fulton

Parking and Blue Badge, Roads for all Forum, Road Strategies, Engagements, ORR, Walking, Wheeling, and Cycling (Active Travel), Electric and Autonomous Vehicles and LEZ's.







**Advising Scottish Ministers
on Accessible Travel**

ISBN: 978-1-911672-29-6

Produced by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS1299422 (06/23)