

# Impact Assessment

High Level impact assessment: proposed new requirements in revised DPPP Guidance

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
<b>Restructuring the Guidance – chapter two</b>	<p><b>Evidence:</b> 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> <p>Our mystery shop of spontaneous Assisted Travel 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. Our recent stakeholder engagement has provided anecdotal confirmation that even regular users of rail travel rarely read the document. Respondents to our consultation suggested the passenger-facing document could be shorter, more customer-friendly</p>	<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[+] Station and rolling stock information will be kept up-to-date online, rather than go out of date in leaflets that are expensive to reproduce.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>[+] 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 accessibility information changes.</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>

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	<p>and accessible, and focussed on what assistance is available and how to obtain it.</p> <p><b>Proposed Solution:</b>            We propose that operators:            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            ii) Revise, restructure and expand the policy document, explicitly setting out how they will deliver their commitments.</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>			
<b>Changing the approval and review process – chapter two</b>	<p><b>Evidence:</b>            For new applicants, the current approval timescales are not well aligned with either the franchise mobilisation or licence application processes.</p> <p>Furthermore, printed DPPP's 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>The annual review process is burdensome for both operators and ORR, and disproportionate</p>	<p>[+] Passenger groups are able to provide input at development stages and are consulted on any proposed changes.</p> <p>[+] DPPP's that better reflect the needs of disabled passenger and others that may request assistance.</p> <p>[+] New operators can produce policies that are approved more efficiently.</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>[+] A faster approval process will result in more timely production of published DPPP's.</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>

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	<p>where there is no material change to facilities or service provision. 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.</p> <p><b>Proposed Solution:</b> For new applicants:</p> <ul style="list-style-type: none"> <li>• We propose that documents are submitted to ORR for approval 10 weeks before the start of operations</li> <li>• We aim to approve documents at least two weeks prior to the intended start of operations</li> <li>• We propose that operators must make their documents available to the public on their website from the start of operations</li> </ul> <p>For existing licence holders we also propose that DPPPs will only require annual review and approval if an operator is proposing significant or material changes. This 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 incorporated feedback from local groups such</p>	[+] More timely access to published DPPP documents.		

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	as their passenger panel, accessibility forum and local user groups, as appropriate.			
<b>Reliability – chapter three</b>	<p><b><u>Accessible journey planning and Booking assistance</u></b>  <b>Evidence:</b> 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 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><b>Proposed Solutions:</b> 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>[+] 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 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>[+] 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 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</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> <p>[-] Additional resource required to manage and analyse increased volumes of assisted travel compliance data.</p>

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	<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><b>At the station</b>  <b>Evidence:</b> 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. Without a system to record when calls were made, and what information was passed on, it is very difficult to establish the cause of an assistance failure e.g. a communication failure between stations, or staff not acting upon information.</p> <p><b>Proposed Solutions:</b> New procedures on communication between staff at different stations (handover protocol) are adopted, alongside the use of a dedicated assistance contact number and responsible member of staff for every station.</p>		<p>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 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, existing available resources and processes).</p>	

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	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.			
<b>Staff Training – chapter four</b>	<p><b>Evidence:</b> Responses to our 2017 consultation reinforced the need to make improvements in staff 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.</p> <p><b>Proposed Solution:</b> We have defined the key elements that should be required in the training of staff. We propose that operators update their training packages accordingly, provide revised training course materials to ORR, and</p> <p>a) deliver ‘refresher’ training to every member of staff. They will have up to two years to do so.</p> <p>Training should be classroom based, with some additional on-the-job training at the operator’s discretion. We propose that all permanent employees receive the training. Temporary agency and contracted staff must also receive a condensed version of the training. Refresher training would have to be carried out for each member of staff by the 2<sup>nd</sup> anniversary of their initial training. We will require additional reporting of training content</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>[+] 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 member of staff; new members of staff would be required to receive the new training package. The cost to</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 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 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>

