

## ORR Accessible Travel Policy review form

<b>Stakeholder</b>	DPTAC
<b>Train Operator</b>	Southeastern Trains
<b>Review end date</b>	21/07/2020

### ATP: Passenger Leaflet

<b>Question</b>	<b>Comments</b>
<b>Tone:</b> 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 tone of the Passenger Leaflet is reasonably good but would benefit from being more welcoming and friendly. A clear statement of SET's commitment to accessibility at the beginning of the Leaflet would help set the right tone from the outset.</p> <p>Very little technical or legal jargon is used, but some of the language is quite convoluted, and the Leaflet would benefit from a thorough edit.</p>
<b>Motivational impact:</b> Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?	<p>The Leaflet is generally positive and motivational but could be more overtly encouraging.</p> <p>As well as a clear statement of SET's commitment to accessibility, the opening section would also benefit from a statement encouraging disabled people to use SET's services, emphasising that SET was committed to providing them with any assistance that they might need.</p>
<b>Ease of use:</b> 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>Whilst the leaflet contained quite a lot of information, it wasn't particularly easy to use. It lacked a clear structure and would benefit from a short table of contents at the beginning (or at least a bullet point summary of the contents).</p> <p>Clearer separation between sections and larger section headings would help, as would avoidance of repetition.</p>

<p><b>Good practice:</b> Please highlight areas which are particularly strong and/or innovative.</p>	<p>The app is a welcome innovation but other options are also available for those travellers where an app is not possible to use or not preferred.</p>
<p><b>Other specific points:</b> Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.</p>	<p>A copy of the Leaflet with annotated comments has also been provided and should be read in addition to the comments in this section.</p> <p>The weakest element of the Leaflet is the way that it deals with DOO services, particularly at partially-staffed or unstaffed stations. The explanation of how customers will be provided with assistance, particularly if they are TUAG customers, is incomplete, muddled and unconvincing. It is unlikely to give some disabled people confidence that that they will receive the assistance they need when using SET services. This element of the leaflet (and the policy and processes that underpin it) needs to be significantly improved. Lists of DOO services and unstaffed and partially-staffed stations should be made available by SET.</p> <p>In terms of the language used there are two general issues worth highlighting:</p> <p>Firstly regarding the term “visually impaired” this is now used less as viewed as possibly relating to how someone looks (i.e. they are “visually” impaired, and have some disfigurement or facial deformity).The term “vision impaired” should be used instead.</p> <p>Secondly, the use of the term “hidden disability” should be replaced by “non-visible disability”, as ‘hidden’ can be construed as meaning that the disabled person is in some way trying to hide their disability.</p> <p>The section on fares is quite confusing, and it wasn’t clear why a list of all Railcards was needed. It also needs to be made clearer that the discounts available to blind/vision-impaired and wheelchair-using customers are separate from those provided by the DPRC.</p> <p>There needs to be clearer information about which SET services are operated by non-compliant PRM-TSI trains, and what mitigations are offered by SET.</p>
<p><b>Overall comments on the leaflet.</b></p>	<p>The draft Passenger Leaflet provides a reasonable starting point but is capable of considerable improvement. It could be friendlier, more welcoming, and more motivational, and would benefit from a clearer structure.</p>

	<p>Most fundamentally, however, the sections dealing with the provision of assistance at unstaffed or partially-staffed stations served by DOO train services are some considerable way short of the required standard, and need to be re-thought and revised if the Leaflet is to provide all disabled people with the necessary confidence to use SET's services.</p>
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## ATP: Policy Document

