

Responses to Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP) – Published July 2019

Organisations:

1. Alzheimers UK
2. Birmingham and Black Country Sight Loss Councils (Thomas Pocklington Trust)
3. c2c
4. Campaign
5. Chiltern Railways
6. CrossCountry
7. Department for Transport (DfT)
8. DPTAC
9. Edinburgh Access Panel
10. Equality and Human Rights Commission (EHRC)
11. Essex County Council
12. Grand Central
13. Greater Anglia
14. Greater Anglia Stakeholder Equality Group
15. GTR
16. Guide Dogs
17. GWR
18. Heathrow Express
19. Hull Trains

20. Individual members of the public
21. John Ballantine
22. Julie Ryder (HearFirst)
23. Leonard Cheshire
24. LNER
25. Merseyrail
26. MIGGS
27. Mobility and Access Committee for Scotland (MACS)
28. Mobility Issues Group for Goring and Streatley
29. Network Rail
30. Nexus
31. North East Action on Transport
32. Northern
33. Rail Delivery Group
34. Rail Future
35. RNIB
36. Scope
37. ScotRail
38. Scottish Accessible Transport Alliance
39. Sense
40. Shaw Trust
41. Sheffield Transport for All
42. SHRIMP

43. South Western Railway
44. Southeastern
45. Speedy Sticks Consulting
46. St Leonards and Hastings Rail Improvement User Group
47. Stagecoach
48. Stephen Brookes
49. Thomas Pocklington Trust
50. Tonbridge Line Commuters
51. Trailblazers (Muscular Dystrophy UK)
52. TransPennine Express
53. Transport Focus
54. Transport for All
55. Transport Scotland
56. Virgin Trains
57. Vision UK
58. Wayfindr
59. Welsh Government
60. West Midlands Trains
61. West of England Combined Authority

Office of Rail and Road consultation on DPPP

How people with dementia's rights are not currently being met

- i. Despite the impairments caused by dementia being recognised as a disability under domestic and international law,¹ people with dementia face significant challenges in realising their rights under the UNCRPD or the Equality Act 2010. Stigma, prejudice and lack of understanding about the condition as well as discrimination on multiple grounds including age and gender, compounds an existing postcode lottery of services for people affected by dementia in the UK. People affected by dementia experience inequality across a wide variety of areas before, during and following a diagnosis including in the wider community, including when they travel. Stigma, prejudice and lack of understanding about the condition as well as discrimination on multiple grounds including age and gender, compounds an existing postcode lottery of services for people affected by dementia in the UK.
- ii. Article 9 of the UNCRPD focusing on accessibility is most relevant for the ORR and stipulates that:

“To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:

a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces;

b) Information, communications and other services, including electronic services and emergency services.

State parties shall also take appropriate measures:

a) To develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public;

b) To ensure that private entities that offer facilities and services which are open or provided to the public take into account all aspects of accessibility for persons with disabilities;

c) To provide training for stakeholders on accessibility issues facing persons with disabilities;

d) To provide in buildings and other facilities open to the public signage in Braille and in easy to read and understand forms;

¹ Equality Act 2010 (England, Wales, Scotland) and Disability Discrimination Act 1995, 2010 (Northern Ireland)

e) *To provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public;*

f) *To promote other appropriate forms of assistance and support to persons with disabilities to ensure their access to information;*

g) *To promote access for persons with disabilities to new information and communications technologies and systems, including the Internet;*

h) *To promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost.”*

1. Involving disabled people in a meaningful way

Staff training

- Dementia Friends either by online video route as a minimum for all staff in the railway industry both customer facing and office/maintenance/design based to ensure they are aware of dementia, how it can affect someone and the considerations in their role.
- All customer facing staff to do Dementia Friends and further specialised F2F training which is at least Tier 2 equivalent to [Health Education England standards](#) with customer facing staff inviting local Alzheimer's Society ambassadors living with and affected by dementia in to speak about the challenges they face

2. Improving the quality and reliability of assistance through better information provision

Journey planning

- Offer printed itineraries in accessible formats to provide key information and how they can access support at every stage of their journey.
- TOC to advertise and place revised passenger leaflets in places people affected by dementia visit most often to increase local awareness of support offered. This could be on local radio, GPs, pharmacies, shops and health centres.

Booking assistance

- Information on booking assistance should also always be available offline in written formats.

Transfer of key information between staff

- Information systems should not identify passengers as having dementia. This is because information being sent or communicated about an individual's support need doesn't need to identify their condition to ensure they are safeguarded. Would suggest using codes with option for further notes like other industries – for example like PRM or SMI for council tax. Then staff are aware that is potentially a lack of capacity from the code and any instructions for specific support in the note i.e. requested for passenger to be checked on to reassure they haven't missed their station throughout journey and then met on the train and escorted at end destination to the taxi rank.
- Staff need to be aware of potential risks and safety implications of vulnerable passengers including people with dementia having assistance booked for them when travelling alone and ensuring they arrive safely at their end

destination. Systems so that staff know where people might be sat like assistance seats being booked in certain carriages with toilets, or in priority seating. Consistency in booking might also support staff to know and feel confident to identify and meet passengers needing support. People have unfortunately got lost and [died in the USA](#) and I know of multiple instances of people not being escorted, walking off and getting lost when travelling with booked assistance on the UK rail network. For examples, evidence and quotes from people with dementia please see Appendix.

Train facilities

- Being alerted to nearest accessible toilet or toilet on the train is incredibly important. This should be done before the train pulls in to allow people with limited mobility to get to that position safely and in advance of the train arriving. Ideally people with disabilities would be seated close accessible toilets and the exit of the train.

Monitoring

- Would suggest ORR monitor this and do not rely on an operator's answer that the information is on their website as fulfilling this requirement. Information on assistance needs to be offered at every stage of the journey, in person, in written format with posted tickets and proactively advertised to local vulnerable or disabled passengers through local channels.
- Regarding websites it needs to be in a easily accessible logical place on the website, prompting all passengers for option of support in language which does not limit people when they book a ticket (some people might not see themselves as disabled, they might need some support or assistance).
- Alzheimer's Society have developed guidelines to create dementia-friendly websites, which enable other web developers to take into account the specific needs of people affected by dementia. These guidelines include important principles about the use of colours, texts and fonts and multi-media. We recommend developers of public sector websites to consult these guidelines and to get in touch if they need/want more information. The guidelines can be accessed [here](#).
- With regards to the language being used to speak about dementia there are also some guidelines which have been developed by people living with dementia. They focus on the way people with dementia are described, ensuring that the language is not stigmatising or negatively biased. We recommend professionals producing content about dementia to consult these guidelines. They can be accessed [here](#).

3. Improving the content, delivery and frequency of staff training

Staff training

- Agree on provision of frequency of refresher training. But would query length, duration and staff groups who would receive this. 1 hour every two years is not enough to cover all disabilities and conditions. We would recommend at least 1 full day refresher every two years at least, with longer trainer 2 days for those staff who provide passenger assistance. Dementia and how to support older passengers should at least be touched on for at least 1 hour of this training with all participants doing Dementia Friends.
- We would request that dementia and aging be touched upon within this training for what dementia is, how it impacts passengers, what support might passengers need and what to be aware of regarding passenger safety.

4. Making more passengers aware of the help that is available

Passenger awareness

- Marketing to non-rail travellers needs to include isolated groups, local services and ways to reach potential passengers who are not online. The Rail Delivery Group's communication strategy has to include significant offline communication to these groups. Tweets, online adverts and typical channels will not reach those passengers. Posters in stations will not be seen, adverts on local radio/local newspapers. Flyers/posters in local pharmacies, working with local Age UK's, Alzheimer's Society, etc. Paid flyers or adverts in mail outs to these groups also could help.
- We would suggest that all rail operators need to have mapped the service user journey of people with disabilities, including people with dementia in order to identify the key touchpoints where they may need help and support. They can build on the Rail Delivery Group map (attached along response submission here to understand where they need to prompt passengers for support and what points on journey staff need to be aware are challenging.
- The information provided also needs to be accessible. Not just visit this website, give option to come into your local station to speak to a member of staff or ring a national number for those without internet access.
- The proposal for train operators to work with local authorities, service providers and disabled access groups needs to be broadened to other groups. It needs also include local carers groups, GP patient participation groups, local day centres or services. They need to be proactive outreaching as often older passengers and those with dementia do not see themselves as disabled, nor would join that type of forum. To improve the service communications need to be clear and succinct. Any follow up afterwards to get their feedback needs to be available by either a phone call, letter, text or email. Multiple options need to be given so they can choose one which works for them, not just for the TOC.

5. Reducing the notice that passengers need to give to book assistance

Notice period for booking assistance

- We would suggest the shortest option of 2 hours before, but give people to book anything from days to hours before so that it meets different people's needs for support/travel.

6. Ensuring that passengers can easily obtain redress when things go wrong

Redress

- Again with operators promoting their redress policies they really need to be proactive, not just contact after via forum booked but proactively go out face to face at the end of the interaction, via phone or email reaching out. There is also limited awareness from people affected by dementia that they can get redress if this service is not provided.

7. Considering passenger needs, station accessibility and staffing (on trains and at stations)

Assistance requests

- Alternative transport needs to be proactively offered and provided, and subsequent support they would have received provided by this transport form.
- Staff flexibly too be enable assistance by train staff, station staff or mobile staff.

8. Improving the communication tools capable of being used for booking assistance

Text relay services

- Agree

Video relay services

- Agree

9. Improving the service passengers when alternative accessible transport is used

Substitute and alternative transport

- Taxi companies should be trained in disability awareness and Dementia Friends so if alternative transport is provided the passenger has same security and support than booked travel assistance. They should be walked to or from the door, and to and from their end destination so they arrive and are greeted safely. Reassurance throughout the journey that the cover of the transport is covered and they do not have to pay as they might forget throughout the journey.

10. Giving clearer information to passengers that use scooters or other mobility aids

Assistance for passengers using a mobility scooter or mobility aid

- Information on using scooters or mobility aid should be included or prompted when booking passenger assist and advertised in stations on trains.

Consultation questions

2. Updating the Disabled People's Protection Policy (DPPP) Guidance

Q1. Renaming Disabled People's Protection Policy

- 'Accessible travel policy' is broader

Q2. Views on replacing passenger-facing document

- Availability of leaflet is poor and is not proactive is reactive. Is only displayed at rail stations, not in places which might then help people find out of the support available and encourage those to travel.
- Leaflets need to use language which is open that those who do not maybe see themselves as disabled, are empowered to ask for support. Do not signpost to only a website, make sure a phone number is also available
- The title of 'Making Rail Accessible: helping older and disabled people' is good as names older people in the title which will help them identify they are entitled and can ask for help.
- 2.24. Use of 'must, where reasonably practicable' in the guidance is still too broad which operators can then argue it was not practical to do so. For some requirements it is a passengers right under the Equality Act for these reasonable adjustments. This equal access should be 'must' only and cannot have any other interpretation.
- 2.26. 2.28. Should be available at the station on request and available online. Would agree might be too long documents and not refreshed regularly, and confusing for passengers if available in leaflet stands. In this case station staff and other staff should have enough knowledge (through inclusion of information in policy) to find out which type of rolling stock is allocated to that train and describe key facilities (wheelchair access, toilets, accessible toilets).

Q3. Views on proposed requirement stations and rolling stock accessibility info part of policy rather than leaflet.

- 2.35. This should be a range of groups and individuals from different conditions, as what might be accessible for one disability might not be accessible for another.
- 2.37. Agree that printed copies of the leaflet must be available within one month.

Q4. Views on proposed changes to the approval and review process

- No further changes needed

3. Reliability

- Booking stage - Prior to confirming bookings, call centre staff complete mandatory checks on the three priority station accessibility fields on NRE: Step-free access note; Assisted Travel; and Staff help available. Is this also followed when booking online and when booking at stations?
- 3.1. We have found that passengers negative experiences impact for years, which need substantial work to raise their confidence. Train operators will need to run proactive outreach to reach these isolated individuals to reassure them of the support and facilities available.
- 3.3. We have found as in the last point that the reliability of getting support alighting was more difficult than boarding. This can be problematic as people with dementia might forget which stop, get off at an earlier stop, or need to be met at the end destination. There have been instances of booked assistance not meeting at the end destination station and vulnerable people with dementia getting lost or walking off. This could be incredibly dangerous. The system of handing over passengers needs to be smoother. Either assisted transport ringing ahead on the train to ensure vulnerable passengers are met safely. An individual with dementia has walked off, become lost and unfortunately passed away in America due to not being met after flying. <https://www.dailymail.co.uk/news/article-2321989/Victoria-Kongs-daughter-death-Alzheimers-sufferer-airport-Im-just-torn-apart-stupidity.html>
- 3.6 regarding technological solutions no passengers without their own technology, or those who might find it difficult to interact with technology at put at a disadvantage from getting more reliable communication/support from passenger assistance. Concerns that new approach to passenger assist will solely focus on better communication for passengers who are technologically enabled. This will disadvantage large group of disabled travellers and people with dementia without access.
- 3.10. The nearest accessible toilet or changing places toilet needs to be listed. Even if it is not in the station.
- 3.15. Maybe worth short paragraph for staff on power of this information for enabling disabled passengers to travel with confidence.
- 3.17. All operators should display step free information, those without this information should be followed up.
- 3.18. Clarity is needed on what step-free mean. Whether is train to platform, train to street etc. This ambiguity is then used by operators claiming they are accessible when they are not. This is confusing for passengers as there is no consistency across the rail network, which can reduce people's confidence to travel. It is not easy for the public to decipher and can lead to individuals being stranded or put in uncomfortable situations navigating a space which isn't accessible.
- 3.26. Signage at [Gatwick airport](#) about step free routes and distances are easy to understand by both distance and approx. journey times.
- 3.31. Simpler language and terms must be used. Terms in 3.31 are preferred to terms in 3.29.

Q5. Views on wording of classifications in Appendix B

- No comment
- 3.36. The majority of bookings for passenger assist made by disabled passengers are currently made by telephone (82%) compared to email/online (12% + 6%). This shows the need to ensure that support and awareness of all of the booking methods passengers are most comfortable with are championed and supported. It shows that most passengers booking are more comfortable booking and confirming by phone; therefore systems need to reflect this need. The Rail Delivery Group and industry is pushing digital methods of booking like Digital passenger assist. This will be useful

for some, but definitely not for all passengers. The ORR needs to ensure the right of disabled passengers to continue to book assistance via phone is protected, as that is the method most passengers are comfortable and confident using.

- 3.42. When agents make booking requests and checks that cannot be delivered at another station this could severely impact a passenger with dementia, especially if travelling alone and staff support has been requested. If someone with dementia needs met and escorted at the station, and this is not available or delivered the passenger might get confused.
- 3.48 Passenger no shows. Clear places to wait, clear signage to assistance points/lounges, reassuring passengers if staff member is not there on time.
- 3.50. Placing passengers next to guard cabin so they are with a staff member who can help them get off the train and meet/flag down assistance. When booking assistance could even make notes of carriage passenger booked in, contact details, or getting in contact with the train prior to arrival to confirm where passenger is and they are on-board. Staff on board so proactively ring ahead to ensure assistance is aware and ready.
- 3.51. Clear information on expectations is needed. When to arrive, where to meet staff, what will happen; then during travel what support they will get, where from; then who will meet them, where at end destination and what support they will get. Any confirmation like in 3.53 should be on the paper booking and repeated by the staff member giving assistance.
- 3.55. 1. Make sure prompts for these three areas have * or hover box with guidance for staff on what could be included to encourage them to fully utilise these sections and what types of instructions are used.
- 3.56. 3. These prompts for the passenger should always be added to booking confirmations not only for first time users so that passengers know what to expect every time they travel. They might have memory problems so might have forgotten what support they have received previously. It shouldn't just be put on the website.

Q6. Views on proposed introduction of mandatory checks on station accessibility information at assistance booking stage

- This would benefit passengers but ensuring they are offered full support available.

Q7. View on proposed development of passenger best practice guidance to inform passengers about what to expect

- Agree that this would support passengers, but needs to be on all information given to passenger booking forms and other information, not just online

Q8. Views on proposed handover protocol

- Agree that a handover protocol would be good to ensure all passengers receive a consistent service and are supported to use the rail network. 3.10 should have a call ahead for a booked assistance including seating reservation for their location on the train as passengers may need to sit in a different area near accessible toilets or might want to sit near the guard to remind them to get off. Agree that dedicated assistance telephone line for each of the stations, would be interested what this protocol would mean in practice for unstaffed or rural stations.

Q9. Views on proposed dedicated assistance line to improve communication

- Agree dedicated assistance line is needed to improve communication and safety of disabled passengers.

4. Staff Training

- Will the ten elements include specific training to understand what dementia is, how it affects people, how this might affect someone travelling and how staff can help throughout the journey.
- 4.4 - D for 'Any staff who answers telephones will be trained in communicating clearly with people who may have difficulty speaking, hearing or understand.' We have Dementia Friends video for supporting customers by phone which should be watched.
- 4.7 Aide-memoires are a must.
- 4.9. For passengers who might navigating difficult due to memory or spatial awareness problems it is crucial station staff are aware of station facilities, local facilities, the nearest accessible facilities (lifts, step-free access, ramps, accessible toilets and changing places)
- 4.13
 - Understanding Disabled People and their everyday challenges
 - This needs to include dementia, that can affect people under the age of 65, diagnosis rates vary across the country, how dementia impact's their day to day life, how dementia impacts them travelling. Dementia Friends must be included in this as a minimum
 - Equality Legislation
 - This also should include Public Sector Duty Act for those funded by government (Network Rail), or services funded by government.
 - This should also include the rights approach that it is the right of disabled people, as any other passenger to access their wider community and not be discriminated against. As set out in Article 14 other status includes 'grounds of disability'. This should be framed in the training that not only is this the right thing to do to support travellers, but is part of the law to provide this service. Failure to do so is going against these legislations and breaching licenses.
 - Defining Disability
 - This should include that passengers might not see themselves as disabled. Dementia is called out as a condition under the Equality Act, but many people with dementia do not see themselves as disabled. Older people as well might not want to ask for help as can feel like a burden or that they do not qualify. This section needs to acknowledge this, so that rail staff know they need to be proactive to encourage/prompt people to either book assistance or get support when travelling. Also needs to cover that some people with dementia might not know or remember they have dementia, so if asked if they have a disability might say they do not need support.
 - Recognising passengers who need assistance
 - Needs to include that dementia can affect people under 65, but also that 1 in 3 people in the UK will die with dementia. That age is a risk factor, so there will be increasing instances with an aging population.
 - Railway Regulatory Framework
 - Highlight Equality Act and what this means for providing reasonable adjustments. Also as above highlight Public Sector Duty and Human Rights Article 14.
 - Passenger Assistance (disabled passenger experience)
 - Staff should support all requests and all methods of requesting, not just the technical methods.
 - Communication
 - This section must include communicating for people with cognitive difficulties including dementia. They might have challenges including forgetting the right word, using similar words, getting words in the

wrong order. This can be frustrating for people with dementia not to be understood and can lower their confidence to go out and about in their local community.

- Accessibility in stations
 - As above needs to also include accessible toilets, changing place toilets, step free access for facilities both inside and in the immediate vicinity.
 - Providing safe assistance
 - Staff need to be aware how to keep passengers and public affected by dementia safe both in station facilities and on the wider network. Passengers with dementia might get lost or walk off. Therefore, they need to be supported throughout their whole journey and ensure they are met safely at the end destination.
 - Involving disabled people in course development/delivery
 - Alzheimer's Society Dementia Voice team has people with dementia across the country who speak about their experiences. We would recommend that local operators work with Dementia Voice team to allocate a local person with dementia to regularly speak at training. <https://www.alzheimers.org.uk/get-involved/dementia-voice>
- 4.18 Disability training must be seen as a priority top down. Operational requirements often get in the way of supporting disabled passengers and it is seen as an afterthought. No exceptions should be made for any operator to not train their staff to support passengers with disabilities, nor provide them equal access to rail services.
 - 4.19 2 years is a long time for them to update their training packages to include the ten elements above. A lot of this information/guidance is provided for free currently by charities and other groups. 2 years is fair to deliver refresher training across the network, but an update to training packages should be completed earlier.

Q10. Views on training content proposals

- Agree on inclusion of ten content areas within the training, but would want to see all conditions and disabled adequately reflected in comparison to the prevalence in the population. This training should not be rushed or shoe-horned into existing training. It needs to be given the weight it deserves. Condition specific training should be approved by leading charities for that condition. For dementia we would suggest as a minimum Dementia Friends key messages and videos, then specific information how to support passengers with dementia we can provide.

Q11. Views on operators being given two years to update and revise their training packages and provide refresher training/priority areas for industry or tailored to priority areas for individuals

- Operators should not be permitted no more than two years to update and revise their training packages. Safety critical training is rolled out immediately, and this should be given equal weighting as disabled passengers and those with dementia are not being supported adequately at the moment and therefore this increases the risks of accidents, trips, falls and accidental trespass. Operators should be given less time, no more than a year to revise and rollout the training. Especially as free materials are often given by charities and groups for organisations to use (Dementia Friends).
- Refresher training should be for priority areas for improvement for the industry as a whole, not tailored for priority areas. All of these areas and information is applicable to every operator regardless of local demographics, geographic region etc.

5. Passenger Awareness of Assisted Travel

- 5.1. 70% of potential Passenger Assist users had either not heard of the scheme. Awareness among people with dementia is very low. Proactive outreach communications needs to be prioritised for the lowest user groups. Communication needs to work with local Alzheimer's Society services, groups, offices and through national channels to our members.
- 5.3. Concur that communication materials need to be available in a variety of formats (not just online) but physically in stations and places that people affected by dementia and their carers regularly go (pharmacies, libraries, day centres, carers groups, Citizen Advice, GP surgeries, dentists, health centres, local shops).
- 5.4. Would follow up how often operators and their staff promote the support services. Face to face interactions are valuable to gently prompt if an individual is aware of the free support, explain what it is and how you get it, and support them to use it for the first time.
- 5.5. With regards to Civil Aviation Authority only model which needs considerations is forums and working groups. Often charities are approached not only by regulators, but individual businesses, service providers or operators to sit on their panel. We would recommend national representation on regulatory or government panels by charity policy representative, with local people with dementia (where available through Alzheimer's Society Dementia Voice Team <https://www.alzheimers.org.uk/get-involved/dementia-voice>) representing their needs locally and feeding their thoughts to national charities to feed up. If no local representation can be found Alzheimer's Society can provide ad hoc advice either at a national or regional level.

