

ORR Accessible Travel Policy review form

Stakeholder	DPTAC
Train Operator	C2C
Review start date	
Review end date	18/02/20

ATP: Passenger Leaflet

Question	Comments
Tone: Does the leaflet have an appropriate tone? Is it friendly and welcoming in tone or is there too much reliance on legal or technical language and jargon?	<p>Overall DPTAC feels that the Leaflet has an appropriate tone and it is relatively easy to read. However, there are a number of improvements that we suggest.</p> <p>Consider putting the second paragraph which starts 'At c2c, we want everyone..' as the first paragraph in order to make the Leaflet more welcoming from the outset. Or write a different first paragraph. Starting with 'The purpose of this leaflet...' feels a bit off-putting.</p> <p>The opening section places too much emphasis on the provision of assistance. The Leaflet certainly needs to cover assistance, but it's also a general guide to accessibility for all disabled travellers, including those who are able and choose to travel independently. As such, the opening section would benefit from a short paragraph that explained that as well as providing information on assistance, the leaflet provided information on all aspects of accessibility.</p> <p>The text feels overly-focussed on the needs to passengers with mobility impairments, particularly wheelchair users. While this is to some extent unavoidable because of their particular needs but a few more examples of how assistance is provided to passengers with other impairments would help a wider range of disabled passengers identify how they can be assisted to use the railway network. In this context, a clear statement at the beginning of the Leaflet stating that c2c were committed to operating an accessible railway for people with the full range of impairments would be helpful (maybe setting out a summary list of impairments), as would occasional reference to these impairments in the Leaflet itself.</p>

	<p>The Leaflet could be improved by making it more visually engaging through the inclusion of more visual/graphic/photographic content.</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>There are a number of instances where a few words could help improve motivation for passengers. For example, against criteria 3.2b a sentence or two before the bullet points could really help. Starting the Leaflet with a motivational paragraph would help (see above). DPTAC would recommend reviewing all the text with a view to making it more motivational. For some of our reviewers the Policy Document came across as more motivational than the Leaflet.</p> <p>It would help if people with non-visible disabilities could identify themselves, and the help they might get, within the Leaflet. Consider putting some examples of non-visible disabilities into the Leaflet, with some specific examples of how they could expect to be helped. (See our comments on the Policy Document).</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>We don't think the readability of the Leaflet was helped by trying to write the text of the Leaflet next to the criteria boxes. Once the Leaflet is printed out without the criteria boxes present then DPTAC suggest a review to ensure appropriate headings are in place, and that the logical flow of the Leaflet is easy to follow. For example, there does not appear to be a suitable heading for the text alongside criteria 3.3d. Also consider swapping the text for criteria 3.2a and 3.2b around, as 3.2a talks about not booking assistance in advance etc.</p> <p>Some instances of language were fairly advanced, and so we would recommend reviewing language for those with lower reading and comprehension ability. Some sentences were very long. While it is not normally necessary to include page numbering in a Leaflet of this length it might be helpful.</p> <p>A text box or similar to separate the information about fare discounts might help to allow those who are concerned about practical help to skip this section if it is not relevant to them.</p> <p>Similarly consolidating contact information in a text box could support readability and easy access to information.</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>The emphasis in the section on 'Help at the Station' on joint working with TfL, MTR and Network Rail at West Ham, Stratford and Liverpool St stations</p> <p>The commitment in the 'Redress and compensation' section to refunding twice the cost of the passenger's journey if assistance isn't delivered as planned (all operators commit to redress but most</p>

	<p>don't say how much they will give)</p> <p>And in the same section, c2c's offer to liaise with other operators when sorting out complaints.</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>Next to criteria 3.1, under heading 'Introduction: Making rail travel accessible for all', the paragraph under the bullet points says '... you may have some questions' and then the next paragraph goes on to say 'This leaflet should provide you with the answers'. If you have questions not answered by the Leaflet (or policy) where do you go for them to be answered?</p> <p>Under the heading 'Wheelchairs and mobility scooters', it will not be clear to everyone what 'combined weight' means. Combined weight of what? There is a discrepancy in the weight of a wheelchair (up to 300kg) and a scooter (up to 250kg). Why does a scooter have to be 3 wheeled to go on the train? Presumably some that have four wheels meet the size and weight requirements? What about folding scooters? Or ones that separate into pieces? Are they allowed on the train?</p> <p>Section on the Passenger Assist app needs revision. It assumes that the reader knows quite a lot about the subject already. It needs to explain that it is planned to improve the Passenger Assist system and introduce a new customer app that will provide more information and allow direct contact between assistance staff and passengers. Some idea of when the app will be introduced would also be helpful.</p> <p>Under the heading 'Help on the train', please tell passengers how they can seek help on your driver only trains. The Policy Document talks about a 'Help' button on the train.</p> <p>Under the heading 'Seats on our trains', can c2c mention their Priority seat badge scheme?</p> <p>In the section 'Buying your ticket', can you add that tickets can also be purchased from 'third party' retailers such as the Trainline. Also by telephone and when using the Passenger Assist service.</p> <p>The section on fares omits the specific discounts available to wheelchair-using and visually impaired travellers.</p> <p>A route map is mentioned in the Leaflet, but does not appear anywhere?</p> <p>Passenger assistance is not well explained and is unlikely to reassure.</p>