<b>Question</b>	<b>Comments</b>
<p><b>Tone:</b> 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 tone of the Policy Document is generally appropriate. It would benefit from a clear statement of SET's commitment to accessibility at the beginning of the Document, which would help set the right tone from the outset.</p> <p>Quite a lot of technical jargon (and acronyms) are used, although generally (but not always) there are explanations as to what they mean/refer to. It would be worth SET considering whether all the technical terminology and linked explanations are necessary ('PSVAR' for instance).</p> <p>Some of the language in the Document is quite convoluted, and some sections poorly drafted (section A3 on ticketing for instance). There is also unnecessary repetition. Overall, the Document would benefit from a thorough edit, and the re-writing of some sections.</p>
<p><b>Motivational impact:</b> 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</p>	<p>As well as a clear statement of SET's commitment to accessibility, the opening section would also benefit from a statement encouraging disabled people to use SET's services, emphasising that SET was committed to providing them with any assistance that they might need.</p> <p>Although generally positive and motivational in tone, a greater degree of overt encouragement to disabled people to use SET's services would be welcome.</p> <p>The Document is generally quite comprehensive but its sheer length will act as a deterrent to many disabled people. It would benefit from a thorough edit to reduce its length.</p>

encourages of the train operator's services.]	
<p><b>Ease of use:</b> 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>In general, the Policy Document is easier to use than the Passenger Leaflet, but suffers from poor drafting in places, and its excessive length.</p> <p>It would also benefit from a table of contents at the beginning of the document, which provided an overview of the Document's structure and contents.</p> <p>The information provided is generally comprehensive (although with some notable omissions as detailed in the next section), and sufficiently detailed. However, overall, it needs editing to reduce its length and improve its ease of use.</p>
<p><b>Good practice:</b> Please highlight areas which are particularly strong and/or innovative.</p>	<p>The range of information about how and when to obtain information and assistance in advance of travelling, during a journey, and post travel should things not go right.</p> <p>Section B2 is well written and the clear commitment of the SET Executive Team and Board to accessibility is very welcome, as is the introduction of Equality Impact Assessments, the disabled passengers mystery shopping programme, and disabled customer panel.</p> <p>The commitment to provide disability awareness training to agency and contract staff is also welcome.</p>
<p><b>Other specific points:</b> Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions</p>	<p>A copy of the Policy Document with annotated comments has also been provided and should be read in addition to the comments in this section.</p> <p>Many of the comments made with reference to the Passenger Leaflet also apply to the Policy Document, so both sets of comments should be taken into consideration when reviewing the Policy Document.</p> <p>As with the Passenger Leaflet, the use of "visually impaired" should be altered to "vision impaired" or "vision impairment" and the term "hidden" disability" should be altered to "non-visible" disability.</p> <p>Section A1 is very long and quite confused in structure. It would be better if the section began with a clear explanation that both booked and unbooked assistance were available. The emphasis on dedicated staff at some major London stations begs the question of who provides assistance at other locations, whilst the role of 'Ambassadors' is not properly explained. It is not clear why a paragraph on 'handover procedure' has been included as disabled passengers are interested in what kind of</p>

	<p>assistance they can expect rather than the operational procedures that underpin it. The sections on DOO at unstaffed and partially-staffed stations are better than the Passenger Leaflet, but still muddled and unclear, particularly with regard to TUAG passengers.</p> <p>Section A3 on Ticketing is very poorly written, with the section on non-DPRC discounts for blind/vision impaired and wheelchair-using passengers particularly difficult to understand. Tickets can also be purchased through other TOC retail channels and third party retailers such as the Trainline.</p> <p>There is no mention of the Rail Ombudsman in section A8?</p> <p>It would be useful for appendices to be attached to the Policy Document providing lists of staffed, partially-staffed, and unstaffed stations, as well as a list of DOO services/routes.</p>
<p><b>Overall comments on the document.</b></p>	<p>The Policy Document provides a comprehensive and detailed source of information, and is generally positive and appropriate in tone. However, it suffers from being excessively long and poorly written in places.</p> <p>The elements of the Document relating to the provision of assistance at unstaffed and unstaffed stations on DOO routes, particularly for TUAG passengers, is in need of further thought and revision. The current draft does not provide confidence that SET have robust policies and procedures in this area.</p>