Q12. Views on recommendations for RDG regarding promotion of assisted travel via Passenger Assist publicity and issuing of Disabled Person's Railcards?

- 5.12. Rail Delivery Group should lead a national campaign, but as previously stated to them this needs to be campaigned aimed at isolated individuals. Promoting an app will put off and not meet the needs of a majority of older passengers. They need to campaign on local radio, local newspapers, national newspapers, and through community forums (carers groups, libraries, pharmacies). They also need to advertise this not only to disabled passengers, but their family and loved ones to raise awareness of the support available.
- 5.14 Disabled Person's Railcard more should be made not only to promote passenger assist, but also by station staff to highlight to travellers who are interested in passenger assist or who could benefit so they are aware of this discount card.
- 5.18. Regarding making changes to the ticket booking section wording should reflect softer language and have options that individuals can see themselves in. 'Would you or the person you are booking on behalf of like any assistance or support to travel?' and then broad options for people to categorise their condition or needs. This prompt should be highlighted and clear to see, also giving a number if an individual wants to discuss this further. This also needs to be mirrored in centre handling procedures, prompting customers during every booking to ensure all customers are given the option for support or assistance.
- 5.21 Agree that promotion through consistent sustainable engagement with local authorities, GP surgeries, hospitals, libraries and other services would help reach wider users who could benefit. Also that this should be done in person, in print, online and in accessible formats.
- 5.23. Agree that working with the following groups in the document would help spread the message of the support available. Outreach of accompanied journeys to prospective users will greatly help to improve confidence to travel. These should be advertised to and organised with local day centres, carers groups, Alzheimer's

Society and Age UK services. Also leaflets should be provided and promoted to these locations.

Q13. Views on proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve Passenger Assist service.

- Agree on proposals for operators to work with these groups. This needs to be meaningful, proactive, outreach to: raise awareness of support, raise confidence to travel and support isolated passengers to travel.

Q.14. Views on proposal for more prescriptive website requirements

- There needs to be consistency of where information on accessible travel is held so if any passenger goes to any website they can find support easily. Language and wording also needs to be consistent throughout operators. The wording used needs to be open and broad to encourage those who might not think they or their loved one could get support. Needs to be at least one click from the home page,

6. New Requirements and Updates in DPPP Guidance

- 6.6 Contact centres need to be consistent as well so if one operator is open 24 hours as a minimum then all need to be open for roughly the same time.

Q15. Views on the three options we identified for reducing notice period for booked assistance.

- All support needs to be consistent across the country to the shortest notice period level of support provided. So if the highest level of support, which is TfL Rail/London Overground 'Turn Up and Go', this needs to be provided everywhere as a minimum then so there is clarity and consistency across the network. 6.12 We would suggest at least 3. A minimum of 2 hours before travel, but ideally turn up and go available on a majority of the network. With this two hour option, would not overtly rely on Passenger Assist app for some audiences who will be more comfortable booking by phone or in person. It might be challenging for the rail network, but currently this is the best option to get as close as possible for passenger with dementia and other disabilities equal access to transport.

Q16. Do you consider that any reduction should be phased in, if so how might this be implemented?

- As above outreach and communications to low awareness groups.
- 6.25 Driver Only Operation still needs to be monitored and reviewed with regards to the rights of disabled passengers to travel. Rural areas are more likely to have Driver Only Operation stations. People in rural areas often bus and community transport is limited, so might heavily rely on rail transport to get to critical health appointments, go shopping or collect prescriptions or medicine.
- 6.32 Taxi transport to the end destination will be suitable in a majority of cases which assisted transport cannot be provided. But it might not in a lot of cases. Passengers need to be treated as individuals and supported to get to where they need to be, and not seen as being difficult. Welcome suggestion that operators provide as many different options as possible.
- 6.33 With regards to mitigating the risk of assistance not being provided. Key will be when booking transport, when boarding a train staff are proactive and check they are aware of the access at their end destination so they will not be stranded or stuck on the train.

Q17. Views on proposal to strengthen how operators consider assistance provision for passengers where different modes of train operators are utilised?

- Agree that support needs to be strengthened and options broadened for potential methods of onward transport/assistance provided.

Q18. Views on proposal to introduce mandatory redress arrangements for assistance failure

- Redress for failed assistance needs to be properly advertised and communicated so passengers know their rights. Most passengers will not know they can claim for failed assistance. This needs to be the starting point with information available in passenger assist leaflets, mentioned when booking and if complaints at stations made clear written information given to support the passenger to make a complaint. Operators cannot direct passengers to go a place on the website and fail to answer the query and provide the information.

Q19. Views on proposal that operators are required to be able to receive a call via text relay

- This should still be available for passengers with hearing loss.

Q20. View on proposal to improve accessibility of substitute and alternative transport provided by train/station operators?

- Wheelchair accessible taxis are often rarely available in rural areas. Taxis can also be hesitant sometimes to take disabled passengers. Agree that operators should be proactive in ensuring sufficient accessible taxis.

Q21. Views on proposal to ensure every station passengers are informed to contact staff

- 6.65. Help points and Freephone numbers need to easily seen and distinguished from all the other signage, information at stations. They need to contrast, stand out and encourage passengers to use them.

Q22. Views on proposal for the carriage of scooters contained in guidance

- Consistency all operators and clear signposting for information when needed.

Q23. Views on proposals to clarify the guidance on passengers purchasing first class tickets they cannot use.

- No comment

Appendix: Quotes from people living with and affected by dementia

'Practice of announcing platforms < 10 mins from dep (departure) is hugely stressful for anyone, let alone those with cognitive impairment/physical frailty; increasingly hard for those with dementia to rush thro crowds = distress/falls/stop travelling' Tweet from people affected by dementia

The following feedback was gathered from people living with dementia from the League of Minds Dementia Voice Group and Wellington Dementia Voice Group:

Supporting for changing and improving Disabled People's Protection Policy and operators procedures and processes

- "Most transport (companies) want a slick movement, they don't cater for the oddball, time is money. They want streamlined process, a one fits all policy. The odd balls have to just muddle along."

Timetabling and passenger information

- 'Electronic timetables are not easy to use. (I) did not like seeing just the next 2 trains and how long till the next ones. This is not helpful, especially when some stops have many different trains stopping there. These boards do not give enough orientation of the route of that train. It is harder to link up with remembering what train (I need to get on) and the timetables that you are likely to have looked at from home prior to going.'
- 'Similarly find the paper timetables of trains and buses at stations or terminals (are) very difficult (to use). It's just a whole wall of timetables. (I) did not like the use of the 24 hour clock, (it is) much too small, not enough space to actually read anything, especially when others are trying to do the same.'
- 'Part of my dementia is that I have difficulty in identifying numbers, so being able to read a train timetable would be impossible.'

Buying tickets and getting information when travelling

- 'In relation to trains there are now so many different train links that tickets do not always work on all trains. This is very confusing, I had an experience where there were 2 trains going to the same place on the same line but I could only get one of two trains. It feels that competition in the transport market had made such infrastructure more difficult and complicated.'

Support at the station and on the train

- '(I worry about) getting off at the wrong stop, not knowing which train to get on and where are all worries.'
- 'Stations were described as 'frightening places'. Very noisy, very busy and generally too many people and 'too much going on'.'
- 'The size and growth of the country has led to overcrowding generally and this includes the public transport. This crowding can sometimes lead to 'sensory overdrive'.'
- 'Steps in some place can be very difficult to navigate. But having a painted the edge of the step in bright colours to show the depth of the step and the measurements.'

Positive feedback on passenger assist

- 'Some experiences, particularly of (travelling by) train had been only positive and this gentleman with both dementia and mobility issues and his wife had received great support and by ringing ahead. Things that made this better was the personal touch.'

With good customer service and ramps brought out to make getting on the train easier.'

- 'Assisted travel on the trains is brilliant, it gives you that peace of mind. I can cope very well but it was wonderful because it's really good and anyone who could have this (dementia), it takes the anxiety out of travelling. (You always question) am I in the right place, on the right train? It's well worth knowing. I don't really like travelling on my own but I would travel again using this service, it is so helpful.'

Identifying staff and getting support

- 'Not everyone wants drivers or staff to know they have dementia and so be treated differently.'
- 'Being able to clearly identify people who can help would really help making travel easier.'
- 'Someone to be available at the station to show us where to go.'
- 'Maybe someone wearing some kind of uniform, just so you can clearly see where to go for help.'
- 'It would be nice to have dedicated people but everything's about money.'
- 'If I am in the big shops or stations and I cannot find something then I will ask where things are. It's easier to ask people where to go and to stand there scratching my head.'
- 'With having dementia, somebody (may) say something in detail, (that) is just not great especially when it comes to finding that place later on, because you forget and then you think where to next?'
- 'I preferred when there were conductors – to help with tickets, orientation, queries etc. This person contact would potentially aid and encourage travel on all forms of public transport.'

Lack of confidence to travel and no awareness of support

- 'I just don't think with how I am now, I would be able to catch the bus or train anywhere.'
- 'Travelling to new places can cause anxiety, but having assisted travel is a real help – if you know about it!'
- 'I've taken the bus quite a few times from Market Drayton to Shrewsbury, I would like to take the leap to take the bus or train to Newcastle sometime too. I'd be nervous about a new route though.'
- 'I wouldn't go anywhere I don't know now.'
- 'I would rather take a taxi because at least then I know where I'm going as with the bus or train I may get off at the wrong stop and end up somewhere I don't know.'
- 'The familiar is OK but those areas which are not are most difficult.'
- 'In busier places routes I'd describe as a 'spiders web'. I mean it's very difficult to get directly across towns and places now, lots of routes mean lots of changes and this can lead to difficulties, confusion, missing connections etc.'

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Thomas Pocklington Trust – Birmingham and Black Country Sight Loss Councils
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

We support this proposal as we feel it would bring the Policy in line with the Department for Transport’s Inclusive Transport Strategy released in July 2018.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

We support this proposal to make the information more concise and easy to access. We request that this information be available online also in the form of an accessible web page. It would also be worth mentioning the Passenger Assist app that is in development as when this launches it will have a huge impact on how disabled passengers travel using assistance.

Making accessing passenger assistance as easy as possible is important so making sure there is only one phone number (or a website where assistance could be booked) is important.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

A passenger leaflet is certainly the easiest way to make sure the information they need is there rather than having to search through a policy document. We feel having a simple one or two page leaflet with all of the key information is the best solution. This must be in plain language free of jargon.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We support these changes and the time frames suggested.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

Whilst step free access is an important part of a train stations accessibility, it is not the only part. We feel this could go further into the accessibility features of a station and not just about step free access. Important factors to also mention include (but are not limited to) tactile floor markings, assistance help/call points, Guide Dog spend areas etc.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

This is a good idea and would hopefully increase staff awareness of accessibility features at stations and highlight issues (even temporary ones such as a broken lift or building works). It should be noted that this exercise should be part of a wider accessibility check that is regularly undertaken and not become a 'box ticking' exercise.

It would also be a good idea to make information around accessibility issues (again, even temporary ones) available online via website, social media and an app. A push notification could be triggered to say 'lift broken, please use A end of platform' or something similar. This should all be in addition to staff relaying information to passengers verbally.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We would support this but with the development of the Passenger Assist app the issue of a disabled passenger finding their own way should not be too much of a problem. Any way of improving communication between the passenger and staff (both on the train and the platform) should be encouraged.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Again, anything that improves communication between staff and passengers should be encouraged, this is the same for communication between staff at different stations. It would be beneficial for people with sight loss to understand the assistance they will receive or that they can request – rather than being asked specific questions about their disability. Asking about the assistance required rather than the disability would show a more personalised service and make the provision more about the passenger than their condition.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

One single phone line for assistance would be greatly received by the sight loss community. As long as this is utilised properly – manned by a person rather than a automated service or an answer machine. The more that can be done to reduce mis-communication the better.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We are saddened to read about the review of existing staff training but pleased that issues have been identified and ORR are already taking steps to improve training packages offered to staff. Focus should be put on treating a person as an individual. Disability Awareness training (and wider accessibility training) should cover all areas of assistance and the facilities that could be helpful to a passenger with additional needs - including hidden disabilities. We support the additional training requirements proposed, particularly around the social and economic factors. Disabled people should be treated as equal members of society and not as an afterthought.

Staff Training (Chapter 4)

Q11. Do you agree that:

- operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?
- the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

We believe that training can quickly become out of date and would suggest that 2 years is too long for training revision. Content should be reviewed every 12 months to make sure it is in line with current trends. All staff should be trained every 2 years but those that work closely with disabled passengers regularly should have refresher training once a year.

We believe tailoring to the individual operator would offer a more personalised service. Staff could discuss issues they have experienced – although there should be elements that are covered by all operators.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We support this as people who apply for a Disabled Persons Railcard are most likely to require assistance.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We support this fully and work with local stakeholders regularly. Examples of these include West Midlands Combined Authority and West Midlands Trains. We have members that sit on Forums including New Street Station Access Forum and Access Birmingham. Only by talking to disabled people will organisations understand their needs. It is important that blind and partially sighted people are considered a valued part of such access groups and not there to fill a seat or their opinions ignored. Too often, groups have been consulted and ignored.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

We fully support an accessible website and would be happy to take part in any accessibility testing using a variety of software. It is worth noting that a website should not be treated as the only way of accessing online information. Social Media is a great way of engaging with people, particularly younger members of the community. Of course, the Passenger Assist App will also be a great tool when launched – again we are happy to support with any accessibility testing.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

In an ideal world, assistance would be offered on a 'turn up and go' basis, however we understand that this may not always be practical, especially at smaller stations. Of the three options suggested, we would prefer the two hours option. This is to bring us closer to reducing barriers to spontaneous travel. Many people would most likely book with a longer notice period so staff cannot expect to be inundated with last minute requests.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

As much as this is an important change that we would welcome as soon as possible, we feel it must be done right rather than rushed to completion. Staff training, the phone line discussed, and other factors should be properly factored in. Advertising could include notifying all persons with a disabled rail card as well as website and social media campaigns. Staff awareness also – people who are currently supporting disabled passengers could pass the information on via

word of mouth. It would be worth asking stations to mention in their Access Forums (where they exist) and contacting some of the larger organisations that support disabled people.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We support improved communication between staff and passengers – including a way for a passenger to contact a member of staff whilst on the train. We agree that this would be down to an operator to do further investigation on their routes to determine where issues could arise.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

This should absolutely be introduced as a standard. If Assistance fails, a passenger could be left on a train and end up getting off at the wrong stop in an unfamiliar location. For someone with sight loss who cannot easily see where they are or how to navigate an area this would be immensely distressing. Furthermore, the additional cost of getting to their intended destination and any knock on effects (missed appointments etc) would only add to this. If a train company had to provide compensation, it would encourage them to make sure that failures do not occur.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We see no reason why this should not be adopted.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We support the proposal but add that for rail replacement buses, information should be provided in an accessible format – a standard print A4 notice will mean that many blind and partially sighted people may not be informed. Likewise with the actual bus stop – often these are not standard bus stops and can be easily missed if someone does not know what to look for or they have a visual impairment. Staff should be fully trained to support disabled passengers in the same way – both at the start and end of their journey. Audio visual services on buses (i.e. Talking Buses) would be beneficial to passengers with sight loss but we understand this is not the responsibility of the train operator to install or manage the equipment.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We support this and would recommend a standardised design for an assistance help point that features recognisable colour contrast.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

N/A

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

We support this although there should not be an area of a train that is inaccessible.

Yes, passengers should be informed and if necessary other arrangements made at no cost to the customer. This could lead to a very undignified situation which is avoidable.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

We support these proposals but would be keen to know how these are going to be adhered to at a high standard across every station. We would also add the following points:

Tactile flooring to be installed on all platforms etc and clear signage – this should be a standard part of the design phase.

Employing people with sight loss to increase understanding and break down barriers. This increase other staff members understanding of sight loss.

Staff members to be kept fully up to date on issues arising that could affect disabled passengers and any measures being taken to ease their journey.

Fully accessible information to be made available on an app but also to be shared with other service providers with apps e.g. the Trainline. Information could include accessibility features of a train station etc – beyond ‘step free’ as this is not relevant to everyone with a disability.

Tactile maps are a good idea but often expensive to update when things change meaning they can quickly become out of date – an accessible app would alleviate this. Maybe look into Microsoft Soundscape?

Q25. Do you have any other comments or views on improving Assisted Travel?

The Birmingham and Black Country Sight Loss Councils are groups of volunteers living with sight loss. Our aim is to represent and act as a voice for blind and partially sighted people and encourage organisations to make reasonable adjustments that can improve the daily lives of people living with sight loss.

We are supported by Thomas Pocklington Trust, a registered charity which offers people who are blind or partially sighted the support they require to lead an independent life. They are committed to increasing awareness and understanding of the needs of people with sight loss, and to developing and implementing services which meet their needs.

The Birmingham and Black Country Sight Loss Councils are happy to support the Office of Road and Rail as well as any train stations or operators to improve their accessibility offerings.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	c2c
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

- Of the two names, an Accessible Travel Policy is favoured with added wording needed to set expectations of what's in the passenger leaflet vs. the full policy documents. The two new documents could be captured under titles such as Accessible Travel:Customer Guide and Accessible Travel: Our Policies.
- Alternatively, it may be better to have an Accessible Travel Commitment with our policies and passenger leaflet falling beneath this.
- While any change to document names could quickly be updated on TOC websites, a grace period must be in place so that there is no requirement to immediately reprint all documents that still reference the old DPPP name. We would only expect these documents to be changed upon their next issue (e.g. Passenger's Charter).

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?**
- b) Is this still a meaningful title for this leaflet?**

- There are numerous reasons why station information can become out of date shortly after printing and distribution. For this reason, it is welcomed that the document becomes more concise. A shorter document without variable information is therefore going to be more useful for passengers.
- A key component of the shorter guide will be ensuring that there are clear instructions of where additional information on station/on board facilities can be found. It is then vital that this information is kept up to date.
- Rather than being the one source of information for passengers to rely on, the passenger facing leaflet should give a summary of the main services on offer, with clear signposting to further sources of information.
- Such signposting within the passenger facing leaflet should also feature where to find broader guidance on travel for disabled passengers, rather than solely focussing on the provision of assisted travel.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

- Removing the requirement for this information to be in the passenger facing leaflet is beneficial, given that this information can be highly variable. However, it seems unnecessary to include this information within the policy document when it is readily available and kept up to date elsewhere.
- Instead of providing this information in the DPPP documents, we should be signposting in these documents to the NRE stations pages or Stations Made Easy. .
- The guidance states that keeping station accessibility information up to date on NRE is a key requirement and will be monitored. The importance of this is not in doubt, but there is a need to make the NRE pages more intuitive for customers and easier for TOCs to update via knowledgebase.
- Clarity is needed regarding the provision of hard copies 'on request'. If this requires TOCs to provide additional printed documents to stations then the current issues with out of date information will remain. Instead of tailor made materials, an acceptable policy should allow station or call centre staff to provide printed versions of the up to date information on NRE.
- We fully support providing alternate formats of this information where requested. Alternate formats should be produced on request as oppose to as a standard. The relatively low demands

for alternate versions of the content make it unreasonable for there to be an expectation that all formats of the content are available at all stations at all times.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

- Any improvement to the turnaround time for approval of changes to existing DPPPs is to be welcomed. Prior experiences have been fairly laborious in order to get relatively minor changes approved.
- It would be beneficial for ORR to produce a timeline of deliverables for both TOCs and themselves to understand and stick to during the approval and review process.
- While input from local groups and accessibility representatives is important to ensure our policies are meeting the needs of our passengers, there may be some disagreements between TOCs and passengers about what is viable. Therefore, greater clarity is needed on who has the final decision on what is 'possible' and why (e.g. costs vs. benefits).
- Setting up a national group of customers that review all TOC DPPPs would ensure that all TOCs receive a consistent and pragmatic review process.
- Clear expectations need to be given as to when TOCs are required to publish their revised DPPP after the final issuance of the new guidelines. Similarly, clear expectations are needed as to when each of the proposed improvements is expected to be introduced.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

- Consistency across TOCs on classification is to be welcomed.
- While we acknowledge the good intentions behind the proposed 5 category system, it is not one that we favour due to the complexity involved.
- The three category classification system would provide a much more user friendly experience and one that is quick and easy to understand. TOCs should then have an option to provide additional

information that explains the classification or any unique characteristics at the station. Standard terminology within the additional information would be beneficial.

- The terminology and classifications used should be consistent with the Accessibility Map being built by the RDG.
- While the five category system provides more detail on what passengers could expect, it would be harder to create, maintain and understand.
- Passenger research may aid a decision in which classification system is ultimately preferable.
- Sufficient time must be given for TOCs to analyse their stations and update the required documents and Knowledgebase. There are existing difficulties with Knowledgebase that have been highlighted by TOCs to the RDG through the RDG Accessibility Group meetings. If Knowledgebase is to become easier to update and more customer friendly, then implementing a new classification system will become more manageable.
- Existing materials should only be expected to be updated when revisions are due, rather than solely to change the classification or icons used on a route map.
- It is important that as an industry we are not giving too much weight to step-free information at the expense of providing clear information on other important facilities, such as the provision of accessible toilets.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

- This is to be welcomed and provides a clear benefit to the customer. However, it is dependent on the information being regularly maintained by all TOCs. Furthermore, it should be highlighted to the passenger that this information is subject to change, particularly if their booking is far in advance of their date of travel.
- In order for this to be successful, all known future impacts must also be flagged by all operators.
- The launch of the new Passenger Assist app in 2019 is likely to alleviate the need for this process. The guidance may therefore become out of date soon after publication. .
- Again, any mandatory checks would be reliant on Knowledgebase being kept up to date, so this needs to be made easier for TOCs.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

- This is a sensible proposal, but it may take time to deliver. Clarity is needed on whether this is an aspirational future initiative or an expectation for the 2019 DPPP Guidance. Any wording and guidance will need to be consistent across TOCs and may take time to develop with the aid of RDG.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

- If staff are required to call ahead of every unbooked journey, then clear expectations must be given to the customer regarding station arrival times. A customer must allow sufficient time for the member of staff to finish their current duty, make the required call and then provide the required level of assistance.
- If customers fail to allow for sufficient time, then this may result in missing a service they planned to travel on via Turn Up & Go.
- All our staff currently call ahead to ensure that assistance can be provided. The demand and likelihood for failure is reduced on c2c due to the fact that we don't hand over to staff from any other TOCs for c2c route journeys.
- With the introduction of the new Passenger Assist app, this process becomes unnecessary as new lines of communication will have been established. The guidance needs to reflect these upcoming changes.

