

ORR Accessible Travel Policy review form

Stakeholder	DPTAC
Train Operator	Heathrow Express
Review end date	4/6/2020

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>The Leaflet is generally friendly in tone, but there is too much use of jargon and the Leaflet feels a little technical and impersonal. The use of the term ‘airport PRM supplier’ (in ‘Contact Us’) is particularly unhelpful and should be re-phrased. Greater use of the pronoun ‘you’ might encourage greater engagement on the part of the reader.</p> <p>The phrase ‘special assistance’ (in ‘Contact Us’) may be associated with ‘special needs’ which may be seen as patronising – perhaps this also could be rephrased?</p>
Motivational impact: Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?	<p>The leaflet is not particularly motivational, partly because of the language used, which could be more positive, lively and encouraging, but also because of the leaflet’s extremely confusing structure, and lack of detail. These latter two points represent major barriers to its use.</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>The leaflet is not easy to use. It is wholly incoherent and, as such, suggests to the reader that the policies sitting behind it are equally confused.</p> <p>There is little logic to the sequence of sections within the leaflet. For instance, it is not obvious why it begins with a ‘Contact us’ section, particularly when this same section is repeated at the end of the</p>

leaflet. A far more logical structure would be to structure the leaflet around a typical customer journey: pre-journey information, buying tickets, at your departure station, on board a Heathrow Express train, at your destination station, onward travel, redress/feedback, all preceded by a section on what assistance can be provided at each stage of the customer's journey. It would also be helpful to let people know at the beginning of the leaflet that alternative formats were available (including a textphone number)

The section on assistance is particularly difficult to use, not least because it conflates different types of assistance (that provided by TfL/Network Rail at Paddington, that provided by Heathrow Express itself, that provided by Heathrow Airport). The apparent need to also pre-book some assistance through airlines, tour companies and travel agents adding a further degree of complexity and confusion. This section needs to be completely re-written with a clear explanation of the various types of assistance available, how the assistance works, and who is responsible for providing it. We have summarised some more specific points on this section below:

In nearly 500 words about 'Assistance for passengers' there is no explanation of the types of assistance available – and only one specific practical reference to assistance (getting on or off the train at Paddington). At Heathrow, the roles and capabilities of 'our team' and 'Omniserve' are unclear. The advice that '*assistance can be booked through your airline*' is of no help if you are meeting or accompanying someone who is flying, and neither is it clear what exactly can be booked.

It is not explained why Heathrow Express does not participate in the national Passenger Assist scheme – a mandatory obligation according to the ORR ATP Guidance.

The advice to '*simply arrive 15 minutes before you wish to depart... there is no need to book assistance*' is wholly inadequate at a station as large and as complex as Paddington. Where should you 'arrive', and if this is the Heathrow Express departure platform, then what happens if you need assistance from, for instance, a station entrance or from connecting transport?

The advice that '*If you require assistance getting... off the train at Paddington, simply arrive no later than 15 minutes before you wish to depart*' does not make sense.

In 'At the station' the phrase '*Stations at Heathrow have been designed so that customers who require additional help or assistance can travel without being required to book assistance*' is confusing, given the apparently contradictory references to booking assistance.

	<p>It is assumed that the phrase <i>'Heathrow Express platforms at Paddington (Platforms 6 & 7) are accessible (except for part of Platform 6 which is not accessible due to a steep curve).'</i> Is referring to platform-train level access – this should be made clear,</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>We welcome the apparent commitments to 'turn up and go' travel and assistance, and level boarding between platform and train, although as noted in our comments it is not clear whether either commitment is actually borne out in reality.</p> <p>The brevity of the leaflet is also welcome, although this partly reflects some severe shortcomings in terms of the level of detail provided.</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>There are important aspects of the customer journey for which no or completely inadequate information is provided. For instance there is nothing on scooters or redress if things go wrong, and the information about Heathrow Express trains themselves is virtually non-existent (saying that the trains <i>'meet modern accessibility standards'</i> means very little to the general reader).</p> <p>In the context of Heathrow Express trains themselves it would be helpful to provide more detailed information on where wheelchair spaces and priority seats are provided, and whether they are available in First as well as Standard Class.</p> <p>The section on fares is very confusing, partly due to poor drafting. The phrase 'A full-price Off-Peak or Advance ticket may cost less than a reduced rate Anytime ticket' was particularly confusing. Does Heathrow Express offer Advance and/or Off-Peak tickets? If so, the leaflet needs to make this clear. It seems that the Heathrow Express offers non-standard DPRC discounts as well as identical discounts to some types of disabled traveller. Is this correct? If so, it needs to be explained much more clearly.</p> <p>It is currently likely that the impacts of Covid-19 will extend at least until the next ATP review date a year from approval. As such, the leaflet needs to include comprehensive details relating to social distancing, including any impacts on the types of assistance available and how this is delivered. It would also seem possible that the current reduced frequency of trains may continue – if so this may have an impact on the relative demand for booked/ unbooked assistance – as passengers may be more likely to aim for a specific train.</p>

