Rail Passenger Assistance: Benchmarking Operators' Performance
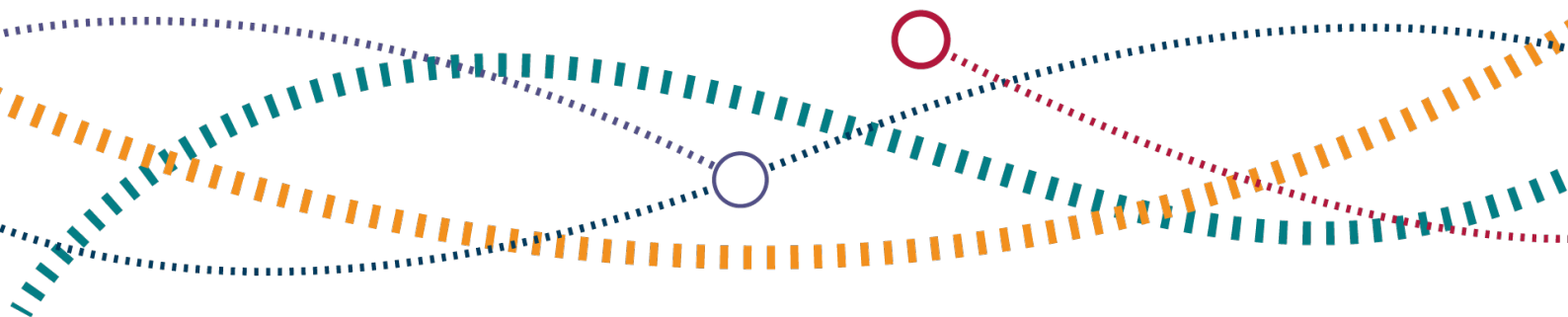
A consultation on a new assessment framework

11 December 2024

Contents

Executive summary

1. Many passengers, including some older and disabled people, rely on the assistance of staff to travel by rail. There were over 350,000 assistance bookings made in 2023-24 and the number is increasing.

2. Providing assistance free of charge to anyone that needs it, whether they have booked in advance or request help at the station, is a requirement of train and station operators' passenger licences via the obligation to produce and comply with an Accessible Travel Policy (ATP).

3. ORR monitors the provision of assistance so we can hold operators to account for meeting this requirement. Our annual survey of passengers that have booked assistance shows that the service is not reliable enough. For the period 2023-24, only 76% of respondents to the survey reported receiving all the assistance they had booked; 12% of respondents to the survey reported that they received none of the assistance they had booked –

rising to 15% and higher for the worst performing operators.

4. Assistance failures leave passengers feeling angry, frustrated and helpless. They reduce passengers' confidence that they will receive the assistance they have booked (only 71% of passengers that make a booking have this confidence), and therefore their confidence to travel by rail. We want to strengthen our ability to hold operators to account for poor performance in this area and to drive improvements in the provision of the service.

5. To achieve this, we are proposing in this consultation a new framework for benchmarking each operator's performance, focusing specifically on their assistance delivery and their organisational capability to improve performance (see Table 1). We plan to introduce this in 2025, resulting in an ongoing annual assessment that ranks the performance of each operator across a range of benchmarks.

Table 1.   Proposed assessment framework

Assessment Area	Sub-Category #1	Sub-Category #2	Sub-Category #3
A. Assistance Delivery	Reliability	Satisfaction	Training
B. Organisational Capability to Improve	Monitoring and Reporting	Risks and Mitigations	Engagement

6. We will publish the results of these assessments and use our findings to inform our engagement with operators as we hold them to account.

7. We are seeking views on the new framework to help us ensure that it accurately captures and takes account of the critical factors that drive more reliable provision of assistance. Consultation questions are embedded within the text of this document and collated at **Annex A**. Responses are invited by **14 February 2025.**

1. Introduction

Background

Passenger Assistance

1.1 Passenger assistance is a free service for disabled passengers or anyone else who may require help to be able to access rail travel. Sitting alongside broader efforts to make rail travel accessible to everyone, it is designed to reduce the barriers to travel that disabled people may face.

1.2 Assistance is available to anyone who needs it: this could be due to a disability (whether visible or non-visible) or long-term health condition, a temporary health issue or older age. Assistance with various activities can be requested, including entering and moving around the station, boarding and alighting the train (e.g. via ramps), carrying luggage (up to three items), or finding the relevant seat.

1.3 Passengers can book assistance in advance of their journey, up to two hours prior to travel in

England and Wales and up to one hour prior to travel on Scotrail services. Alternatively, passengers can request on demand 'Turn-up-and-Go' assistance at the station. In this document, we call this unbooked assistance.

1.4   It is usually the responsibility of station operators to provide assistance at their stations, regardless of the train operator that a passenger is travelling with. At stations managed by Network Rail, in some cases Network Rail is responsible for providing assistance for all passengers, and in others train operators are responsible.

1.5   In 2023-24, over 350,000 assistance bookings were made – more than any previous year. Operators are not currently able to consistently report reliable data to us on unbooked assistance volumes.

Figure 1.1 Passenger bookings

Passenger bookings, annual data

	2021-22	2022-23	2023-24
	190,036	300,953	367,716
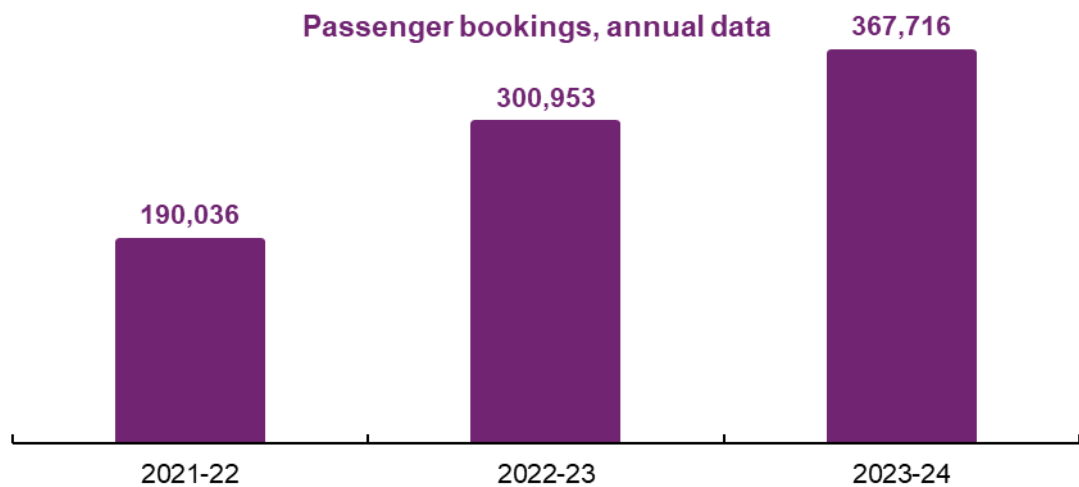
Source: ORR data portal [passenger assistance statistics](#)