Reliability (Chapter 3)

Q9. What are your views on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

- As per previous answer, there is no handover to other TOCs and all of our staff call ahead to ensure that assistance can be provided.
- The proposed guidance states that a dedicated phone line will be required from the TOC in order to avoid call clashes. Installing additional phone lines at all UK rail stations is not a realistic option. The additional costs involved for what would only be an interim solution are not realistic and the new Passenger Assist app will soon replace the need for this style of communication.
- At a national level, Station Connect limits the need for an additional dedicated line. Station Connect takes away the need for additional steps to be made to make contact with another station..

- *Station operators must also be able to evidence that the relevant action specified in the call ahead protocol was completed.* This will place a greater administrative burden on station staff and may at times be hard to demonstrate.
- If this is to be trialled in 'early 2019', is it expected to be complete in time for the publication of the revised DPPP guidelines in Spring 2019?
- All c2c stations are staffed from first service to last, so staff being available to call ahead should not be an issue (unless completing other duties).
- Guidance should be amended to reflect that there should be a means of communication, but not prescriptive on how this communication takes place.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

- We broadly agree with the nature and importance of the content outlined, however the level of detail suggested from the training guidance may go beyond what is realistically possible. All 10 elements can be touched upon, but with over 50 sub-topics outlined in Annex A it is unlikely that a detailed level of training will be possible for all staff. Additionally, the volume of content may be challenging to take in during an extended classroom based training session. Instead, it may be more beneficial to focus on the core messages that enable us to provide a reliable and safe service to all of our passengers.
- New staff: all 10 elements of the recommended training can be captured within the corporate induction that is mandatory for all permanent members of staff.
- Existing staff: delivering the full 10 point training package may take considerably longer with existing staff, with staff release a major unbudgeted challenge.
- Length of training: due to the many competing training needs and limited ability for staff release, it would be very difficult to provide the recommended 6-7 hours of initial training for all employees. Similarly, a half day course as a follow up is unlikely to be met.
- Delivery methods: mandating the need for classroom based training would delay the delivery to all employees well beyond the suggested two year implementation period. For new starters, initial training would be classroom based as part of the corporate induction. For frontline staff, additional local training will continue to take place. For existing staff, we would propose to deliver the ten core elements in a variety of methods, including adding on to existing training modules, creating a bespoke e-learning module and combining with operational safety training sessions.
- The timelines for training of existing staff are limited, with budget approval being required for any additional training needs. This therefore means that any training for existing staff is unlikely

to begin until 2020 at the earliest. However, for new starters, additional training could begin as soon as the course content has been refreshed in line with the new guidance.

- We are keen to ensure that all our training is regularly updated and reflects the most recent statistics and legal policies.
- While we are keen to ensure that individuals with a disability are involved in the creation/review of training content, we would not be able to guarantee that the content is delivered by a disabled person. All of our training will continue to be delivered by accredited trainers.
- While we are not envisaging being able to offer the full level of training specified in the revised DPPP Guidance, our streamlined training will identify areas that require greater focus in future training sessions.
- We are unable to control the training provided to all contracted and temporary staff. The majority of staff contracted through an agency will receive training prior to joining c2c. While we can recommend modules to be included, we cannot guarantee that this will be delivered in the same level to all staff. Furthermore, there may be additional unbudgeted costs associated with any additional training for staff contracted in this way.
- Overall, we welcome the chance to further improve our disability training. However, many elements of the revised DPPP guidance go beyond what is reasonably achievable for a small TOC such as c2c. Strict adherence would result in major deterioration to the quality of service in other areas of the business.
- If the goal is to ensure consistent knowledge across staff of all TOCs, then the creation and maintenance of base training materials centrally may be beneficial. These could then be adapted for use in each TOC. This would also reduce the burden on individual TOCs to produce large quantities of new content in a short space of time.
- The guidance needs to greater reflect that some of the proposed content is covered locally, rather than as part of formal classroom based training. Indeed it is more beneficial to deliver many of the training elements in this way.
- The guidance currently fails to sufficiently recognise the different levels of training required by the individuals in different roles.
- TOCs have not been provided with the specific points where they are falling short of the desired training levels. We would welcome this information so as to fully understand the changes that are necessary and the impacts this will have on our operations.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?

- Two years is likely to be a tight timeframe for the production and delivery of this training content. Like many TOCs, c2c already have committed training schedules planned for the year ahead with associated budgets approved. Any additional training would now not be possible until 2020 at the earliest, giving us just one year to provide training to all members of staff.
- The timelines are only likely to be met if there is a degree of flexibility to the nature of the training delivered and the methods used. If the 6-7 hours of classroom based training is mandatory for all staff then this will be unachievable. However, if we are able to streamline the training, focussing on the core elements to c2c, and use bespoke e-learning modules then delivery within this timeframe may be possible.

The refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

- While lightly touching on key industry themes, we see additional value in focussing refresher training on the core elements of importance to c2c.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

- We support the recommendation that RDG continue to promote assisted travel alongside the launch of the new Passenger Assist app. The power of a national joint up campaign will far eclipse the impacts that are possible from a series of TOC-led local campaigns.
- Greater publicity should drive demand of services. Promoting the assistance available when travelling by rail to current non-rail users may drive uptake.
- It is important that any materials related to Passenger Assist are reflective of all TOC policies.
- It is suggested in the guidance that TOCs ask disabled railcard users if they require assistance as part of the ticket buying process. This may be something that can be incorporated into our ticket buying process, but may not be available immediately.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

- c2c already do a lot of work with local communities in order to promote accessible travel. Our regular Try a Train days have been very successful and offer individuals a chance to travel by train when they may not have previously considered it an option. We will be continuing this practice in the future. We will also continue to regularly attend groups such as Options for Independent Living (Essex County Council), RDG Accessibility Group, and liaise with DTAPC.
- Adapting existing passenger forums to promote assisted travel are part of c2c plans for 2019. This will build upon our already successful Passenger Panel.
- Sufficient time must be given for TOCs to set up any new user groups. Such groups can occasionally be difficult to fill with sufficient members to generate meaningful discussion.
- The specific reporting requirements should be included in the guidance, so that TOCs are clear on what information will need to be captured and reported.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

- This would require minor changes to the c2c website. We would seek to maintain an overall heading of the all encompassing 'Travel Assistance', only referring to Passenger Assist when specifically giving details of the booked assistance process.
- This information is currently easy to locate, with contact details visible from just one click from the c2c website homepage.
- Displaying all of the content on the page could be confusing for passengers. It is therefore proposed that we continue to display the key information, whilst providing links to all other information. This will include pdf copies of both the policy document and the streamlined assistance leaflet.
- Guidelines for websites are useful (e.g. Travel Assistance within one-click), but overly prescriptive guidelines may inadvertently make this information harder to digest if pages become cluttered.
- Working towards W3C standards is an ambiguous phrase that needs to be clarified. When will TOCs be expected to have met this standard by?

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

- c2c's current notice period for booked assistance is less than two of the three proposed notice periods if assistance is being booked for travel solely on the c2c route. Furthermore, Turn Up & Go is available at all stations, although passengers may have to wait for staff to finish other duties before being able to book assistance.
- For cross TOC travel, there is currently a 24 hour dependency which is driven by other TOC notice periods. Our cross TOC notice period would be adjusted to the new maximum notice period for the whole network, whilst c2c's own notice would remain at 4 hours. Our 24 notice on cross TOC travel is driven by the longer notice periods that exist on other TOCs - we would be able to reduce this if agreed by other TOCs.
- Our position is likely to be different to that of TOCs with long distance routes, or unstaffed stations. At an industry level, two or six hour notification windows do not seem realistic at present as they represent a very large jump from existing 24 hour policies.
- For cross TOC travel the preference would therefore be to introduce the 10pm day before travel deadline to ensure that all TOCs are able to cope with the policy. This could gradually be phased down over a number of years.
- It is important that if a time window is used (e.g. 6 hours before travel), rather than a set time (e.g. 10pm day before travel), then this is business hours so as to ensure that the booking is possible.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

- Cross TOC travel is always likely to require a greater notice period and a two hour notice period may never be achievable for booked assistance.
- A phased approach must take place over a number of years in order to give TOCs sufficient time to adjust. In particular, step changes such as moving to same day booking of assistance must be ushered in with caution.
- The Passenger Assist app has the potential to facilitate the reduction of booking times, with a quicker flow of information across TOCs. However, no changes should be introduced until the new app has been successfully introduced at across the UK rail network.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

- c2c operate on a solely DDO basis so all journeys are made on the same mode of train operation. Staff are available from first service to last service at all stations, so risk of missed assistance is reduced.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

- Mandatory redress in the event of a failed assistance is a good idea, but it has to be introduced with a level of flexibility according to the nature of the journey, value of ticket and reason why assistance failed.
- c2c already have mandatory redress arrangements for assistance failure (twice the cost of the ticket for your journey if it's entirely on the c2c network). For this to become an industry standard is therefore welcomed.
- It is important that the focus is not solely on redress, but also on reassuring passengers that lessons are learnt from every missed assistance and that actions are being taken to reduce the chances of another failure occurring.
- Care must be taken that all redress claims are legitimate and there is no exploitation of the system. The newly appointed Rail Ombudsman should help to provide clarity over any contentious cases.
- It will be important for a method of apportioning blame for the failed assistance is developed, so as to ensure that the appropriate redress is paid out by the right TOC on cross TOC journeys.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

- Textphone is currently available when contacting c2c.
- Further clarity is needed on the implications of a text relay call. We should continue to shift towards web and app based technologies where appropriate.
- Passenger App may make this less necessary as staff and passengers will be able to interact with each other directly.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

- Ensuring that rail replacement services (or alternatives) are available to all accessible travellers is an important facet of our approach during planned or unplanned rail closures.
- However, this guideline goes beyond that and relates to the training third party drivers receive. As a TOC, there is no control over the training that taxi and bus drivers receive, so to make ‘reasonable endeavours’ to ensure this is adequate would be problematic. It may be more appropriate to amend this to make an obligation of enquiry, rather than any suggestion of control over the training received.
- Many taxi ranks are not on TOC land and it is impossible to screen vehicles according to the level of training a driver has received.
- Exact reporting requirements will need to be confirmed.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

- For c2c, this proposal should create no additional workload or obligation on top of our current standards.
- All of our stations are staffed from first service to last service. Additionally, all stations have help points.
- In exceptional circumstances, staff may be unavailable and help points may be unreachable or faulty.
- Other TOCs may face a greater challenge from this guideline, particularly if they are remote, unstaffed or lack Help Points.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

- Presumption of carriage is a potentially dangerous concept to introduce.
- The restrictions specified in TOC policy documents must be adhered to.
- TOCs must have the ability to restrict scooter access if their travel is deemed unsafe.
- Permit schemes have some benefits, but we shouldn't move to a position where a permit is always required as this could create an additional barrier to travel and requires additional forward journey planning.
- For cross TOC journeys, it needs to be easy for operators and customers to ensure that the scooter is eligible on all services at the time of booking.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

a) passengers do not purchase tickets they cannot make use of; and

b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

a.) passengers do not purchase tickets they cannot make use of; and

- There are no first class seats on c2c, so some of these issues are only relevant when booking cross-TOC journeys. It is hard to introduce additional checks at this level as not all TOCs will have access to all other TOCs rolling stock information.
- Any changes will only be beneficial if they can somehow be incorporated into third party ticket retailers processes. Without this, a level of inconsistency will remain.

b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

- Ideally, passengers would know before their journey commences on the availability of toilets on board. However, this can change rapidly and communicating this changing picture would be challenging.
- The feasibility of this needs to be investigated further. Ensuring that this information is accurate will be difficult as train formation and toilet availability can change between time of booking assistance and date of travel. The feasibility and cost of displaying this information on CIS screens will be investigated. Therefore a passenger could make an informed decision at the

station before boarding a service. This is not without challenges and may require a period of time to implement after the publication of the revised DPPP guidance. It should also not come at the expense of other vital passenger information.

- Passengers who require assistance and opt to travel on a subsequent service due to an out of order on-board toilet, will need to notify station staff in order to ensure that the correct assistance is still going to be available at the destination station.
- The guidance references that passengers are informed ‘sufficiently in advance’ if an accessible toilet is out of order. Clarity is needed on what constitutes ‘sufficiently in advance’.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

- Will good practice be transformed into expected levels of service in the future?
- How will these good practice elements interact with the Equality Act 2010 that requires operators to make ‘reasonable adjustments’.

Q25. Do you have any other comments or views on improving Assisted Travel?

- The guidance largely refers to those disabled passengers who are requiring assistance. There needs to be a greater emphasis on how TOCs can act in order to improve rail travel for those passengers who have a disability but are not actively requesting assistance.
- While we fully recognise the importance of staff training, some areas of the guidance may be impossible to meet without a significant detriment to the day to day operation of the railway.
- With a substantial number of recommendations, clear expectations need to be given regarding how long TOCs will have to implement policy/process changes after the publication of the new guidance.

Thank you for taking the time to respond.

Dear ORR

I want to protect and improve accessibility to the railway both in respect of turn up and go and assistance on the train. I therefore want the future

Disabled People's Protection Policy guidance for train and station operators to

- Prevent train companies from removing guards / conductors from trains
- Prevent companies from removing staff from stations and ticket offices and
- Require companies to put a guard / conductor on every train and fully staff our stations.

Sincerely

Marylebone Station
Great Central House
Melcombe Place
London NW1 6JJ

[redacted]

17th January 2019

Dear [redacted],

Re: Chiltern Railways response to consultation on Disabled People's Protection Policies

Thank you for your email dated 14 November 2018 in respect of the above. We appreciate the opportunity given to review and feedback on the proposed content and are keen to work alongside you to ensure that the information published adds value to all parties concerned.

In terms of the consultation documents provided, please see below our response to each question raised;

1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

We believe that moving to an 'Inclusive Travel Policy' or 'Accessible Travel Policy' is a positive move as it uses customer focussed language that is reflective of changes to legislation, recognising that disabilities are wide ranging. We have assumed that the above amends the terminology of the collective reference to the passenger leaflet and policy document noting that Appendix A states that the title of the customer facing document is to be determined following consultation. Consideration should be given to how this may affect passenger awareness of a well-established name if "Making Rail accessible..." is no longer used. There would also be additional print costs incurred to operators in updating references to this document from material such as Passenger's Charters and posters, if these required any amendment at the same time to reflect the change in title; otherwise there would be inconsistent terminology in use for a period of time.

Alternatively, to provide further clarity for customers, the documents could be renamed to 'Accessible Travel: Customer Guide' and 'Accessible Travel: Policy' which would replace the Making Rail Accessible and DPPP respectively. This would clearly signpost the purpose of each document, under a common banner.

Franchise Agreements for franchised rail operators may also need to be amended to reflect the change in document and agreement to the change will need to be granted by the Secretary of State for Transport.

2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) **Is there anything you consider is missing from the required content?**
- b) **Is this still a meaningful title for this leaflet?**

Chiltern Railways is supportive of making the current passenger-facing document more user friendly and agree that including all the current material, in print, is a barrier to customers using it and operators maintaining an up-to-date and accurate source of information. We do not believe there is any required content missing from your proposal.

However, the information that will be removed remains important and should be readily accessible for customers and rail staff. We therefore suggest the document signposts readers to the relevant section of the operator's website (or advice to another appropriate way of obtaining further information), as a means to achieving this and creating standardisation across the industry.

The requirements within the draft guidance document that Crystal Mark accreditation for plain English is obtained is a positive step in ensuring the content is written in a passenger focussed way, and this approach is already adopted elsewhere within the Arriva Group.

We are supportive in maintaining the existing title of the passenger-facing document as it is both effective in describing its purpose and audience and is familiar to existing rail users, though we note the possibility of an alternative, Accessible Travel: Customer Guide as outlined in point 1.

3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We are supportive of this change to ensure the passenger-facing document remains user friendly and information up-to-date providing that adequate signposting is provided to where this information can be located. It is worth noting that information about trains and stations can change frequently and so we should consider that this information should be provided via online links only as printed material can quickly become obsolete. The online location of this (and all other accessibility information) must be consistent across operators to ensure ease of access.

4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We are supportive of any improvements that streamline the process of maintaining up-to-date DPPP's and welcome the inclusion that minor and immaterial changes to the existing document will not require approval. However further clarification of the components of the approval and review process would be welcome; for example, who decides if it is not possible to incorporate feedback from local groups? Greater clarity of each stage of the approval and review process would assist operators in ensuring sufficient time is afforded when updating their documents and there is transparency of the pathway to approval.

In respect of franchised operators and new licence applications the timeframe between award and franchise start date must be a factor in whether a new DPPP can be submitted for approval 10 weeks before the start of operations. This is particularly important when considering whether it is feasible to carry out consultation with some of the suggested local groups which may not yet have been formed i.e.

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passenger panel and accessibility forum. A possible alternative in this scenario would be for the operator to maintain the commitments in franchise agreements and within the existing DPPP for the first franchise year until an appropriate consultation can be carried out.

5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The terms included within the classifications are generally accepted within the industry and it is therefore sensible to adopt this approach. However, it is important to make the distinction that whilst access to some platforms from the street may be step-free, access between the platform and train may not be accessible, even with a ramp, if the gradient is too steep. We would therefore welcome clarification within the classifications that where step-free access between the platform and train interface cannot be achieved that those platforms or stations are categorised as D or E with an appropriate explanation in knowledgebase. If there are plans in the future to amend the classification terms for step-free access, then there must be an approval process in place for agreeing those changes.

6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

The proposed changes need to be delivered via a systematic process of improvement and the accuracy of NRE Knowledgebase, including agreed processes for inputting short notice updates to station accessibility, should be the priority before approaching what and how mandatory checks are carried out during the booking process. Once there is certainty of the accuracy of available information then trigger points during the booking process would be a sensible approach to ensuring that booking agents check accessibility information whilst maintaining a personalised conversation with the customer. Ideally the booking system should alert an agent to any accessibility restrictions during the booking process based on the requirements of that individual customer and we would welcome development of the new Passenger Assist system to include such checks.

7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

A pragmatic approach to guidance should be taken to reflect the variances in the station and on-board experience across the UK and it should be recognised that best practice in this context may not apply in every scenario and may even cause the passenger confusion and therefore, we believe 'good practice' would be a more appropriate description of this guidance. As the proposal includes adding guidance to the booking confirmation a link to tailored information that is relevant to the operators delivering the assistance for the booked journey would enable advice that is appropriate to that journey to be provided.

8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

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In principle we support the idea of introducing an assistance handover protocol to ensure robust delivery of passenger assistance, particularly for un-booked assistance and confirming the passenger's location on the train when there is no booked seat. As part of the Arriva UK owning Group, we are pleased that our colleagues at Northern are trialling this process and providing feedback to ensure the system is deliverable before any industry wide adoption.

There are several practicalities to test, such as how the process would operate at unstaffed stations where the handover is carried out to on-board staff. The input of front-line staff regarding deliverability is essential to this being successful. A pragmatic approach to the protocol has been taken with handover calls the exception rather than the rule in every case; however greater clarification regarding the process at times of disruption or the passenger travelling on a different train to that booked requires further exploration and testing.

9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

The trial of the assistance handover process should highlight whether a dedicated assistance line is necessary and for which categories of station this is required. Clarification is also needed on what stations are classed as Mainline. As the delivery of assistance across UK rail is not a one fits all solution the mandating of a dedicated assistance number as a one fits all approach may not be appropriate in these circumstances. The practicalities, in particular of providing a dedicated number for unstaffed stations, requires further consideration, as in many cases the on-board staff will be responsible for meeting the customer's needs and therefore the handover protocol can be achieved by staff communicating in person. Situations where a station is part-time staffed needs further consideration as it would appear impractical to some degree to provide two numbers (a direct line to the station during staffing hours and an alternative number outside of those hours). Further clarification of the actions required by staff managing this number are required, particularly in the event that the receiver of the call may not be located at the station.

10. What are your views on our training proposals? Do you agree with the proposed outline content?

We understand the intent towards proposing training elements as it is important that customers are assured of a base standard of service and assistance irrespective of the operator whose services they use. Each train operator does however provide variances in its service delivery based on the market they serve, the trains they operate, stations they manage/call at and the unique needs of those customers. We therefore believe that in the event that elements of training are mandated this should be output based rather than prescriptive content to enable each operator to tailor their training package to their customers and operations.

Whilst it is important to keep staff appropriately re-briefed on changes in legislation or customer needs, mandating classroom-based refresher training every two years will create challenges. This includes ensuring that all staff can be released from duty for an additional training session whilst also ensuring the timely delivery of that training. Technology can play a key role in refreshing staff competencies and knowledge and we believe that in many cases e-learning could provide an efficient, timely and

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measurable record of that training. Appropriate consideration should also be given to how refresher training can be delivered on the job through manager and employee one-to-ones.

11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

We note that in other areas e.g. training for traincrew and station staff on manual handling (such as ramps), licence holders are typically required to ensure that staff are competent in the duties they are employed to undertake. This is achieved by competency management systems rather than specific training or retraining intervals being mandated by the regulator.

The proposed two-year timescale for training to be revised and subsequently approved by ORR and delivered to all staff is likely to be challenging for operators to achieve and detailed analysis of existing training commitments will need to be undertaken to determine whether this is achievable within each company's existing resource plan, without negatively impacting service delivery. The long-term impact of staff being released from duty for training will also require analysis on the basis of the current proposal that all refresher training is classroom based every two years. We suggest that ORR discusses the impact and likely timescales on an individual basis with each operator.

The focus of training should be a combination of priority areas for improvement, to ensure consistent industry standards, with the ability for tailored local priorities to be included. Standardised training outputs should focus on ensuring the delivery of a consistent experience for customers who need extra support across the industry, with refresher training focussing on legislative updates and local initiative developments, which could be efficiently cascaded during existing briefing cycles.

12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We support increasing customer awareness of the Passenger Assist service operators can provide as outlined in the consultation and RDG leading the promotion at a national level to deliver a UK wide media campaign. We believe increased awareness will ultimately lead to an improved and safer service for customers who need extra help. An option to prompt staff to enquire if assistance is needed for a Disabled Railcard holder could be achieved through an opt-in check box on the railcard where the customer can indicate that they may require assistance all or sometimes when travelling. This would act as a prompt to staff whilst also avoiding asking customers when it may not be welcome.

The approach to promoting passenger assistance should be taken in co-ordination with the other areas for improvement the industry will be working towards. For example, it is important to prioritise improvements to the reliability and delivery of assistance to customers already using the service before targeting more customers and risking failure to meet those needs.