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	and delivery to ensure the new requirements are met.		each operator is not available to us but would vary depending on the extent of the gap for each operator to compliance with the new requirements.  [-] Additional ongoing reporting and monitoring administration.	
<b>Raising Passenger Awareness – chapter five</b>	<p><b>Evidence:</b> Our research shows that awareness of the ability to get help with rail travel is low:</p> <ul style="list-style-type: none"> <li>• 70% of potential Passenger Assist users had either not heard of it (54%) or had heard of it but knew nothing about it (16%);</li> <li>• 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%).</li> <li>• 60% of people who had never used Passenger Assist reported they would be likely to do so in future, which suggests significant untapped demand.</li> </ul> <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 previous consultation suggested that on websites</p>	<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, 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 area – costs are not available to us</p> <p>[-] Cost of website redesign to meet requirements is not available to us. All operators would have to make some</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>

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	<p>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.</p> <p><b>Proposed Solution:</b> We propose to amend the DPPP 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 will also require that the term 'Passenger Assist' is used on operator websites when describing the system to book and provide assistance, and key information, reflecting that presented in the passenger leaflet, is provided on a single page linked to the homepage.</p>		<p>form of amendment to their existing website to refer to the booking service as 'Passenger Assist', and ensure that the availability of the key information is consistently located and available on one single webpage.</p> <p>[-] Annual reporting on work with local and regional stakeholders</p>	
<b>Notice period for booked assistance – chapter six</b>	<p><b>Evidence:</b> 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><b>Proposed Solution 1: 10pm day before</b></p> <p>[+] Consumers are provided with clarification that they can book assistance the evening before they travel.</p> <p>[-] Same day solution that consumers want is not provided.</p>	<p><b>Proposed Solution 1: 10pm day before</b></p> <p>[+] 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</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>

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	<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. Last year more than 4 in 5 of assistance bookings were booked over the phone.</p> <p>From our stakeholder engagement we know that passengers want to see as short a notice period as possible being consistently implemented across the industry.</p> <p><b>Proposed Solution:</b> Three options are consulted on, proposing that passengers can book;</p> <ol style="list-style-type: none"> <li>(1) Up to 10pm the day before travel</li> <li>(2) A minimum of 6 hours before travel</li> <li>(3) A minimum of 2 hours before travel</li> </ol> <p>We are consulting on the potential for a phased introduction to align with the planned changes to the Passenger Assist booking system. This could see the implementation of option 1 in 2019, followed by option 2 and/or option 3 in 2020,</p>	<p><b>Proposed Solution 2: Min. 6 hrs</b>  [+] Provides same day solution that consumers want.</p> <p>[+] Increased simplicity and consistency of approach across operators</p> <p><b>Proposed Solution 3: Min 2 hrs</b>  [+] Provides same day solution that consumers want with added journey flexibility</p> <p>[+] Short notice bookings benefit leisure and business commuters</p> <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</p>	<p>could be avoided in the near term by advertising the National Freephone Passenger Assistance number</p> <p><b>Proposed Solution 2: Min 6 hrs</b>  [+] 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 process and technology may have to be introduced. Any potential costs are not available to us</p> <p><b>Proposed Solution 3: Min 2 hrs</b>  [+] Would maximise the potential of the new Passenger Assist system and deliver a more consistent service</p> <p>[-] New process and technology may have to be introduced Any potential costs are not available to us</p>	

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
		ensure successful implementation	[+] Phasing the reduction of the notice period allows technology, resource and processes to be in place to ensure successful implementation	
<b>Modes of operation – chapter six</b>	<p><b>Evidence:</b> 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.</p> <p><b>Proposed Solution:</b> We propose 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 provided by train staff, station staff or mobile staff where such working practices are routinely operated or can reasonably be accommodated. Where</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>[+] 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>	[+] We propose to seek evidence of risk assessments of assistance provision under DCO/DCOO as required. This may include as part of the approval process for new Accessible / Inclusive Transport Policies and where operators may be considering adopting greater use of DCO / DOO across their network.