Regulatory requirement

1.6 Each operator must have an operating licence, issued by ORR. These licences include a condition entitled Accessible Travel Policy (ATP), which requires each operator, including Network Rail and London Underground, to establish, publish and comply with an ATP, stating how they will protect the interests of disabled users of their trains and stations. ORR has published guidance setting out the required contents of each ATP: [Accessible Travel Policy](#).

1.7 Providing assistance to passengers, whether on a booked or unbooked basis, is the central commitment of each ATP. A key priority for ORR's regulatory work is to hold operators to account for fulfilling the commitments made to passengers in their ATPs. In this document we use the word 'operators' to mean any train or station operator responsible for providing assistance, including Network Rail and London Underground.

Reliability of passenger assistance

1.8 The reliability of passenger assistance matters. When assistance failures occur the consequences can be significant, including missed appointments, lost business and abandoned holidays. In the worst cases, passengers can be left on trains unable to alight and carried to the wrong stations, feeling angry, frustrated and helpless. Even when passengers are able to complete their journeys despite the assistance not being provided, their journey

experience is nonetheless worsened, and their confidence in the service lowered.

1.9   ORR monitors the reliability of assistance provision so that we can hold operators to account for meeting their ATP commitments. Currently, our most reliable source of data is an ongoing survey of passengers who have booked assistance, which we have been running since 2017. We publish the findings annually and almost 9,500 passengers completed the survey in 2023-24. We are working with the rail industry to secure good quality data on both booked and unbooked assistance outcomes for every assisted journey. We discuss this work further in **Section 2**.

1.10 Our passenger survey shows that assistance delivery is not reliable enough. As set out in figure 1.2, for the period 2023-24, 12% of respondents to the survey reported that they received none of the assistance they had booked – rising to 15% and higher for the worst performing operators. Only 76% of respondents

reported receiving all the assistance they had booked. This figure drops to 71% for passengers with non-visible disabilities.

Figure 1.2 Reliability of assistance provision (2023-24)
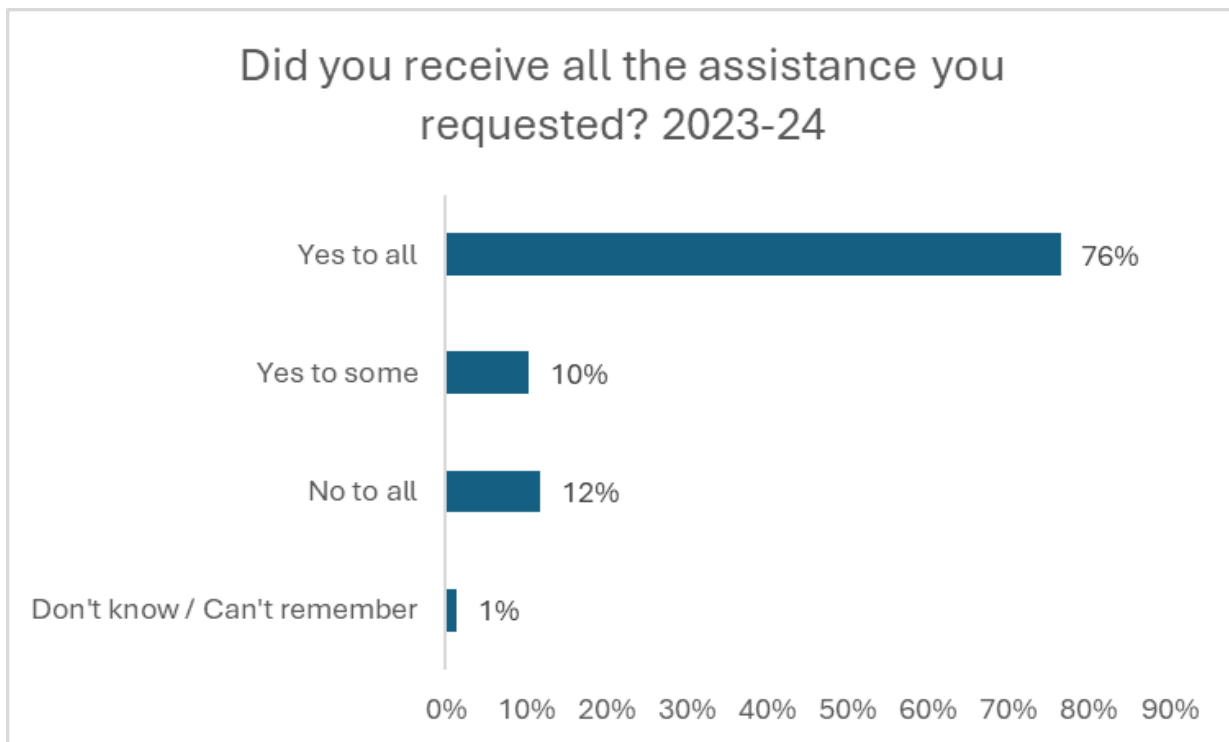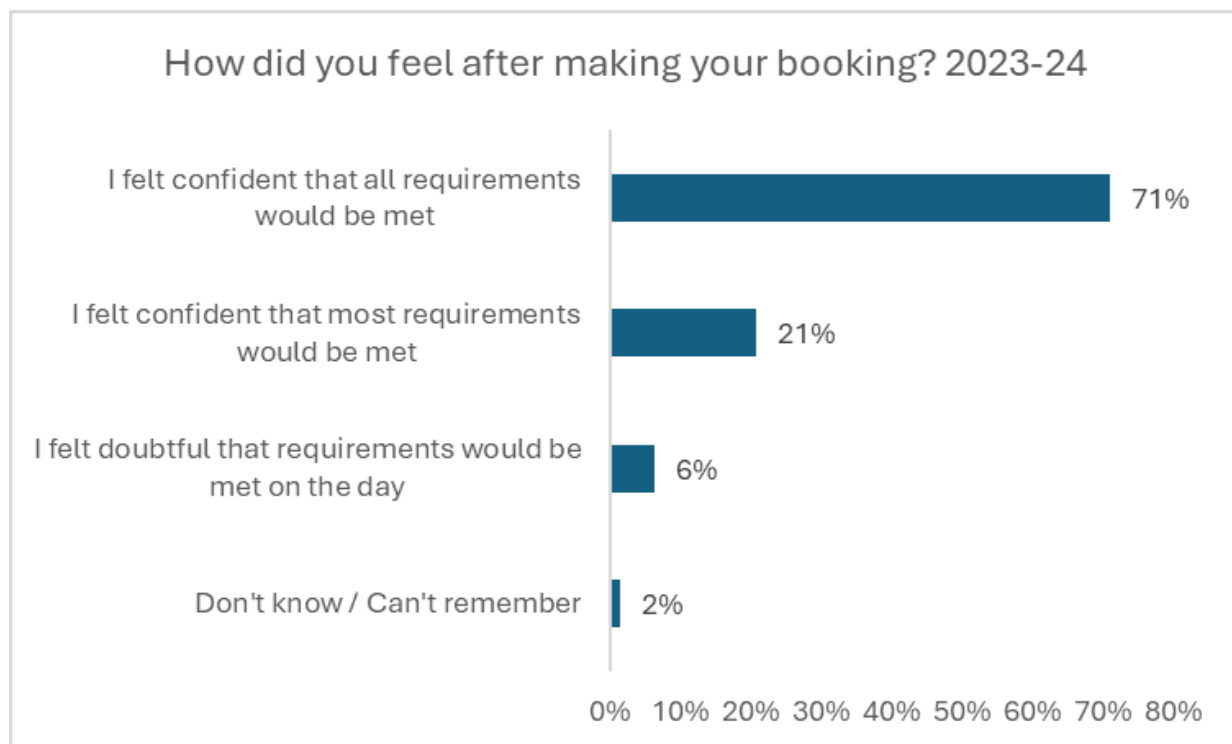