	<p>Under 'inaccessible stations', there is no mention of transport to the next accessible station.</p> <p>Under the section 'Where travel is being arranged in advance', it would be helpful to make clear that the reductions in booking times highlighted will apply to all operators.</p>
Overall comments on the leaflet.	<p>Overall an informative and fairly reassuring Leaflet, which would benefit from some amendments, as well as being made visually more appealing. It would benefit from an edit that focussed on the provision of relevant information and increasing motivational content.</p> <p>Parts of the Policy Document are easier to read and follow than the leaflet. For example the section on Passenger Assist in the Leaflet (against criteria 3.1) is not nearly as helpful as that in the Policy Document (against criteria A1.1 and A 1.2a). Although the Leaflet needs to be a much shortened version of the Policy Document, DPTAC would recommend a review as whether the Leaflet reflected the most important and relevant sections of the Policy Document.</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</p>	<p>Overall, DPTAC found the tone of the Policy Document to be better than the Leaflet, with some of the information being more clearly expressed (Passenger Assist for instance).</p> <p>However, offsetting this, it has a much wordier style and is very long and quite repetitive in places. As such, it would benefit from a thorough edit to improve the structure, remove repetition and reduce the length.</p>

<p>excessive use of legal or technical language, and jargon.]</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 Policy Document is reasonably motivating in tone. The additional detail gives those passengers who are looking for precise information about how their needs will be met greater assurance. However, the length of it obviously means that many passengers will not wish to read such a comprehensive document. For this reason, it is important that the points of clarity and content with regard to the Leaflet raised above are addressed, and that the most important elements of the Policy Document are reflected in the Leaflet.</p> <p>The opening section was very badly written and in need of a complete re-write. The second paragraph in particular starts by saying that the Document focusses on c2c's approach to providing assistance for those disabled passengers with 'restricted mobility', and then goes on to list a largely unrelated list of passengers who can seek assistance. The list itself was incomplete (why highlight learning disabilities for instance but not other non-visible disabilities?) In the last sentence we found the reference to 'meeting expectations' a little odd. It would be better replaced by a short, opening paragraph to the section that simply and clearly stated c2c's commitment to welcoming disabled customers, and to operating an accessible and inclusive railway.</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>We found the structure of the Document confusing, with no obvious logic to the sequence of sections. It would have been easier to follow and use if it had been based around a typical passenger journey (i.e. pre-journey planning, access to the station, at the station, on the train, and so on).</p> <p>It is right that the Policy Document is more comprehensive than the Leaflet, and inevitably included some more complex concepts. However, the document uses complex sentence structure in places, and some of these would benefit from restructuring.</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>Under the heading 'Turn up and go' there is mention of an information point on the trains, located opposite the accessible on-board toilet. This appears to be a really good initiative. This isn't mentioned in the Leaflet, but it would be useful if it was.</p> <p>Priority seating badge (please also mention in the leaflet).</p> <p>'When receiving assistance onto one of our trains, our team will check the operational status of the accessible toilet and notify you of this'. (Please also mention Leaflet.)</p>

	<p>We thought the commitment to training temporary staff, and staff operating rail replacement services, was good.</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>The Policy Document, and as noted above the Leaflet, are largely silent on non-visible disabilities. There should be more explicit mention of these disabilities. DPTAC's suggested summary of the conditions that might be encompassed by 'non-visible disabilities' is as follows:</p> <ul style="list-style-type: none"> • mental health conditions, eg anxiety, depression, OCD, schizophrenia, personality disorders • Autism and Asperger Syndrome • sensory processing difficulties • cognitive impairment, eg dementia, traumatic brain injury, learning disabilities • 'non-visible' physical health conditions, eg chronic pain, respiratory and heart conditions, diabetes, cancer • hearing loss • low or restricted vision. <p>.</p> <p>There are inconsistencies in terminology. Sometimes there is mention of non-visible disabilities, and sometimes mention of hidden disabilities. DPTAC favours 'non-visible disabilities'.</p> <p>The section on assistance would benefit from the inclusion of contact details for passengers wishing to book assistance.</p> <p>The paragraph in the same section on 'handover protocols' and Passenger Assist was very confusing and needs a re-write. 'Handover protocol' is industry jargon that will mean very little to most people, and we weren't clear why disabled passengers need to know about internal industry processes in any event?</p> <p>Again in the same section, the sub-section on 'Booking notice periods' the description of the phased reduction in notice periods is inconsistent with the Leaflet - in particular, the caveat of 'where reasonably practicable' added to the final stage of the reduction to two hours.</p> <p>In section 4a, paragraph beginning 'While arranging assistance....' it says '... we have self-service ticket</p>

machines at all stations excluding West Ham (which is managed by Transport for London)'. Presumably there are self-service ticket machines there though? Consider clarifying this.

