

ORR Accessible Travel Policy review form

Stakeholder	Disabled Persons Transport Advisory Committee
Train Operator	Grand Central

ATP: Passenger Leaflet

Question	Comments
Tone: Does the document carry an appropriate tone?	<p>The overall tone of the leaflet is positive and reassuring, but this is somewhat undermined by the poor quality of some of the text; some sections of which are overly-long, unnecessarily convoluted or repetitive. An early example of this can be found on page 3 in the last paragraph of the section on Passenger Assist, which begins 'We aim to provide sufficient resourcing so that your call will be answered within 30 seconds...'. It would be simpler to just say 'We aim to answer your call within 30 seconds...'. More positively the document, in general, addresses the content to the reader, demonstrated in the use of "you" throughout, which is engaging. However, it is rather inconsistent in its use of terminology – "people", "passengers" and "customer"; and "disabled people", "people with disabilities", "people with reduced mobility". It would benefit from a review of the terms used to provide for greater consistency. There is also some use of rail jargon – two examples being the use of "re-platformed" and 'Handover Protocol' on page 3. Some of the language seems quite technical as a result of being over-complicated. Some examples:</p> <ul style="list-style-type: none"> - throughout it refers to the stations "(we) serve" where ""call at" would be a simpler term that is commonly understood. - uses "aural" and "aurally" in relation to information where the long accepted term

	<p>(including in the regulations” is “audible”.</p> <ul style="list-style-type: none"> - “Text relay” may not be understood by all readers (page 3). Would be useful to add “a service for deaf and hard of hearing passengers” <p>Finally, the passenger leaflet would benefit from being more visually engaging through the use of photographs, graphics and other images.</p>
<p>Motivational impact: Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?</p>	<p>Whilst the leaflet is generally positive and reassuring in tone its length and overly-complicated language means that its motivational impact is somewhat dissipated.</p> <p>The leaflet would benefit from an additional paragraph in the ‘Introduction’ section that clearly stated that GC’s approach to accessibility embraced the full range of visible and non-visible disabilities (DPTAC has previously provided a suggested summary list of types of disability).</p> <p>The introduction would benefit from a description of the Grand Central operation ie the geographical area served; summary of the routes; and an explanation of the situation with regard to stations (ie that GC do not operate any direct but work with the operators that do to provide the service to disabled passengers).</p> <p>There are questions left unanswered after reading the leaflet. For example, Passenger Assist can provide booking confirmation by email or by post, but what if you don’t have an email address or you are travelling the next day? Isn’t there a confirmation booking reference that can be given over the phone?</p> <p>Another example is where it mentions that from June 2020 communication between the Senior Conductor and the destination staff will be via a dedicated telephone number using the Handover Protocol. Passengers will not be familiar with what the Handover Protocol is (why would they) and they are left with the question – so what happens between now and June 2020?</p>

<p>Ease of use: Does the content of the leaflet provide clarity both in terms of the language used and explanatory text? Does the leaflet have a logical and easy to follow structure?</p>	<p>The layout of the Content page could be improved (though that could be a point for the design to follow). For example, “Assistance: What is available and how to get it” is shown in bold as is “Passenger Assist” but the latter is a sub-heading of the former. “Turn up and go” and “Alternative accessible transport” should also be listed as sub-headings: the latter would be improved by the addition of “routes” after “transport” since it currently implies it is an alternative to Rail when it may only be an alternative for part of the route to avoid an inaccessible station.</p> <p>“Passenger Assist” is used as a heading but “Advance booking: using Passenger Assist” would be clearer to the reader and more logical when followed by “Turn up and go”. The sub-headings for the other points eg Discounts and railcards, should also be included in the contents page.</p> <p>Overall, the order of the material in the document is logical but it could be improved. For example, “Purchasing your travel tickets” – could be improved by starting with the pre-booked arrangements and then the “turn up and go” options. Also, in the section on “At the station” a clear distinction could be made between arrangements at staffed and unstaffed stations.</p> <p>In the section on ‘Discounts and Railcards’, it would make more sense to describe the Disabled persons Railcard first as this applies to a much wider range of disabled people than the specific discounts for visually impaired and wheelchair using passengers.</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>The statement to reduce the pre-booking times and the timetable for doing so is a welcome inclusion. It enables disabled passengers to hold the rail operator to account.</p>
<p>Other specific points: Please</p>	<p>Some specific points:</p>

raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.

Page 2 - 2nd bullet: should add “or services are disrupted”
- 4th bullet: add “and in some cases for” before “a companion” a discounts don’t always apply to a companion

Page 2 – At the station – logically the order should be:

1. Assistance to and from...
2. Help through the station.... [Note: not clear what “larger” is included here]
3. Assistance with getting on and off...
4. Boarding and alighting with wheelchairs... [Note: “Help with” should be added before “boarding”]
5. Help with luggage....

Page 2 – On the train – “Advice regarding location...” and “Assistance with luggage” should be reversed.

Also in this section, the first point suggests assistance only provided if a seat is reserved which would suggest a blind person turning up wouldn’t get assistance. Is that correct? The point on toilets should be “toilets, including accessible toilet facilities” as not all disabled and older people need accessible toilets.

