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Rail Markets & Economics



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25/11/2019

Hugh Clancy
Director
First Trenitalia West Coast Railway
(By email)

Dear Hugh,

Approval of First Trenitalia West Coast Railway (trading as Avanti West Coast) Accessible Travel Policy (Condition 5 of the Station Licence and GB Statement of National Regulatory Conditions: Passenger)

Thank you for submitting Avanti West Coast's (AWC) draft Accessible Travel Policy (ATP) for approval.

I confirm that we have reviewed the ATP against the 2019 "Accessible Travel Policy Guidance for Train and Station Operators" (the guidance). As part of our review process we also sought views on the draft ATP from Transport Focus and Disabled Persons Transport Advisory Committee (DPTAC) and had several exchanges with AWC to clarify its commitments. I can confirm that AWC's ATP meets the requirements of Condition 5 of its station licence and GB Statement of National Regulatory Conditions: Passenger (SNRP) with the exception of those areas identified below.

We note that at the time of submission, you have yet to commence the start of your franchise. As a result, you have identified areas where you are unable to provide sufficient information and secure compliance against some of the sections within the guidance.

Outstanding action plan

The table below sets out an action plan identifying these outstanding areas, which you have committed to addressing following commencement of your franchise:

Action for AWC to complete	By when
1. You will ensure details of services and facilities at all of the stations you manage and other stations called at by your services, is provided on your website, available to download and in alternative formats where requested. A1.2k, A2.2.7	1 April 2020
2. You will have successfully recruited an Accessibility Champion, and established an Accessibility Panel. B2.1, B5.1	1 April 2020

3. We note there is little detail provided against B6 Staff training. As a result, additional emphasis on how your training plan will be delivered is included as part of your training progress report due by July 2020. B6.2	31 July 2020
4. Your website will be fully compliant with WCAG standards by the end of 2021. A2.5.1	31 December 2021

I shall be grateful if you will provide an update against each commitment upon completion and in line with the timeframe allocated.

We expect that from 31 July 2020 you will be able to demonstrate full regard to the guidance and that your practices fully reflect this.

Failing to address these commitments may lead to non-compliance with the guidance, and therefore a breach of your licence condition.

Non-compliance may be subject to enforcement action by ORR.

Rail replacement services

We note the commitment to securing accessible vehicles during disruption, where possible. Please note that, as indicated in our letter of 30 September 2019, we have had cause to re-consider the position in relation to the accessibility of rail replacement services, as set out in paragraph A6.2 of the ATP guidance, and will be re-consulting on the point. It is therefore possible the relevant text in the guidance, and therefore in your ATP, may need to be amended in due course.

Future investment

We welcome the following initiatives, which are being introduced as part of your new franchise and which we believe are likely to be positive for passengers:

- The continuation of the JAM card scheme, designed to help passengers who have a non-visible disability communicate with your team, together with the development of a journey planning and guidance tool; and
- The introduction of new fully accessible ticket vending machines to replace all existing ones.

Stakeholders’ review of your ATP welcomed the JAM card scheme but suggested supplementing this with other schemes which are designed to improve accessibility. You may wish to consider this further.

A copy of the approved ATP is attached to this letter, and will be published on our website along with a copy of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Clements', with a large, sweeping flourish at the end.

Marcus Clements