Under the heading 'Assistance with luggage it asks the passenger to bear in mind the weight, size and quantity of luggage, not exceeding limits, and refers people to the NRCoC. Many people won't refer to a separate document, so perhaps the 'limits' should be reproduced in this Document, and in the Leaflet.

Under the heading 'Seats on trains' there is mention of a priority seating badge. This should also be mentioned in the Leaflet. If application is dependent on medical information then it should probably say that here.

Under the heading 'Passenger journey information' it says '... especially if you have mental, intellectual or sensory impairments...' Some people will not like, and some will not understand, the term 'mental impairments'. Consider re-phrasing this sentence.

Under the heading 'Train departures and arrivals information', it says 'On the train station announcements will provide sufficient time for you, if you require assistance, to prepare to alight.' What does this mean? Presumably the station announcements aren't tailored to individual passengers? And to their individual assistance requirements? Consider reviewing this sentence.

In paragraph beginning 'To help you find the information you need, we also provide a homepage link...', it talks about restrictions on the use of wheelchairs, power chairs and scooters, without detailing what these restrictions are. Consider putting the restrictions here or signposting to the paragraph they are identified in.

Under 'Wheelchairs and mobility scooters', it talks about the 'combined weight' of a wheelchair. This needs explaining. It talks about 3 wheeled travel scooters, but I'm guessing there may be 4 wheeled scooters that come in under the size? The section is silent on folding scooters, or scooters that break down into sections and could be stored in luggage racks. There is a weight discrepancy between scooters and wheelchairs.

Under the heading 'Delays and disruptions to facilities' there is a sentence that says 'Disruption to facilities and services can have a significant impact on both your accessibility and your level of confidence of persons in travelling with us'. It is not clear what this means and would benefit from re-wording.

In section A2.2.7 and 2.2.8, instead of 'National Key Toilets' use RADAR.

In section A2.2.7 and 2.2.8, what does 'level of platform accessibility' mean? The bullet points in this section in general aren't clear.

In section A2.3.1.b there is use of the word 'wayfinding', which people don't always understand.

In section A6.7 and A6.8, we strongly recommend you reword '... our staff are trained to take into account your needs especially if you have mobility/visual/hearing impairments, or if you are older, inform or vulnerable.'

This document really needs page numbers, and the criteria removing. Once the criteria are removed then it needs to be reviewed for 'flow'.

Under the heading 'Staff training' it would be helpful if there was strong reference to training with respect to passengers with non-visible disabilities.

Throughout the Policy Document it would be helpful to put in more references to 'non-visible disabilities' and how passengers with them could be helped in practice. It might help people with disabilities to be able to recognise themselves in the Document, and have an idea what help might be available to them at various points. For example, what help might be available for someone with autism? Even just mentioning autism might help some people feel more confident that the train companies have an understanding of their difficulties, which will help some. Knowing if you have autism that when there is disruption/platform changes that someone is there to help them, can be reassuring.

There is a good deal of confusion around the availability of staff. In the section on 'Turn Up and Go' it is clearly stated that 'all of our trains are operated without any customer service staff on board...'. Yet throughout the document there are frequent references to staff providing help and advice. In several cases, it would be easy to misinterpret this information and expect such help and advice to be available from staff on-board train services, whereas in fact I think it is station staff being referred to. We think c2c need to be clearer about the extent to which staff can help, and the information and help available to passengers on board a train service.

In the section on 'Website', the last paragraph runs to around 250 words. It is not clear why quite such a

	<p>detailed description of the contents of the c2c website is required, but it contributes to the excessive length of the Document.</p> <p>In the 'Redress and compensation' section there needs to be information on the Rail Ombudsman.</p> <p>In the Strategy and Management section there is a reference to the PRM-TSI in the context of 'new facilities', although the PRM-TSI is a regulatory requirement for rolling stock, not stations or other facilities.</p> <p>In the section on 'Management arrangements' It would be beneficial to have a paragraph stating the commitment of the Managing-Director of c2c and their senior leadership team to operating an accessible and inclusive railway.</p> <p>The 'Strategy and Management' section was very muddled when it came to describing planned future improvements. There was quite a good section on 'Improving access to c2c services', but this was then followed later by another section entitled 'Access improvements', which rather oddly went on describe stations that weren't step-free, followed by a series of bullet points describing already completed and implemented improvements. It is difficult to see what value this latter section added to the document.</p> <p>We were surprised at the lack of a specific disability advisory group of some kind.</p>
<p>Overall comments on the document.</p>	<p>The general tone of the Policy Document is good, and the draft read well in places, but overall it is in need of fairly significant improvement. In particular it needs to be shorter, have a more logical and clearer structure, avoid repetition, and, in places, be better drafted.</p> <p>The criteria need to be deleted from the left hand column, and then the document reviewed again for logical flow and readability. Including the criteria wasn't helpful. The document needs to read as a logical, coherent policy document, rather than a response to the criteria.</p> <p>Some of the language is quite complex and would benefit from review.</p> <p>Many of the points made with regard to the Passenger Leaflet are also relevant to the Policy Document, so c2c should cross-refer to those points when revising the Policy Document.</p>

[ORR suggested areas for further review](#)

Document	Guidance Element	ORR Comment	Stakeholder Comment