Source: [2023 to 2024 passenger assist research report](#)

1.11 This poor reliability is affecting passengers' confidence in the service; having made a booking, only 71% of respondents felt that they would receive all the assistance they had

requested (21% felt most requirements would be met, and 6% were doubtful their requirements would be met), as shown in Figure 1.3 below.

Figure 1.3 Confidence in assistance provision (2023-24)

How did you feel after making your booking? 2023-24

Response	Percentage
I felt confident that all requirements would be met	71%
I felt confident that most requirements would be met	21%
I felt doubtful that requirements would be met on the day	6%
Don't know / Can't remember	2%

Source: 2023 to 2024 passenger assist research report

Monitoring and compliance

1.12 ORR already requires operators to take active steps to monitor and improve their performance in this area. We also carry out our own activities

to monitor and ensure compliance with ATP commitments, and other regulatory requirements that affect accessibility, details of which can be found on our website: Accessible Travel Policy (ATP) | Office of Rail and Road (orr.gov.uk)

1.13 Over the past two years, this has included:

- In 2023 we commissioned audits into how five operators were meeting regulatory requirements related to the delivery of assistance. Our report identified key areas of focus for the industry as a whole to drive improvement in the delivery of passenger assistance, as well as good practice and areas to improve for the five operators.

- We monitor accessibility training, including an assessment in 2021 of the new induction training materials and delivery formats to ensure that they met the 'mandatory training outcomes' specified in our ATP guidance. Then in 2023 we reviewed provision of refresher training, engaging closely with those

operators where we had concerns about timeliness or delivery method.

- In March 2024 we published a [report on the reliability of station lifts](#), and the impact of poor lift performance on passengers. We also reviewed the provision of information on lift availability for passengers, to enable better journey planning. This report will serve as the baseline for ongoing monitoring and regular publication of performance data.

- Focused work on the worst performing operators in our annual survey of booked assistance. Most recently, this has included [engagement with Northern](#) on the basis of their performance in 2023-24: we required them to produce a performance improvement plan, which we have reviewed, and we will be closely monitoring its implementation

- A review of disabled passengers' experience of complaints handling. This [2024 report](#) included research on passengers' awareness

of, and the likelihood to use, complaints handling processes. ORR followed-up with relevant operators to drive improvement, after identifying some non-compliance with specific requirements in our [Complaints Code of Practice](#) and ATP Guidance.

- In 2024 we conducted [research on help points at stations](#). Our report showed that reliability was inconsistent and we raised concerns about operators' ability to promptly identify and fix any issues. We asked station operators to review their approaches to monitoring and to carry out a risk assessment for the unstaffed and partially staffed stations on their network.

Our proposals

Our objective

1.14 We want to strengthen our ability to hold operators to account for the assistance they provide to passengers and drive improvements, particularly in the reliability of assistance delivery.

1.15 We therefore propose to introduce a new framework for benchmarking performance, focusing specifically on assistance delivery. Our proposed framework draws on the work of the CAA to benchmark the provision of assistance at airports, and builds upon ORR's experience of developing and using the risk management maturity model (RM3) to assess operators' health and safety maturity. It aims to transparently identify better and worse performance in providing assistance, so that we can focus our compliance activities on the worst performing operators whilst highlighting good practice for sharing across the industry.

