

Marcus Clements
 Head of Consumer Policy
 Office of Rail and Road

11 September 2020

SWR response to Compliance with Condition 5 (Accessible Travel Policy) of your Station Licence and GB Statement of National Regulatory Provisions: Passenger (20 August 2020)

Dear Marcus

Thank you for your letter dated 20 August 2020 regarding South Western Railway's (SWR) compliance with Condition 5 of our Accessible Travel Policy (ATP).

It is always disappointing to hear that colleagues at SWR have not provided all the assistance requested by customers when travelling on our trains or at our stations. In the rail year 2019 – 2020, SWR staff provided booked assistance on over 78,000 occasions (this figure includes assistance provided at London Waterloo, Clapham Junction and Guildford. Although these stations are managed by Network Rail, it is SWR staff who provide the assistance). We note that the research figures quoted by ORR in your letter to us on 20 August 2020 only show that you have surveyed 125 customers, which, compared to our assistance figures, is a very small fraction of the true number of travellers. This survey figure is also below your minimum target of 275 customers, according to your report of 2019 – 2020. We would be interested to know the demographic breakdown of those surveyed, as well as which part of any assistance wasn't provided to the customers' full expectations.

Given the above, we would like to reassure you, our Regulator, as well as our customers, that the true success rate of passenger assistance provided by SWR colleagues is much higher than that quote by you in your research. The table below illustrates our figures provided to you for assistance reliability at SWR (these figures exclude London Waterloo, Clapham Junction and Guildford stations for reporting purposes and are based on a capture rate of c.60%):

	Unsuccessful assistance number
Total booked assistance "unsuccessful" raw number	5622
Total booked assistance "unsuccessful" due to SWR error	698
Total booked assistance "unsuccessful" due to changes by customer e.g. did not turn up or travelled earlier	4646

Given the figures in the table above, SWR's success rate at its own stations, excluding Waterloo, Guildford and Clapham Junction is c.95% (assuming scaling up from the current capture rate of c.60%). We concede that the above figures are not indicative of the customers' feelings and we do not have a feedback survey to ask them if they received all of their expected assistance, however, we believe that the numbers provided above are a closer reflection of the true picture of assistance provided by SWR colleagues. However, that being said, at least 5% of customers at SWR managed stations did not receive their assistance as booked and it is right that we address this.

With the introduction of the Accessible Travel Policy (ATP) on 9 October 2020, we hope that this will provide better information to customers to help mitigate any risks of them missing opportunities to interact with our colleagues who can then provide them with assistance. As part of the ATP, we hope that the soon to be

published Handover Protocol for assistance will ensure that our communication systems are more robust. In the numbers quoted above as 698 occurrences where SWR has made an error, there are occasions where our handover process has not worked, and unfortunately, the customer has not benefited from the service that they expected or deserved.

In our last letter to you, we mentioned that we had been issuing text messages to our guards about any booked assists for their train services, and we are pleased to say that we believe that this has been a success in improving the reliability of assistance provided by our guards. In addition to this, we have secured funding to roll out our Assisted Boarding Points at all SWR managed stations in the hope that any customers who have pre-booked assistance ensure that they have a dedicated point on the platform in which to wait so that our guards especially know where to expect to find them so that they can provide any assistance they need when boarding the train. Although separate to the research quoted in your letter, these boarding points will also allow us to improve the reliability of unbooked assistance on our network which makes up the majority of assistance provided by SWR colleagues. For any customers requesting assistance through these boarding points, we will also be able to provide them with a short customer satisfaction survey which will provide us with much needed insight into our assistance provision.

Regarding redress for customers, the majority of cases are rejected because after investigations, we have found that the assistance was indeed provided to the customer. There have also been occasions where the customer has not provided us with their bank details and/or postal address in order for us to provide them with the appropriate redress, despite our contact centre agents' chasing. As with all cases, we judge each case individually and where appropriate, we have offered the necessary redress as well as any gestures of goodwill. Our Station Managers and Accessibility and Inclusion Manager have also contacted customers on occasions where things have gone wrong and in addition to financial compensation, we have found this to be more effective in repairing any damaged or broken relationships with customers.

We hope the above reassures you and our customers of our commitment to ensuring that all our customers can travel safely and confidently with SWR. We are especially looking forward to the roll out of Assisted Boarding Points and I know that colleagues in your team have taken a keen interest in receiving a future update on this.

Yours sincerely



Michael Adlington
Accessibility and Inclusion Manager

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



Mike Adlington
Accessibility and Inclusion Manager
South Western Railway

20 August 2020

Dear Mike,

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 South Western Railway's (SWR) licence and its activities in relation to its obligations under sections **A1 (Booking and providing assistance to passengers)** and **A8 (Redress)** of the Accessible Travel Policy (ATP).

Reliability of booked assistance

In its ATP SWR 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 SWR received 56,956 requests for booked assistance in 2019/20.

As you will be aware, the Office of Rail and Road (ORR) 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 SWR only 65% of passengers surveyed¹ received all aspects of the assistance they had booked in advance. We note that a quarter (25%) of those SWR passengers surveyed did not receive any aspect of the assistance they had booked.

These findings indicate that the reliability of SWR booked assistance provision is therefore currently falling short of what we, and your passengers, expect. It is

¹ Based on a sample of 125 of SWR passengers surveyed by Breaking Blue.



especially disappointing that the changes you outlined in your response² to us when we wrote to you on the same issue last year have failed to deliver the improvements you anticipated, and highlight that further action is required. It is important that passengers receive the service they have booked. Failure to do so can have an adverse impact on passengers' confidence and willingness to travel in future.

Passenger redress following booked assistance failure

One of the principal ways the ORR monitors licence holders' compliance with their ATP obligations is via their routine core data submissions. Our review of SWR's activities in relation to the provision of redress to passengers following a booked assistance failure shows that between rail periods 1-13 in 2019/20 SWR received 246 claims for redress; of these, 112 were approved and redress was provided. This indicates that only around 46% of all claims from passengers for redress due to booked assistance failure have been approved by SWR, an approval rate which is lower than other comparable operators.

It is our expectation that passengers should be able to receive appropriate redress when they do not receive the assistance they have booked. Where they do not, it is important that we understand why this is the case.

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.

In addition, please also include any supporting material, where relevant, together with any action you have taken or propose to take to ensure that passengers who have not received the assistance they booked can receive the redress to which they are entitled.

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.

² SWR 16 April 2019 response to ORR letter regarding the reliability of assistance provision: https://orr.gov.uk/_data/assets/pdf_file/0003/41358/swr-response-dppp-compliance.pdf



Yours sincerely

A handwritten signature in black ink, appearing to read "Marcus Clements". The signature is fluid and cursive, with a large loop at the end.

Marcus Clements