

IMPACT ASSESSMENT

New and revised requirements in updated Accessible Travel Policy Guidance

		Impact on.....		
Policy Area	Evidence and solutions	Consumers	Train and station operators	ORR
Restructuring the Guidance	Evidence: A DPPP currently consists of separate passenger leaflets and policy documents. The current requirements for the 'Passenger' document mean that it is difficult for operators to produce a concise and user-friendly leaflet. The leaflet also contains information which is not of immediate interest to the traveller. The size of the leaflet can result in large printing and distribution costs, particularly when there are material changes to facilities and services that mean revisions are necessary. This can happen several times a year when there is significant investment in stations and rolling stock taking place.	<p>[+] The Passenger Leaflet will be more accessible and customer-friendly.</p> <p>[+] The leaflet will be focussed on key information so that passengers will be more aware of the assistance on offer.</p> <p>[+] Station and rolling stock information will be kept up-to-date online, rather than go out of date</p>	<p>[+] A more focussed 'Passenger Leaflet will make it easier for operators to produce a concise, user-friendly, up-to-date and accessible document – including in leaflet form at stations, and in alternative formats on request.</p> <p>[+] They will not be required to produce expensive updates when rolling stock and stations</p>	<p>[+] Better understanding through enhanced monitoring of: the provision of stations and rolling stock accessibility information online; the provision and display of the passenger leaflet at stations to ensure it is readily available and displayed prominently.</p>

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	<p>Our mystery shop of spontaneous Assisted Travel¹ found that the leaflet was available over the counter on just three out of ten journeys, and less than one in five respondents to a survey said that they found out about Assisted Travel from a leaflet. Stakeholder engagement has provided anecdotal confirmation that even regular users of rail travel rarely read the document. Respondents to our November 2017 consultation suggested the passenger-facing document could be shorter, more customer-friendly and accessible, and focussed on what assistance is available and how to obtain it. This was reinforced in responses to our November 2018 consultation.</p> <p>Revised Requirement: Operators to produce a revised 'Accessible Travel Policy'. They must:</p> <ul style="list-style-type: none"> i) Revise and condense the passenger leaflet that is available at stations to provide key information passengers need before they travel, including how to book assistance; and 	<p>in leaflets that are expensive to reproduce.</p> <p>[+] Passengers requiring detailed access to up-to-date station accessibility and staffing information will still be able to access this from station staff.</p>	<p>accessibility information changes.</p>	

¹ https://webarchive.nationalarchives.gov.uk/20180605094905/http://orr.gov.uk/data/assets/pdf_file/0006/25980/a-mystery-shop-of-turn-up-and-go-services-report-november-2017.pdf

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	<p>ii) Revise, restructure and expand the policy document, explicitly setting out how they will deliver their commitments.</p> <p>Network Rail to produce a policy document as above, as well as guides to each of its stations for older and disabled people.</p> <p>We also propose to strengthen our monitoring of operators' provision of information on Assisted Travel and the accessibility of their services at stations and online.</p>			
Changing the approval and review process	<p>Evidence: For new applicants, the current approval timescales are not well aligned with either the franchise mobilisation or licence application processes.</p> <p>Furthermore, printed DPPPs are not required at stations until three months after a DPPP has been approved, which means passengers do not have access to relevant Assisted Travel information.</p>	<p>[+] Passenger groups are able to provide input at development stages and are consulted on any proposed changes.</p> <p>[+] DPPPs that better reflect the needs of disabled passenger and others that may request assistance.</p>	<p>[+] More structured and efficient approval process.</p> <p>[+] Reduced burden on operators from not having to submit policies for annual approval when non-material changes have taken place.</p>	<p>[+] More efficient approval process and opportunity to view input from passenger groups at early stage.</p> <p>[+] Reduced burden on resource to undertake annual reviews when non-material changes have taken place.</p>

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	<p>The annual review process is burdensome for both operators and ORR, and disproportionate where there is no material change to facilities or service provision.</p> <p>Responses to our November 2017 consultation and feedback from our engagement with stakeholders suggested disability groups/forums should be involved in the DPPP approval consultation process. This was echoed in responses to our November 2018 consultation.</p> <p>Revised requirements: For new applicants:</p> <ul style="list-style-type: none"> • Documents must be submitted to ORR for approval 12 weeks before the start of operations • We aim to approve documents at least four weeks prior to the intended start of operations • Operators must make their documents available to the public on their website from the start of operations <p>For existing licence holders we also require that they carry out an annual review of their Accessible Travel Policies</p>	<p>[+] New operators can produce policies that are approved more efficiently.</p> <p>[+] More timely access to published Accessible Travel Policy documents.</p>	<p>[+] A faster approval process will result in more timely production of published DPPPs.</p>	

