

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

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Smart and Integrated Ticketing Team

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**MACS Response to the Consultation on the Future of Smart Ticketing In Scotland**

Please find enclosed a response to the Consultation on the Future of Smart Ticketing In Scotland provided by the Mobility and Access Committee for Scotland (MACS).

Should you require any additional information, please do not hesitate to contact me.

Kind regards,

Aga Lysak

MACS Secretary

1. The Mobility and Access Committee for Scotland is a strategic non-governmental public body which advises the Minister for Transport and the Islands on key issues relating to transport, which may affect people with disabilities or other reduced mobility. The Committee also have a remit to take account of the broad views and lived experiences of people with disabilities when giving advice.
2. As such, we are keen to respond to this consultation to ensure that any new smart-ticketing initiatives take the needs of disabled people into account, both with respect to on-site use and back-end account administration.
3. It is essential that accessibility at all points is considered as a distinct concern and for this reason we have chosen to respond only to those questions within this consultation which directly relate to this and which would be noted during the statutory Equality Impact Assessment.
4. Accessibility must play an integral part within the entire smart-ticketing system and facilities to allow disabled people to use and gain benefit from the system on the same terms as their non-disabled peers must be available at all user-interfacing points. This includes, for example, any website, telephone or in-person platform for enrolling in or transacting with a user's account, any marketing or advertising (including for any special offers or promotions) and any reader or similar device with which the user must interact, and which are used for tracking user journeys for the purpose of billing or other administration.
5. Further, assumptions, such as that accessibility is only important for users who transact monetarily should not be made, as has been the case with some private ventures. We would hope that, given an aging population and hence the potential for the number of disabled people likely to interact with smart-ticketing to rise significantly, accessibility will be a ubiquitous concept from its inception.
6. The remainder of this response details specific challenges disabled people are likely to experience and how these could be mitigated within the proposed smart-ticketing system implementation.
7. Whereas we appreciate that the Scottish Government wish to give transport providers a degree of flexibility in terms of the way smart-ticketing is implemented, we would hope that universal accessibility of these individual implementations, both hardware and software would be incumbent upon them. We feel strongly that adaptations made to facilitate easier access by disabled people would be inherently beneficial to all users and that this concept should be promoted in any legislation or guidance issued.
8. Smart-card readers or validators, such as those found on buses or at tram stops (for example, Edinburgh Trams), should be easily identifiable, preferably contrasting against surrounding surfaces. Where possible, and particularly in areas with no staff presence, an audible signal should be heard to indicate that the card has been read or validated and that the interaction is complete (for example, as on First Aberdeen buses). Card readers or validators should be placed at a height that can be easily reached by those seated in a wheelchair to allow for

independent use and where possible in a position free from nearby obstructions (as opposed to those at Edinburgh Waverley station).

9. We understand that some organisations are actively encouraging customers to use standalone ticket machines to perform tasks such as purchasing tickets, loading funds onto cards or checking balances in order to reduce staffing requirements. We are extremely concerned that this may prevent people who would otherwise have difficulty using ticket machines independently, such as those who are visually impaired; on the dyslexic spectrum or who are otherwise uncomfortable using such technologies from accessing transport or the benefits those smart-cards may offer.
10. We would strongly recommend that staff are easily accessible to assist, either via a manned service point or by phone on a contact number that does not levy additional charges (such as network access or service charges) to the caller, whether calling from a regular landline or mobile phone. In addition, we would ask that disabled people who are unable to use ticket machines or other digital platforms (such as websites or mobile applications) and who thus need to contact staff directly for assistance should not be penalised, either financially or by non-receipt of any other benefit as a result. This includes, for example, the receipt of any promotional offer or access to premium services as opposed to the detriment incurred by any non-disabled person seeking the same assistance voluntarily.
11. New and replacement smart-cards should feature a clear and easily identifiable design with the name of the card or issuing organisation printed in text which is clear and well contrasted against the background colour. We would suggest the use of a raised dot or symbol (as is often used on bank debit or credit cards) to allow for blind or partially sighted people to easily locate and identify the card amongst others in their possession. This would serve the additional purpose of helping users to orientate the card correctly when using it with a card reader or validator thus reducing the time needed to complete a transaction. Any important information likely to be needed by the cardholder such as the card's expiry date or the contact telephone number for customer support should be likewise printed clearly.
12. It is likely that any smart-ticketing implementation will include a back-end system that allows customers to view or edit information related to their smart-card, travel, financial profile or personal identity. Any such interface should be designed with accessibility as a core concern and which adheres to industry standards including those backed by W3C (World Wide Web Consortium). Where this is not possible due to a system that has already been developed, an alternative, accessible interface that allows users to undertake the same tasks as the original should be present and accessible from a location which is easily identifiable (for example, TheTrainLine) from the top level of the interface. The accessibility of any alternative system should be independent of any processor platform or operating system, browser or pre-installed mainstream technology. Consideration should also be given to users using text-only browsers or older operating systems (including those that do not feature the latest updates). It is worth noting that some disabled people using access technologies may deliberately avoid up-to-date systems as these systems are often incompatible with these technologies or are subject to spurious results.