	It would be better to use the term 'assistance dogs' rather than 'guide dogs'.
Overall comments on the leaflet.	This is a very poor draft, which needs to be comprehensively re-written. However, such is the level of confusion and lack of clarity/detail in the draft, that it suggests the need for Heathrow Express to undertake a more fundamental review of its policies with regard to accessibility.

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>The Policy Document seemed to employ varying writing styles, some fairly friendly in tone, but others far more impersonal. Indeed some sections read more like a supplier specification than a customer-facing document.</p> <p>Poor drafting and convoluted language exacerbated the deficiencies in tone, as did the use of jargon such as: 'PRM supplier'; 'TUAG'; 'CC', 'DPPP'; and 'CMS'.</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 not motivational due to deficiencies in its tone, but more particularly because of significant problems with its ease of use, and the lack of appropriately detailed information in many areas.</p>
<p>Ease of use: Does the content</p>	

<p>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>The Policy Document is not easy to use. Like the Passenger Leaflet, it suffers from the lack of a logical structure, as well as the same deficiencies in terms of appropriately detailed information. The document would seem to be the work of several different people with little consistency of style, and with some paragraphs seeming to have been placed without any reference to the text that preceded them (the last paragraph in the 'Booking and providing assistance' section for instance). The quality of drafting is generally very poor.</p> <p>The section on 'Booking and providing assistance' is even more confusing than the section in the Passenger Leaflet. It, again, conflates the assistance provided by various organisations without clearly differentiating between them or providing enough detail to be of practical help. This is made even more confusing by the inclusion of further information on assistance in the separate section on 'Heathrow Airport'.</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>We welcome the commitment to 'turn up and go' travel and assistance, although it needs to be made clear which stage(s) of a typical customer journey on the Heathrow Express this applies to.</p> <p>The 'Monitoring and Evaluation' section is clearly written and seems to be comprehensive in scope.</p>

Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions

Most of the specific points raised with regard to the Passenger Leaflet are also relevant to the Policy Document, so the comments below should be read in conjunction with those already made with reference to the Passenger Leaflet, particularly the comments on 'Tickets and fares', which we haven't repeated but apply equally to the Passenger Leaflet and Policy Document.

It would be useful to include a clear statement (preferably at the beginning of the leaflet) that Heathrow Express (and other organisation involved in a typical Heathrow Express customer journey (such as Heathrow Airport) provide assistance to all disabled passengers, irrespective of whether they had visible or non-visible disabilities. DPTAC has previously provided a list of disabilities that can be used for illustrative purposes.

As already highlighted, the section on 'Booking and providing assistance' is extremely confusing, largely because it is very poorly written and conflates the assistance provided by various organisations (Heathrow Express, Network Rail, and Heathrow Airport), leaving the reader unclear whether assistance needs to be booked and whether it is available for any disabled person that needs it or just those disabled people with mobility impairments? Furthermore, it is not clear whether the operator participates in the national Passenger Assist scheme, and if not, whether bookings made via airlines are communicated along the rest of a passenger's journey (i.e. to other rail operators).

The confused messaging is exacerbated by a complete lack of practical detail in terms of how assistance works. It is not clear, for instance, whether there are meeting points at Paddington or Heathrow for people needing assistance (the Station Information' section seems to suggest not for either station, but confusingly contact and location details are separately provided for the Network Rail assistance point at Paddington), or what the arrangements are if you need onward assistance from Network Rail or Heathrow Airport (via their 'PRM supplier'),

With regard to the Heathrow special assistance bus (information about which is in the 'Alternative accessible transport' section for some reason), more detail would be helpful: contact information, time it may take to arrive, how to book in advance, if necessary? This information should also appear in the Passenger Leaflet.