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13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We are supportive of the proposal to require operators to work with local authorities, service providers and disabled access groups; however, it is unclear why this needs to be mandated. Activities of this nature already occur, and we only plan to strengthen and expand our activities in this area. We believe that engaging disabled people in the design of our service and testing ideas with them can only ensure that we deliver a better and more reliable service that adds value to our customers' journeys. Operating businesses may need time to review their organisational capabilities to ensure that they are resourced and structured in a way that enables the ongoing engagement activity outlined in the consultation document.

14. What are your views on the proposal for more prescriptive website requirements?

In principle we are supportive of the proposals outlined in the draft guidance document and in ensuring that all operator websites comply with W3C standards to ensure that customers with disabilities have easy access to the information they may need to plan their journeys. We will need time to review the content of their websites and accessibility standards with their web developers to identify any steps they may need to take to meet the requirements of the guidance document.

15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

As an aspiration we are supportive of reducing industry timescales for pre-booked passenger assistance as this will lead to customers having greater flexibility and opportunity to travel in the certainty that the industry can meet their needs. There is a need to ensure that the current technology underpinning this system is updated before any changes can be made, such as the introduction of a new passenger assist booking system, and also ensuring that the National Reservation System can support seat and wheelchair spaces being booked within the same timeframe and honoured on board the train.

The ability for each operators passenger assist booking team to meet any of the timescales proposed is currently very limited and, if as the consultation suggests, the aspiration is to reach a point where each operator's team is open for those hours then the practicalities of eventually reaching a 2 hour booking window would mean that each booking team may need to operate 24 hours a day. Our own insight indicates that very few calls are made past 2000hrs each night, and even less following 2200hrs. A more pragmatic approach may therefore be for calls after a certain time to divert to a centralised call centre or one of the operators whose existing contact hours meet those needs.

In the event that the aspiration is for each operator to be able provide a passenger assist team beyond their currently resourced hours then taking the opportunity to build this into future franchising requirements would be the most appropriate route.

16. How do you consider any reduction might be phased in? If so, how might this be implemented?

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As outlined above the first steps needs to ensure that systems and technology underpinning the passenger assist service are aligned to meeting any reduction in timescales. Following this, dependent upon the booking timeframe to be delivered, each operator will need to undertake an assessment of its existing resource capabilities to ensure it can meet the needs of customers' booking assistance, particularly at locations where assistance is delivered by mobile staff. With technology and the right level of resource in place then an aspiration to reduce the booking window will be deliverable. We are supportive of a common standard for pre-booked assistance to support promotion and awareness to customers of the service the industry can provide.

17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

If the definition of "normal operating conditions" are the base timetable and booking office opening hours then this is a process already in place because Chiltern Railways is conscious of the fact that we have some unmanned stations and operate a DOO service on part of the route and therefore we have procedures in place to provide the assistance needed by passengers who require journeys across these areas. The procedures that are in place have been implemented following a risk assessment process to ensure no failure in the assistance provided to the extent that a passenger should not notice any difference in the different modes of train and station operation.

18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We prefer to treat each customer as an individual and therefore by mandating any redress scheme, we lose our ability to do this with the customer-service focus which is intended. By stipulating that customers must be compensated for an assistance failure (once determined what failure means to each customer and the impact this has had on the individual), it then gives the impression that we are issuing redress because we have to rather than something we have chosen to do in recognition of the experience received.

The vast majority of other operators already compensate customers where it is felt it is appropriate as this is the 'right thing to do' from a customer service perspective and so if there is an issue identified where we have not demonstrated good levels of customer service then this should be raised directly with that operator or owning group as part of the ORR quality monitoring and regulatory processes.

In proposing mandatory redress for assistance failures there are a number of factors to consider:

- 1) **Doing the right thing:** The focus of managing an assistance failure complaint must be to ensure the customer has confidence to continue to use rail in the future. Compensation can be a means to supporting an apology but in isolation it will not restore confidence and trust and should therefore not be prioritised above taking action to reduce the failure reoccurring.
- 2) **Responsibility:** The vast majority of customers want assurances that if there is a failure in the delivery of passenger assistance that an appropriate investigation is carried out to identify the cause and mitigate it from occurring again. The failure of passenger assistance can be caused by the operator booking the assistance, the operator delivering the assistance, the operator responsible for keeping accessibility information up to date, by third parties (such as a failure of a taxi company) or a combination

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of the above. Arriva's focus first and foremost is to always ensure that the cause of failure is addressed, working with any third party to address this where appropriate.

3) **Managing Expectations:** The severity of a passenger assistance failure will inevitably differ according to the passenger's needs. For example, at time of disruption or peak demand assisting staff will prioritise the assistance needs of a customer using a wheelchair or a customer with a hearing or visual impairment above a customer with luggage assistance, who may be asked to wait. Managing expectations around what comprises a failure and to what degree requires further clarification.

4) **Level of redress:** You have highlighted within your consultation that a customer may already have a right to compensation under the Consumer Rights Act for a passenger assistance failure which sets out the route to redress and potentially a full or partial refund. A customer may also have rights under the Equality Act. Agreeing what an appropriate level of compensation is, should be determined by the operator, in discussion with the passenger, following an investigation being completed, based on how that customer has been affected and the particular facts of that case. In our experience passenger assistance failures are very context and fact specific which may present challenges in setting prescribed limits. Further the establishment of the Rail Ombudsman now allows for a customer to escalate a complaint if they are not satisfied without having to resort to court proceedings.

5) **Consistency:** For any compensation process to operate fairly all operators identified in point 1 above would need to agree to accept liability for compensating the customer if they caused the failure in assistance delivery.

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In principle the proposal to increase the availability of accessible alternative transport, particularly accessible buses and coaches is a positive step as it both reduces disruption and inconvenience to customers with mobility impairments and manages costs to the operator. The reality however is that the industry is dependent upon the vehicles approved operators have available at that time, which when procured for unplanned disruption may be more limited than when planned in advance for improvement work. The ability to provide a consistent customer experience is also important as it may not be possible to ensure that all vehicles are accessible on a particular date. This can lead to uncertainty for customers regarding the services they can use and those requiring alternative accessible transport to be ordered for them. If this is not known in advance it could lead to unexpected delays at the station for the customer whilst this is arranged.

The availability of accessible vehicles (including taxis), particularly in rural areas, is often extremely limited and our train operators work hard to procure transport as quickly as possible when required. In reality our powers are limited to increase the availability of accessible transport beyond actively working

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with existing operators to provide a service as quickly as possible to those customers when it is needed. Our priority is and always shall be to ensure that no customer is stranded, even if that means arranging separate transport for that individual.

The ability to require drivers of rail replacement buses, coaches and taxis to be trained to provide appropriate assistance could be included where contracts are renegotiated where this is not already in place.

21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

As highlighted in your consultation document help points are available at almost three-quarters of stations. In addition, a number of these help points may only currently provide automated information and help points may not be installed on every platform. Therefore, there may be a sizable gap filling process to achieve a consistent approach across the rail network.

With regards to a Freephone number, on a practical level this would need to be available from first until last train service, and currently Chiltern Railways does not provide an aligned service. Advertising a Freephone number for those who answer help point calls may be an alternative route but there could be issues regarding this number being used inappropriately. A more suitable alternative could be to promote the availability of the National Rail Freephone passenger assistance line or National Rail Enquiries.

22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Focussing initially on the capability to carry scooters there currently remain restrictions to rolling stock (due to there not being a sufficient turning circle or space on board) and stations (due to the ramp gradient between platform and some rolling stock) that prevent a consistent approach being adopted and it would be pragmatic to enable rolling stock changes to first be completed before moving to a presumption of carriage across the industry.

Secondly, we would support an education campaign focussed on how customers should safely use their scooters across the rail network and what to expect on-board; for example, to transfer to a seat and not occupy the wheelchair space.

We would be supportive of an RDG led collaboration with scooter manufacturers to introduce a 'safe for rail' accreditation sticker on scooters that can be transported on all accessibility compliant rolling stock. This would enable a consistent, industry wide approach to be adopted, where restrictions on carriage would be limited to the combined weight of the passenger and scooter and ramp gradients.

23. What are your views on our proposals to clarify the guidance to ensure:

a) passengers do not unknowingly purchase tickets they cannot make full use of; and

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b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

Our ability within the industry to mitigate passengers from purchasing a ticket they cannot make full use of is constrained by the ticket type, purchase channel (including third parties) and variances in rolling stock. To deliver this information changes in how customer information is captured during the ticket buying process may be required (i.e. a prompt regarding whether an accessible toilet may be required during the journey) along with integration of systems and information as they are digitalised. We would welcome a collaborative industry wide approach to exploring how better information of this nature can be provided to customers when buying tickets from a wide range of operators and third parties.

With regards to informing customers when a toilet is out of order on-board the train, until all trains are digitalised to automatically report faults to other industry systems, we are reliant on staff becoming aware of the fault and reporting it to enable online information and station customer information screens providing an appropriate message. This means that it will not always be possible to alert customers before travel and this could lead to delays in alternative routes and transport being provided. It is also worth considering the current range of information sources at stations across the UK rail network where not every station has a real time customer information screen or public-address system. Whilst this will inevitably be addressed over time the guidance document should reflect that these information systems will not be in place in the short term.

24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?

We welcome the examples of good practice you have identified and these are currently being explored. Where 'may' has been used examples of when you view adoption not being a reasonable adjustment for an operator would be helpful. Some examples provided are achieved through digital enablers and we may not have the infrastructure in place within their existing franchise to support those outputs.

The example of best practice provided regarding Video Relay services is interesting and looking for innovation outside of rail should be encouraged. Whilst it should not be a barrier to offering this service further consideration of the possible operational hours should be explored as it may not be possible to access a BSL interpreter for the same timeframe as other contact channels.

Thank you again for this opportunity to provide consultation feedback and we look forward to working with you in improving assisted travel.

Yours sincerely,

[redacted]
Customer Service Director

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Marcus Clement, Head of Consumer Policy
Consumer Policy Team
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

By email: DPPP@orr.gov.uk

16 January 2019

Dear Marcus

CrossCountry response to consultation on Disabled People's Protection Policies

Thank you for your email dated 14 November 2018 in respect of the above. We appreciate the opportunity given to review and feedback on the proposed content and are keen to work alongside you to ensure that the information published adds value to all parties concerned.

In terms of the consultation documents provided, please see below our response to each question raised;

1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

We believe that moving to an 'Inclusive Travel Policy' or 'Accessible Travel Policy' is a positive move as it uses customer focussed language that is reflective of changes to legislation, recognising that disabilities are wide ranging. We have assumed that the above amends the terminology of the collective reference to the passenger leaflet and policy document noting that Appendix A states that the title of the customer facing document is to be determined following consultation. Consideration should be given to how this may affect passenger awareness of a well-established name if "Making Rail accessible..." is no longer used. There would also be additional print costs incurred to operators in updating references to this document from material such as Passenger's Charters and posters, if these required any amendment at the same time to reflect the change in title; otherwise there would be inconsistent terminology in use for a period of time.

Alternatively, to provide further clarity for customers, the documents could be renamed to 'Accessible Travel: Customer Guide' and 'Accessible Travel: Policy' which would replace the Making Rail Accessible and DPPP respectively. This would clearly signpost the purpose of each document, under a common banner.

Franchise Agreements for franchised rail operators may also need to be amended to reflect the change in document and agreement to the change will need to be granted by the Secretary of State for Transport.

2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

CrossCountry is supportive of making the current passenger-facing document more user friendly and agree that including all the current material, in print, is a barrier to customers using it and operators maintaining an up-to-date and accurate source of information. We do not believe there is any required content missing from your proposal.

However, the information that will be removed remains important and should be readily accessible for customers and rail staff. We therefore suggest the document signposts readers to the relevant section of the operator's website (or advice to another appropriate way of obtaining further information), as a means to achieving this and creating standardisation across the industry.

The requirements within the draft guidance document that Crystal Mark accreditation for plain English is obtained is a positive step in ensuring the content is written in a passenger focussed way, and this approach is already adopted elsewhere within the Arriva Group.

We are supportive in maintaining the existing title of the passenger-facing document as it is both effective in describing its purpose and audience and is familiar to existing rail users, though we note the possibility of an alternative, Accessible Travel: Customer Guide as outlined in point 1.

3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We are supportive of this change to ensure the passenger-facing document remains user friendly and information up-to-date providing that adequate signposting is provided to where this information can be located. It is worth noting that information about trains and stations can change frequently and so we should consider that this information should be provided via online links only as printed material can quickly become obsolete. The online location of this (and all other accessibility information) must be consistent across operators to ensure ease of access.

4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We are supportive of any improvements that streamline the process of maintaining up-to-date DPPPs and welcome the inclusion that minor and immaterial changes to the existing document will not require approval. However further clarification of the components of the approval and review process would be welcome; for example, who decides if it is not possible to incorporate feedback from local groups? Greater clarity of each stage of the approval and review process would assist operators in ensuring sufficient time is afforded when updating their documents and there is transparency of the pathway to approval.

In respect of franchised operators and new licence applications the timeframe between award and franchise start date must be a factor in whether a new DPPP can be submitted for approval 10 weeks before the start of operations. This is particularly important when considering whether it is feasible to carry out consultation with some of the suggested local groups which may not yet have been formed i.e. passenger panel and accessibility forum. A possible alternative in this scenario would be for the operator to maintain the commitments in franchise agreements and within the existing DPPP for the first franchise year until an appropriate consultation can be carried out.

5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The terms included within the classifications are generally accepted within the industry and it is therefore sensible to adopt this approach. However, it is important to make the distinction that whilst access to some platforms from the street may be step-free, access between the platform and train may not be accessible, even with a ramp, if the gradient is too steep. We would therefore welcome clarification within the classifications that where step-free access between the platform and train interface cannot be achieved that those platforms or stations are categorised as D or E with an appropriate explanation in knowledgebase. If there are plans in the future to amend the classification terms for step-free access, then there must be an approval process in place for agreeing those changes.

6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

The proposed changes need to be delivered via a systematic process of improvement and the accuracy of NRE Knowledgebase, including agreed processes for inputting short notice updates to station accessibility, should be the priority before approaching what and how mandatory checks are carried out during the booking process. Once there is certainty of the accuracy of available information then trigger points during the booking process would be a sensible approach to ensuring that booking agents check accessibility information whilst maintaining a personalised conversation with the customer. Ideally the booking system should alert an agent to any accessibility restrictions during the booking process based on the requirements of that individual customer and we would welcome development of the new Passenger Assist system to include such checks.

7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

A pragmatic approach to guidance should be taken to reflect the variances in the station and on-board experience across the UK and it should be recognised that best practice in this context may not apply in every scenario and may even cause the passenger confusion and therefore, we believe 'good practice' would be a more appropriate description of this guidance. As the proposal includes adding guidance to the booking confirmation a link to tailored information that is relevant to the operators delivering the assistance for the booked journey would enable advice that is appropriate to that journey to be provided.

8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

In principle we support the idea of introducing an assistance handover protocol to ensure robust delivery of passenger assistance, particularly for un-booked assistance and confirming the passenger's location on the train when there is no booked seat. As part of the Arriva UK owning Group, we are pleased that our colleagues at Northern are trialling this process and providing feedback to ensure the system is deliverable before any industry wide adoption.

There are several practicalities to test, such as how the process would operate at unstaffed stations where the handover is carried out to on-board staff. The input of front-line staff regarding deliverability is essential to this being successful. A pragmatic approach to the protocol has been

taken with handover calls the exception rather than the rule in every case; however greater clarification regarding the process at times of disruption or the passenger travelling on a different train to that booked requires further exploration and testing.

9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

The trial of the assistance handover process should highlight whether a dedicated assistance line is necessary and for which categories of station this is required. Clarification is also needed on what stations are classed as Mainline. As the delivery of assistance across UK rail is not a one fits all solution the mandating of a dedicated assistance number as a one fits all approach may not be appropriate in these circumstances. The practicalities, in particular of providing a dedicated number for unstaffed stations, requires further consideration, as in many cases the on-board staff will be responsible for meeting the customer's needs and therefore the handover protocol can be achieved by staff communicating in person. Situations where a station is part-time staffed needs further consideration as it would appear impractical to some degree to provide two numbers (a direct line to the station during staffing hours and an alternative number outside of those hours).

Further clarification of the actions required by staff managing this number are required, particularly in the event that the receiver of the call may not be located at the station.

10. What are your views on our training proposals? Do you agree with the proposed outline content?

We understand the intent towards proposing training elements as it is important that customers are assured of a base standard of service and assistance irrespective of the operator whose services they use. Each train operator does however provide variances in its service delivery based on the market they serve, the trains they operate, stations they manage/call at and the unique needs of those customers. We therefore believe that in the event that elements of training are mandated this should be output based rather than prescriptive content to enable each operator to tailor their training package to their customers and operations.

Whilst it is important to keep staff appropriately re-briefed on changes in legislation or customer needs, mandating classroom-based refresher training every two years will create challenges. This includes ensuring that all staff can be released from duty for an additional training session whilst also ensuring the timely delivery of that training. Technology can play a key role in refreshing staff competencies and knowledge and we believe that in many cases e-learning could provide an efficient, timely and measurable record of that training. Appropriate consideration should also be given to how refresher training can be delivered on the job through manager and employee one-to-ones.

11. Do you agree that:

- **Operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **The refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

We note that in other areas licence holders are typically required to ensure that staff are competent in the duties they are employed to undertake, rather than specific training or retraining intervals being mandated by the regulator.

The proposed two-year timescale for training to be revised and subsequently approved by ORR and delivered to all staff is likely to be challenging for operators to achieve and detailed analysis of existing training commitments will need to be undertaken to determine whether this is achievable within each company's existing resource plan, without negatively impacting service delivery. The long-term impact of staff being released from duty for training will also require analysis on the basis of the current proposal that all refresher training is classroom based every two years. We suggest that ORR discusses the impact and likely timescales on an individual basis with each operator.

The focus of training should be a combination of priority areas for improvement, to ensure consistent industry standards, with the ability for tailored local priorities to be included. Standardised training outputs should focus on ensuring the delivery of a consistent experience for customers who need extra support across the industry, with refresher training focussing on legislative updates and local initiative developments, which could be efficiently cascaded during existing briefing cycles.

12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We support increasing customer awareness of the Passenger Assist service operators can provide as outlined in the consultation and RDG leading the promotion at a national level to deliver a UK wide media campaign. We believe increased awareness will ultimately lead to an improved and safer service for customers who need extra help. An option to prompt staff to enquire if assistance is needed for a Disabled Railcard holder could be achieved through an opt-in check box on the railcard where the customer can indicate that they may require assistance all or sometimes when travelling. This would act as a prompt to staff whilst also avoiding asking customers when it may not be welcome.

The approach to promoting passenger assistance should be taken in co-ordination with the other areas for improvement the industry will be working towards. For example, it is important to prioritise improvements to the reliability and delivery of assistance to customers already using the service before targeting more customers and risking failure to meet those needs.

13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We are supportive of the proposal to require operators to work with local authorities, service providers and disabled access groups; however, it is unclear why this needs to be mandated. Many activities of this nature already occur within CrossCountry, and we only plan to strengthen and expand our activities in this area. We believe that engaging disabled people in the design of our service and testing ideas with them can only ensure that we deliver a better and more reliable service that adds value to our customers' journeys.

Operating businesses may need time to review their organisational capabilities to ensure that they are resourced and structured in a way that enables the ongoing engagement activity outlined in the consultation document.

14. What are your views on the proposal for more prescriptive website requirements?

In principle we are supportive of the proposals outlined in the draft guidance document and in ensuring that all operator websites comply with W3C standards to ensure that customers with disabilities have easy access to the information they may need to plan their journeys. Operators will need time to review the content of their websites and accessibility standards with their web developers to identify any steps they may need to take to meet the requirements of the guidance document.

15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

As an aspiration we are supportive of reducing industry timescales for pre-booked passenger assistance as this will lead to customers having greater flexibility and opportunity to travel in the certainty that the industry can meet their needs. There is a need to ensure that the current technology underpinning this system is updated before any changes can be made, such as the introduction of a new passenger assist booking system, and also ensuring that the National Reservation System can support seat and wheelchair spaces being booked within the same timeframe and honoured on board the train.

The ability for each operators passenger assist booking team to meet any of the timescales proposed is currently very limited and, if as the consultation suggests, the aspiration is to reach a point where each operator's team is open for those hours then the practicalities of eventually reaching a 2 hour booking window would mean that each booking team may need to operate 24 hours a day. Our own insight indicates that very few calls are made past 2000hrs each night, and even less following 2200hrs. A more pragmatic approach may therefore be for calls after a certain time to divert to a centralised call centre or one of the operators whose existing contact hours meet those needs.

In the event that the aspiration is for each operator to be able provide a passenger assist team beyond their currently resourced hours then taking the opportunity to build this into future franchising requirements would be the most appropriate route.

16. How do you consider any reduction might be phased in? If so, how might this be implemented?

As outlined above the first steps needs to ensure that systems and technology underpinning the passenger assist service are aligned to meeting any reduction in timescales. Following this, dependent upon the booking timeframe to be delivered, each operator will need to undertake an assessment of its existing resource capabilities to ensure it can meet the needs of customers' booking assistance, particularly at locations where assistance is delivered by mobile staff. With technology and the right level of resource in place then an aspiration to reduce the booking window will be deliverable.

We are supportive of a common standard for pre-booked assistance to support promotion and awareness to customers of the service the industry can provide.

17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

CrossCountry does not operate any services where there is not a second person on-board the train. We therefore believe that this question is best placed to be answered by operators who have different modes of train operation.

18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

In proposing mandatory redress for assistance failures there are a number of factors to consider:

- 1) Responsibility: The vast majority of customers want assurances that if there is a failure in the delivery of passenger assistance that an appropriate investigation is carried out to identify the cause and mitigate it from occurring again. The failure of passenger assistance can be caused by the operator booking the assistance, the operator delivering the assistance, the operator responsible for keeping accessibility information up to date, by third parties (such as a failure of a taxi company) or a combination of the above. CrossCountry's focus first and foremost is to always ensure that the cause of failure is addressed, working with any third party to address this where appropriate.
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The availability of accessible vehicles (including taxis), particularly in rural areas, is often extremely limited and our train operators work hard to procure transport as quickly as possible when required. In reality, our powers are limited to increase the availability of accessible transport beyond actively working with existing operators to provide a service as quickly as possible to those customers when it is needed. Our priority is and always shall be to ensure that no customer is stranded, even if that means arranging separate transport for that individual.

