Marcus Clements

Head of Consumer Policy Directorate of Economics, Markets & Strategy Office of Rail and Road



Robert Gravelle Accessibility and Inclusion Manager Transport for Wales

23 February 2021

Dear Robert,

Compliance with Condition 5 (Accessible Travel Policy) of your Station Licence and GB Statement of National Regulatory Provisions: Passenger

Thank you for your letter dated 14 September 2020 in respect of Transport for Wales' licence and its performance in relation to its obligations under section A1 (**Booking and providing assistance to passengers**) of the Accessible Travel Policy (ATP) guidance.

Your response has helped us to understand in more depth the background to the challenges TFWR has experienced on its network. Whilst we note that the Wales and Borders rail network was subject to extreme weather events in 2019-20, it is important to highlight that under the ATP Guidance, all operators' have a duty to ensure that, wherever possible, passengers are able to continue their journey and are not left stranded where disruption to services and facilities occur.

It is our expectation that when passengers have booked assistance in advance through Passenger Assist that, because of service disruption, is no longer valid, operators should contact those passengers to make appropriate arrangements. Failure to do so can have significant impact on the confidence of disabled people and other passengers with reduced mobility in travelling on the railway.

In your response you have set out a number of measures that will be put into place over 2020-21 to improve the reliability of your assistance service. We will continue to discuss these measures in our quarterly ATP meetings, to ensure they will address the identified reliability failures and improve overall the reliability of assistance.

Please note that this letter and your previous reply will be published on our website.

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Head Office: 25 Cabot Square, London E14 4QZ

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Yours sincerely

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Marcus Clements



Tŷ'r Santes Fair 47 Heol Penarth Caerdydd CF10 5DJ trctrenau.cymru St. Mary's House 47 Penarth Road Cardiff CF10 5DJ tfwrail.wales

Marcus Clements Head of Consumer Policy Office of Road and Rail (By email)

14th September 2020

Dear Marcus,

Compliance with Condition 5 (Accessible Travel Policy) of your Station Licence and GB Statement of National Regulatory Provisions: Passenger

In response to your letter dated 20th August 2020 regarding; Condition 5 of Transport for Wales' licence and its performance in relation to obligations under section A1 (Booking and providing assistance to passengers) of the Accessible Travel Policy (ATP).

Since the start of our franchise in 2018, TfW as a Rail Operator has been committed to the principles of the Accessible Travel Policy (ATP). Striving towards providing passenger assistance whether booked in advance through Passenger Assist or via 'turn up and go' provision.

In addition to receiving 55,492 requests for booked assistance in 2019/20, we obviously support a growing number of customers who desire a more spontaneous and independent solution via 'turn up and go'. A service, which we strongly endorse in the spirit of the Equalities Act 2010 and the Conditions of the Transport for Wales license.

Whist there are no excuses for 23% of Transport for Wales passengers you surveyed not receiving any aspect of the assistance they had booked. 2019/20 was a challenging year for TfW and the Wales and Boarders rail network. We saw the unprecedented impact of flooding, extremes of weather conditions across the whole of the TfW network and the associated adverse impacts experienced by an increasing number of customers. Coupled with implications that can only be associated to, what was at that time, the ageing rolling stock.

This said TfW are acutely aware and concerned with our performance in relation to all passenger assist and thank you, for your ongoing research and notification. We feel your monitoring is of great support and opportunity, help us externally recognise where we need to improve our services and achieve our obligations.

As part our commitment to all our customers and the obligations we have ourselves been monitoring our performance and importantly developing approaches to address this recognised shortfall. These approaches include: -

As of September 2020 TfW, staff will receive the RDG 'Transreport' app, linking in association with other TOCs. This approach is expected to support our ability to better account for, recognise and manage booked passenger assistance, as well as support 'turn up and go' customers cross our services and those using other TOCs entering the TfW Network. The 'Transreport' system will enable staff via the app, to manage passenger assist requests faster and importantly in real-time. Proving an effective solution to passenger assist and customer experience.



