



**Falkirk District
Access and Assessment Group
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To: Cathy Peattie MSP
Constituency Office
5 Kerse Road
Grangemouth
FK3 8HQ

From: Henry Sherlock
Date:
Copy:

Issue: National Scottish Travel Pass/National Entitlement Card

Action: Clarification and Reply to Issues Raised

Timing: As Soon As Possible

Dear Mrs Cathy Peattie MSP,

Thank you for your letter dated 19th November 2007, enclosing the response received from Malcolm Reed of Transport Scotland dated 12th November 2007 in reply to issues regarding the National Entitlement Card raised by our Group.

I copied members of our Access Group in to Mr Reed's responses and the Group have requested that I ask for your further co-operation in this matter.

The Group have requested the following:

1. In your acknowledgement, dated 23rd August 2007, you stated that you had written to Mr Stewart Stevenson MSP, Minister for Transport **and** the Equal Opportunities Committee. A delegated reply has been received from Malcolm Reed of Transport Scotland, but there has been no reply from the Equal Opportunities Committee.

Could you please ask the Equal Opportunities Committee if they are in a position to reply.

2. The Group, as a whole did not understand most of the content contained in the reply given by Malcolm Reed of Transport Scotland and have asked for a further response in Plain English.

Could you please ask Mr Malcolm Reed for a reply in Plain English

3. The Group feels that Mr Malcolm Reed did not fully answer the issues raised.
Could you please ask Mr Malcolm Reed to reply to the responses and further issues raised in Annex A.

4. As Deputy Convener of the Transport, Infrastructure and Climate Change Committee, the Group would also appreciate your own thoughts, understandings and input on these issues.

Could you please provide the Group with your own thoughts, understandings and inputs on the issues raised in the initial letter dated 6th June 2007 and the additional issues raised in Annex A to this correspondence.

As always, the Group and myself appreciate your support in this matter and look forward to a response to these issues.

Regards

Henry Sherlock

Chairperson
Falkirk District Access and Assessment Group

**Additional Issues Raised
In Response To Malcolm Reeds Reply
Dated 12th November 2007**

Issue 1.

Lack of Literature Accompanying the National Travel Pass/National Entitlement Card:

1.1 Mr Malcolm Reed states that the introduction of the National Entitlement Card was introduced in partnership between the Scottish Government, Local Authorities and the Improvement Services and it was Improvement Service's who would not **permit** Transport Scotland to enclose any information with the card.

- If these three main organisations were supposed to be working in partnership, why was it solely the decision of the Improvement Service's to object to the issue of information with the card?
- Why was the focus of the Improvement Services not on improving the service to the client?
- One of the core objectives of the Improvement Service's is to "promote a learning culture and support collaborative working.... Do you think that the Improvement Service met this core objective in this case?
- Another core objective of the Improvement Service is to "promote good practice across Scottish Local Government". Do you think that providing no information with such an important mobility card is promoting good practice?
- Another core objective of the Improvement Service is to "promote the use of knowledge management within local authorities to support sharing and learning, e-governance and business re-design". Do you think that the Improvement Service met this core objective by not sharing knowledge in this case?

1.2 Mr Malcolm Reed states that the information leaflet is available in alternative formats and is also available on the website www.transportscotland.gov.uk

- Why does the information leaflet (the hard copy and electronic copy on the website) not clearly state that alternative formats are available and how to obtain them?
- When dialling the enquiry helpline (from information contained in the booklet) there is only a procedure to obtain further hard copies of the leaflet. Why is there nothing in place to obtain copies in alternative formats?
- How will people with visual impairments, learning difficulties, dyslexia etc access the information contained in the booklet if alternative formats are not readily available?

1.3 Mr Malcolm Reed states that "a number of marketing campaigns were made via its website, the media and bus operators". That "local authorities were also encouraged to promote the scheme through their own communication channels".

- The Marketing Campaigns did not address all the concessionary schemes covered by the (and in Malcolm Reed's words) "multi application card". The marketing focussed on the national bus travel only. Why were there no

marketing campaigns to inform the correct information about what was happening to existing schemes, such as the blind persons scheme etc?

- The bus company does not provide information in alternative formats and even within local authorities, information in alternative formats are not readily available. What was put in place to ensure that disabled people were fully informed? Was information made available in Braille? Was it available in large print? Was it available in British Sign Language (print)? Was it made available in audio?
- What did transport Scotland put in place to ensure that disabled people were communicated to in the right format?

Issue 2.

Misleading Title of National Travel Pass/National Entitlement Card:

2.1 Mr Malcolm Reed states that “Transport Scotland have no control over how other bodies refer to the card”.

- If Transport Scotland were working with other organisations in true partnership, why was there no agreement in place to ensure that all interested parties referred to the card in the same way?

2.2 Mr Malcolm Reed did not address this issue

- What will be done to ensure that disabled and elderly people who are entitled to the card are made clear of what the card can and cannot be used for? (including information in alternative formats, additional travel schemes).

2.3 Mr Malcolm Reed states that “the NEC is a multi application smart card and can hold other travel concessions and give other access to services”.

- How have the disabled community been made aware of those other concessions and services?

Issue 3.