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	<p>and submit it to ORR; however, these will only require ORR review and approval if an operator is proposing significant or material changes. Approval will take six weeks. Should we agree with an operator's submission that changes are not material or significant, no review or approval will take place.</p> <p>At the time of submission, operators must confirm that they have sought and considered feedback from local groups such as their passenger panel, accessibility forum and local user groups, as appropriate.</p>			
Reliability	<p><u>Accessible journey planning and Booking assistance</u> Evidence: Analysis of existing information on the National Rail Enquiries (NRE) website (underpinned by the Knowledgebase database) shows that across the network, station accessibility information is often inconsistent and at times incorrect.</p> <p>ORR analysis coupled with anecdotal evidence from operators and responses to</p>	<p>[+] Improving the availability and consistency of accessibility information to both passengers and staff will reduce the likelihood that prospective passengers are unaware of journey opportunities or barriers to access, and will support the booking and</p>	<p>[+] Improve rail staff decision making by giving them access to more accurate information about stations, enabling them to better tailor assistance to each passenger's needs. In doing so this will reduce the likelihood of assistance failures and ensure assistance staff are deployed more</p>	<p>[+] Increased intelligence to more accurately identify poor performance or non-compliance at an individual operator level in the provision of assisted travel.</p>

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	<p>our November 2018 consultation, supports the assumption that using incorrect accessibility information when journey planning and booking assistance has adverse impacts on the reliability of assisted travel.</p> <p>New requirements: Operators use standardised station accessibility classifications and wording to ensure that consistent, accurate and useful information is available online on the NRE web pages and at stations regarding station facilities for disabled passengers and others that may benefit from step-free access – for use by passengers, booking agents and staff.</p> <p>Mandate inclusion of step-free access information on Station Welcome Posters.</p> <p>Prior to confirming bookings, call centre staff complete mandatory checks on the three priority station accessibility fields on NRE: i) Step-free access note; ii) Assisted Travel, and; iii) Staff help available.</p>	<p>delivery of reliable assisted travel.</p> <p>[+] Improving station-to-station/ station-to-train handover and communication will have a direct positive impact on the reliability of alighting assistance.</p>	<p>efficiently and effective across the network.</p> <p>[+] Improvements in the reliability of assistance as an outcome of these measures should also reduce the volume of accessibility-related complaints received by the industry (~6,000 p/a) coupled with positive reputational benefits.</p> <p>[+] Train and station operators have also informed us that having more certainty over the ‘priority’ accessibility fields they are required to regularly update in Knowledgebase, coupled with the standardisation of the data format, will enable them to target their existing resource more effectively (e.g. because Knowledgebase is becoming increasing</p>	

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	<p><u>At the station</u> Evidence: Data from our Passenger Assist monitoring survey shows that 10% of alighting assistance fails – in general due to staff not being present to deliver this. Qualitative evidence reveals that boarding staff often complain they are unable to get an answer when calling ahead to destination stations, or that alighting stations have not received a call from a boarding station regarding an arriving passenger. Station-to-station calls are currently usually via landlines, which do not provide a call log. Until the new Passenger Assist mobile application is introduced it is very difficult to establish the cause of an assistance failure without a system to record when calls were made, and what information was passed on, e.g. a communication failure between stations, or staff not acting upon information.</p> <p>New requirements: Subject to the outcome of a trial to commence in August 2019, new procedures on communication between staff at different stations (handover protocol) are adopted by June 2020, alongside the use of a dedicated assistance contact number/Passenger</p>		<p>expansive, our changes gives operators surety that if time and resource is constrained they can focus on core fields that have the most impact and know precisely what data to populate them with).</p> <p>[-] Updating of 2015 'On Track' station accessibility categories.</p> <p>[-] Updating and completion of Knowledgebase priority text fields (additional costs will vary between train and station operators depending on the number of stations they manage, the extent to which recent station audits have already been completed, existing available resources and processes).</p>	