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Secondly, we would support an education campaign focussed on how customers should safely use their scooters across the rail network and what to expect on-board; for example, to transfer to a seat and not occupy the wheelchair space.

Whilst some operators do have a permit scheme in place, we would be supportive of an RDG led collaboration with scooter manufacturers to introduce a 'safe for rail' accreditation sticker on scooters that can be transported on all accessibility compliant rolling stock. This would enable a consistent, industry wide approach to be adopted, where restrictions on carriage would be limited to the combined weight of the passenger and scooter and ramp gradients.

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- b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

Our ability within the industry to mitigate passengers from purchasing a ticket they cannot make full use of is constrained by the ticket type, purchase channel (including third parties) and variances in rolling stock. To deliver this information changes in how customer information is captured during the ticket buying process may be required (i.e. a prompt regarding whether an accessible toilet may be required during the journey) along with integration of systems and information as they are digitalised. We would welcome a collaborative industry wide approach to exploring how better information of this nature can be provided to customers when buying tickets from a wide range of operators and third parties.

With regards to informing customers when a toilet is out of order on-board the train, until all trains are digitalised to automatically report faults to other industry systems, we are reliant on staff becoming aware of the fault and reporting it to enable online information and station customer information screens providing an appropriate message. This means that it will not always be possible to alert customers before travel and this could lead to delays in alternative routes and transport being provided. It is also worth considering the current range of information sources at stations across the UK rail network where not every station has a real time customer information screen or public-address system. Whilst this will inevitably be addressed over time the guidance document should reflect that these information systems will not be in place in the short term.

24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?

We welcome the examples of good practice you have identified and are pleased to report that many of these areas are already adopted by CrossCountry or are currently being explored. Where 'may' has been used, examples of when you view adoption not being a reasonable adjustment for an operator would be helpful. Some examples provided are achieved through digital enablers and operators may not have the infrastructure in place within their existing franchise to support those outputs.

The example of best practice provided regarding Video Relay services is interesting and looking for innovation outside of rail should be encouraged. Whilst it should not be a barrier to offering this service further consideration of the possible operational hours should be explored as it may not be possible to access a BSL interpreter for the same timeframe as other contact channels.

Thank you again for this opportunity to provide consultation feedback and we look forward to working with you in improving assisted travel.

Kind regards



Andrew Cooper
Managing Director



Department
for Transport

Accessibility Policy Manager
Department for Transport
Great Minster House
33 Horseferry Road
SW1P 4DT

Web site: www.gov.uk/dft

Consumer Policy Team
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

18 January 2019

Dear ORR Consumer Policy Team,

DfT response to Improving Assisted Travel consultation on the changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)

Thank you very much for the opportunity to comment on the ORR's Improving Assisted Travel consultation on the changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP). I am responding on behalf of the Department for Transport ("DfT").

DfT welcomes the revised DPPP guidance, as you know the guidance has not been reviewed since we passed the custodianship of the DPPP to ORR. We are grateful to our partners in the rail industry and disability organisations for their work in helping to review the DPPP guidance.

DfT is committed to ensuring that everybody has the same opportunity to access public transport. The Inclusive Transport Strategy, which was launched on 25th July 2018, sets out the Government's plans to make our transport system more inclusive and to make travel easier for disabled people. We also highlighted the importance of the ORR playing an active role in improving accessibility in the Secretary of State's guidance to the ORR in July 2017.

DfT shares ORR's 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. We are keen for ORR to hold train and station operators to account by taking enforcement action where there are breaches of licence

conditions such as the failure to meet the requirements in the DPPP and the Design Standards for Accessible Railway Stations. Consistent with the Secretary of State's guidance to the ORR, in order to maximise the opportunities from the revised guidance it will be critical for the ORR to use all of its powers under consumer law to hold industry to account for fulfilling their obligations following the issue of the guidance, including taking enforcement action where appropriate.

DfT is pleased to respond to ORR's questions as follows.

Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

A: As stated in the DPPP guidance, we do not think that the title 'Disabled People's Protection Policy' is meaningful or helpful to passengers, and as such we welcome the change of name to 'Accessible Travel Policy' (ATP).

Q.2 What are your views on our proposal to replace the current passenger facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

(a) Is there anything you consider is missing from the required content?

A. DfT is supportive of the proposal to make the passenger facing document 'Making Rail Accessible: helping older and disabled people' concise. We believe that information on tickets and discounts and the provision of alternative accessible transport should be retained in the passenger facing document.

(b) Is this still a meaningful title for this leaflet?

A. No. We suggest the title of the leaflet should be changed to "Accessible Travel Information".

Q.3 What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

A. DfT is of the view that stations and rolling stock accessibility information should be part of the passenger facing leaflet, not the policy document. This is because it would make it easier for passengers to have all the necessary information at one place to plan their journeys. It may also be helpful if the leaflet can state the train type and its routes.

A map of stations showing whether a station has step-free access to some or all platforms, accessible toilets, assistance staff available, ticket office height adjusted, a designated meeting point, blue badge parking, help point, and tactile pavement would help contribute in making the leaflet of most use and customer-friendly.

Q.4 What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

A. We welcome the reduction of the 'grace' period for an operator to supply a DPPP to display at a staffed station from the current three months to one month. However, we think only under extenuating circumstances should it take one month to provide a DPPP – ideally this should be available on day one of the start of operation.

Also, we strongly agree with and support the idea that disabled people should be involved in the development of the DPPP. We are similarly planning to make it a requirement in future rail franchise competitions for bidders to introduce and maintain an accessibility panel made up of people with a broad range of disabilities, which they should consult in the co-designing of physical assets, electronic services and applications, and other services and facilities as appropriate.

Q.5 What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

A. DfT wants the rail industry to define what is step-free access. We prefer the five categories as per the RDG 'On Track for 2020' report, not the three categories listed in the consultation document.

Q.6 What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

A. The proposal to introduce a mandatory check on station accessibility information before booking assistance for passengers is a welcomed development. This may reduce the number of incorrect bookings, but it will not solve the issue overall if TOCs rely on the information available on Stations Made Easy which we know is currently often inaccurate. The provision of accurate, real-time information will help address the issue of incorrect bookings.

We would like ORR to explain how it will monitor compliance. We urge ORR to institute an appropriate monitoring mechanism to ensure that booking staff make the checks before booking assistance for passengers.

Q.7 What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

A. We are supportive of the idea of a guidance document (not a 'best practice' guide as this risks discouraging TOCs from going beyond it) for passenger assist users, but we would like more information on who will be responsible for the creation of the guidance document; is it the ORR or RDG or each respective TOC?

As it is the desire to make the DPPP of TOCs concise, we are of the view that the inclusion of this guidance document into the TOC's DPPP will defeat this aim.

Q.8 What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

A. The introduction of an assistance handover protocol is a welcomed innovation which may lead to improved communication between stations. We think that the station in which the passenger boards the train should always make contact with the station ahead whether the passenger booked assistance or not. In cases, where a phone call is not answered, a text message could be sent. As part of ORR monitoring activities, we suggest ORR should demand at least 5% percent of stations records on the assistance handover of each TOCs.

In order for ORR to know the level of satisfaction with regards to assistance provided, we believe it would be helpful if ORR requires TOCs to survey at least 25% of customers who have used booked assistance on a monthly basis. We are considering making this a requirement in future franchise agreements and therefore would be keen to understand ORR intentions in this area following the consultation.

Q.9 What are your view on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

A. DfT supports the introduction of a dedicated assistance line at train stations across Britain. We would like ORR to put in place a mechanism to

monitor calls to the dedicated number, including whether they are answered and quality.

While we understand that ORR does not want to be prescriptive and also would want TOCs to be innovative, it may be helpful if ORR is clear that it wants the “responsible person” to be a person at a control centre who is responsible for a number stations.

Q.10 What are your views on our training proposals? Do you agree with the proposed outline content?

A. DfT believes that a properly trained staff on the railway network will lead to an improved awareness of the various forms and types of disability including those that are hidden, and as such we are in support of the ten areas that the disability awareness training that TOCs offer to their staff should cover.

The current guidance states that disability awareness training should be offered to all customer-facing staff. We believe this should go further; we think every member of staff, regardless of their role or seniority, should undergo an enhanced disability awareness training, which may help in changing the rail industry’s attitude towards providing a service to disabled people.

RDG should take the lead in the creation of an enhanced disability awareness training that covers that ten areas that ORR has proposed and ensure that its members offer this enhanced disability awareness training to all its staff. We support the idea that disabled persons should be involved in the design and delivery of disability awareness training.

Q.11 Do you agree that:

(a) operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?

A. DfT agrees that the disability awareness training offered by operators should be updated and revised every two years. It might be helpful if every member of staff can undergo refresher training every year, although recognise the resource requirement this would involve.

(b) the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

A. The refresher training should cover the priority areas for improvement for the industry as a whole, as a minimum at a high level. However if there are particular areas where an operator is recognised to be

performing poorly and in need of improvement, these should be covered in more detail.

Q.12 What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

A. The findings of various research conducted recently either by partners in the rail industry or by disabled groups support the view of the low awareness of passenger assist. That is why the Inclusive Transport Strategy which was published in July 2018 included a commitment that through future rail franchises bidders will be required to promote the greater awareness of passenger assist. For this reason, we agree with ORR's recommendation to RDG to promote passenger assist.

However, we are of the view that more can be done and we would like ORR to use the revision of the DPPP guidance document to push RDG and all train and station operators to do more to promote the awareness of passenger assist such as embarking on a widespread communications campaign both at stations and on trains and online about the existence of passenger assist, learning lessons from successful campaigns such as the British Transport Police "See It. Say It. Sorted." Campaign.

We are working with both the Disabled Persons Transport Advisory Committee and RDG in reviewing the eligibility criteria of the DPRC; we will consider the recommendations made by ORR as part of the revision of the DPPP guidance document.

Q.13 What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

A. DfT strongly supports the proposal to require train and station operators to work with third parties such as local authorities, the NHS and disability access groups to promote passenger assist in the revised DPPP guidance as this may lead to an increase in the awareness of the service.

We were happy to note that ORR requires train and station operators to submit an annual report of their engagement activities with local authorities, the NHS and disability access groups.

Q.14 What are your views on the proposal for more prescriptive website requirements?

A. DfT agrees with ORR's proposal for the term "Passenger Assist" to be used on the websites of TOCs in describing the system used to book and

provide assistance. A single click should link passengers to where they can find the essential information with regards to passenger assist.

Q.15 What are your views on the three options we have identified for reducing the notice period for booked assistance?

A. DfT welcomes the proposals to reduce the minimum notice period for booking assistance. We encourage the ORR to be as ambitious as reasonably possible and set the shortest minimum period which operational constraints allow, based on their knowledge of and input from the industry. In addition, we are obviously keen to see TOCs go beyond this minimum and deliver a turn-up and go service wherever possible.

Q.16 Do you consider any reduction might be phased in? If so, how might this be implemented?

A. DfT is of the view that, any reduction of the notice period recommended for booking assistance should be phased in as it will give TOCs sufficient time to introduce any process changes that would be required. We agree with the timelines that ORR has proposed.

Q.17 What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

A. DfT agrees and supports the proposal that TOCs should conduct an assessment of their normal operating conditions to determine where the provision of assistance to those with accessibility needs will be at risk. The assessment will enable them to have a full understanding of any issues and challenges around the provision of assistance and mitigation measures to be found.

Q.18 What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

A. DfT supports proposals to introduce mandatory redress arrangements for assistance failure (as well as other consumer facing issues) by making membership of the Rail Ombudsman mandatory for all train and station operators as part of their licence, consistent with the ORR's consultation issued on 19 December 2018.

We also intend to introduce a similar requirement in future rail franchise competitions for TOCs to compensate passengers in cases where booked assistance fails so are keen to work closely with ORR to understand plans in relation to this area to ensure a joined-up approach and avoid duplication.

We are happy that ORR plans to monitor the provision of compensation and would encourage ORR to publish the findings in the "Measuring Up" report.

We welcome the proposals to promote the provision of redress to passengers. It is important that the significant role of the Ombudsman is clearly referred to in a range of sources and that customers are clear about the range of accessibility issues the Ombudsman can adjudicate on and that they can readily access it.

Q.19 What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

A. DfT does not oppose this proposal, but we would like to understand the level of passenger demand for text relay. This will help determine the case for funding the service and its likely take up, or whether a more tailored approach should be considered. Provided there's sufficient demand for the service, it may prove useful for customers (but should be promoted clearly, and not result in confusion for passengers due to too many contact options).

Q.20 What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

A. DfT thinks that given 97% of buses (designed to carry over twenty-two passengers on local and scheduled routes) in Great Britain now incorporate a wheelchair space, boarding ramp and other accessibility features, the rationale for allowing TOCs to rely on wheelchair accessible taxis and private hire vehicles (PHVs) during planned disruption, rather than specifying that rail replacement services must be provided using buses and coaches compliant with the Public Service Vehicles Accessibility Regulations (PSVAR), is now greatly reduced. Enabling disabled passengers to travel on the same rail replacement services as other travellers would reduce the need for them to wait, sometimes for extended periods, for alternative accessible transport to be provided, improving the reliability and overall quality of their journey experience. It would also reduce the need to procure wheelchair accessible taxis and PHVs, and incentivise bus and coach operators yet to comply with accessibility Regulations to accelerate their plans for doing so.

We would therefore suggest that operators are required to ensure that buses and coaches providing rail replacement services comply with the Public Service Vehicles Accessibility Regulations (PSVAR) where disruption is planned or reasonably foreseeable, and that wheelchair accessible taxis and PHVs are relied upon only during periods of unexpected disruption or where the accessible buses or coaches procured are inadequate to meet passenger needs.

We support the proposal that operators must make reasonable endeavours to ensure drivers of rail replacement bus services and taxis have been trained to provide appropriate assistance to rail passengers. They could also usefully be encouraged to liaise with the respective local licensing authority to encourage the adoption of authority-wide driver training requirements, so as to avoid the patchwork provision of training, with little oversight or accountability, by individual operators, which may not result in a consistent service for passengers.

Q.21 What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

A. DfT strongly supports this proposal. We know that the support received from staff both in person and via other means such as telephone can be very important to disabled passengers, including often those with hidden disabilities, and can improve passengers' confidence to travel and their experience. Requiring TOCs to ensure passengers know how to access that support and can do so easily would be welcome.

Q.22 What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the Guidance review?

A. DfT supports the ORR proposals on the carriage of scooters contained in the draft revised Guidance.

Q.23 What are your views on our proposals to clarify the guidance to ensure: (a) passengers do not unknowingly purchase tickets they cannot make full use of; and

(b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

A. DfT supports these proposals.

24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?

A. DfT does not have any comments on the areas identified by ORR as good practices.

No part of this response should be considered confidential.

Yours sincerely,

A response from the Disabled Persons Transport Advisory Committee to the Office of Rail and Road's consultation 'Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)'

Introduction to our response

The Disabled Persons Transport Advisory Committee ('DPTAC') was established by the Transport Act 1985 and is the Government's statutory advisor on issues relating to transport provision for disabled people. DPTAC's vision is that disabled people should have the same access to transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and without extra cost.

Disability affects some around 14 million people in the UK. It includes physical or sensory impairments as well as 'non-visible' disabilities such as autism, dementia, learning disabilities and anxiety. For many people a lack of mobility or confidence in using the transport system is a barrier to being able to access employment, education, health care and broader commercial opportunities (for example shopping), and to a social life.

DPTAC has welcomed the comprehensive, inclusive and challenging approach that the ORR has taken to its Review of DPPP Guidance and passenger assistance, and has found its own engagement in the Review through the stakeholder Advisory Group particularly helpful.

DPTAC welcomes the opportunity to respond to this consultation, and has set out responses to the specific questions raised by the Office of Rail and Road ('ORR'), as well as making a number of more general suggestions at the end of its response.

We would welcome further engagement with the ORR as it finalises its revised Guidance, particularly on any matters relating to our response to this consultation.

DPTAC has no objection to our response being published in full by the ORR.

DPTAC response to consultation questions

We would like to make two general points with regard to the draft revised Guidance:

- Firstly that the ORR should consider whether the Guidance should give greater consideration to the very significant proportion of disabled passengers that do not require assistance and prefer to travel independently. We comment on this point specifically in our response to question 2.1, but believe that the ORR should consider the question more generally;

- Secondly that there needs to be greater clarity around the provision of assistance in the context of 'spontaneous' travel and 'pre-planned' travel. We deal with this point in more detail in the 'Additional Points' we have included at the end of our response.

Q1. What are your views on replacing 'Disabled People's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

DPTAC strongly supports replacing the term 'Disabled Persons Protection Policy' with either 'Inclusive Travel Policy' or 'Accessible Travel Policy'.

The two alternative titles both have merits. 'Inclusive Travel Policy' has a useful synergy with the government's wider 'Inclusive Travel Strategy', but carries the risk of being incorrectly interpreted as applying to all protected groups under the Equality Act.

On balance, therefore, DPTAC favours the use of 'Accessible Travel Policy', which has the advantage of clearly communicating the nature and purpose of the policy.

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

DPTAC believes that this would be a useful improvement, particularly if a template-based approach was adopted, with a view to ensuring a more consistent approach across all train operators and Network Rail. A template-based approach may also make it easier to translate documents into alternative formats.

A more passenger-friendly document would help disabled passengers understand better what they can expect from a train operator and/or Network Rail, and would allow them to plan journeys more confidently. It would be especially helpful for disabled passengers making a journey on a part of the rail network that they are not familiar with.

2.1 Is there anything you consider is missing from the required content?

We believe that the ORR should consider whether the leaflet should more broadly deal with accessible travel for all disabled people, not just those that require assistance. The primary purpose of the leaflet should be to help ensure that all disabled people have the confidence to make journeys on the rail network, including the many disabled people that prefer to travel independently.

A very significant proportion of the roundly 14 million people in Britain with a disability do not require assistance but do need information on the facilities and services provided by train operators and Network Rail in order to be able to confidently plan their journey. Many hearing impaired people, for instance, would feel empowered to travel independently if they knew that visual information was available at stations and on trains, at that ticket offices were equipped with hearing loops.

We accept that this potentially makes the document longer, but believe that the advantages of a broader approach strongly outweigh the potential disadvantages, particularly if a similar stylistic approach (i.e. concise and passenger friendly) was adopted for the additional information required.

2.2 Is this still a meaningful title for this leaflet?

The current title reads rather awkwardly, and we would suggest its replacement by a more straightforward and positive title. An alternative might be something along the lines of 'Making a journey by train: advice for disabled and older passengers.' This would also be a better descriptor in terms of the wider provision of information we advocate in section 2.1, above.

Q3. What are your views on our proposed requirement that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We support this suggestion, but would highlight that detailed information on station and rolling stock accessibility is vital for disabled people planning a rail journey. The passenger-facing document needs, therefore, to make very clear where this information can be found.

We would suggest that the only exception to the proposed approach should be that from 2020 onwards the passenger-facing leaflet should highlight any passenger services which are operated using rolling stock that has been granted a PRM-TSI dispensation (noting the need for such dispensations to be described in plain English).

Q4. What are your views on the proposed changes to the approval and review process?

We support the suggested approach. It makes sense for disabled people, particularly those who are potential users of the services concerned to be involved in the development of Inclusive/Accessible Travel Policies. We also support the proposed changes to the timescales for the review and publication of such policies. It is important that a train operator's Inclusive/Accessible Travel Policy is available, online at least, from the first day of its operation.

4.1 Do you have any additional suggestions for improvement?

We would suggest that the proposed new approach, if adopted, should be reviewed to after two years of operation to assess its efficacy.

Q.5 What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

We support, in principle, the proposal to adopt a standard classification of the extent to which stations provide step-free access, but would strongly emphasise the need for the definitions of each category to be easily understandable by passengers.

Whilst we appreciate that the current definitions have been developed for the purpose of allocating stations to one of the suggested categories, there is clearly a significant challenge involved in translating these definitions into simple but meaningful descriptors for passengers. This is particularly the case with categories B, C and D.

Q6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

We strongly support this proposal.

Q7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We strongly support this proposal. The guidance provided to passengers should also be integrated into staff training programmes.

DPTAC would welcome involvement in the development of such best practice.

Q8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

We strongly support this proposal.

Q9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

We support this proposal.

Q10. What are your views on our training proposals? Do you agree with the proposed outline content?

We strongly support the proposal that refresher training should be undertaken every two years.

We support the inclusion of the elements defined in paragraph 4.13 as mandatory elements within train operator and Network Rail training programmes. However, we are concerned that they place insufficient emphasis on the practical help and assistance that can be provided by staff.

It is clearly important that staff have a good understanding of disability in a general sense including the legal and regulatory framework within which train operators and Network Rail operate, and the suggested mandatory elements in training cover this ground well. However, it is equally important that staff have a good understanding, at a practical level, of the kind of assistance that might be helpful for a passenger with autism for instance. For front line staff, at least, we would advocate a more balanced approach to the mandatory elements of training, with an equally strong emphasis on the practical aspects of providing help and assistance.

We would also advocate that a broader approach to training is adopted, with the requirement that all train operator management staff, and relevant Network Rail management staff, undergo disability training. In this case a greater emphasis on the legal and regulatory framework would be appropriate.

It is particularly important that the senior leadership teams of train operators and Network Rail undergo training. It is these individuals that will shape and define the culture of the organisations that they lead, and it is vital that they understand and support the need for a more inclusive approach to the services provided by their organisations.

We strongly support the involvement of disabled people in training programmes, and the mandatory provision of training to temporary agency and contract staff.

Q11. Do you agree that:

- operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?

We support this proposal; in general two years is a reasonable timeframe for train operators and Network Rail to complete the necessary revisions to their training packages and undertake refresher training.

However, it is clear that there is quite a significant range in the quality and duration of training courses currently provided by train operators. In this context we suggest that priority should be given to securing improvements to those training courses currently judged to be the weakest (in duration and/or quality), with a one year to eighteen month timescale (depending on the number of staff that need to be re-trained) for revising such courses and completing refresher training.

- the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

It is important that all train operators and Network Rail address network-wide, systemic issues, but also importance that individual operators address any areas of weakness specific to that operator. It does not seem unreasonable or impractical, therefore, to adopt a balanced approach to refresher training that includes both network-wide and operator specific issues.