- We are continuing to improve our booking processes. TfW are committed to improving the availability and booking of reserved PRM spaces. A provision not available across the network during the period in question (2019/20 1-13).
- The ongoing introduction of improved fleet with greater PRM capacity is better supporting Booked passenger assist and 'turn up and go' customers to access our service. This reducing the disappointment of a 'turn up and go' customers allocated a booked space made in advance.
- Staff training is increasingly a priority with training been developed and now implemented that matches the mandatory requirements of the ATP.
- January 2020 TfW saw the launch of 'Interpreter Now' a live BSL interpreter support app, fully funded by TfW and downloadable by any BSL using customer experiencing or requiring information whilst using our network, including those requiring or having booked passenger assist.
- Initially intended for March 2020 (Delayed by CV19), but formally launched in June, TfW adopted the Sunflower Lanyard. The lanyard now illustrating its benefit in supporting our staff recognise those traveling customers requiring additional support.
- All station and conductor teams are now briefed regarding their responsibility to conduct PRM passenger assistance – briefings are performed at regular intervals as part of their standard operational procedures.
- Complaints relating to passenger assist are now not only forwarded to the relevant conductor
 or stations teams, but are actively followed up and addressed, through 1 to 1 staff
 intervention if necessary, or additional support from the Access & Inclusion Manger / Team.
- Main stations now have dedicated Passenger assist teams, which not only support booked passenger assists, but also anyone requiring additional support.
- TfW have initiated a program of critical friends drawing from the community expert
 individuals with lived experience of using rail as a person with reduced mobility and other
 impairments. The Access & Inclusion Panel since Jan 2020 meeting on a monthly basis is
 providing their insight toward our understanding of how we need to address this community
 and support their needs and independence.
- TfW for the first time now have a dedicated Access & Inclusion manager and support officer. This is leading towards the championing of change for the disabled and mobility impaired communities. It is expected that this function will over time instigate significant organisational change and improvements for all our PRM customers using our services.
- October 2020 will see TfW launch our ATP. This significant work illustrating our evolution, policy's and expectations not only for our customers but on our staff alike. Upon formal launch the direct requirements will be underlined and relayed to all staff.

Looking more towards the future, as the TfW franchise matures and our obligations are realised it is expected that passenger assistance across a widening proportion of our network will become redundant; simply as we are working towards level boarding and independently usable / negotiable stations and services. This is especially illustrated by the Core Valley Lines (CVL), which builds up a large proportion of the welsh network, where we will see for the first time in Wales true level boarding.

I trust that this response is an illustration of TfWs commitment and actions towards improving our performance within Condition 5 and our obligations under section A1 (Booking and providing assistance to passengers) of the Accessible Travel Policy (ATP).

Yours sincerely,

Robert Gravelle (Dr)

Rheolwr Hygyrchedd a Chynhwysiant / Accessibility and Inclusion Manager

Robert.Gravelle@tfwrail.wales

02920 720 505





Marcus Clements

Head of Consumer Policy Directorate of Economics, Markets & Strategy Office of Rail and Road



Robert Gravelle Accessibility and Inclusion Manager **Transport for Wales**

20 August 2020

Dear Robert,

Compliance with Condition 5 (Accessible Travel Policy) of your Station Licence and GB Statement of National Regulatory **Provisions: Passenger**

I refer to Condition 5 of Transport for Wales' licence and its performance in relation to its obligations under section A1 (Booking and providing assistance to passengers) of the Accessible Travel Policy (ATP).

In its ATP, Transport for Wales has committed to providing assistance when booked in advance through Passenger Assist, at any station during the hours that trains are scheduled to serve that station. Our data shows that Transport for Wales received 55,492 requests for booked assistance in 2019/20.

As you will be aware, the Office of Rail and Road conducts ongoing research into the experience of booked assistance users who rely on the service to make their journeys. Our latest survey results for 2019/20 (rail periods 1-13) show that at the stations managed by Transport for Wales only 69% of passengers surveyed1 received all of the assistance they had booked in advance. We note that almost a quarter (23%) of those Transport for Wales passengers surveyed did not receive any aspect of the assistance they had booked.

These findings indicate that the reliability of Transport for Wales' booked assistance provision is currently falling short of what we, and your passengers, expect. It is important that passengers receive the service they have booked. Failure to do so

T: 020 7282 2000

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Head Office: 25 Cabot Square, London E14 4QZ

¹ Based on a sample of 166 Transport for Wales passengers surveyed by Breaking Blue



can have an adverse impact on passengers' confidence and willingness to travel in future.

Next steps

I shall be grateful if you will explain the reasons for the shortfall in performance together with the steps you intend to take to improve the reliability of the booked assistance provided to passengers.

I look forward to receiving your reply by Friday 11 September 2020.

Please send your response to: Denise.Brown@orr.gov.uk

This letter and your reply will be published on our website.

Yours sincerely

Marcus Clements