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	<p>Assist app/other technology agreed with ORR and responsible member of staff for every station.</p> <p>Additional monitoring of information provision at stations and online. This could include mystery shopping of stations, websites, contact centres or help-points and/or greater monitoring of social media.</p>			
Staff Training	<p>Evidence: Responses to our November 2017 and November 2018 consultations reinforced the need to make improvements in staff disability awareness training. Our review of the current provision of training found it to be variable across the sector, with the duration of training varying between an hour and two days, and the use, in some cases, of out of date legislation and terminology. Some frontline staff have not received training in this areas for a number of years.</p> <p>New requirements: We have defined the key outcomes to be achieved in the training of staff. We require that by July 2021 operators:</p>	<p>[+] Passengers travel with greater confidence as staff utilise increased skills and knowledge</p> <p>[+] Reduced risk of assistance failing</p> <p>[+] Staff will proactively identify passengers in need of assistance, and those with hidden disabilities.</p>	<p>[+] Staff will have increased skills, knowledge, and confidence to provide appropriate help to passengers requiring assistance.</p> <p>[+] Staff will have a better understanding of all relevant legislation, which will mean operators are more likely to be compliant.</p> <p>[+] Assistance provision will be more reliable.</p>	<p>[+] Ongoing monitoring of the user experience of Passenger Assist will provide an assessment of the impact of strengthened training provisions</p> <p>[+] Compliance data and reporting provides greater assurances that operators are complying with their obligations and helps meet our vision of a railway network where passengers can request assistance with</p>

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	<ul style="list-style-type: none"> Expand and reinforce disability awareness training courses to cover these key elements; Ensure frontline staff receive refresher training and all new staff receive the updated training package Ensure staff hear first-hand from disabled people about their lived experience of using the railway and being provided a safe space to explore the issues raised; Develop training courses in tandem with disabled people. Deliver condensed versions of the training to staff working in contact centres and on temporary contracts (including via agencies) <p>Operators must provide ongoing refresher training at least every two years to ensure they continue to demonstrate the required skills, knowledge and attitude to deliver a better customer experience for disabled passengers.</p> <p>Operators are required to set out their plans to deliver these improvements in their Accessible Travel Policies and set</p>		<p>[+] Potential for more passengers to travel by rail.</p> <p>[-] All operators would have to update their training programme and provide 'refresher' training to each current member of frontline staff; all new members of staff would be required to receive the updated training package. The cost to each operator was not provided to us in response to the publication of a draft of this document for consultation. We expect this will vary depending on the extent of the gap we identified for each operator to compliance with the new requirements, and how each operator chooses to close this gap - which will depend on factors such as the scope and content of previous</p>	<p>confidence and ease, safe in the knowledge that it will be provided reliably, effectively and consistently by staff that have the training and knowledge to do so with confidence and skill – irrespective of train or station operator.</p>

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	out the progress they have made in a report to ORR in July 2020.		<p>training packages, staff responsibilities, and existing training commitments.</p> <p>[-] Additional ongoing reporting and monitoring administration.</p>	
Raising Passenger Awareness	<p>Evidence: Our research² shows that awareness of the ability to get help with rail travel is low:</p> <ul style="list-style-type: none"> 70% of potential Passenger Assist users had either not heard of it (54%) or had heard of it but knew nothing about it (16%); 86% of potential users of unbooked assistance were either not aware they could travel spontaneously (81%) or had heard of it but knew nothing about it (5%). 60% of people who had never used Passenger Assist reported they would be likely to do so in future, which suggests significant untapped demand. 	<p>[+] Increased awareness of the assistance that is available and how to get it</p> <p>[+] All information can be found, in a consistent location, usually within one page of an operator's website</p>	<p>[+] Potential for more passengers to travel by rail.</p> <p>[+] Improved communication of assistance when it is booked will enable resources to be more appropriately focused to deliver what is expected.</p> <p>[-] Additional expenditure on promoting Passenger Assist at local and regional level for any operators that do little or nothing in this</p>	<p>[+] Better understanding of website compliance via additional monitoring.</p> <p>[+] Identification of good practice and compliance issues through additional monitoring of operators' work with local and regional stakeholders</p>

² <https://webarchive.nationalarchives.gov.uk/20180605092249/http://orr.gov.uk/statistics/published-stats/analytical-and-research-reports>

