# Disabled Persons Transport Advisory Committee

## Comments on DfT Pay-as-you-go on rail Consultation "Moving Britain Ahead"

**DPTAC –** The Disabled Persons Transport Advisory Committee (DPTAC) was established by the Transport Act 1985 and is the Government's statutory advisor on issues relating to transport provision for disabled people. DPTAC's vision is that disabled people should have the same access to transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and without extra cost.

### Pay-as-you-go extension: Introductory Statement.

Disability affects some 13 million people in the UK. It includes physical or sensory impairments as well as 'non-visible' disabilities such as autism, dementia, learning disabilities or anxiety. For many people a lack of mobility or confidence in using the transport system is a barrier to being able to access employment, education, health care and broader commercial opportunities (for example shopping), and to a social life.

In this context, the Equality Act 2010 was introduced with a key aim to ensure that elimination of discrimination, harassment and victimisation of disabled people (in addition to other people identified as having a Protected Characteristic as detailed in the Act) is addressed. Furthermore, the Equality Act 2010 requires that robust approach is taken to advance equality of opportunity and foster good relations for disabled people under the Public Sector Equality Duty component of this Act.

DPTAC welcomes the opportunity to respond to this Consultation and to offer comments for consideration to support DfT in planning for the expansion of this technology.

There are three clear benefits in terms of why it is important to deliver an improved rail journey experience for disabled customers. Firstly, an accessible rail network offers a means to unlock the spending power of disabled customers and is therefore beneficial from a commercial revenue/ taxation generation context, including with respect to external goods and services accessed by rail. Secondly, developing a new model approach to improve the rail journey experience of disabled people helps DfT and operators to fulfil their obligations under the PSED and Equality Act/ regulatory framework respectively, which is beneficial in a much broader societal context, for example, helping reduce the unemployment gap of disabled people and people who are not disabled. Thirdly, there is the additional benefit of reducing risk of civil action being taken against the operator should the operator be seen to fail to fulfil their Duty to promote equality.

Expanding smart ticketing will doubtless be welcomed by passengers as a significant improvement to the rail network; it is important that disabled people can benefit fully from the changes proposed.

**Pay-as-you-go ('PAYG') expansion: the benefits to disabled people**

DPTAC is positive about the extension of smart ticketing. In building on the success of existing schemes, in particular Oyster/ contactless in London, we recognise the significant benefits that will be delivered to all passengers in terms of:

- Simplification of the fares system – replacing complexity (the passenger has to find the right ticket) with sophistication (the passenger trusts the network to charge the right price);
- Ease of use - removing the need to use Ticket Offices or Ticket Vending Machines (TVMs);
- Potential cost savings for some passengers;
- Industry cost savings – enabling spending and investment to be put to better use;

DPTAC also recognises that there will be potentially significant specific benefits for disabled people. For example:

- Some disabled people currently experience barriers to access when purchasing paper tickets using Ticket Vending Machines (TVMs) due to: lack of tactile information and functionality, and the complexity of information etc. This may be particularly relevant to people with a visual or cognitive impairment. Likewise barriers to access exist for some users of Ticket Offices, for example where communication is dependent on speaking and/or listening. The extension of smart ticketing offers an opportunity to bypass these barriers to access;
- Smart ticketing offers flexibility in changing travel plans at short notice – this may also be of benefit to people who are currently anxious about getting on the wrong train or having the wrong ticket.
- Where staff are no longer required in fixed ticket office locations due to the reduced demand for paper tickets, this could free them up to be more visible to passengers, and to provide information, reassurance and assistance.

**Pay-as-you-go ('PAYG') expansion: potential adverse impacts on disabled people**

Whilst we recognise that the benefits of smart ticketing are significant, there are also some potential adverse effects relating to direct impacts and indirect unintended consequences. To ensure the extension is a success, DPTAC urges DfT to ensure consideration is given to the needs of all users. In particular we would draw DfT's attention to the following:

*Confidence in the system*

- Consistency across the network

  The paper ticketing system has been around for a very long time. In its current form, despite some well-documented shortcomings, it offers a largely-consistent network-wide facility with common rules and definitions.

Passengers can purchase a ticket from any station to any other station, and travel with confidence according to the conditions of that ticket.