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We strongly support the proposal to make greater use of the Disabled Persons Railcard ('DPRC') to promote assistance. However, we are conscious of the risk of implying that anyone who is disabled needs to book assistance if they want to make a rail journey. Messaging needs to be carefully worded, therefore, to highlight that many disabled people can use the rail network without assistance but that assistance is available for those that need it. It would be sensible to provide information on the kinds of assistance available for different types of visible and non-visible disability when promoting Passenger Assist.

With the caveats above, we would strongly support the inclusion of a leaflet, which provides information on Passenger Assist, whenever a Disabled Person's Railcard is issued. This is considerable overlap between those passengers purchasing a DPRC and those who would potentially benefit from assistance, so it makes good sense to exploit this synergy in promotional terms.

We would also strongly advocate that whenever an online travel booking is made using a DPRC discount that a 'pop-up' box asks the ticket purchaser if they would like to book assistance. The tone and content of such message should be consistent with the principles described above. This requirement should not only apply to train operator websites/apps, but also licenced third party retailer (such as the Trainline) websites and apps.

Whilst supporting the much stronger promotion of Passenger Assist to DPRC holders, this should not obviate the wider need for the stronger and more creative promotion of Passenger Assist through a range of channels.

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We strongly support this proposal.

In addition to local, train operator-driven activities, at a national level, promotion through national charities that provide practical support to disabled people (such as 'Action on Hearing Loss'), can also be an effective way of promoting Passenger Assist, and there may be a role for RDG in engaging with such charities.

Q14. What are your views on the proposal for more prescriptive website requirements?

We strongly support this proposal.

It makes good sense for there to be uniform adoption by train operators and Network Rail of the term 'Passenger Assist' to describe the booking and provision of assistance. This will eliminate a lot of current confusion.

The provision of a single page summary of information contained in the passenger leaflet linked to each operator's home page (i.e. one 'click' away from the home page) is not an onerous requirement, and could be an effective way of highlighting both the accessibility of each operator's services and Passenger Assist.

Q15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

Option 3 would be an ideal approach, but we acknowledge that there are some significant challenges in achieving this. Given this we would advocate a phased approach, which at each stage was based on a single, national rule (or at least as close to it as possible) in order to eliminate some of the current confusion and remove the need for detailed planning on operator/route/time of travel basis. In this context, it might be sensible to agree a, say, five year, programme with operators/Network Rail and the franchising authorities that would move from the current position to as close to the ideal position as possible.

This would allow time for train operators and Network Rail to develop the required processes, adjust staffing levels, train staff, and agree financial adjustments with the franchising authorities and government. It would also allow new notice periods to be built into the specifications for new franchises (or whatever industry structure emerges from the Williams Review). It would also allow each phase to be properly tested to ensure that delivery was robust, as well as allowing train operators and Network Rail to monitor performance and make adjustments based on lessons learned.

Even within this approach, there are likely to be significant issues at some locations (unstaffed stations on rural routes for instance). We will comment on this more generally at the end of our response.

A more detailed exploration of how well the Merseytravel approach has worked might be instructive in developing the programme suggested above.

Q16. Do you consider that any reduction should be phased in? If so, how might this be implemented?

We would strongly support a phased approach. Please see our response to question 15.

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We support the approach proposed, but would suggest that the ORR await the final conclusions from the research into this area that has been jointly commissioned by RGD and the DfT, before finalising the guidance to train operators. In general, this issue remains an area of significant concern to DPTAC.

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We strongly support the proposal to make redress arrangements for failures to provide Passenger Assist when booked a mandatory requirement upon train operators and Network Rail. We likewise strongly support the mandatory requirement to promote the existence of such arrangements (including their inclusion in the passenger facing and policy documents for each operator and Network Rail). We also believe that each operator and Network Rail should publish on their website and elsewhere a clear explanation of their arrangements, including the criteria that will be used to assess a failed assist and the specific redress payments that will be made.

We understand the rationale behind allowing train operators and Network Rail to choose their own redress arrangements, but are concerned that this will lead to a confusing proliferation of approaches. In this context we suggest that redress arrangements are reviewed in 2021 and the guidance amended if it is clear that a multiplicity of approaches is undermining or weakening the effectiveness of redress arrangements. Although outside the scope of this consultation, we would support the inclusion of unresolved disputes over Passenger Assist redress arrangements within the remit of the Rail Ombudsman.

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We strongly support this proposal.

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

PSVAR is now fully in place, and it should be a mandatory requirement upon operators that need to book rail replacement bus services to contractually require bus operators to provide PSVAR compliant buses.

Equally, train operators and Network Rail should proactively engage with taxi operators, particularly those with a good record on disability training, to explore the

availability of WAV's for the use of wheelchair-using passengers who may require this type of assisted travel when substitute or alternative transport is being used.

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We strongly support this proposal, although noting the need for such information to be provided in a range of formats.

Q22: What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the Guidance review?

We support the approach proposed but strongly believe that there needs to be a consistent approach across all operators.

It should be possible to construct a matrix of scooter types and rolling stock classes, which clearly indicates whether a particular type/model of scooter can be conveyed on a particular class of rolling stock. Once completed the matrix could be used all operators when communicating their acceptance policy for scooters. This should eliminate any potential confusion resulting from specific operators adopting different policies for the same rolling stock. RDG and/or RSSB would be well placed to develop such a matrix, use of which should be a mandatory requirement for operators.

Q23. What are your views on our proposals to clarify the guidance to ensure:

- (a) passengers do not unknowingly purchase tickets they cannot make full use of; and

We strongly support this proposal.

- (b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

We strongly support this proposal. It would also be sensible to ensure that best practice is shared in this area. LNER, for instance, provide a reporting tool that allows passengers to let them know by text when a toilet is not working.

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?

The examples good are very good, and could possibly form the basis of 'committed obligations' in future franchises.

We would suggest that the ORR considers whether point (4) in our 'Additional Points' below should be included within the revised Guidance, either in the main body of the Guidance itself (our preference) or as additional area of identified good practice.

Additional Points

In addition to our responses to the questions posed in the consultation document, we wish to make the following points:

(1) We believe that there is still a lack of clarity around the need for booked assistance, 'spontaneous' travel that still requires un-booked assistance, and 'turn up and go' travel by disabled passengers sufficiently confident to travel independently.

There needs to be a clear explanation by each operator of its policy with regard to booked assistance, and its policy with regard to the provision of assistance where this has not been booked. This needs to be realistic, particularly in the context of un-booked assistance, and not set unrealistic expectations.

For instance, in the case of un-booked assistance, this would presumably be provided where possible but may involve delay and cannot be guaranteed, and is more likely to be possible at, say, a major fully-staffed station, than a smaller, unstaffed station? If so this needs to be clearly explained both in principle and at individual station level. In this context it is worth noting the inconsistency between the fairly open-ended passenger commitment in 3.2A of the revised guidance and the more limited operator requirement set out in section 4.f ('where reasonably practicable').

We welcome the aspiration of providing assistance to those passengers that choose to travel spontaneously, but believe that it is only by providing realistic information that disabled passengers can plan their journeys with confidence.

Although outside the scope of this consultation, we strongly believe that there is a need for a detailed database of all stations, which provides a breakdown of their accessibility by broad type of disability (mobility impairment, visual impairment; cognitive impairment etc.), as well as the specific arrangements for booked and un-booked assistance at that location.

The information contained in such a database could be communicated widely, and be used as the basis for (much) better-informed journey planning by disabled people and for the provision of assistance by operators.

The detailed work in compiling such a database is outside the scope of this consultation, but some of the principles inherent within it (such as clarity on the need for booked assistance and provision of un-booked assistance) should be requirements within the revised Guidance.

(2) We have in a couple of our responses suggested that the new arrangements be reviewed after a period of time. In a more general sense, we believe it would be sensible to review the Guidance in its entirety every five years.

The ORR may wish to consider formalising such an approach in order to mitigate the risk of inappropriately long gaps between reviews as has happened with the current Guidance.

(3) Although completely outside the scope of this consultation, we wish to advocate that franchise bidders be required to submit draft Accessible/Inclusive Travel Plans as part of their franchise bids, and that evaluation of such plans be a scored component within the bid evaluation process.

Such an approach would embed accessibility more fundamentally into the franchising process, and mean that accessibility planning was already well-advanced when new franchisees mobilised ahead of taking over a franchise.

DPTAC will be raising this possibility with the DfT and wanted the ORR to be aware of the initiative when finalising the revised Guidance to operators (although we would not expect any such requirement, if adopted, to have any material impact on the contents of the Guidance in the short term).

(4) We would suggest that strong encouragement be given to train operators and Network Rail to develop and use 'travel training, 'buddying' and mentoring schemes should also be included in the Guidance. Such schemes have proved to be effective ways of giving people with a range of disabilities the confidence to use the transport network independently.

Such schemes lend themselves to partnership arrangements between train operators/Network Rail and local disability groups, special schools, charities and other third parties. However, there is also a role for the DfT and RDG in highlighting and sharing good practice in this area.

It is worth noting that such schemes can also provide material benefits to train operators in terms of understanding better how travel by disabled people can be most effectively supported.

(5) We would strongly advocate the use of the term 'non-visible' disability rather than 'hidden' disability, as the latter term can be taken to imply a degree of culpability on the part of a disabled person in not disclosing their disability.

DPTAC

18th January, 2019

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Edinburgh Access Panel
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

“Accessible” is good because it’s not just disabled folk who need easy access – it’s elderly, infirm, ill (etc) too. But you need to make sure that this is the scope that’s intended.

“Travel” is good because it’s a generic word that will be interpreted as meaning end-to-end and hopefully seamless journeys.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- a) If the leaflet is fairly generic (in order to keep it to a manageable size), then I'd like to see station-specific leaflets available too because stations have their own specific access issues, eg Edinburgh Waverley and Haymarket pose quite different challenges. Possibly carrier-specific leaflets too.
- b) I'd incorporate the word "Travel".

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Keep this info separate from the leaflet. But make sure it's readily available both online and by phone. Many disabled folk will prefer to make a phone call rather than look online. It's essential that whoever takes the call has the appropriate info at hand.

Station info and rolling stock info is likely to change quite frequently. Another good reason for keeping it separate from the leaflet.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

It's important to know what the alternatives are to "step-free" access. Level access? Escalator? Lift? The last 2 are certainly not necessarily accessible to all.

Also, think about access to the station from outside – how to get to your platform from a taxi or bus that drops you off OUTSIDE the station – eg at Edin Waverley. This is why the Scottish framework is "Accessible travel..", not "Accessible transport...".

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Good.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Good

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Good. I'd also like to see a handover protocol from train to taxi and from taxi to train – eg a handover between passenger assistance and the taxi marshall at the station's taxi rank.

Make sure the handover protocol includes an adequate service for cases where a train arrives very late. At least a basic level of assistance must be on hand 24 x 7 or at least until the last train of the day has arrived.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Good. Make sure it's usable by disabled folk, including deaf.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

Staff Training (Chapter 4)

Q11. Do you agree that:

- operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?
- the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

It's absolutely essential that you emphasise the importance of (a) pre-booking assistance, and (b) cancelling your booking if you decide not to travel. My experience is that these 2 things would contribute substantially to the effectiveness of the assistance service – ie by minimising ad hoc requests and no-shows.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

Good. Need to focus on taxi services.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

Good

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

See Q12.

There's a trade-off. Booking early means more manageable resource allocation. Booking late means more flexibility for the passenger. You need to analyse the pros and cons of each option while keeping in mind the need to pre-book and to cancel if no-show.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

A process for redress is desirable provided the cause of the "failure" is the "responsibility" of Passenger Assistance. I suspect in practice a great deal of resource would have to be spent on looking into claims – resource that otherwise would be devoted to assisting passengers. So tread carefully! Need a very simple a clear SLA.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Good. Many disabled people struggle to hear on the phone. Also, make sure that button-operated voice-links (eg at taxi ranks) are loud and audible above the noise of the station. Install an effective loop if possible.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Good. Make sure that this information is conveyed in ways that are suitable for deaf and blind people.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

We've had these sorts of problems with buses and trams in Edinburgh. It's essential that info is available to would-be passengers about whether scooters are allowed. Of course it's desirable to allow scooter users to travel by train with their scooters. But there are definitely safety issues – not least for other passengers. Edinburgh Trams have launched a permit system whereby smaller types of scooter are allowed on board. This seems to work fairly well.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

Good.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

See Q25.

Q25. Do you have any other comments or views on improving Assisted Travel?

- Make sure assistance of some sort is available out of hours to support train arrivals which are severely delayed.
- Allow assistance to be booked by disabled people who want to visit a station not to travel but to (say) buy a ticket.

- If places are provided where passengers arriving by taxi have to wait for assistance, make sure these places are warm, dry and comfortable.
- Make sure lifts to platforms have sufficient capacity to accommodate disabled people and encourage other passengers to give them priority. And make sure there is a back-up facility available for when a lift breaks down.

Thank you for taking the time to respond.

Our response to the ORR consultation on Improving Assisted Travel

Consultation details

Title of consultation: Improving Assisted Travel: a consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)

Source of consultation: Office of Rail and Road

Date we submitted our response: March 2019

For more information please contact

[redacted]

Equality and Human Rights Commission, Fleetbank House, 2-6 Salisbury Square,
London EC4Y 8JX

[redacted]equalityhumanrights.com

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About the Equality and Human Rights Commission

The Equality and Human Rights Commission (the Commission) is a statutory body established under the Equality Act 2006. It operates independently to encourage equality and diversity, eliminate unlawful discrimination, and protect and promote human rights. We are committed to our vision of a modern Britain where everyone is treated with dignity and respect, and we all have an equal chance to succeed.

The Commission enforces equality legislation on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. It encourages compliance with the Human Rights Act 1998 and is accredited at UN level as an 'A status' national human rights institution (NHRI) in recognition of its independence, powers and performance.

The Commission has been given powers by Parliament to advise Government on the equality and human rights implications of laws and proposed laws, and to publish information or provide advice on any matter related to equality, diversity and human rights.

Introduction

Access to accessible, affordable transport underpins individuals' ability to participate in all aspects of social and economic life, and to live independently.

In our 2017 review *Being Disabled in Britain*¹ we noted that disabled people continue to face a number of issues accessing transport services, ranging from the physical design of transport modes and stations to attitudinal and psychological barriers experienced as a result of poor staff training and knowledge. We recommended that the rail industry undertake more work to improve the quality and consistency of assistance it provides, and noted that the Passenger Assist scheme required further improvement to ensure it meets the needs of disabled people .

We made similar recommendations in our report to the UN Committee on the Rights of Persons with Disabilities in 2017², proposing that the UK and devolved governments ensure that public transport staff are equipped with the skills and knowledge to assist disabled passengers; that trains provide accessible real-time travel information; and ensure that accessibility is built into infrastructure and planning processes. The UN Committee expressed similar concerns and made a number of recommendations along the same lines³.

Our recent state of the nation report *Is Britain Fairer? 2018*⁴ sets out too how transport services are at risk of becoming increasingly inaccessible to disabled people and older people, particularly because of a lack of proper planning in the design and delivery of transport services. As such, access to transport has been identified a potential priority in our draft new Strategic Plan, which will be published shortly.

¹ <https://www.equalityhumanrights.com/sites/default/files/being-disabled-in-britain.pdf>

² <https://www.equalityhumanrights.com/en/publication-download/disability-rights-uk-updated-submission-un-committee-rights-persons>

³ https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GC/5&Lang=en

⁴ <https://www.equalityhumanrights.com/sites/default/files/is-britain-fairer-2018-pre-lay.pdf>

Summary

We welcome the ORR's commitment to improving passenger experiences and outcomes, particularly the commitment to improving the quality of information available to disabled passengers; raising awareness of available assistance and routes to redress when things go wrong; improved staff training; and greater involvement of disabled people in the development of policy and staff training. This approach will support disabled people in the realisation of their rights to accessible services and to live independently as part of their communities, as set out in Articles 9 and 19 of the UN Convention on the Rights of Persons with Disabilities⁵.

We note that the draft guidance clearly sets out relevant legislation, including reference to the Equality Act 2010 and the Human Rights Act 1998. We welcome this clarity.

However, we consider that there is insufficient emphasis on how section 20 of the Equality Act 2010 (the reasonable adjustments duty - see below) affects train and station operators, and recommend that the guidance is revised to provide greater detail on how transport providers might meet this duty.

Equality and human rights

All public authorities in Britain including the Office of Rail and Road and Network Rail have obligations under the Human Rights Act 1998 and the Equality Act 2010. Regulators such as the Office of Rail and Road have a particular responsibility to help ensure that their sectors meet these obligations.

Complying with obligations under equality and human rights law is not only a matter of legal compliance; it enables public bodies and service providers to deliver good quality, appropriate and accessible services to all customers.

⁵ <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html>

How the Equality Act 2010 relates to transport

Train and station operators have specific obligations under the Equality Act 2010.

The Equality Act 2010 protects individuals with protected characteristics, such as disability and age, from discrimination and promotes a fair and more equal society. There are specific provisions which relate to transport service provision for disabled people⁶.

Section 20⁷ of the Act also places a duty on transport service providers to make reasonable adjustments. This applies to the way vehicles are operated, for example, by requiring train or station staff to assist a person with a mobility impairment in getting on and off a train, or by a bus driver telling a visually impaired person when they have reached their stop. It may require a service to be provided in a different way.

The duty to make reasonable adjustments also includes providing auxiliary aids and services, such as hearing loops in stations, information in alternative formats, and ramps; these may be reasonable adjustments and, if so, the transport provider must provide them.

In addition, section 149⁸ of the Equality Act 2010 requires public authorities and those exercising a public function to comply with a general duty to **have due regard** to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between different groups
- Foster good relations between different groups

How the international human rights framework relates to transport

⁶ <https://www.legislation.gov.uk/ukpga/2010/15/part/12>

⁷ <https://www.legislation.gov.uk/ukpga/2010/15/section/20>

⁸ <https://www.legislation.gov.uk/ukpga/2010/15/section/149>

Accessibility is a precondition for independent living and the full inclusion and participation of disabled people, and to enable them to enjoy all other human rights, including rights to work, rights to education, and rights to leisure and recreation.

There are a number of provisions within international treaties which either relate to, or can be applied to, the topic of transport. These are, in particular, Articles 9 and 19 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

Article 9 - Accessibility

UNCRPD Article 9⁹ requires States Parties to ‘take appropriate measures to ensure’ disabled people have equal access to ‘the physical environment, to transportation, to information and communications...and to other facilities and services open or provided to the public both in urban and rural areas’. This could include ensuring private providers consider accessibility issues, implementing accessibility training, and providing information in accessible formats and assistance when accessing services. As with s.20 of the Equality Act 2010, obligations around accessibility are anticipatory: that means the state and its agents need to take proactive steps to provide accessible services rather than wait for requests.

Article 19 - living independently and being included in the community.

Although UNCRPD Article 19¹⁰ on independent living does not explicitly refer to transport, it is clearly of central importance to achieving this right. The UN Committee on the Rights of Persons with Disabilities has made it clear, through its authoritative interpretation of Article 19,¹¹ that access to transport is a key part of ensuring that disabled people have choice and control over all aspects of their lives in order to enable independent living, and for full and effective inclusion and participation in all areas of life on an equal basis with others. Article 19 says that States Parties ‘shall

⁹ <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html>

¹⁰ <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-19-living-independently-and-being-included-in-the-community.html>

¹¹ CRPD (2017), ‘General Comment No 5 on Living Independently and Being Included in the Community’. Available at: https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GC/5&Lang=en

take effective and appropriate measures to facilitate full enjoyment' of this right by disabled people.

Accessible Travel Policies

We welcome the proposal to rename Disabled People's Protection Policy to Accessible Travel Policy as we believe this will increase awareness of the support available to passengers with a range of impairments, and make support relevant to those who do not necessarily identify as disabled, but who may require assistance.

We also welcome the proposal to simplify and streamline the passenger leaflet so that disabled and other passengers have the necessary information available to them, and in a variety of accessible formats.

However, we believe that the passenger leaflet should make it clear to travellers that there is **no requirement to use the Passenger Assist scheme in order to travel**. The Commission believes that by relying on Passenger Assist alone, train and station operators may not be fully meeting their obligations under s.20 of the Equality Act 2010.

This emphasis should also be picked up in the policy document.

'Turn up and go' versus Passenger Assist

The Commission believes that spontaneous travel is fundamental to the rights of disabled people in realising their right to independent living, under Art.19 of UNCRPD.

While Passenger Assist provides a valuable service, and the proposals in the guidance will undoubtedly assist in improving and streamlining the provision of assistance to disabled passengers, we believe that **additional emphasis should be placed on the operator's duty to make reasonable adjustments, and to ensure that passengers are not led to believe they must only rely on Passenger Assist as standard when travelling.**

We note from the consultation document that a mystery shopping exercise by the ORR into passenger experiences of 'Turn-up-and-go' (TUAG) services revealed that 86% of participants were either very or fairly confident about TUAG in future. In contrast, 70% of potential users of Passenger Assist were either unaware of the scheme, or knew little about it. As such, we agree with the proposals to raise awareness and would be happy to support the ORR, the Rail Delivery Group and industry in delivering this activity.

We know that the majority of stations in London work as TUAG and believe that if operators fully meet their duty to make reasonable adjustments, a service much closer to TUAG as standard will be possible at mainline stations. **By encouraging train and station operators to meet the duty to make reasonable adjustments, the guidance can support disabled people's right to travel independently.**

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Essex County Council
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

“Inclusive” as a term reflects wider than disability. The term would extend the policy to other demographics including (but not limited to) race, sexuality, age and socio-economic cross-sections, under the Equality Act 2010.

“Accessible” is traditionally connected with disability, although has less connection to the Social Model of Disability.

It is for this reason that “accessible” is preferred, although perhaps “Accessible and Inclusive Travel Policy” might please most people. However, the title is must reflect and be consistent with the content.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- A) The commitments to passengers must reach further than before and during a journey. For example: leaving the station is missing from the journey experience – which can be an emotion point for people, especially if greeting loved ones or a journey has gone wrong. Information about planning the exit, such as taxi, bus etc should be included.
- Different stages of a journey will be different ‘trigger points’ for different people with different disabilities. One leaflet will not cover all eventualities. We would recommend that an industry-led customer focused piece of work could deliver something that covers the 80% of common issues, whilst recording the 20% and identifying any potential opportunities to provide ‘what to expect’ information.
 - The leaflet should be connected with the elements of redress which is further covered in this consultation to ensure consistency.
- B) Making Rail Accessible – we agree with the proposals within this element. The title should be understandable to users with a learning impairment as well as those who are older or irregular travellers. “Accessible train journeys” or similar might be a good alternative. The eventual title should be tested against the contents with all groups of customers (primarily older and disabled people) to find which title would align with the content to enable easier recognition and greater take up.
- C) We would also ask that the net is cast a little wider to ensure that rail travel is accessible to all with a flexible approach, reflecting individual needs and choices.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

The rolling stock or station specification is not a policy element or even something that a rail operator can easily influence. (A policy will state what outcomes an operator will achieve, rather than important information that a customer or groups of customer might need to know.)