Eligibility criteria for the plus one (+1) component:

3.1 Mr Malcolm Reed states that “the onus is on the applicant to provide evidence to confirm that they meet the eligibility criteria”.

- The question was not answered. The question was “what is the position for people who, for reasons of their own, do not claim benefits? If for example a blind person does not want to be registered, then they hold no documentary evidence. This means no benefit and no NEC. What is in place to ensure that this does not happen?”

3.2 Mr Malcolm Reed states that “It is considered that the criteria which were developed are fair, consistent and focuses support on those who suffer from a physical or mental impairment which severely effects their mobility and therefore their ability to travel to carry out day to day activities”.

- Who is it that considered the criteria to be fair? It is important to consider that there would be a truer understanding of what is fair if there was involvement/consultation with people who are disabled rather than with organisations who represent those who are disabled.

- How can the criteria be fair when it does not refer to sensory impairment. Mobility and carrying out day to day activities are also issues for visually and hearing impaired people.

3.3 Mr Malcolm Reed has stated that “busses must be fully accessible by 2017 and coaches by 2020. These timetables have been agreed by the Transport Industry and Disabled Person’s Transport Advisory Committee”.

- Why have a National Entitlement Card which allows disabled people free bus travel if the buses will not be fully accessible to disabled people for another 10 years and coaches for another 13 years?
- The Disability Discrimination Act was introduced in 1995 to eradicate discrimination to disabled people. Why will it take in total 22 years to make all buses accessible when the profits in the industry are exceptionally high? (this year sees the First Group bus profits rise by 20.5% to £47.6million)
- Public transport is the only means of transport to people with certain disabilities. Why has such a huge accessibility timescale been allowed to this fundamental need?
- Has anyone asked disabled people their views on these timescales?

3.4 Mr Malcolm Reed states that “Under the formal guidance issued to bus operators they are reminded that they have an obligation under the Disability Discrimination Act to offer reasonable assistance to disabled people where practical”.

- Has there been any activity undertaken to ensure that assistance is actually being offered to disabled people?
- How does one clarify “reasonable”? When it is stated reasonable assistance, to whom are we referring the reasonable? Ie reasonable to whom?
- How does one clarify “where practical”? When saying “where practical”, to what are we referring practical to? Is it to effort? Is it to time scale? Is it to safety? Etc.etc

Issue 4.

Eligibility:

4.1 Mr Malcolm Reed did not appear to answer the question.

- What measures are currently in place to ensure that our elderly and disabled community do not miss out on the national travel pass?

4.2 Mr Malcolm Reed’s response was not understood.

- Has clear guidance to the local authorities been given to allow for margins of flexibility on the eligibility criteria?

4.3 Mr Malcolm Reed states that “The Department of Work and Pensions and Local Authority can offer support to those individuals that require support”.

- Why is it down to individuals to seek additional support from other Departments when it was Transport Scotland who are accountable for introducing the NEC?
- Many disabled people in this country are not getting their right benefits as it is. Do you think that disabled people feel secure in seeking support from a Department that was not responsible for introducing the NEC?

Issue 5.

On other modes of transport with companion (+1) component:

5.1 Mr Malcolm Reed did not answer the question.

- The people in the call centre (number kindly provided on the back of the National Entitlement card) do not provide the same information as railway station staff in the ticket offices. They are advising people with the (+1) component that the individual can travel anywhere in Scotland with a companion on ANY MODE of TRANSPORT free of charge. Strange enough conductors on trains are of the same understanding. However, train station staff in the ticket offices have been advised to charge the companion. Sometimes 100% full fare. Sometimes 50% of the full fare. Sometimes 34% of the full fare. Sometimes 100% full fare for both card holder and companion. This has resulted in many disabled people not being able to use the trains. In turn it has had the opposite effect which the issue of this card was supposed to have. Instead of offering freedom to travel, some of our most vulnerable people in our community are too confused, embarrassed and remain isolated over this error. **Will anything be done to clarify this position and deal with the total confusion this has caused?**

5.2 Mr Malcolm Reed did not answer this question.

- When travelling by trains in Scotland it becomes even more confusing and difficult for the person with a disability. If you want any concession (that is if one is being offered), you have to make your way to the ticket office to buy your ticket. If you attempt to buy your ticket on the train, no concession at all are given. **Will anything be done to resolve this?**

5.3 Mr Malcolm Reed states that “the concession introduced by the Scottish Executive is Scotland-Wide free bus travel, concessions offered on other modes of transport are administered and funded through local authority schemes. It is a matter for the local authority and transport operator to promote the local concession correctly”.

- As explained in the original letter, this is not being done correctly and disabled people in Scotland are confused. What is Transport Scotland going to do to rectify this confusion?
- Once again, as the title of the card states it is the “National Entitlement Card”. Why is Transport Scotland not addressing this issue and merely continuing to pass the buck to the local authorities and local transport operators and leaving the disabled people of Scotland in total confusion?
- The blind persons scheme allows the holder to travel on all modes of transport free of charge all over Scotland. A companion can travel free on buses under the plus one rule. However, a companion can not travel free on any other mode of transport. Why is it seen that a companion is not necessary on other modes of transport?

Henry Sherlock

Falkirk District Access and Assessment Group