By contrast, the evolution of smart ticketing has been piecemeal and disjointed. There is not a standard approach, or as yet any network-wide facility. Particular issues exist already at the boundary points of smartcard schemes. There is plenty of anecdotal evidence to suggest this causes confusion and sometimes cost for the unfortunate passenger who has fallen foul of the rules. For example, a passenger can pass through the ticket gates at Gatwick Airport station using contactless/ Oyster, but this will be valid to only a minority of destinations served from this station. They can use 'Keygo' on all GTR trains, but in general only to stations where GTR is SFO. This inconsistency may be particularly challenging to some disabled people.

A limited extension of the area of validity of smartcards will not address this lack of network consistency – it will simply move the problem a few miles down the line, as amended boundaries between old and new are created. If smart technology is really to replace paper tickets, then a network-wide strategic approach is required regarding both availability and use, as has been implemented in the Netherlands for example.

- The risks of getting it wrong

The success of Oyster/ contactless in London, and the OV Chipkaart in The Netherlands, is to a large extent due to passenger trust in the system – that the fare charged will be correct, and that the implications of getting it wrong (forgetting to tap in or out) are not disastrous. In particular, the maximum fare in both cases is not excessive (£10.10 in zones 1-9/ Euro 20 in NL).

By contrast, a maximum fare applied to a system which includes through trains between e.g. Brighton and Cambridge would presumably have to be at least the price of a peak single – at present £49.70. It is unclear how this would work for someone forgetting to tap out at e.g. Preston Park having travelled from Brighton (single fare currently £2.80), but this could potentially result in a wholly-disproportionate penalty. This has the potential to cause anxiety for disabled people, particularly those with cognitive/ learning challenges, who are neurodiverse, or who have Alzheimer's or dementia. This is highly relevant in the context of an ageing population – there is a strong correlation between disability and age.

The risks of forgetting to tap in/out are obviously greater at ungated stations – of which there are many in the area proposed for smartcard expansion. By contrast, e.g. London Underground is an almost fully-gated system (except some ungated interchanges) and as such the risks are much lower.

A further difference between TfL's area of operation, and the wider National Rail network is that the former only runs trains where all stations are covered by Oyster/ contactless, whereas the latter may have an artificial cut-off point halfway through the train's journey, where smart ticketing ceases to be valid.

Taken together, these issues add up to a very different passenger confidence profile between TfL/ Dutch Railways, and National Rail. The table below shows how the impact of penalty charges changes dependent on the cost and network characteristics (as applies to passengers using Oyster/ contactless - indicative relative scores/ costs only, to illustrate the point):

Cost of failing to tap in/ out

| Risk of failing to tap in/ out | | £10 | £20 | £30 | £40 |
|---|---|---|---|---|---|
| | **Very low** - all stations gated/ All accept smartcards (e.g. LU) | Low | Low | Med | Med |
| | **Low** – not all stations gated/ All accept smartcards (e.g. LO) | Low | Med | Med | Med |
| | **Medium** - all stations gated/ Not all accept smartcards (e.g. c2c) | Med | Med | Med | High |
| | **High** – not all stations gated/ Not all accept smartcards (e.g. GTR) | Med | Med | High | High |

*Relative risk plus cost impact of failing to tap in/out when using Oyster. Current London Zones 1-6 situation in first column (in bold box).*

It is therefore likely that in the area proposed for PAYG expansion, passengers would be more likely to a) be penalised for failing to tap in/out, and b) be more anxious about this, than e.g. when using a fully-gated system with universal smartcard acceptance such as London Underground. People with some types of disabilities are potentially more likely to fail to tap in/out because of their disability, and thus incur a penalty fare. Similarly people with some types of disability are likely to experience higher levels of anxiety than other passengers as a result of their disability. If PAYG is expanded into areas where not all stations are gated, where not all calling points on a train journey are covered by the PAYG scheme, and where penalties are high, there is the potential for the impact of risk plus cost to act as a barrier to access to a greater extent than at present.

*Using the system*

Whilst in general DPTAC is positive about the usability of smartcards, it is important that in any system consideration is given to the usability by all passengers. For example, how will visually-impaired people locate smartcard readers, and what happens if they cannot, for example at ungated and unfamiliar stations? How will hearing and/or sight-impaired people know that the smartcard has been read by the reader? Are the methods for adding credit to smartcards accessible, including websites and e.g. third party agents?