Benchmarking framework

1.16 Our proposed assistance benchmarking framework would see an annual assessment of performance in two areas:

- the delivery of assistance, and

- the organisational capability to improve performance.

1.17 For each of those two areas, operators would be given a ranking (upper/middle/lower). This benchmarking framework is described in detail in the next section.

1.18 We intend to publish our assessment every year and use the findings to inform our engagement with operators. Where there are serious concerns about performance we will not wait for the annual benchmarking assessment before engaging with an operator. ORR will be monitoring industry performance throughout the year and will act as appropriate to raise any issues with operators.

1.19 We will also continue to monitor other aspects of ATP compliance, as well as operators' broader infrastructure accessibility obligations, through activities such as those set out paragraph 1.13. These broader obligations include the provision of ramps, lifts and tactile paving at stations, ensuring accurate and up-to-date information is available on the accessibility of stations and train services, and maintaining facilities such as help

points that allow passengers to request assistance at unstaffed stations.

Scope

1.20 Our intention is to assess every passenger train operator that is responsible for providing assistance at stations, as well as Network Rail and London Underground for the stations they operate on the national rail network. We explore further in Section 2 (paragraphs 2.7. and 2.8) how Network Rail performance might be disaggregated.

1.21 For some operators, sufficient data may not be available to assess them against all aspects of the benchmarking framework. We have indicated the operators that we expect to exclude from specific sub-categories in the relevant sections in this document.

Stakeholder engagement

1.22 The proposals set out in this document were developed through a process of informal engagement with stakeholders. We have shared

draft versions of the framework with ORR's Accessible Travel Stakeholder Forum (comprising representatives from organisations with an interest in accessibility), and with working-level experts in industry and government. In particular, our proposals are informed by the assistance benchmarking framework for airports, which was developed and implemented by the Civil Aviation Authority (CAA). We met with CAA to discuss their approach, and joined them on an airport visit to understand how the framework is applied.

1.23 The engagement that we have had so far from these stakeholders has helped to shape the draft framework, and we hope that this consultation will help us to refine it further.

How to respond

1.24 Responses to this consultation are invited by **5pm on Friday 14 February 2025**.

Office of Rail and Road | Rail Passenger Assistance Benchmarking

1.25 Responses should be sent using the online form on our website, by email to ATP@orr.gov.uk, or by post to:

Assistance Benchmarking Consultation
Office of Rail and Road
25 Cabot Square
London, E14 4QZ.

1.26 In addition to the consultation questions we have set out in this document, we also invite any general feedback on our proposals.

1.27 ORR has actively considered the needs of blind and partially sighted people in accessing this document in PDF format. The text is available in full on the ORR website and may be freely downloaded. Individuals can use free accessibility features or screen readers to read the contents of this document.

1.28 We have also produced Standard Print and Easy Read versions of this consultation document which can be accessed on our website.

1.29 If you need this document in a different format such as audio recording or braille, please contact our Public Correspondence Team:

E-mail: Webteam@orr.gov.uk
Telephone: 0207 282 2000
Post: Office of Rail and Road, 25 Cabot Square, London, E14 4QZ.

1.30 We will consider your request and will endeavour to respond within 20 working days.

1.31 We plan to publish all responses to this consultation on our website. Should you wish for any information in your response to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily the Freedom of Information Act 2000 (FOIA), the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (DPA) and the Environmental Information Regulations 2004.

1.32 Under the FOIA, there is a statutory code of practice which deals, amongst other things, with obligations of confidence. In view of this, if you are seeking confidentiality for information you are providing, please explain why. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on ORR.

1.33 If you are seeking to make a response in confidence, we would also be grateful if you would annex any confidential information, or provide a non-confidential summary, so that we can publish the non-confidential aspects of your response.

2. Proposed assistance benchmarking framework

Introduction

2.1 This section of the consultation document provides an overview of the benchmarking framework: the different categories and sub-categories that we are looking to assess, and the performance levels that we propose to use. We then provide a more detailed description of each sub-category – including how we intend to collect evidence and distinguish between performance levels.

Overview

Performance Categories

2.2 We propose to assess operators' performance in two categories: delivery of assistance and capability to improve. Each of these categories will be broken down further into three sub-categories.

- **A: DELIVERY** captures the extent to which an operator is meeting the basic requirements.

  - **A1: Reliability** - are passengers receiving the assistance that they have requested?

  - **A2: Satisfaction** - are they happy with the assistance that they get?

  - **A3: Training** - are staff receiving the appropriate training?

- **B: CAPABILITY TO IMPROVE** looks at the important enabling factors that allow an operator to address and develop its performance for passengers.

  - **B1: Monitoring and reporting** - does the operator record assistance outcomes and understand performance levels?

  - **B2: Risks and mitigations** - does the operator identify the risks to reliable assistance, and develop and implement appropriate mitigations?

- **B3: Engagement** – does the operator work together with passengers' representative groups and industry colleagues to tackle failures and improve?

Performance levels

2.3 We propose to assess operators against three levels of performance. This is sufficient to identify both the poorer performers, where we will focus our engagement, and the better performers who others can look to for good practice. It also makes the framework easier to understand for both industry and passengers. A summary description of the three levels is given below. A more detailed description of performance levels is provided for each of the six subcategories in the next section.

Proposed performance levels

[Upper]:

● Sustained strong track record of delivery.

- No complacency, looking to improve further, innovation informed by good evidence.

[Middle]

- Performance middling, steady but with room for improvement.

- Commitment and plans to improve, based on an informed understanding of issues.

[Lower]

- Poor performance relative to peers and regulatory requirements, downward or static. Poor understanding of the factors that affect performance – effective action not being taken.

2.4   A performance level would be awarded separately for each of the six sub-categories. These would then be brought together to give a performance assessment for each of the headline categories, delivery and capability to improve. We are also considering including in our assessment an indication of direction of travel for each subcategory – whether an operator's performance is improving or worsening. See Table 2.1 below for an example of the overall performance assessment, in which direction of travel could be indicated by arrows.