The consultation recognises the value of an online database of accessibility and functional features of stations and rolling stock. We would prefer that a single point of information should be made available online, managed by the relevant TOC or ROSCO and integrated into the National Rail Enquires website.

Where this is a new requirement outside of the current licences, this should be properly funded to ensure that it is designed to be accessible and fit for purpose, as well as able to be converted to print where appropriate. We would also like to encourage the data to be made

available to third party applications and websites as a commercial API, to enable technology to disseminate the information to customers in accessible ways.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We welcome consultation and feedback with passenger panels, accessibility forums and local user groups. We agree that this should form part of the 'DPPP' design and review process. We would stress that there is a need for consistency and continuity across the network.

2.36 – third bullet point: New operators may not have access to the same accessibility groups that an incumbent has. This could be overcome if the work was overseen and supported by RDG, who could ensure that such work was available to franchise changes etc. We would encourage incumbent TOCs to use a generic data agreement to allow representative disability group details to be shared with new operators when bidding for a franchise or concession.

2.40 – The proposition for reducing timescales does not take into account other operational issues at either the TOC or ORR which can occur. We would recommend keeping it 8 weeks and reviewing the internal processes to ensure that the overall review can be done properly and considered to ensure that any amendments deliver improvements. We would suggest looking to SixSigma values for any process improvements.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The classifications don't mean much as "category A, category B" etc – some stations will have different levels of access in some areas more than others – for example a category A station might not have a changing place, which for some disabled people are essential, whilst a category B station could have a changing place.

It should be considered that the accessibility criteria could be a lot clearer and easier for disabled people to understand. We would ask that this is properly considered before implementation.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

The mandatory checks would reasonably be expected by the customer to already happen. Instead it is left to the customer to ask the advisor about the accessibility or research this themselves. There is a question about if the checks go one step back and be integrated into the NRE booking engine, which would provide information at point of journey investigation.

There is a separate question about the information available and how, strategically, this could improve journey experience and grow trust. Ultimately, if the information is available to both assistance booking agents and customers, more people could benefit from better information as they can understand the journey they'll be taking before they book tickets.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We have considered that some of the actions are basic and some needs to be a bit more pragmatic. For example, one area not involved is around the emotions of a journey, which should be properly considered as part of the development.

Examining this, there are four stages of the journey means you have different expectations for each part of the journey from staff and the TOC. The expectations range from proactive (locate your customer to deliver help and support) through to exception-based (only contact if their journey changes and they then require support).

For example:

- Journey assistance – where does it start vs where *should* it start?
- Journey assistance – where does it stop vs where *should* it stop?
- Different actions according to different station types/categories

We would suggest that each stage has its own communication and support profile which could then inform the guidance and what should be included. Development of this should lead to a single version which is applied across all TOCs. It should be properly funded through ORR work as such guidance is complex.

Looking to the customer expectations and managing these, there are some questions around what is reasonable and what is realistic for a customer to expect. This should be completed in conjunction with the above.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Such processes should be mandatory. The individual processes should be set as standards to achieve and the method of delivery left to the rail operators to determine collectively, to enable processes to be developed within their own systems and capabilities.

It should be noted that the “no call” option leaves an opportunity of risk that a person will be left on a train (opportunity for assistance to fail) as staff will not have the time to check the entire train if a customer could be in multiple locations. Seat reservations should not be trusted as a definitive location of customer either – many ambulant customers report time and again that they might be advised by departure station staff to sit elsewhere, they are difficult to read and sometimes electronic systems fail, reducing the customer experience.

Telephone calls could be replaced by digital technology in the future – there could be investigation of integrating this to a standard system such as Genius or the Passenger Assist solution.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This already exists in the form of a single phone line in to a rail station. A dedicated number will add complication.

The process could be left to the operators to improve and instead form part of a strategy and inform an amendment to policy.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

It could be observed that the content of the proposals is often interpreted differently by TOCs, although with many operators around 9 of the 10 points are already covered in most training. Consistency is important and a centrally owned and derived basis would enable a disabled-person led ‘syllabus’ to be built.

We are unsure of the importance of the Railway Regulatory Framework and its involvement in training to frontline staff. We would like further clarity on this.

Hidden disability is recognised as an issue within the proposals and expansion on better understanding learning, emotional, mental health and sensory disabilities is welcomed.

We believe that refresher training should include ‘desk-based’ delivery rather than class room, which could speed up training delivery to large train operating companies. We understand

“every member of staff” to start from the Chief Executive down and ask that this be better clarified within the outcome to this consultation.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Having examined the numbers of staff within a typical TOC, we consider that two years to deliver refresher training to a large number of staff would be unmanageable. Three years is also quite tight but more palatable to TOCs.

Any training packages should be developed in conjunction with disability professionals and supported by life experience to inform staff. There could be questions about funding development of this training, which should be resolved by the ORR and DfT.

We would anticipate that refresher training should be tailored to reflect the common elements around service delivery to customers with additional needs as well as focusing on areas of improvement within a TOC. We would also welcome periods of championing awareness topics on a rotating basis, to continue the knowledge update with staff.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We would like to understand how many people who hold DPRC do or do not use pre-booked assistance each time they travel before reflecting fully on this question, or if there is a better avenue of promotions.

We consider that as part of the outcome, any stipulated promotion should be properly funded. And adhere to DfT and any subsequent strategies.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We welcome this and indeed this already happens in Essex. Essex County Council are members of the Greater Anglia Stakeholder Equality Group. Alongside this we facilitate the Options for Independent Living Transport Group (Rail), where C2C, Greater Anglia and TfL Rail (MTR) attend and meet with representative users in Essex.

We have a history of strong positive working relations, which have lead to examples such as:

- Development of “please offer me a seat” badges for those with hidden additional requirements
- Targeted communications about lift improvements, ensuring infrequent and regular travellers are aware of when works are being carried out
- Try a train days over the past 15 years, encouraging people with disabilities to use the train and build their confidence.
- Updating members about the progress of the PA App

We will continue to remind our members about the Passenger Assist service, although many have commented that they prefer to travel on a turn up and go basis due to their own work requirements.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

We feel that the current NRE website is quite cluttered and unappealing to users, especially those who might struggle with complex information. We therefore would welcome a more responsive and compliant website. Any information should be consistent with local franchise rail operators. Above all, it should be clearer and in easy read

Any station or journey maps should be integrated to information and work with screen reading software. We would suggest that it should be properly tested by a provider such as the Shaw Trust.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

The proposals lack strategy of how it could be realistically and reasonably implemented. The timescales are incredibly optimistic when managing such a wide scale implementation.

Customer expectations should also be managed accordingly – and interlinked with the redress solution. The cost of implementation should be properly budgeted for and any existing franchise obligations need to be considered

We would stress that many rail users with disabilities would still prefer “turn up and go” though – true equality.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Key issue is the range of assistance notice operators request, which makes phasing anything in difficult.

The range of stations without staff also make the two hours notice an issue. One way to overcome this might be for drivers to assist where required (like in Europe). We recognise the challenges with this and ask that the ORR, RDG and DfT work together to examine a way in which this could move forward.

The Passenger Assist Technology must be rolled out before any reduction is phased in.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We believe that any different modes of train operation shouldn't mitigate the assistance provision requirements of a TOC.

The DPPP should state the outcomes to be attained and standard processes developed by TOCs to ensure complete compliance. Success and failure should be properly and adequately recorded.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Any form of redress should come under 'delay repay', normalising the exceptions to ensure a quick response, rather than making a separate process. The crucial piece of this is how it is communicated to customers.

The value of redress should be developed by the industry overall and be identical between operators so that the customer knows what the outcome will be. The ORR should approve the final processes and values, with consistency across all TOCs. Where there are multiple TOCs involved, there should be a clear process for managing a redress across a journey and agreed prior to commencing.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We agree that a solution such as NGT should be implemented. The hearing impaired and deaf community must be properly consulted though to identify the best way to implement this alongside wider ways to communicate issues during a customer's journey – such as a train being cancelled due to failure during its journey or changes to service.

Other channels for communication should be considered, including WhatsApp, Facebook Messenger, SMS and Twitter. NGT, whilst being a suitable tool, is not always the preferred method of communication for deaf people.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

The proposals would require stronger partnership working with the licencing authorities and TOCs to enable better alternative transport. There is no legal requirement for this and TOCs cannot easily influence changes.

One alternative might be to agree methods of 'more accessible' transport, such as low floor buses or tail-gate lift equipped mini buses. There might also be an opportunity to work with Community Transport schemes or equivalent small vehicle operators to ensure that alternative transport is suitable for the customer.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

This is a common sense approach which relies on staff being in the same place each time. The way in which staff are contacted should be further discussed and designed by TOCs to be identical across the network whilst being simple for all customers – perhaps a remote doorbell at a meeting point that can connect to a nominated member of staff as one solution?

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Mobility scooters are available in two forms – class 2 and class 3 vehicles. The categorisation of scooters as “small”, “medium” or “large” is misleading.

The issues have arisen from an unregulated retail industry selling mobility devices without the proper and full education to the customer. Therefore we would suggest the following should be adopted:

- The Rail Delivery Group (RDG), RSSB and Mobility Scooter manufacturers work together to identify a kite-mark scheme
- The RSSB agree the requirements for travel, such as folding or the customer not travelling in the scooter if it is not crash tested.
- TOCs agree a process to educate customers, with RDG support
- This is then expanded to other medical support aids such as rollators or hand-bike attachments on wheelchairs.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- **a) passengers do not purchase tickets they cannot make use of; and**
- **b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

A)

The question around tickets that cannot be used focuses on First Class travel, although there may be some journeys that will result in a customer being onboard a train that is too long for their destination station platform – Chiltern Railways loco-hauled services from Marylebone to Kidderminster are an example of this.

At the core, any data provision needs to be contained within a national data system and owned by a TOC before it can be implemented. The logical area for this would be National Rail Enquiries. We would suggest that this should be properly examined and costed by RDG before a proper decision is taken.

b)

This information could be communicated through TOC control systems, although there are questions of how up to data information might be. It requires further investigation by TOCs to identify the best ways to do this, as well as identifying a method of opportunity to remedy issues.

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Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

There are many examples available around with UK within the TOCs. For example, Greater Anglia run a successful Stakeholder Equality Group and offer integrated video assistance within their TVMs.

Good examples should be requested from the TOCs as well as the public and made available through a knowledge base.

Q25. Do you have any other comments or views on improving Assisted Travel?

Many of the aspirations within this document are laudable and the right thing to do. There remains a question about a strategy for delivery, ownership of that strategy and the costs of the delivery.

We would like to see a coherent, industry owned and supported strategy that can deliver a meaningful change, as well as a properly managed delivery of outcomes.

Thank you for taking the time to respond.



Marcus Clement
Head of Consumer Policy
Consumer Policy Team
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

By email: DPPP@orr.gov.uk

11 January 2019

Dear Marcus,

Re: Grand Central response to consultation on Disabled People's Protection Policies

Thank you for your email dated 14 November 2018 in respect of the above. We appreciate the opportunity given to review and feedback on the proposed content and are keen to work alongside you to ensure that the information published adds value to all parties concerned.

In terms of the consultation documents provided, please see below our response on behalf of Grand Central to each question raised;

1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

We believe that moving to an 'Inclusive Travel Policy' or 'Accessible Travel Policy' is a positive move as it uses customer focussed language that is reflective of changes to legislation, recognising that disabilities are wide ranging. We have assumed that the above amends the terminology of the collective reference to the passenger leaflet and policy document noting that Appendix A states that the title of the customer facing document is to be determined following consultation. Consideration should be given to how this may affect passenger awareness of a well-established name if "Making Rail accessible...." is no longer used. There would also be additional print costs incurred to

operators in updating references to this document from material such as Passenger Charters and posters, if these required any amendment at the same time to reflect the change in title; otherwise there would be inconsistent terminology in use for a period of time.

Alternatively, to provide further clarity for customers, the documents could be renamed to 'Accessible Travel: Customer Guide' and 'Accessible Travel: Policy' which would replace the Making Rail Accessible and DPPP respectively. This would clearly signpost the purpose of each document, under a common banner.

Franchise Agreements for franchised rail operators may also need to be amended to reflect the change in document and agreement to the change will need to be granted by the Secretary of State for Transport.

2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

a) Is there anything you consider is missing from the required content?

b) Is this still a meaningful title for this leaflet?

Grand Central is supportive of making the current passenger-facing document more user friendly and agree that including all the current material, in print, is a barrier to customers using it and operators maintaining an up-to-date and accurate source of information. We do not believe there is any required content missing from your proposal.

However, the information that will be removed remains important and should be readily accessible for customers and rail staff. We therefore suggest the document signposts readers to the relevant section of the operator's website (or advice to another appropriate way of obtaining further information), as a means to achieving this and creating standardisation across the industry.

The requirements within the draft guidance document that Crystal Mark accreditation for plain English is obtained is a positive step in ensuring the content is written in a passenger focussed way, and this approach is already adopted elsewhere within the Arriva Group.

We are supportive in maintaining the existing title of the passenger-facing document as it is both effective in describing its purpose and audience and is familiar to existing rail users, though we note the possibility of an alternative, 'Accessible Travel: Customer Guide' as outlined in point 1.

3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We are supportive of this change to ensure the passenger-facing document remains user friendly and information up-to-date providing that adequate signposting is provided to where this information can be located. It is worth noting that information about trains and stations can change frequently and so we should consider that this information should be provided via online links only as printed material can quickly become obsolete. The online location of this (and all other accessibility information) must be consistent across operators to ensure ease of access.

4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We are supportive of any improvements that streamline the process of maintaining up-to-date DPPPs and welcome the inclusion that minor and immaterial changes to the existing document will not require approval. However further clarification of the components of the approval and review process would be welcome; for example, who decides if it is not possible to incorporate feedback from local groups? Greater clarity of each stage of the approval and review process would assist operators in ensuring sufficient time is afforded when updating their documents and there is transparency of the pathway to approval.

In respect of franchised operators and new licence applications the timeframe between award and franchise start date must be a factor in whether a new DPPP can be submitted for approval 10 weeks before the start of operations. This is particularly important when considering whether it is feasible to carry out consultation with some of the suggested local groups which may not yet have been formed i.e. passenger panel and accessibility forum. A possible alternative in this scenario would be for the operator to maintain the commitments in franchise agreements and within the existing DPPP for the first franchise year until an appropriate consultation can be carried out.

5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The terms included within the classifications are generally accepted within the industry and it is therefore sensible to adopt this approach. However, it is important to make the distinction that whilst access to some platforms from the street may be step-free, access between the platform and train may not be accessible, even with a ramp, if the gradient is too steep. We would therefore welcome clarification within the classifications that where step-free access between the platform and train interface cannot be achieved that those platforms or stations are categorised as D or E with an appropriate explanation in knowledgebase. If there are plans in the future to amend the classification terms for step-free access, then there must be an approval process in place for agreeing those changes.

6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

The proposed changes need to be delivered via a systematic process of improvement and the accuracy of NRE Knowledgebase, including agreed processes for inputting short notice updates to station accessibility, should be the priority before approaching what and how mandatory checks are carried out during the booking process. Once there is certainty of the accuracy of available information then trigger points during the booking process would be a sensible approach to ensuring that booking agents check accessibility information whilst maintaining a personalised conversation with the customer. Ideally the booking system should alert an agent to any accessibility restrictions during the booking process based on the requirements of that individual customer and we would welcome development of the new Passenger Assist system to include such checks.

7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

A pragmatic approach to guidance should be taken to reflect the variances in the station and on-board experience across the UK and it should be recognised that best practice in this context may not apply in every scenario and may even cause the passenger confusion and therefore, we believe 'good practice' would be a more appropriate description of this guidance. As the proposal includes adding guidance to the booking confirmation, a link to tailored information that is relevant to the operators delivering the assistance for the booked journey would enable advice that is appropriate to that journey to be provided.

8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

In principle we support the idea of introducing an assistance handover protocol to ensure robust delivery of passenger assistance, particularly for un-booked assistance and confirming the passenger's location on the train when there is no booked seat. As part of the Arriva UK owning Group, we are pleased that our colleagues at Northern are trialling this process and providing feedback to ensure the system is deliverable before any industry wide adoption.

There are several practicalities to test, such as how the process would operate at unstaffed stations where the handover is carried out to on-board staff. The input of front-line staff regarding deliverability is essential to this being successful. A pragmatic approach to the protocol has been taken with handover calls the exception rather than the rule in every case; however greater clarification regarding the process at times of disruption or the passenger travelling on a different train to that booked requires further

exploration and testing.

9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

The trial of the assistance handover process should highlight whether a dedicated assistance line is necessary and for which categories of station this is required. Clarification is also needed on what stations are classed as Mainline. As the delivery of assistance across UK rail is not a one fits all solution the mandating of a dedicated assistance number as a one fits all approach may not be appropriate in these circumstances. The practicalities, in particular of providing a dedicated number for unstaffed stations, requires further consideration, as in many cases the on-board staff will be responsible for meeting the customer's needs and therefore the handover protocol can be achieved by staff communicating in person. Situations where a station is part-time staffed needs further consideration as it would appear impractical to some degree to provide two numbers (a direct line to the station during staffing hours and an alternative number outside of those hours). Further clarification of the actions required by staff managing this number are required, particularly in the event that the receiver of the call may not be located at the station.

10. What are your views on our training proposals? Do you agree with the proposed outline content?

We understand the intent towards proposing training elements as it is important that customers are assured of a base standard of service and assistance irrespective of the operator whose services they use. Each train operator does however provide variances in its service delivery based on the market they serve, the trains they operate, stations they manage/call at and the unique needs of those customers. We therefore believe that in the event that elements of training are mandated this should be output based rather than prescriptive content to enable each operator to tailor their training package to their customers and operations.

Whilst it is important to keep staff appropriately re-briefed on changes in legislation or customer needs, mandating classroom-based refresher training every two years will create challenges. This includes ensuring that all staff can be released from duty for an additional training session whilst also ensuring the timely delivery of that training. Technology can play a key role in refreshing staff competencies and knowledge and we believe that in many cases e-learning could provide an efficient, timely and measurable record of that training. Appropriate consideration should also be given to how refresher training can be delivered on the job through manager and employee one-to-ones.

11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

We note that in other areas licence holders are typically required to ensure that staff are competent in the duties they are employed to undertake, rather than specific training or retraining intervals being mandated by the regulator.

The proposed two-year timescale for training to be revised and subsequently approved by ORR and delivered to all staff is likely to be challenging for operators to achieve and detailed analysis of existing training commitments will need to be undertaken to determine whether this is achievable within each company's existing resource plan, without negatively impacting service delivery. The long-term impact of staff being released from duty for training will also require analysis on the basis of the current proposal that all refresher training is classroom based every two years. We suggest that ORR discusses the impact and likely timescales on an individual basis with each operator.

The focus of training should be a combination of priority areas for improvement, to ensure consistent industry standards, with the ability for tailored local priorities to be included. Standardised training outputs should focus on ensuring the delivery of a consistent experience for customers who need extra support across the industry, with refresher training focussing on legislative updates and local initiative developments, which could be efficiently cascaded during existing briefing cycles.

12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We support increasing customer awareness of the Passenger Assist service operators can provide as outlined in the consultation and RDG leading the promotion at a national level to deliver a UK wide media campaign. We believe increased awareness will ultimately lead to an improved and safer service for customers who need extra help. An option to prompt staff to enquire if assistance is needed for a Disabled Railcard holder could be achieved through an opt-in check box on the railcard where the customer can indicate that they may require assistance all or sometimes when travelling. This would act as a prompt to staff whilst also avoiding asking customers when it may not be welcome.

The approach to promoting passenger assistance should be taken in co-ordination with the other areas for improvement the industry will be working towards. For example, it is important to prioritise improvements to the reliability and delivery of assistance to customers already using the service before targeting more customers and risking failure

to meet those needs.

13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We are supportive of the proposal to require operators to work with local authorities, service providers and disabled access groups; however, it is unclear why this needs to be mandated. Across Arriva train operators many activities of this nature already occur, and Grand Central only plan to strengthen and expand our activities in this area. We believe that engaging disabled people in the design of our service and testing ideas with them can only ensure that we deliver a better and more reliable service that adds value to our customers' journeys. Operating businesses may need time to review their organisational capabilities to ensure that they are resourced and structured in a way that enables the ongoing engagement activity outlined in the consultation document.

14. What are your views on the proposal for more prescriptive website requirements?

In principle we are supportive of the proposals outlined in the draft guidance document and in ensuring that all operator websites comply with W3C standards to ensure that customers with disabilities have easy access to the information they may need to plan their journeys. Operators will need time to review the content of their websites and accessibility standards with their web developers to identify any steps they may need to take to meet the requirements of the guidance document.

15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

As an aspiration we are supportive of reducing industry timescales for pre-booked passenger assistance as this will lead to customers having greater flexibility and opportunity to travel in the certainty that the industry can meet their needs. There is a need to ensure that the current technology underpinning this system is updated before any changes can be made, such as the introduction of a new passenger assist booking system, and also ensuring that the National Reservation System can support seat and wheelchair spaces being booked within the same timeframe and honoured on board the train.

The ability for each operators passenger assist booking team to meet any of the timescales proposed is currently very limited and, if as the consultation suggests, the aspiration is to reach a point where each operator's team is open for those hours then the practicalities of eventually reaching a 2 hour booking window would mean that each booking team may need to operate 24 hours a day. Our own insight indicates that very few calls are made past 2000hrs each night, and even less following 2200hrs. A more pragmatic approach may therefore be for calls after a certain time to divert to a

centralised call centre or one of the operators whose existing contact hours meet those needs.

In the event that the aspiration is for each operator to be able provide a passenger assist team beyond their currently resourced hours then taking the opportunity to build this into future franchising requirements would be the most appropriate route.

16. How do you consider any reduction might be phased in? If so, how might this be implemented?

As outlined above the first steps needs to ensure that systems and technology underpinning the passenger assist service are aligned to meeting any reduction in timescales. Following this, dependent upon the booking timeframe to be delivered, each operator will need to undertake an assessment of its existing resource capabilities to ensure it can meet the needs of customers' booking assistance, particularly at locations where assistance is delivered by mobile staff. With technology and the right level of resource in place then an aspiration to reduce the booking window will be deliverable. We are supportive of a common standard for pre-booked assistance to support promotion and awareness to customers of the service the industry can provide.