We assume that there is research available on usability issues, based on the experience of existing smartcard schemes, and would encourage DfT to approach e.g. TfL/ Rail Delivery Group/ GTR etc. to discuss this.

*Price and discounts*

- Price paid

  DPTAC would like to emphasise that disabled people's income is proportionally lower than that of other people and they are more likely to be living in poverty. For example, SCOPE highlights that after housing costs,  the proportion of working age disabled people living in poverty (28%) is higher than the proportion of working age non-disabled people (18%) – see: https://www.scope.org.uk/media/disability-facts-figures.

  Whilst some passengers may benefit from lower fares, the implication of the consultation is that some will be paying more. Any increase in specific journey price may have the effect of reducing disabled people's access to rail transport (and potentially to employment etc.). Furthermore, there is a suggestion that infrequent commuters might benefit at the expense of all-week commuters. This would seem to penalise those who through necessity have to work full-time at regular hours – likely to include a substantial number of disabled people on relatively lower incomes. We   assume that there will be generative effects of introducing smartcards – does this offer an opportunity to limit or avoid any potential increases?

- Discounted travel

  It is important that any smartcard expansion maintains the current availability of discounted tickets, including Railcard, employment-based, and non-Railcard discounts. A dual approach offering both contactless payment and a smartcard is likely to be necessary to maximise benefits.

- Comparison with paper ticket prices

  Some disabled people may find smartcards impossible or difficult to use – e.g. where this would require a visually-impaired person to locate a smartcard reader at an unstaffed and non-gated station, or where someone with manual dexterity issues is unable to use this reliably. It is important that any accessibility issues are resolved, and until this can be done paper tickets should continue to be available. As far as is reasonably possible these should offer travel at the same price as a smartcard, and should not put a disabled person at a substantial disadvantage.

- Companions

  Many disabled people travel independently, but for some the presence of a personal assistant/ companion is essential for accessibility reasons. It is important that any discount schemes for companions are maintained when smartcards are extended.

- Seat reservations

Where paper tickets are currently issued with seat reservations, it is important that smartcard extension does not reduce this facility, and that any alternative reservation system is accessible to all passengers.

*Passenger Assist*

Where assisted passengers migrate from paper tickets bought in advance, to smartcards, it is important that Assisted Travel can still be booked without the passenger having to hold a ticket.

More generally, there is an opportunity here simultaneously to improve the capacity of the network to deal with unbooked 'turn up and go' assistance – in particular by ensuring that staff capable of providing assistance are available either at stations, or on-board trains, but never neither. The Consultation quite rightly points to the disbenefits at present of passengers having to plan their journey in advance when purchasing a (return) ticket, and then losing money if they change their plans, whereas smart ticketing permits a change of plans without penalty. DPTAC expects the same benefits of spontaneity to be available to disabled passengers – and as such a firm commitment to providing unbooked assistance is required.

*Station Staffing*

We are aware at present that many if not most staffed stations are single-staffed in the Ticket Office only – the staffing hours being controlled by DfT under 'Schedule 17' of the Ticketing and Settlement Agreement.

With the extension of smartcards, there will come a point where reduced demand for counter sales invites the reduction of hours/ closure of Ticket Offices – we have already seen this happen at TfL.

This represents both a threat and an opportunity for disabled passengers. It is a threat because at present DfT generally only mandates Ticket Office staffing, and without such a requirement TOCs may be free to reduce or remove staff. This threatens the provision of assistance, the availability of toilets and waiting rooms (typically closed when stations are unstaffed) and potentially lifts, and personal security impacts relating to staff visibility. It may also dissuade a TOC running DOO trains from progressing station accessibility improvements, where these would stimulate the demand for assisted travel. These issues affect disabled people greatly, and DPTAC is very concerned about the potential for reduced staffing at stations in the medium to long term.

However, it is also an opportunity for DfT to redeploy staff to where they are most effective – i.e. out in the station public areas to provide reassurance, information and assistance – and ensure the continued availability of facilities. This would require a new approach to the mandating of staff at stations – based not on ticket retailing but on passenger needs.