Office of Rail and Road | Rail Passenger Assistance Benchmarking

Table 2.1   Illustrative Assistance Benchmark Table

Operator	A. Delivery	A1. Reliability	A2. Satisfaction	A3. Training	B. Capability to Improve	B1. Monitoring & Reporting	B2. Risks & Mitigations	B3. Engagement
#1	**Middle**	Middle■	Upper▲	Middle▼	**Upper**	Upper■	Upper▲	Middle■
#2	**Lower**	Lower▼	Lower▼	Middle■	**Middle**	Lower■	Middle■	Lower▼
#3	**Upper**	Upper■	Middle▼	Middle■	**Middle**	Middle■	Middle■	Lower■

Key: direction of travel indicated by ▲ (improving) ▼(worsening) ■ (no change)
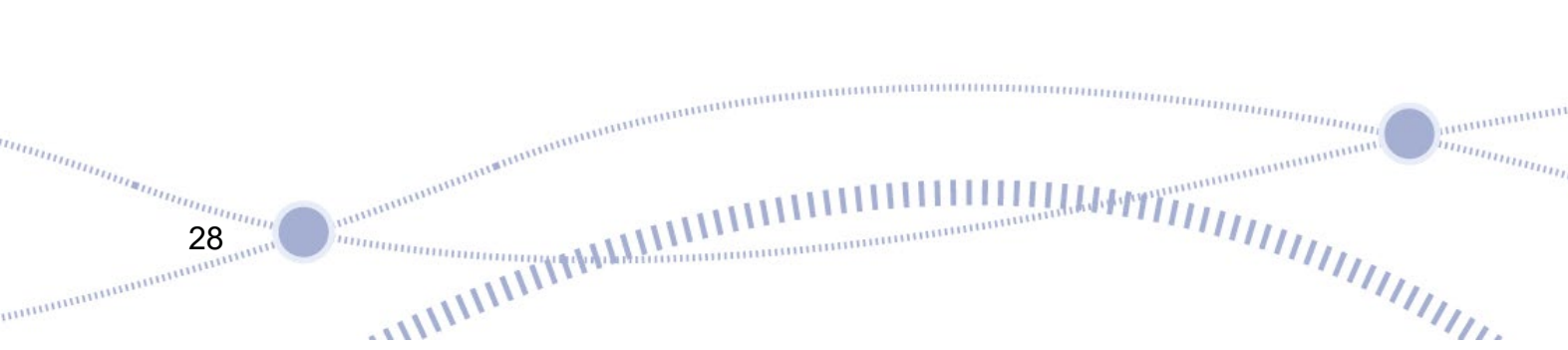
2.5 We are not proposing to combine the assessments to produce a single overall assessment for each operator because we want to focus operators' attention on those areas where it is most needed.

2.6 We want our assessment to be evidence-based and, so far as possible, objective. There will however inevitably be an element of judgement and best-fit. An operator's performance may vary across different areas, and there is likely to be some overlap when assessing performance in different categories. While some categories are suited to quantitative assessment, in others the decisions on performance thresholds will be qualitative. We will design our assessment process to ensure a fair and consistent approach between operators and we will follow up with operators in order to ensure they provide us with the best available evidence to support this process.

Network Rail

2.7   Around a third of passenger assists are delivered at stations that are managed by Network Rail. The performance of Network Rail is therefore critical to the overall reliability of the assistance service and we are considering how best to benchmark Network Rail performance alongside that of train operators.

2.8   We have identified three options that we are now considering:

(i)   We could carry out a single assessment for Network Rail as a whole;

(ii) We could carry out a separate assessment for each of the stations where Network Rail provide assistance; or

(iii) Reflecting that Network Rail is organised into five regions for management purposes, we could carry out an assessment at Network Rail region level.

Consultation Questions

(1) Do you agree with our plan to publish a report that benchmarks operators' performance levels in providing assistance to rail passengers? Explain your answer.

(2) Are the two headline performance categories (delivery and capability to improve) clear and meaningful? Is there anything else that should be included?

(3) Are the performance level descriptors clear and meaningful? How should we name these performance levels (if at all)? Is three the right number of levels?

Performance Sub-Categories

A. Delivery

2.9   The Delivery category encompasses three sub-categories that are critical to delivery of assistance for passengers, and to compliance with an operator's ATP commitments: Reliability, Satisfaction and Training.

A1. Reliability

2.10 Reliability is the most significant factor in this area: is assistance actually being delivered?

2.11 In assessing an operator's performance in this sub-category, we would ideally have access to comprehensive and accurate data on assistance outcomes for booked and unbooked assistance.

2.12 Operators are not currently able to consistently provide accurate data on assistance outcomes to us. We have worked with Rail Delivery Group to review the data that we require operators to report and agreed new reporting categories in April 2024. We then allowed industry time to introduce new reporting mechanisms into the passenger assist system, and to make more progress in rolling out the passenger assist staff app that enables staff to report assistance outcomes in real time. We will be requiring operators to report against the new categories from April 2025. We will consider how to build this data into the benchmarking assessment once we are content with data quality.

2.13 Our assessment will therefore initially be based on the findings from our ongoing passenger survey of booked assistance. To assess reliability, we will focus on the percentage of respondents who report not having received any of the assistance that they had booked.

2.14 To recognise performance over time, and to improve the sample size, we propose to include the most recent three years' of data in our analysis. To emphasise the most recent performance within this time series, we propose to use a weighted average, with the relative weighting for successive years being 1/2/3, from earliest to most recent. In assessing threshold decisions, we may also take direction-of-travel into account.

Figure 2.1 Illustration of how an operator's score for reliability would be calculated.

$$(Y1 + (Y2 \, x \, 2) + (Y3 \, x \, 3)) \div 6 = Result$$

Year	Y1 2021-22	Y2 2022-23	Y3 2023-24	RESULT
% of survey respondents that report receiving none of their booked assistance	12	10	8	$\underline{(12 + 20 + 24)}$ = 9.3%

2.15 A reliable assessment of an operator's performance in this area will depend upon an adequate sample size of survey responses. Operators for which we do not have a sufficient sample will not receive a score in this area. Taking into account our proposal to use three

years' worth of data, we propose to set this threshold at a minimum of fifty survey responses in each year. On the basis of our current evidence base, this would exclude Arriva Rail London (London Overground), c2c, Cross Country, Grand Central, Hull Trains, London Underground, Lumo, and MTR (the Elizabeth Line). There are currently low volumes of survey responses for these operators, either because they provide a low volume of assistance (i.e. those operators that do not manage many stations or any at all), or because their assistance is mostly unbooked (the survey covers only booked assistance).