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	<p>The evidence from both the research and our discussions with disability groups is that the current DPPP leaflet is not always easy to find or to read: less than one in five in the research discovered what assistance is available from a leaflet. Respondents to our November 2017 consultation suggested that on websites journey information should be prioritised. Other important aspects included uncluttered presentation of information, available one-click away from the homepage, and consistent use of terminology across different operators' websites. Responses to our November 2018 consultation supported our proposed solutions and offered further detailed suggestions.</p> <p>Revised requirements: We have amended the Guidance to require operators to work with charities, local authorities, local service providers, local or regional access groups, and a group of users to promote Assisted Travel and obtain feedback, as well as reporting on this activity to ORR. We also require that the term 'Passenger Assist' is used in any of the channels with which operators</p>		<p>area – costs were not provided to use in response to the publication of a draft of this document for consultation</p> <p>[-] Firms costs of website redesign to meet requirements has not been provided to us. All operators would have to make some form of amendment to their existing website to refer to the booking service as 'Passenger Assist', to ensure that the availability of the key information is consistently located and collated on one single webpage, and new website accessibility standards are worked towards</p> <p>[-] Annual reporting on work with local and regional stakeholders</p>	

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	communicate to passengers when describing the system to book and provide assistance, that new website accessibility requirements are worked towards, and key information, reflecting that presented in the passenger leaflet, is provided or linked to on a single page linked to the homepage.			
Notice period for booked assistance	<p>Evidence: There is a wide variation in the advertised minimum notice period required, with 10 operators having notice periods shorter than the standard 24 hours before travel. This complexity is likely to be confusing for passengers: in some cases different notice periods will apply to trains at the same station; and in others notice periods offered by one operator cannot be delivered by other operators (acting as subcontractors) who have a longer notice period.</p> <p>Operators also have different policies and practices in the operation of booking contact centres: across the industry, there are 13 contact centres that take assistance bookings. Passengers can book any journey with any call centre, however, their opening times vary.</p>	<p>Requirement 1: 10pm day before [+] Consumers are provided with clarification that they can book assistance the evening before they travel.</p> <p>[-] Same day solution that some consumers want is not immediately provided.</p>	<p>Requirement 1: 10pm day before [+] No change to current booking process or communication systems.</p> <p>[-] Extension of contact centre opening hours in the medium to long term would have cost and employee contractual implications for the 12 operators affected, but can be avoided in the near term by advertising the National Freephone Passenger Assistance number and diverting calls to other operators (e.g. in the same owning Group).</p>	<p>[+] Helps deliver our vision of a railway network where assistance is provided reliably, effectively and consistently, irrespective of train or station operator.</p>

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	<p>Last year more than 4 in 5 of assistance bookings were booked over the phone.</p> <p>From our consultations and stakeholder engagement we know that passengers want to see as short a notice period as possible being consistently implemented across the industry.</p> <p>Revised requirement: After considering responses to the November 2018 consultation, we require operators to phase in the reductions we proposed in alignment with the planned changes to the Passenger Assist booking system. This will ensure that passengers can book:</p> <ol style="list-style-type: none"> (1) Up to 10pm the day before travel by April 2020 (2) A minimum of 6 hours before travel by April 2021 (3) A minimum of 2 hours before travel by April 2022 	<p>Requirement 2: Min. 6 hrs [+] Provides same day solution that consumers want.</p> <p>[+] Increased simplicity and consistency of approach across operators</p> <p>Requirement 3: Min 2 hrs [+] Provides same day solution that consumers want with added journey flexibility</p> <p>[+] Short notice bookings benefit leisure and business commuters</p>	<p>Requirement 2: Min 6 hrs [+] Allows sufficient time for staff to be redeployed to provide assistance</p> <p>[-] Only 4 operators have a notice period of less than 6 hours. New processes and technology may have to be introduced. Any potential costs have not been made available to us in response to publication of a draft of this document for consultation.</p> <p>Requirement 3: Min 2 hrs [+] Maximises the potential of the new Passenger Assist system and deliver a more consistent service</p> <p>[+] Phasing the reduction of the notice period allows technology, resource and processes to be in place to</p>	

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		<p>[+] Would maximise the potential of the new Passenger Assist system and would successfully remove the complexity of the current service; providing a more secure service.</p> <p>[+] Phasing the reduction of the notice period allows technology, resource and processed to be in place to ensure successful implementation</p> <p>[-] As with unbooked assistance, passengers providing only 2 hours' notice may not be able to secure a seat or wheelchair space, and alternative accessible transport may be difficult to arrange in some locations.</p>	<p>ensure successful implementation</p> <p>[-] New process and technology may have to be introduced. Any potential costs have not been made available to us in response to publication of a draft of this document for consultation.</p>	