*Additional station entrances*

We are concerned that the costs of smartcard readers/ gates may act as a barrier to the development of new station entrances – in particular the creation of step-free

routes. National Rail stations currently have very poor step-free access when compared to other sectors such as Retail (only around 1 in 5 stations meet new-build standards in this regard). Whilst the Access for All fund is welcome, it has limited resources and cannot meet the needs of passengers at many quieter stations. There are however some lower-cost opportunities to improve access (for example removing a fence to create level access, which would be possible at e.g. Ashwell and Morden). The relative cost of such schemes may be significantly increased by the requirement to install smartcard readers/ gates, and we would not wish to see this as an unintended outcome of smartcard extension.

*Impact on crowding*

We assume that given the benefits, smartcard expansion will be generative in terms of passenger numbers. Although smartcards have the potential to distribute demand more evenly, we are also concerned that an increase in crowding could occur in places. This could cause particular problems for some disabled people, and we would urge DfT to ensure capacity is planned appropriately and with reference to any likely generative effects.

*Process of change*

Whist many people will benefit from smartcard extension, for some the process of change will be difficult. We would encourage DfT to provide information and support to all passengers, and in particular disabled passengers, to enable them to benefit from the new technology and transition smoothly from paper tickets.

**Summary of Key Recommendations**

*1. Plan for a network-wide approach*

In order to create a modern ticketing system which provides the maximum benefit to all passengers, it is necessary for DfT to take a consistent network-wide approach, including with regard to PAYG (and any discounts). A limited expansion of this form of smart ticketing will to some extent continue to create confusion and anxiety, particularly at the interfaces where paper ticketing becomes mandatory. At the very least, an interim limited expansion should not compromise the future adoption of a network-wide consistent system.

*2. Ensure disabled people have the confidence to travel*

A consistent approach should be reinforced by measures to reassure all passengers that a) they will be charged the correct and cheapest fare, and b) the risks if they make a mistake are proportionate. Charging a maximum fare for failing to tap in/out, consistent with current peak time singles in the proposed extended area, is unlikely to be proportionate, and will not give many disabled people the confidence they need. We recommend that DfT considers possible operational and technological solutions to this issue – with specific reference to disabled people. We note that in London, mitigations exist where passengers accidentally fail to tap in/out, and suggest that a similar approach is taken in the expanded PAYG area, including the provision of mitigations for specific disability-related issues.

*3. Use any existing research/ evidence*

We recommend DfT sources any available research and evidence into the impacts of smartcard schemes on disabled passengers (including for example any evidence of likely crowding due to the generative effects, and of any potential fare rises) and uses this to influence this project.

*4. Hold workshops with disabled people*

Subject to the availability of any relevant research, it may be appropriate to carry out workshops with disabled people, examining on an impairment-specific basis the various elements of smartcard use, including for example: purchasing a smartcard; loading credit; using websites; tapping in/ out; locating readers; what happens if things go wrong (forgetting to tap in/ out, running out of credit etc.) and how to resolve etc.

*5. Use this as an opportunity to maximise the benefits of station staffing*

We urge DfT to develop a new model of station staffing which takes account of technological change and ensures the continued availability of staff, assistance, and station facilities. We believe it would be a mistake to see smartcard expansion as an opportunity to cut staff numbers, and would like to see DfT adopt a similar commitment to TfL in continuing to staff stations when Ticket Offices are no longer justified.

*6. Support TOCs to improve station step-free access*

We suggest that DfT commits to cover the cost of additional smartcard reader/ gateline installation where TOCs are otherwise able to fund small-scale step-free access improvement schemes.

*7. Ensure assisted passengers can also benefit from improved journey flexibility*

PAYG smartcards offer improved flexibility and mean in particular that passengers do not have to plan return journeys. This same flexibility should be available to assisted passengers by the guarantee of 'turn up and go' assistance where required.

*8. Carry out an Equality Impact Assessment*

The key recommendations above are based on DPTAC's current understanding of the likely impacts. However, given the potential significance of the proposed changes, we also recommend that, in line with DfT's Public Sector Equality Duty, an Equality Impact Assessment is carried out. This should examine in more detail, and on a step-by-step basis, the likely impacts on disabled people with a range of impairments.