2.16 Operators should be aiming to eliminate assistance failures. Taking current performance into account, and with the aim of setting targets that are stretching but achievable, we propose the following initial performance category thresholds.

A1. Reliability Tier Thresholds

- **Upper:** 5% or less of passengers reporting none of the booked assistance received.

- **Middle:** 6-10%

- **Lower:** 11% and above.

2.17 On the basis of performance over the past three years, and using the weighted average illustrated above, no operators would achieve the upper performance level in this category, with the best operators achieving 6%. In all, seven of the operators in scope for this category would be in the middle level, and eight in the lower level.

2.18 Some operators conduct their own monitoring and customer research to review their own performance. Where operators have robust data on performance then they are welcome to submit it, and we may take it into consideration when considering threshold cases. However, the ORR survey has the advantage of a consistent

approach for all and will carry the most weight in our assessment.

Consultation Questions

(4) Is the proposed reliability metric clear and sufficiently reflective of reliability performance to allow comparison?

(5) Are the proposed reliability performance level thresholds set appropriately?

(6) Is the minimum sample size threshold for inclusion in this area of the assessment set appropriately?

A2. Satisfaction

2.19 Whereas Reliability assesses whether a passenger receives any assistance at all, Satisfaction measures the quality of that assistance when it does happen. There can be a big difference for a passenger between assistance delivered well, and assistance that is late, rushed or insensitive to a passenger's specific needs.

2.20 The annual ORR survey of booked assistance will again be the main source of evidence in this area. Where survey respondents report that they did receive assistance, we ask them whether they were satisfied with the assistance that they received at the station. The key measure is the percentage of those who report that they were 'satisfied' or 'very satisfied'. Industry performance in this area is currently at a relatively high level, with all operators scoring above 90% in the most recent survey.

2.21 To expand the sample size and recognise performance over time, as with reliability we propose to use a three-year weighted score: weighted 1/2/3 in favour of the most recent surveys.

2.22 Using the proposed performance thresholds on the basis of the last three years' results, the best five operators fall into the Upper performance level, with the next ten operators in the Middle performance level. No operators would be assessed as Lower.

2.23 As with reliability, a robust assessment of an operator's performance in this area will depend upon an adequate sample size of survey responses. Operators for whom we do not have a sufficient sample will not receive a score in this area. Taking into account our proposal to use three years' worth of data, we propose to set this threshold at a minimum of fifty survey responses in each year. On the basis of our current survey, this would exclude Arriva Rail London (London Overground), c2c, Cross Country, Grand Central, Hull Trains, London Underground, Lumo, and MTR (the Elizabeth Line).

A2. Satisfaction Tier Thresholds

- **[Upper]:** 95% and above

- **[Middle]:** 90-94%

- **[Lower]:** below 90%

2.24 As with reliability, some operators conduct their own monitoring and customer research to review customer satisfaction. Where operators have

robust, relevant data then they are welcome to submit it to us, and we may take it into consideration when considering threshold cases. However, the ORR survey has the advantage of a consistent approach for all and will carry the most weight in our assessment.

2.25 It is possible that in the future other sources of consistent cross-industry evidence may become available for booked and unbooked assistance (for example, 'star ratings' from users of the passenger assist app), and we would then consider whether and how to incorporate this additional data into the assessment.

Consultation Questions

(7) Is the proposed Satisfaction metric clear, and sufficiently reflective of performance to allow comparison?

(8) Are the Satisfaction performance level thresholds set appropriately?

(9) Is the minimum sample size threshold for inclusion in this area of the assessment set appropriately?

A3. Training

2.26 The third Delivery sub-category is Training: a key factor in ensuring that staff have the necessary skills and knowledge to provide assistance for passengers with a range of disabilities. We propose to incorporate our oversight of accessibility training into the assistance benchmarking framework as we consider training to be a key factor in the reliable provision of assistance.

2.27 There are specific regulatory requirements in this area. Operators must ensure that relevant

passenger-facing staff are able to meet the mandatory training outcomes that are set out in ORR's ATP guidance. These outcomes include an understanding of passenger assistance – its importance to passengers, and how to provide it safely and reliably. To this end, operators are required to provide comprehensive accessibility training at induction, and refresher training at least every two years to all passenger-facing staff. The refresher training can be tailored according to the operator's priorities. There are further requirements in terms of how the training should be developed, e.g. with input from passengers with lived experience of disability, and delivered, e.g. with an opportunity for staff to ask questions.

2.28 We expect to base our assessment on two key sources: quantitative data and qualitative information. Firstly, we will monitor the percentage of eligible staff who have received either induction training or refresher training within the past two years. We plan to request this

data from operators on a quarterly basis through the existing processes through which operators report regular compliance data to us. Reporting requirements are set out in our Core Data guidance. If we have concerns about the quality of the data then we may seek additional assurance from operators. . If we have concerns about the quality of the data then we may seek additional assurance from operators.

2.29 Secondly, we will ask operators for qualitative information. We will require them to summarise the content of their refresher training, and to summarise how these materials have been developed and delivered. We will be looking for evidence of how the content and delivery format has been designed to address the relevant operational risks, and any relevant evidence that the operator can provide to show how they have met or exceeded the regulatory requirements.

2.30 In terms of assessing this evidence, we propose the following performance level thresholds.

A3 Training Tier Descriptions

- **[Upper]:** operators must show that they have clearly gone above and beyond the baseline regulatory requirements. This may take several forms, but might include opportunities for staff to further develop their understanding and skills, or relevant training having been delivered outside the regular 2-year refresher training cycle, or of training being delivered in a face-to-face format.