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Modes of operation	<p>Evidence: In recent years, a number of train operators have introduced what has been termed Driver Controlled Operation (DCO) –where a second person is usually present on board the train for customer service and/or ticket inspection but not responsible for door operation; in certain circumstances, the train may run without the second person. The current DPPP guidance does not explore this eventuality. Our work with GTR in 2017 regarding assistance provision under DCO on Southern routes demonstrates that operators now need to consider the options that may be available to provide passengers with assistance under a number of differing scenarios. The use of mobile staff to provide assistance at unstaffed or part-staffed stations on DOO routes has been introduced in recent years.</p> <p>New requirement: We require that as far as possible, operators consider a variety of means of providing assistance in differing circumstances. This could include alternative accessible transport, or using staff flexibly to enable assistance to be</p>	<p>[+] Passengers requiring assistance can, as far as is reasonably practicable, make a journey that most reasonably resembles what is available to other passengers</p>	<p>[+] Operators can, as far as is reasonably practicable, meet the needs of their passengers requiring assistance to travel.</p> <p>[-] Potential costs of operators' assessment of where assistance provision may be most at risk and any resultant action are not available to us.</p>	<p>[+] We will seek evidence of risk assessments of assistance provision under DOO/DCOO as required. This will include as part of the approval process for new Accessible Transport Policies and where operators may be considering adopting greater use of DCO / DOO across their network.</p>

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	provided by train staff, station staff or mobile staff where such working practices are routinely operated or can reasonably be accommodated. Where DCO/DOO is introduced, and for new franchises with DOO/DCO train and station operators must to consider the normal operating conditions across their network, to assess where assistance provision may be most at risk and provide us that assessment, and adapt accordingly.			
Redress	<p>Evidence: Our research identified that one in five users do not receive all the assistance they have booked. Many operators already provide redress for failure to provide assistance but the approach in terms of the redress provided, and whether information is easily available or actively promoted varies. Responses to our November 2017 consultation were broadly in favour of giving passengers a form of remedy when failures occur. This was reinforced in responses to our November 2018 consultation.</p> <p>New requirement: Operators must introduce and make passengers aware of</p>	<p>[+] Will ensure every passenger is able to obtain a means of redress when booked assistance is not provided</p> <p>[+] Redress will be provided, regardless of which operator a passenger is travelling with or which operator is providing the assistance at the station.</p>	<p>[+] Engenders increased passenger trust in operators</p> <p>[+] Reputational benefits for operators that are seen to be providing redress</p> <p>[+] Will be able to assess each case on an individual basis and provide appropriate redress.</p> <p>[-] In response to publication of a draft version of this document</p>	<p>[+] We will monitor the provision of redress (number of times, and average value of compensation) within core data</p> <p>[+] Will provide incentives to improve the reliability of Passenger Assist</p>

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	a universal redress requirement to ensure every passenger can claim redress when assistance is booked but not provided. Rather than a fixed amount of redress, operators will be able to consider appropriate redress on a case-by-case basis. The operator with which the passenger was travelling, or was due to travel, is responsible for providing redress.	[+] Engenders trust that assistance will be delivered as requested	for consultation, costs have not been made available to us by those operators who do not currently offer redress.	
Text Relay	Evidence: Text phones are becoming less common as more people are using more modern technology such as text relay, mobile phone SMS text messages or social media. Operators we have spoken to told us that they are very rarely contacted on a text phone. Several operators now have a text relay contact number and we received advice from Action on Hearing Loss that this should be adopted more widely. From the information available on National Rail Enquiries and operator DPPPs we understand only four operators have text relay contact numbers. Mandatory adoption of text relay was supported by respondents to the November 2018 consultation.	[+] Passengers who are deaf or have a hearing loss will have the same access to a customer contact centre as any other passenger.	[+] Adoption of modern technology [-] It may take time to adopt and deliver for the small number of operators that do not currently offer this – no costs were made available to us in response to the publication of a draft of this document for consultation, although free Next Generation Text Service Lite is available.	