There is also linked confusion around the use of platform 6. The Introduction to the Policy Document says that from December 2019, for 15 months, HEx will operate from just one platform which will be either platform 6 or 7 . This should now be known? In the Passenger leaflet the implication is that part of

platform 6 at Paddington is curved and does not have level access – will a platform-train ramp be provided here when required? Will any other mitigations be put in place to facilitate use of the platform? Will mobility-impaired customers need assistance?

It would be far better to completely re-draft this section breaking assistance down into each stage of a typical customer journey, explaining who provides assistance for each stage (and providing their contact details), and describing how assistance works from a practical perspective at each stage.

There is considerable confusion about whether Heathrow Express offers level access or not. Although on page 5 it states *'there is no step on a Heathrow Express train'* and the 'At the Station' section on page 6 states *'Stations and platforms have been designed to ensure that there is step free access throughout...'*, on p10 it only states 'the platforms can be level' and 'there is still a gap between the platform and the train'?

This confusion is exacerbated by the sentence in the Introduction, which reads *'Our service provides level access across all stations, however this is due to change in the summer of 2020 (i.e. now) with the introduction of our new trains, therefore the operating process and this ATP will be updated to reflect those changes'*.va Although it seems astonishing that Heathrow Express is introducing trains that will reduce accessibility, if correct, it will presumably require a significant change to the delivery of assistance - including the provision of platform-train ramps?

It would also seem likely to stimulate the demand for assistance (including booked assistance), as many existing unassisted passengers will in future need assistance to board and alight. If this change is imminent then there seems no point in publishing the ATP as it stands – it would be better to include the changed arrangements now.

The Information provision section states *'This leaflet is available in other formats such as Braille, large print or audio, within 7 days of a request to our Customer Relations team'*. It would be helpful to move this section to the beginning of the Policy Document and to insert a link to the customer relations after this sentence.

The last paragraph of the 'Alternative accessible transport' section sits oddly with the rest of the section. Indeed, it is difficult to understand what point this paragraph is trying to make?

The information on mobility scooters is very unclear. Whereas in the 'On the train' section it is stated that

	<p><i>'Passengers do not have to get off their mobility scooters as our trains have level access'</i>, the section on mobility scooters that follows it says that mobility scooters can only be accepted in a <i>'collapsed position'</i> (and collapsed before boarding the train) and must be stored in luggage racks? If Heathrow Express is a TUAG railway why do disabled passengers need to book assistance from Network Rail and Heathrow Airport if they need help stowing their scooter in the luggage rack?</p> <p>The section on 'Disruption to facilities and services' is very sketchy. Information needs to be provided prior to passengers arriving at the station, and in various formats. Use of social media was mentioned in the Passenger Leaflet but not in the Policy Document?</p> <p>The section on 'Disabled parking' focusses almost entirely on enforcement and contains very little information about what disabled parking is available.</p> <p>The section on 'Making connections' is again very sketchy with little practical information about the interfaces between Heathrow Express and Network Rail/Heathrow Airport let alone other train operators or airlines. There is very little information on wayfinding and the section on signage has been deleted.</p> <p>There is no information on feedback, complaints, customer redress, the Rail Ombudsman and so on. The 'Contact us' section has been deleted.</p> <p>The section on 'Management arrangements' is very confused with a number of individuals with similar sounding job titles and seemingly overlapping roles. There is no mention of a commitment to accessibility on the part of the MD of Heathrow Express and his/her senior leadership team. This section provides little confidence that Heathrow Express really understands or is fully committed to its responsibilities and legal obligations as far as accessibility is concerned.</p> <p>The section on 'Access improvements' appears to be a general list of improvements without any particular focus on accessibility.</p> <p>In the section 'Working with others' we suspect that that the reference to a 'Sunshine Lanyard' should actually refer to a 'Sunflower Lanyard'.</p> <p>The end of the section on 'Staff training' is completely incomprehensible.</p>

Overall comments on the document.	This is an extremely poor draft that needs to be comprehensively re-thought and re-written. As with the Passenger Leaflet (indeed, even more so), it begs some worrying questions about whether Heathrow Express really understands its legal obligations and whether it has any real commitment to accessibility.
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