13. Where users access these systems on a mobile phone or tablet, we would suggest that any applications or mobile-compatible versions of websites rendered using a mobile browser are thoroughly tested with the most common access technologies prior to release.
14. Care should also be taken to ensure that essential features are not blocked or inaccessible to screen readers as is often the case. It should be noted that just because something may look accessible does not always mean that this is the case.
15. We would also suggest that any transactions completed using a mobile device should also result in a receipt or similar confirmation being emailed to the customer (as is the case with the current PassengerAssist system) as this provides independently accessible assurance that the transaction has indeed been successful. This is particularly important in the case of financial transactions, as some users may have reservations about using mobile technology or lack confidence that they have completed the transaction correctly.
16. We are particularly concerned about the potential for price inequality or discrimination against disabled people who are unable to access or use smart technologies including websites, mobile phones or ticket machines. We are concerned that disabled people may miss out on promotional offers, discounts or travel incentives where these benefits are only marketed online (such as for cheap advance travel tickets) or are available to those who have used services on digital platforms exclusively.
17. This may be especially potent for older people who have only ever undertaken person-to-person transactions and thus do not have confidence using standalone machines, or those travelling for the first time.
18. We feel strongly that any benefits should be available to access via any medium, or in cases where they are dependant on online access or activity (for example, discounts or free travel offered per number of tickets purchased online), that they should be accessible via a member of staff in cases similar to the above. The consequences of not doing so are likely to include reduced uptake of smart-card ticketing and by extension a loss of revenue for the associated transport operator.
19. MACS is concerned as to how the complexities of concessionary travel schemes administered by different Scottish local authorities will be incorporated into a single smart-ticketing solution. For example, travel is free on all rail journeys within Scotland for those who are registered blind holding a concession card issued by Aberdeenshire Council; however companions are required to pay the full fare. Conversely, travel is free for all rail journeys within Scotland for those who are registered blind holding a concession card issued by Highland Council; however companions can travel for a nominal charge, but only on specific sections of certain routes.
20. Using rail as an example, discussions with train operators and the Rail Delivery Group have previously resulted in a consensus that it would be too difficult to incorporate scenarios for all 32 local authorities into the National Reservation

System for travellers and companions. It is therefore difficult to see how this could be achieved for the proposed smart-ticketing solution in addition to scenarios for other modes of transport, with complexities increased exponentially for multi-modal journeys.

21. However, if concessionary travel was to be isolated from the proposed solution, this would adversely disadvantage disabled people wishing to book for and travel with non-disabled companions, as is also the case at present (for example, it is not currently possible to book travel for those who do and do not use concessionary travel cards and reserve seats together in the same booking).
22. It is essential to ensure equality in the range of booking options available including for those holding concessionary travel cards. At present, it is not possible for card holders to book combined rail and ferry travel in the same booking which gives rise to the potential for these customers to miss out on multi-modal travel promotions, including those travelling to the islands for tourism and by extension providing revenue for the local economy.
23. We are concerned at the implied expectation that the overall cost of end-to-end journeys booked on a single, smart ticket will reduce and the impact the resulting reduction in income will have on smaller transport operators, particularly those running community transport schemes. There appears to be an implication that the Scottish Government are willing to offer financial incentives to transport operators to facilitate implementation and provision of smart-ticketing infrastructure for passenger benefits; however this does not seem to cover the anticipated reduction in routine income. We are concerned that this may force the smallest operators to cease provision of services and, as there is often a direct correlation between the size of operator and number of people served, this has the potential to disenfranchise the most isolated communities, especially those in Highland and on outlying islands.
24. This is of serious concern to disabled people, many of whom (including those on the lowest incomes) rely on these services for access to essential healthcare (including mental health services), work and social engagement.
25. We are concerned as to how the proposed smart-ticketing solution will work in conjunction with bookings for cross-border journeys with respect to the accessibility of the infrastructure for booking or validating tickets. For example, long distance bus or rail journeys between England and Scotland may not be purchased using a smart-card. We feel that more guidance is necessary as to how these journeys would be handled were they to form part of an extended, multi-modal booking.
26. We would advocate that any new or updated systems would have the resilience to handle this eventuality and that transport providers would ensure a seamless booking experience from the passenger's perspective incorporating the accessibility implementations noted previously.
27. There are potential accessibility challenges if two separate systems are required to book these journeys and if indeed this is required, we would advocate that

transport providers will manage any handover between systems effectively and efficiently without compromising the user's experience.

28. We feel that any smart-ticketing solution should provide complete transparency with respect to all costs incurred for all parts of a journey. At present, some ticket machines (such as the Virgin Trains ticket machines at Edinburgh Waverley station) only detail the final cost for a transaction without detailing a breakdown of the component parts to this total. This is particularly important for those customers requiring receipts to claim expenses (e.g. for work purposes) where any ambiguity may cause concern on the part of auditors. Just as a full breakdown of costs is provided when people shop online for goods or services, so should this be available when purchasing tickets from travel ticket machines. Full clarity about what is being purchased is also essential for those on low incomes particularly given the potential for confusion given rise to by the wide range of ticketing options, supplements and bundles available on different transport modes.