Page 3 – last paragraph of section on Passenger Assist: the 5 minute deadline for providing assistance shouldn’t be caveated by ‘where reasonably practicable’. The 5 minute deadline is a ‘hard’ requirement.

Page 3 – Turn up and go, 1st para, “where practicable” does those mean if you are able to get to the platform unassisted? If so, then should say that explicitly. Also in that sentence it refers to “attract the attention of on-board staff” but offers no advice on how to do so.

2nd para, “if practicable” – is that necessary when it is stated that “every effort” will be made. It begins to read like multiple let-out clauses, as well as making the section unnecessarily complicated.

3rd para – “ when possible” begs the question when isn’t it? Is further advice needed here.

What about advice on turning up a unstaffed station and haven’t pre-booked?

Page 4 – first para example re steps, needs to have “you are unable to manage steps” otherwise it reads as though the operator would arrange for alternative transport for all disabled passengers which isn’t the case.

Finally in this section, what about advice on assistance at the destination station if you haven’t pre-booked?

Page 4 – ‘What to expect’: opening sentence uses “ensure” when previously said that if not pre-booked there is no guarantee of assistance.

Before you travel – first mention of the App but no detail given.

Purchasing your travel tickets – On line – “ five days” should be “five working days” (consistent with other timeframes and the policy)

Using your app – add “e ticket” before “your smart device”

By phone – useful to repeat the telephone number here.

Ticket machines and ticket offices – what about staff assistance (for example, to help with ticket machines) or collection from the ticket office?

Finally, the last paragraph of the section on purchasing tickets reads very awkwardly, and seems to imply that there is a specific link between non-visible disabilities and the need for assistance when purchasing tickets. In reality disabled travellers who have visible or non-visible disabilities may need such assistance.

Discounts and railcards (page 5) – the documentation required could be made clearer. For example, a search of Guide Dogs website for ownership certificate produced 0 results and not at all clear what document RNIB would issue. In addition, the text with regard to the specific discounts available to visually impaired and wheelchair-using passengers is misleading in implying that to use these discounts you should not hold a Railcard. No such requirement exists it.

Page 6 – Purchase of advance tickets – maybe a sentence to explain what an advance ticket is? A reference to Passenger Assist or another source in relation to checking the availability of the space would be helpful.

‘At the station’ – Meeting points – how are vision impaired passengers advised on where those are?

4th para – states that station staff communicate with the destination staff but earlier it says that role is for the Senior Conductor. In any event if assistance has been pre-booked through Passenger assist staff at the destination station should be made aware of the need to provide assistance at the time of booking, rather than during the journey by the on-board Senior Conductor.

What about alighting assistance for turn up and go passengers – is that also within 5 minutes or is that simply not guaranteed?

Page 7 – ‘Assistance with luggage’ – might be helpful to include examples as per the policy document

‘On the train’ – seats on trains: add “wheelchair” before spaces in 2nd line (otherwise implies this applies to the toilets too. Useful to mention here that priority seats provide space for assistance dog – not just additional legroom. Use of the term ‘hidden disabilities’, should be replaced by ‘non-visible disabilities’”

Page 8 – foldable scooters – if it is the case that they need to be lifted by accompanying

	<p>persons then is it a requirement that users of said scooters need to be accompanied? This needs to be clarified.</p> <p>'If things do not go as planned' – should also include “disruption” in the list of events.</p> <p>Page 9 – “safe haven” is an unusual expression. “Safe refuge” or “Place of safety” (used in the policy document) would be more appropriate.</p> <p>The section on ‘emergency procedures’ was particularly wordy and convoluted.</p> <p>Other points:</p> <p>Assistance dogs are specifically mentioned in the policy document and a para in the leaflet would also be useful.</p> <p>The policy mentions the “Helping Hand” scheme and it would be useful to include in the leaflet.</p> <p>Page 9 should explicitly cover “Complaints” which is more than “feedback”</p>
<p>Overall comments on the leaflet.</p>	<p>The leaflet, whilst fairly comprehensive in scope and generally positive in tone, is made significantly less effective by its overly-convoluted language, and sheer length.</p> <p>It would benefit from a thorough edit to simplify its language, reduce its length and, in places, improve its structure, as well as picking-up the specific points above.</p>