- **[Middle]:** Operators must show that they are compliant with the ATP obligations. Passenger-facing staff must receive accessibility training on induction, and refresher training every 2 years; the training content must have received input from passengers with lived experience of disability; in terms of delivery format, there must be an opportunity for staff to ask questions

- **[Lower]:** Any operator that cannot give assurance that the regulatory requirements are being met will fall into this category. Where necessary we will seek further assurance that the issue is being

addressed through appropriate remedies. For example, in the past we have taken compliance action against operators who were relying solely on a written briefing note for delivery of refresher training.

Consultation Questions

(10) Is the proposed Training metric clear (taking into account the relevant detail provided in the ATP guidance on mandatory training outcomes)?

(11) Are the Training performance level thresholds set appropriately?

B. Capability to Improve

2.31 The second headline assessment category, alongside delivery, is an operator's Capability to Improve. We have taken inspiration from existing maturity frameworks, including ORR's own safety Risk Management Maturity Model (RM3) and its 'Plan, Do, Check, Act' principles, a framework already familiar to the rail industry.

2.32 The strategy section of ORR's ATP Guidance includes high-level requirements in this area. Operators commit to embedding the provision of services to disabled people (including assistance) within planning and management. There is also a clear expectation on operators to measure the success of their ATPs, and continue to improve in this area. The detail of the framework, as outlined below, is an elaboration of these high-level principles set out in the guidance.

2.33 The three sub-categories in this section focus on this organisational capability to manage and improve performance: does the operator monitor delivery of assistance effectively? Has it identified the risks that affect its performance and developed appropriate solutions? Does it effectively engage with passengers and industry through this process?

2.34 Our assessment of performance in this area will be primarily based on a review of the documentary evidence that an operator has of its own processes, and the positive changes that it

has made as a result. We will expect operators to provide this evidence. The criteria have been developed with this consideration in mind: what kind of documents would we expect an operator to maintain and provide as part of its continuous improvement, and what evidence would make up the basis of an informed assessment of an operator's performance.

2.35 In order to make our assessment we will send an information request to operators. We will share a draft of this information request with operators, for feedback. Our intention is for operators to be able to answer the questions by providing documentary evidence that already exists through management processes. During the submission and review stages of the benchmarking assessment there may, particularly in the first year, be further exchanges to clarify any queries or ask for additional evidence where necessary. In view of the qualitative nature of this part of the exercise,

there is likely to be a more significant element of 'best-fit' judgement on ORR's part.

2.36 Where appropriate we will also make use of information provided to us through the course of our regular monitoring work. For example, when assessing an operator's performance for the sub category Monitoring and Reporting, we will look at the accuracy and timeliness of Core Data submissions.

2.37 For each sub-category, a [upper] level assessment would require at least everything within the [middle] level, and nothing from the [lower] level.

B1. Monitoring and Reporting

2.38 The first sub-category is 'Monitoring and Reporting'. Our core expectation is that operators should have, and use, clear and consistent methods for accurately recording the outcomes of booked and unbooked assistance. This is based on the principle that, to manage and improve their own performance, operators

need to have a clear sense of what is happening to passengers that request assistance. They should also make appropriate use of other data sources, such as complaints, where relevant. ORR already requires operators to summarise and report quantitative data in this area to ORR through the Core Data process. The information request will ask operators to describe the systems that they use for generating these reports, and any others that are used internally.

B1. Monitoring and Reporting Tier Descriptions

[**Upper**] performance level entails the following:

- Everything within [middle], and nothing from [lower].

- The operator conducts its own data quality assurance, including assurance of data generated at the frontline, for accuracy and completeness, using comparator data sources where appropriate.

- The operator takes appropriate steps to address any gaps in data, or data quality issues.

For the **[Middle]** performance level, we will require evidence of the following:

- The operator has a clear, consistent process for frontline staff to capture accurate, timely and comprehensive data on assistance outcomes – for both booked and unbooked assistance.

- The operator considers a range of other sources to capture information, feedback and insight on issues that impact reliability, including complaints.

- The operator uses this data to generate performance reports, regularly reviewed by management.

- As a result, the operator has a good, evidence-based understanding of the usage profile for assistance, including types of assistance (booked and unbooked), and demand by station.

- The operator completes accurate and timely Core Data submissions on assistance (booked and unbooked) and complaints for ORR, each rail period.

The **[Lower]** performance level describes a failure to meet these requirements, and is characterised by:

- The operator does not have adequate frontline processes for capturing assistance outcomes, and management therefore does not have access to accurate summary information on assistance performance.

- There is little or no consideration of other information sources.

- Core Data submissions to ORR are inaccurate or incomplete.

B2. Risk and mitigation

2.39 The second Capability to Improve sub-category is 'Risk and Mitigation'. Here we are looking to assess: whether an operator can show evidence that it understands its own performance and the risks that bear upon it. Does the operator develop appropriate mitigations to mitigate these risks? Again, these aspects of organisational

management will be familiar to the rail industry from the similar expectations on safety, and operators with an effective system for managing assistance will be able to provide evidence to that effect. Our information request will focus on asking operators to provide completed examples of the documents that they use to manage these processes.

B2. Risk and Mitigation Tier Descriptions

The **[Upper]** performance level again describes performance that goes above and beyond the baseline expectations. Operators in this tier will be expected to demonstrate all of the criteria for [Middle] and none of those for [Lower].

- Where there are failures, managers proactively investigate what happened, and why.

- Risk analysis and mitigations are, where appropriate, specific to stations, staff delivery model, and other relevant facets of the operator's services.

- The operator looks for opportunities to improve – adopting or trialling technical innovations or good practice developed in other sectors.

- Challenging internal performance targets are set and monitored.

For the **[Middle]** performance level, we expect operators to show:

- A solid, evidence-based understanding of the main risks to delivery of assistance, including service disruption.

- Appropriate mitigations are developed on the basis of this risk analysis.

- Mitigations are promptly implemented (this may be on a trial basis).