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	<p>Revised requirement: Rather than just having a text phone, operators are required to be able to take a call via text relay from a deaf or speech-impaired passenger (including via text phone).</p>			
<p>Accessible substitute transport and accessible alternative transport</p>	<p>Evidence: The data we collect as part of our routine monitoring work shows that alternative accessible transport was provided on almost 6,000 occasions in 2017/18.</p> <p>We know from complaints received that the availability of accessible taxis, private hire vehicles and buses varies considerably. Overall, around 58% of taxi and private hire vehicles (PHVs) in England are already wheelchair accessible, but these tend to be concentrated in urban locations and taxi fleets.</p> <p>The proportion of wheelchair accessible PHVs remains very low, at about 2%. In Scotland, 47% of licensed taxis are wheelchair accessible.</p>	<p>[+] Drivers will be trained on how to deliver assistance.</p> <p>[+] Availability of accessible taxis and rail replacement services may increase over time.</p> <p>[+] Passengers will better understand whether a rail replacement service is likely to be accessible to them</p>	<p>[+] These proposals would encourage operators to better meet the needs of their passengers</p> <p>[+] The process of working with third parties to explore the availability of accessible vehicles should not impose any substantial regulatory burden;</p> <p>[+] Given the obligations already in place on bus and coach operators to train their drivers, we do not anticipate that this should impact on the provision of replacement bus services.</p>	<p>[+] New monitoring to understand the prevalence of accessible rail replacement services</p>

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	<p>Operators have only limited ability to influence the market for accessible buses and taxis, but there are examples of good practice in the provision of accessible vehicles for planned rail replacement services.</p> <p>Whilst bus drivers receive disability awareness training, there is no requirement for taxi drivers to have been similarly trained.</p> <p>New requirements: Operators provide transparency in their policies on the accessibility of rail replacement buses and their work to secure more accessible vehicles, make reasonable endeavours to work with taxi companies that provide accessible taxis and set out how drivers are provided appropriate disability awareness training.</p>		<p>[-] Providing core data on the accessibility of the rail replacement bus services and a report on how they have worked with taxi and bus companies may impose a small additional administrative exercise.</p>	
Ability for Passengers to Contact Staff	<p>Evidence: Our analysis of National Rail Enquires tells us that 1554 stations in GB are classified as 'step-free'. 307 are staffed from first train service to last. Where the station is unstaffed passengers that require assistance may arrive wishing</p>	<p>[+] Information and assistance can be more easily obtained</p>	<p>[+] Assurance that passengers are better informed of the assisted travel services available to them</p>	<p>[+] Helps deliver our vision of a railway network where passengers can request assistance with confidence and ease.</p>

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	<p>to travel spontaneously, but there may be no staff on-hand to help. However, 74% of all stations across the rail network have help points that can provide a means of contact if they are suitably labelled. A number of franchises have commitments to increasing the provision of help points and station Wi-Fi over the next few years. The requirement was broadly supported by respondents to the November 2018 consultation.</p> <p>New requirement: Requirement for operators to ensure that at every station passengers are informed how to contact to a member of staff that is able to provide assistance and service information: in person, via a help point or, where there is sufficient mobile phone coverage, a Freephone number.</p>	[+] Opportunities to travel will increase	[-] Additional signage may be necessary at some stations	[+] Increased monitoring will allow ORR to measure the reliability of assistance provision
Scooters and other Mobility Aids	<p>Evidence: From assessing DPPP we know there is a variance of acceptance of scooters across the industry. Assessing on the platform whether a scooter is safe to accept onboard is challenging for station staff.</p>	[+] Wider acceptance of scooters and other mobility aids, will increase opportunities to travel.	[+] Transparency will reduce instances of passengers being refused travel or assistance booking failing.	[+] Helps deliver our vision of a railway network where passengers can request assistance with confidence and ease.

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	<p>Revised requirement: Operators' mobility scooter policies must extend to other mobility aids, and clearly set out any restrictions. In approving new and revised policies ORR will assume scooters can be carried unless evidence is provided to the contrary. Every passenger leaflet must clearly set out the size, weight and types of scooters that may be carried, and any other mobility aids.</p>	<p>[+] Clarity on acceptance will provide greater confidence and certainty to passengers.</p> <p>[+] Transparency on travel with scooters will reduce the likelihood of assistance failure</p>	<p>[-] ORR's presumption that scooters can be carried unless there is evidence to the contrary may require additional expenditure in determining on which routes and between which stations scooters may be carried.</p>	