ATP: Policy Document

Question	Comments
<p>Tone: Does the policy document have an appropriate tone, bearing in mind that it is a more formal and comprehensive description of the train operator's policy with regards to accessibility. [NB. The document should still avoid excessive use of legal or technical language, and jargon.]</p>	<p>Most of the comments made with regard to the passenger leaflet also apply to the policy document. This is particularly the case in terms of the use of over-convoluted language, which undermines the positive tone of the document. The sheer length of the document and repetitive nature of some of the information provided exacerbate this.</p> <p>The language used perhaps also needs to consider that the policy document has a wider range of audiences that the passenger leaflet, encompassing regulators, staff and the general public, as well as disabled travellers.</p>
<p>Motivational impact: Does the content of the policy document provide positive encouragement for disabled people to travel by rail? [NB. The policy document is inherently less focussed on motivational content, but should nevertheless be written in a way that encourages of the train operator's services.]</p>	<p>The points made with regard to the passenger leaflet almost all apply to the policy document as well. However, the additional length of the policy document is likely to deter some disabled people from using it.</p> <p>The information on 'turn up and go' is rather buried in the Passenger Assist section – unlike the leaflet – and it would benefit from being more clearly distinguished.</p> <p>It provides more detail than the leaflet, as would be expected, but the order of the material presented is different and there is also information provided, such as the para on carriage of assistance dogs that is not picked up in the leaflet. The Booking and providing assistance section is rather muddled – it starts with Passenger Assist – touches on turn up and go (without reference to that phrase) then has assistance with onward travel coming before help with luggage and seats on trains. The order of the material needs to follow a more logical sequencing.</p>

<p>Ease of use: Does the content provide clarity both in terms of language used and explanatory text? Does the document have a logical and easy to follow structure? Is the information provided sufficiently comprehensive and, where necessary, sufficiently detailed?</p>	<p>See comments above.</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>The reference to annual review is important but it comes on p 19 and is rather lost in the text</p> <p>The section on ‘emergency procedures’ is better written than in the passenger leaflet.</p>
<p>Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions</p>	<p>As mentioned above, much of the text mirrors that in the leaflet and the same points made in relation to the latter apply equally to the Policy. Some additional points:</p> <p>‘Commitments’ - Web link to the disabled peoples protection policy – needs to be updated</p> <p>Passenger Assist – references discussing requirements at stations accessible to the customer and but there is no reference – even if a cross reference to another section – about what they can/will discuss/arrange for journeys that would involve inaccessible stations.</p> <p>2nd para in the section references “where we have no staff” but elsewhere it is stated that they have no staff at any station as they do not operate any stations. It is rather ambiguous and the drafting could be improved.</p> <p>Typo – under Recommended notice period “they are” needed before “not reserved in advance”.</p>

'Assistance at stations' – "at no additional cost" needed at the end of 2nd para.

3rd para – says "unstaffed station make use of the Help Point" but elsewhere it says that Help points are "usually in place" and so is contradictory

4th para – useful to include website and hashtag addresses

Boarding ramps – send para add "such" before "assistance. Also, how does the passenger advise the Senior Conductor if they have not booked?

'Changes and disruption to services' – first reference in 4th para to Social Media Channels - worth saying what they are and including the addresses/links.

Final para in this section rather mirrors a section on Page 8

Assistance Dogs – section should recognise that priority seats have space for the dog

'Accessible Travel Policy' – 3rd para – include contacts or reference contacts section for the sources of alternative formats. – same point applies on next page too

References throughout to Disabled Parking – should be "disabled customers'/passengers' parking.

List of facilities on page 8 – ' – rather than "mental, intellectual or sensory considerations." perhaps use "non-visible and sensory disabilities"

Trains – aural (should be audible) and visual information : committed? It is a legal requirement so should be stated in those terms. The penultimate paragraph in this section is particularly convoluted.

Connecting and wayfinding – there is only a reference to info on the poster but elsewhere there is more information about other sources – worth a cross reference here

	<p>Information points..... – 3rd para mentions a poster at “all stations” but on page 7 it says “most”?</p> <p>Our website – when will Grand Central meet the guidelines?</p> <p>‘Delays, disruption...’ – opening para: disruption can have a significant impact on accessibility for a wide range of disabled travellers, not just those with reduced mobility.</p> <p>‘Delays, disruption...’ - para 8, this is the first reference to Passenger Assist requesting a telephone contact number. Include in other sections?</p> <p>Alterations to facilities – is it necessary to repeat the same list of facilities as mentioned on previous page?</p> <p>‘Redress’ – no reference (as there is in the leaflet) to Rail Ombudsman. Should be included. Also will passengers be informed about their consumer rights to be able to make this judgement – perhaps a link here?</p> <p>‘Monitoring and Evaluation’ - postal travel surveys are not accessible to vision impaired passengers. What thought has been given to telephone surveys?</p> <p>‘Working with disabled customers...’ – in the opening paragraph it is incorrect to say that DPTAC and Transport Focus approve ATPs. Rather DPTAC and TF review and comment on draft ATPs, whilst the ORR has the formal role of approving them. In the section on ‘key partners’ the engagement with Network Rail needs to be extended to include collaboration on the operational aspects of accessibility including the provision of assistance at Network Rail-managed stations.</p> <p>‘Training Outcomes’ – Over a year to have all staff trained? Perhaps include a timeframe for different staff teams – important that customer facing staff are trained well in advance of 31 July 2021!</p>
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	<p>Include “4, Recognising Passengers who need assistance...” in the training for agency or temp staff and other transport providers.</p>
<p>Overall comments on the document.</p>	<p>As with the passenger leaflet the policy document would benefit from a thorough edit to make the language simpler, eliminate repetition, and reduce the length of the document.</p> <p>The document does not communicate any sense that accessibility is owned by the senior leadership team of Grand Central.</p>