- The roll-out of mitigations is monitored, and their impact kept under review, with appropriate follow-up action where necessary.

- Responsibility for assistance is documented in job roles and up-to-date operational handbooks.

The **[Lower]** performance level applies where operators are struggling to show the above. Operators that fall into this category will be characterised by:

- Limited understanding of own performance.

- Where things are going wrong, the operator cannot or does not identify why.

- The operator has little understanding of the specific risks to its own delivery of assistance, beyond generic whole-industry themes.

- Little development and implementation of mitigations.

B3. Engagement with Passengers and Industry

2.40 The third and last Capability to Improve sub-category is about engagement with passengers and their representatives, and with industry colleagues. To improve, operators must seek and use feedback from passengers with lived experience of disability: both to better understand the areas where current performance needs to be

improved, and to test the potential viability of mitigations.

2.41 The industry must also work together. The rail network is complex, with passenger journeys frequently involving more than one operator. Reliable assistance depends upon cooperation between these operators, in terms of

(a) operational frontline communication;

(b) risk management with other operators where there are frequent route interfaces; and

(c) whole-industry cooperation to share best practice and develop joined-up solutions.

2.42 The ORR ATP Guidance includes obligations in these areas. Each operator is required to consult a forum of passengers with lived experience of disability, and operators are expected to take part in the cross-industry structures and systems that are designed to facilitate cooperation and a joined-up service for passengers.

B3. Engagement Tier Descriptions

To achieve the **[Upper]** performance level, we would expect operators to show everything in [Middle] none of the characteristics from [Lower], and:

- How the passenger forum feedback has contributed to improvements in delivery of assistance.

- Regular engagement with interfacing operators, to discuss risks and mitigations, with tangible outputs.

- The operator to be at the forefront of innovation, trialling or implementing technology, common learning and shared best practice.

For the **[Middle]** performance level, we expect operators to demonstrate:

- Regular, structured engagement with a forum of disabled passengers, with performance reports shared and discussed with this forum.

- Engagement with interfacing operators to investigate the causes of assistance failures.

- Appropriate input provided to cross-industry groups and forums, to share mitigations and help develop cross-industry solutions.

- Incorporation of learning from this engagement into the operator's own mitigations.

The **[Lower]** performance level describes the following characteristics:

- Engagement with the forum of disabled passengers is only ad-hoc, or too infrequent to provide meaningful input.

- Engagement with forum of disabled passengers lacks structure and focus.

- Little or no evidence of communication with interfacing operators about assistance risks and mitigations.

Consultation Questions

For all of the capability sub-categories listed above (monitoring and reporting, risk and mitigation, engagement with passengers and industry), we have the following questions where we seek input from stakeholders.

(12) Taken together, do these criteria capture the key factors that determine an operator's capability to effectively manage and improve its provision of assistance? Is there anything missing, and is there anything listed that is not relevant?

(13) Can these criteria be critically evaluated, based on the assessment of a proportionate evidence gathering, submission and assessment process?

3. Equality Impact Assessment

3.1 The proposals in this document are designed to advance equality of opportunity for older and disabled people by increasing the reliability and quality of passenger assistance upon which they may rely to travel by rail. We do not consider they impact on other groups with protected characteristics.

3.2 We have focused on the provision of assistance because it is the central commitment made by operators in their ATPs, without which a large number of passengers would be unable to travel by rail, and because our monitoring indicates that it is not delivered as reliably as it should be. We considered, but are not proposing, inclusion of other ATP obligations or wider accessibility requirements within this framework as they form part of the broader monitoring and compliance activities we set out earlier in this document.

3.3 ORR is not proposing a change in the requirement to provide assistance; we are

consulting on a new framework to better hold operators to account for their existing obligations to do so. We welcome comments on how the framework may be used to go further in advancing equality of opportunity for and reducing discrimination against groups with protected characteristics under the Equality Act.

Consultation Question

(14) Please indicate how the assistance benchmarking framework might be used to even further advance equality of opportunity and reduce discrimination for groups protected under the Equality Act.

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4. Next steps

4.1 Following consideration of the responses we will publish our decision, and the finalised Assistance Benchmarking Framework.

4.2 Following publication of the framework, we will develop the information request in Spring 2025, including via engagement with rail industry stakeholders, to ensure that the request is proportionate and appropriate to assess performance against the framework criteria.

4.3 We will then issue the information request for completion by operators, allowing sufficient time for a full response. Our analysis of these returns may involve some further discussions with specific operators where required. This will be conducted alongside analysis of results from the annual survey of booked assistance.

4.4 We expect publication of the first full benchmarking report in Autumn 2025.

Annex A: Consultation Questions

(1) Do you agree with our plan to publish a report that benchmarks operators' performance levels in providing assistance to rail passengers? Explain your answer.

(2) Are the two headline performance categories (delivery and capability to improve) clear and meaningful? Is there anything else that should be included?

(3) Are the performance level descriptors clear and meaningful? How should we name these performance levels (if at all)? Is three the right number of levels?

(4) Is the proposed reliability metric clear and sufficiently reflective of reliability performance to allow comparison?

(5) Are the proposed reliability performance level thresholds set appropriately?

(6) Is the minimum sample size threshold for inclusion in this area of the assessment set appropriately?

(7) Is the proposed Satisfaction metric clear, and sufficiently reflective of performance to allow comparison?

(8) Are the Satisfaction performance level thresholds set appropriately?

(9) Is the minimum sample size threshold for inclusion in this area of the assessment set appropriately?

(10) Is the proposed Training metric clear (taking into account the relevant detail provided in the ATP guidance on mandatory training outcomes)?

(11) Are the Training performance level thresholds set appropriately?

(12) Taken together, do these criteria capture the key factors that determine an operator's capability to effectively manage and improve its provision of

assistance? Is there anything missing, and is there anything listed that is not relevant?

(13) Can these criteria be critically evaluated, based on the assessment of a proportionate evidence gathering, submission and assessment process?

(14) Please indicate how the assistance benchmarking framework might be used to even further advance equality of opportunity and reduce discrimination for groups protected under the Equality Act.