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	DCO/DOO is introduced, we propose that train and station operators take steps to consider the normal operating conditions across their network, to assess where assistance provision may be most at risk, and adapt accordingly.			
<b>Redress – chapter six</b>	<p><b>Evidence:</b> 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 Nov 2017 consultation were broadly in favour of giving passengers a form of remedy when failures occur.</p> <p><b>Proposed Solution:</b> Operators to introduce and advertise a universal redress requirement to ensure every passenger receives redress when assistance is booked but not provided. Rather than a fixed amount of redress, operators would be able to consider appropriate redress on a case-by-case basis.</p>	<p>[+] Will ensure every passenger receives redress when booked assistance is not provided</p> <p>[+] Redress will be provided, regardless of which operator a passenger is travelling with.</p> <p>[+] Engenders trust that assistance will be delivered as requested</p>	<p>[+] Engenders increased passenger trust in operators</p> <p>[+] Will be able to assess each case on an individual basis and provide appropriate redress.</p> <p>[-] Costs are not available to us for those operators who do not currently offer redress.</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>
<b>Text Relay – chapter six</b>	<p><b>Evidence:</b> 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</p>	<p>[+] Passengers who are deaf or have a hearing loss would have the same access to a customer contact centre as any other passenger.</p>	<p>[+] Adoption of modern technology</p> <p>[-] It may take time to adopt and deliver across the industry – costs are not available to us although free</p>	

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	<p>Action on Hearing Loss that this should be adopted more widely. From the information available on National Rail Enquiries and operator DPPP's we understand only four operators have text relay contact numbers.</p> <p><b>Proposed Solution:</b> We propose that 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>		Next Generation Text Service Lite is available.	
<b>Accessible substitute transport and accessible alternative transport – chapter six</b>	<p><b>Evidence:</b> 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. 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. The proportion of wheelchair accessible PHVs remains very low, at about 2%. In Scotland, 47% of licensed taxis are wheelchair accessible. Whilst bus drivers receive disability awareness training, there is no requirement for taxi drivers to have been similarly trained.</p>	<p>[+] Drivers will be trained on how to deliver assistance.</p> <p>[+] Availability of accessible taxis and rail replacement services should increase.</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>	[+] New monitoring to understand the prevalence of accessible rail replacement services

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	<p><b>Proposed Solution:</b> We propose that operators demonstrate how they have worked with third parties to use more accessible rail replacement buses and made reasonable endeavours to work with taxi companies that provide accessible taxis and give drivers 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>	
<p><b>Ability for Passengers to Contact Staff – chapter six</b></p>	<p><b>Evidence:</b> 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 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.</p> <p><b>Proposed Solution:</b> 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>	<p>[+] Information and assistance can be more easily obtained</p> <p>[+] Opportunities to travel will increase</p>	<p>[+] Assurance that passengers are better informed of the assisted travel services available to them</p> <p>[-] Additional signage may be necessary at some stations</p>	<p>[+] Helps deliver our vision of a railway network where passengers can request assistance with confidence and ease.</p> <p>[+] Increased monitoring will allow ORR to measure the reliability of assistance provision</p>
<p><b>Scooters - chapters</b></p>	<p><b>Evidence:</b> From assessing DPPP’s we know there is a variance of acceptance of scooters across the industry.</p>	<p>[+] Wider acceptance of scooters and other mobility aids, will increase opportunities to travel.</p>	<p>[+] Transparency will reduce instances of passengers being refused travel or assistance booking failing.</p>	<p>[+] Helps deliver our vision of a railway network where passengers can</p>

		Impact on.....		
Policy Area	Evidence & Solutions	Consumers	Train and station operators	ORR
	<p><b>Proposed Solution:</b> Operators' mobility scooter policies must include a presumption of carriage, extend to other mobility aids, and clearly set out any restrictions. 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>[-] Presumption of carriage may require additional expenditure in determining on which routes and between which stations scooters may be carried.</p>	<p>request assistance with confidence and ease.</p>