17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

Grand Central do not operate any services where there is not a second person on-board the train.

18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Grand Central prefer to treat each customer as an individual and therefore by mandating any redress scheme, we lose our ability to do this with the customer-service focus which is intended. By stipulating that customers must be compensated for an assistance failure (once determined what failure means to each customer and the impact this has had on the individual), it then gives the impression that we are issuing redress because we have to rather than something we have chosen to do in recognition of the experience received.

The vast majority of other operators already compensate customers where it is felt it is appropriate as this is the 'right thing to do' from a customer service perspective and so if there is an issue identified where an operator has not demonstrated good levels of customer service then this should be raised directly with that operator or owning group as part of the ORR quality monitoring and regulatory processes.

In proposing mandatory redress for assistance failures there are a number of factors to consider:

- 1) **Doing the right thing:** The focus of managing an assistance failure complaint must be to ensure the customer has confidence to continue to use rail in the future. Compensation can be a means to supporting an apology but in isolation it will not restore confidence and trust and should therefore not be prioritised above taking action to reduce the failure reoccurring.
- 2) **Responsibility:** The vast majority of customers want assurances that if there is a failure in the delivery of passenger assistance that an appropriate investigation is carried out to identify the cause and mitigate it from occurring again. The failure of passenger assistance can be caused by the operator booking the assistance, the operator delivering the assistance, the operator responsible for keeping accessibility information up to date, by third parties (such as a failure of a taxi company) or a combination of the above. Grand Central's focus first and foremost is to always ensure that the cause of failure is addressed, working with any third party to address this where appropriate.
- 3) **Managing Expectations:** The severity of a passenger assistance failure will inevitably differ according to the passenger's needs. For example, at time of disruption or peak demand assisting staff will prioritise the assistance needs of a customer using a wheelchair or a customer with a hearing or visual impairment above a customer with luggage assistance, who may be asked to wait. Managing expectations around what comprises a failure and to what degree requires further clarification.
- 4) **Level of redress:** You have highlighted within your consultation that a customer may already have a right to compensation under the Consumer Rights Act for a passenger assistance failure which sets out the route to redress and potentially a full or partial refund. A customer may also have rights under the Equality Act. Agreeing what an appropriate level of compensation is, should be determined by the operator, in discussion with the passenger, following an investigation being completed, based on how that customer has been affected and the particular facts of that case. In our experience passenger assistance failures are very context and fact specific which may present challenges in setting prescribed limits. Further the establishment of the Rail Ombudsman now allows for a customer to escalate a complaint if they are not satisfied without having to resort to court proceedings.
- 5) **Consistency:** For any compensation process to operate fairly all operators identified in point 1 above would need to agree to accept liability for compensating the customer if they caused the failure in assistance delivery.

19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We support the proposal to move towards accepting calls via Next Generation Text Service as a step forwards from the current text phone system. Consideration must be given to existing technology arrangements and the impact this may have on implementation timescales when evaluating when this may be effective from.

20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

In principle the proposal to increase the availability of accessible alternative transport, particularly accessible buses and coaches is a positive step as it both reduces disruption and inconvenience to customers with mobility impairments and manages costs to the operator. The reality however is that the industry is dependent upon the vehicles approved operators have available at that time, which when procured for unplanned disruption may be more limited than when planned in advance for improvement work. The ability to provide a consistent customer experience is also important as it may not be possible to ensure that all vehicles are accessible on a particular date. This can lead to uncertainty for customers regarding the services they can use and those requiring alternative accessible transport to be ordered for them. If this is not known in advance it could lead to unexpected delays at the station for the customer whilst this is arranged.

The availability of accessible vehicles (including taxis), particularly in rural areas, is often extremely limited and we work hard to procure transport as quickly as possible when required. In reality, our powers are limited to increase the availability of accessible transport beyond actively working with existing operators to provide a service as quickly as possible to those customers when it is needed. Our priority is and always shall be to ensure that no customer is stranded, even if that means arranging separate transport for that individual.

The ability to require drivers of rail replacement buses, coaches and taxis to be trained to provide appropriate assistance could be included where contracts are renegotiated where this is not already in place.

21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

As highlighted in your consultation document help points are available at almost three-quarters of stations. In addition, a number of these help points may only currently provide automated information and help points may not be installed on every platform. Therefore, there may be a sizable gap filling process to achieve a consistent approach across the rail network.

With regards to a Freephone number, on a practical level this would need to be available from first until last train service, and currently most operators contact centres do not provide an aligned service. Advertising a Freephone number for the operator's team who answer help point calls may be an alternative route but there could be issues regarding this number being used inappropriately. A more suitable alternative could be to promote the availability of the National Rail Freephone passenger assistance line or National Rail Enquiries.

22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Focussing initially on the capability to carry scooters there currently remain restrictions to rolling stock (due to there not being a sufficient turning circle or space on board) and stations (due to the ramp gradient between platform and some rolling stock) that prevent a consistent approach being adopted and it would be pragmatic to enable rolling stock changes to first be completed before moving to a presumption of carriage across the industry.

Secondly, we would support an education campaign focussed on how customers should safely use their scooters across the rail network and what to expect on-board; for example, to transfer to a seat and not occupy the wheelchair space.

Whilst some operators do have a permit scheme in place, we would be supportive of an RDG led collaboration with scooter manufacturers to introduce a 'safe for rail' accreditation sticker on scooters that can be transported on all accessibility compliant rolling stock. This would enable a consistent, industry wide approach to be adopted, where restrictions on carriage would be limited to the combined weight of the passenger and scooter and ramp gradients.

23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not unknowingly purchase tickets they cannot make full use of; and**
- b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

Our ability within the industry to mitigate passengers from purchasing a ticket they cannot make full use of is constrained by the ticket type, purchase channel (including third parties) and variances in rolling stock. To deliver this information changes in how customer information is captured during the ticket buying process may be required (i.e. a prompt regarding whether an accessible toilet may be required during the journey) along with integration of systems and information as they are digitalised. We would welcome a collaborative industry wide approach to exploring how better information of this nature can be provided to customers when buying tickets from a wide range of operators and third parties.

With regards to informing customers when a toilet is out of order on-board the train, until all trains are digitalised to automatically report faults to other industry systems, we are reliant on staff becoming aware of the fault and reporting it to enable online information and station customer information screens providing an appropriate message. This means that it will not always be possible to alert customers before travel and this could lead to delays in alternative routes and transport being provided. It is also

worth considering the current range of information sources at stations across the UK rail network where not every station has a real time customer information screen or public-address system. Whilst this will inevitably be addressed over time the guidance document should reflect that these information systems will not be in place in the short term.

24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?

We welcome the examples of good practice you have identified and are pleased to report that many of these areas are already adopted by Arriva operating companies, or are currently being explored. Where 'may' has been used, in the revised guidance, examples of when you view adoption as not being a reasonable adjustment for an operator would be helpful. Some examples provided are achieved through digital enablers, and operators may not have the infrastructure in place within their existing franchise to support those outputs.

The example of best practice provided regarding Video Relay services is interesting and looking for innovation outside of rail should be encouraged. Whilst it should not be a barrier to offering this service further consideration of the possible operational hours should be explored as it may not be possible to access a BSL interpreter for the same timeframe as other contact channels.

Thank you again for this opportunity to provide consultation feedback and we look forward to working with you in improving assisted travel.

Yours sincerely,

Managing Director
Grand Central

15 January 2019

Dear Sir/Madam

RESPONSE TO THE ORR CONSULTATION ON CHANGED GUIDANCE FOR TRAIN AND STATION OPERATORS ON DISABLED PEOPLE'S PROTECTION POLICY

Thank you for providing draft guidance for review around Disabled People's Protection Policy (DPPP) for train operators. On behalf of Greater Anglia I provide our responses to the questions set out in the consultation.

What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

We support the move away from the current title and have a preference for Accessible Travel Policy.

What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

We wholly support the simplification of this document which is currently unnecessarily wordy. Much of the information a customer would seek out to assist them in their journey planning is lost amongst the detail. It would be helpful if the title reflected the Accessible Travel Policy although 'Accessible Travel: A Guide' may be more customer friendly.

This document should be kept simple and should offer signposting for further information in order that the pertinent information doesn't get lost.

We support the idea of providing alternative versions of these documents on request, the very low levels of requests for alternatives would suggest that production on demand would sufficiently satisfy any requests. Furthermore, the advancement of different technologies has meant that 'traditional alternative formats' may be less relevant than, for instance, more accessible websites.

What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We believe rolling stock information is of limited value to a customer who, for the most part, is not interested in what classification of train they may or may not board, they just want to know if they can make their intended journey. It's also possible that with the variety of units and routes that the information is only as good as when it was written and quickly out of date. Therefore we agree that it should either be in the policy document or online. Station information is more crucial for a customer, however. Often it is the qualitative information about a station that is important and the current table format doesn't provide that. The risk of doing so in a printed document is that it creates an unnecessarily large directory of information with limited value to the user (who may want details for one or two stations and not necessarily on the same network). We should be aiming to provide better qualitative information about accessibility online and signpost it in the documents and for consistency this should be same source for all TOCs - therefore a preference is to manage this through the RDG.

What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We believe the right approach would be to support a national panel to approve new documents in order to provide the consistency that our customers need. A customer should be able to pick up two different TOC DPPP's and, broadly speaking, read the same information in both. Reviewing documents locally would not offer this and potentially offer a completely different framework of evaluation.

Additionally, we consider the two week implementation timeline from approval to print to be an unreasonable target. Design, typeset, corrections, print and distribution are not feasible in this timescale.

What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

Consistent classification of stations would be beneficial for both TOC employees and customers for assessing step free accessibility. However, any categorisation system must be clear and unambiguous and the proposed system is complicated and lacks clarity. A simple categorisation with signposting to more qualitative sources would be more straight forward and would offer the benefit of including additional information which may be pertinent to someone for whom the accessibility of a rail service is more than whether it is step free or not.

What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

This is already standard practice within call centres. However, perhaps the lack of consistency of information (as above) is the limiting factor, so it does make sense to have that check and consistent approach as part of the booking process.

What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Guidance for passengers would be very beneficial so that all parties are clear on what is expected of them and what can be expected from the other. However, there will be a disparity amongst train operators because of staff levels and different operational models, so whilst we should not be using that as a reason to not provide the guidance, we do need to be mindful of the fact that many customers will not differentiate between operators and this may lead to an expectation v reality gap, so we need to be clear and realistic about minimum standards.

What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

We support a standard protocol which would potentially resolve some issues where Network Rail or another TOC are boarding a passenger and follow a different protocol. It is hoped that the Passenger Assist app would ultimately resolve these issues. In reality of course, a protocol already exists amongst station staff, but it is the human fallibility element which causes the breakdown and a protocol which doesn't accommodate this won't make any substantial difference. If a member of staff is particularly busy, unable to make a phone call immediately, caught up in disruption or even has cognition issues themselves then the assistance protocol may breakdown or be less consistently delivered.

What are your views on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Each staffed station currently has its own phone line, we don't believe adding an additional telephone line will bring any significant benefit. There are times when a member of staff may be conducting assists at the receiving station, other customer service duties or train dispatch and under those circumstances an additional phone line will make no difference to them being able to receive a call.

What are your views on our training proposals? Do you agree with the proposed content?

We support the introduction of a standardised training package across the industry which is developed by experts. A framework for modules and some signposting for resources and best practice would be useful and the content suggested would appear satisfactory. Given the subjective nature of some training methods (ie simulation glasses), some guidance on current acceptable methodology would be beneficial to aid consistency.

We believe training on accessibility is of real benefit to every member of staff regardless of level or job however the content of that training may vary and this needs to be considered when designing a course. We would also request some clarity on the degree of training offered to agency workers and contractors.

Do you agree that:

- operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?
- the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

We currently have a committed obligation to deliver refresher training every three years and consider this is a more achievable timeframe in which to balance the continual operation of the railway whilst delivering the many courses that are expected, particularly for front line staff. We would also support a multi modal approach to the delivery of refresher training which would enable far more flexibility for train operators with time and content.

What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We agree with the idea of assisted travel promotion through the RDG and will continue to support that message locally through our community engagement.

What are your views on the proposal for more prescriptive website requirements?

In principal we would support prescriptive requirements around language and location of accessibility information on websites to offer customers continuity. We would however need greater clarity on what 'prescriptive website requirements' actually means, if this is intended to have any major impact on design or functionality .

What are your views on the three options for reducing the notice period for booked assistance?

We are supportive of offering a more pragmatic approach to booking assistance for a customer and from this point of view feel that the 10pm option is more suitable.

How do you consider any reduction might be phased in? If so, how might this happen?

There are complexities and resource issues around any changes to call centre opening hours which may involve contractual negotiations. These unknowns prevent us from offering any firm suggestions for a phased process, at this point.

What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We currently have a mixed system of assistance provision for our services. For some areas it is via alternative transport, for others we have mobile customer service staff or dedicated station staff. We would continue to support a mixed system for our network.

What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Redress is something we're committed to offering customers already if their booked assistance has failed. In principle, we support mandatory arrangements. However, we believe this needs further work to ensure that its traceable, not open to fraud and that the perception of failure is agreed.

What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We are supportive of the introduction of text relay.

What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We cannot escape the fact that at times the industry needs to use alternative transport either during disruption or engineering works. When sourcing alternative transport we seek accessible vehicles where practicable. We are often limited by the availability of accessible alternatives and would welcome any proposal that improved that situation.

We strongly disagree however that train operators are required to assess other companies and their staff training as suggested in this guidance. We are supportive of the idea that we encourage our major contracts to conduct accessibility awareness training but question how this is supposed to be evaluated if a) we are not experts in accessibility training and b) there is no nationally recognised course in which we can assess them against. We feel it would be helpful if the ORR worked with other regulators to require those providers to have the same requirements for accessibility awareness.

What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We support the proposal that this information and its location (ie on a welcome poster perhaps) is standardised across the industry

What are your views on our proposals for the carriage of scooters contained in the draft revised guidance? Are there any other changes to operators policies on scooters and mobility aids we should consider as part of the government review?

We are supportive of the carriage of scooters however we need to be very clear what we can and cannot accommodate on board. We think it would be beneficial for the RDG to work with scooter manufacturers to create a classification system which dictates a presumption of carriage rather than a presumption of carriage for all scooters with exceptions.

**What are your views on our proposals to clarify the guidance to ensure:
a) passengers do not purchase tickets they cannot make use of; and**

b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

Obviously it is never our intention to sell a ticket which can not be used by the customer so we completely support the principle of the question and where possible we notify customers via CIS if, for example, toilets are out of service at the beginning of the journey or lifts are being repaired. There is a degree of complexity around reporting live information however we're hopeful that our new train fleet will deliver this sort of information.

Thank you for taking the time to consider these responses and we look forward to the outcome of the consultation.

Yours faithfully

Accessibility Manager

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Greater Anglia
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

“Inclusive” as a term reflects wider than disability. The term would extend the policy to other demographics including (but not limited to) race, sexuality, age and socio-economic cross-sections, under the Equality Act 2010.

“Accessible” is traditionally connected with disability, although has less connection to the Social Model of Disability.

It is for this reason that “accessible” is preferred, although perhaps “Accessible and Inclusive Travel Policy” might please most people. However, the title is must reflect and be consistent with the content.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- A) The commitments to passengers must reach further than before and during a journey. For example: leaving the station is missing from the journey experience – which can be an emotion point for people, especially if greeting loved ones or a journey has gone wrong. Therefore information about planning the exit, such as taxi, bus etc should be included.
- Different stages of a journey will be different ‘trigger points’ for different people with different disabilities. One leaflet will not cover all eventualities. We would recommend that an industry-led customer focused piece of work could deliver something that covers the 80% of common issues, whilst recording the 20% and identifying any potential opportunities to provide ‘what to expect’ information.
 - The leaflet should be connected with the elements of redress which is further covered in this consultation.
- B) Making Rail Accessible – this element makes sense. The title should be understandable to users with a learning impairment as well as those who are older or irregular travellers. “Accessible train journeys” or similar might be a good alternative. The eventual title should be tested against the contents with all groups of customers, regardless of access requirements. We would suggest that any images and wording should emphasise that both visible and hidden disabilities could benefit from the information.
- C) We would also ask that the net is cast a little wider to ensure that rail travel is accessible to all with a flexible approach, reflecting individual needs and choices.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

The rolling stock specification is not a policy element or even something that a rail operator can easily influence. A policy says what outcomes an operator will achieve, rather than important information that a customer or group of customer might need to know.

The consultation recognises the value of an online database of accessibility and functional features of stations and rolling stock. We would prefer that a single point of information should be made available online, managed by the relevant TOC in partnership with the ROSCO and integrated into the National Rail Enquires website.

Where this is a new requirement outside of the current licences, this should be properly funded to ensure that it is designed to be accessible and fit for purpose, as well as being available for conversion to print in various formats where appropriate.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We welcome consultation and feedback with passenger panels, accessibility forums and local user groups. We agree that this should form part of the 'DPPP' design and review process. We would stress that there is a need for consistency and continuity across the network.

2.36 – third bullet point: New operators may not have access to the same accessibility groups that an incumbent has. This could be overcome if the work was overseen and supported by RDG, who could ensure that such work was available to franchise changes etc.

2.40 – The proposition for reducing timescales does not take into account other operational issues at either the TOC or ORR which can occur. We would recommend keeping it 8 weeks and reviewing the internal processes to ensure that the overall review can be done properly and considered to ensure that any amendments deliver improvements. We would suggest looking at using SixSigma as a basis for identifying any process improvements.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The classifications don't mean much as "category A, category B" etc – some stations will have different levels of access in some areas more than others – for example a category A station might not have a changing place, which for some disabled people are essential, whilst a category B station could have a changing place.

It should be considered that the accessibility criteria could be a lot clearer and easier for disabled people to understand. We would ask that this is properly considered before implementation.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

The mandatory checks would reasonably be expected by the customer to already happen. Instead it is left to the customer to ask the advisor about the accessibility or research this themselves. There is a question about if the checks go one step back and be integrated into the NRE booking engine, which would provide information at point of journey investigation.

There is a separate question about the information available and how, strategically, this could improve journey experience and grow trust. Ultimately, if the information is available to both assistance booking agents and customers, more people could benefit from better information as they can understand the journey they'll be taking before they book tickets.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We have considered that some of the actions are basic and some needs to be a bit more pragmatic. For example, one area not involved is around the emotions of a journey, which should be properly considered as part of the development.

Examining this, there are four stages of the journey which means you have different expectations for each part of the journey from staff and the TOC. The expectations range from proactive (locate your customer to deliver help and support) through to exception-based (only contact if their journey changes and they then require support).

For example:

- Journey assistance – where does it start vs where *should* it start?
- Journey assistance – where does it stop vs where *should* it stop?
- Different actions according to different station types/categories

We would suggest that each stage has its own communication and support profile which could then inform the guidance and what should be included. Development of this should lead to a single version which is applied across all TOCs. It should be properly funded through ORR work as such guidance is complex.

Looking to the customer expectations and managing these, there are some questions around what is reasonable and what is realistic for a customer to expect. This should be completed in conjunction with the above.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Such processes should be mandatory. However the individual processes should be set as standards to achieve and the delivery left to the rail operators, to enable processes to be developed within their own systems and capabilities.

It should be noted that the “no call” option leaves an opportunity of risk that a person will be left on a train (opportunity for assistance to fail) as staff will not have the time to check the entire train if a customer could be in multiple locations. Seat reservations should not be trusted as a definitive location of customer either – many customers report time and again that they often sit elsewhere, they are difficult to read and sometimes electronic systems fail, reducing the customer experience to a “free for all”.

Telephone calls could be replaced by digital technology in the future – there could be investigation of integrating this to a standard system such as Genius or the Passenger Assist solution.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This already exists in the form of a single phone line in to a rail station. A dedicated number will add complication.

The process could be left to the operators to improve and instead form part of a strategy and inform an amendment to policy.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

It could be observed that the content of the proposals is often interpreted differently by TOCs, although with many operators around 9 of the 10 points are already covered in most training. Consistency is important and a centrally owned and derived basis would enable a disabled-person led ‘syllabus’ to be built.

We are unsure of the importance of the Railway Regulatory Framework and its involvement in training to frontline staff. We would like further clarity on this.

Hidden disability is recognised as an issue within the proposals and expansion on better understanding learning, emotional, mental health and sensory disabilities is welcomed.

We believe that refresher training should include ‘desk-based’ delivery rather than class room, which could speed up training delivery to large train operating companies. We understand “every member of staff” to start from the Chief Executive down and ask that this be better clarified within the outcome to this consultation.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Having examined the numbers of staff within a typical TOC, we consider that two years to deliver refresher training to a large number of staff would be unmanageable. Three years is also quite tight but more palatable to TOCs.

Any training packages should be developed in conjunction with disability professionals and supported by life experience to inform staff. There could be questions about funding development of this training, which should be resolved by the ORR and DfT.

We would anticipate that refresher training should be tailored to reflect the common elements around service delivery to customers with additional needs as well as focusing on areas of improvement within a TOC. We would also welcome periods of championing awareness topics on a rotating basis, to continue the knowledge update with staff.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We would like to understand how many people who hold DPRC do or do not use pre-booked assistance each time they travel before reflecting fully on this question, or if there is a better avenue of promotions.

We consider that as part of the outcome, any stipulated promotion should be properly funded. And adhere to DfT and any subsequent strategies.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We welcome this and indeed this already happens in Greater Anglia. All of the local authorities are members of the Greater Anglia Stakeholder Equality Group.

There is a history of strong positive working relations within Anglia, which have lead to examples such as:

- Development of “please offer me a seat” badges for those with hidden additional requirements
- Targeted communications about lift improvements, ensuring infrequent and regular travellers are aware of when works are being carried out
- Try a train days over the past 15 years, encouraging people with disabilities to use the train and build their confidence.
- Updating members about the progress of the PA App

The Stakeholder Equality Group will continue to support the publicity of the Passenger Assist service, although many have commented that they prefer to travel on a turn up and go basis due to their own work requirements.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

We feel that the current NRE website is quite cluttered and unappealing to users, especially those who might struggle with complex information. We therefore would welcome a more responsive and compliant website. Any information should be consistent with local franchise rail operators. Above all, it should be clearer and in easy read

Any station or journey maps should be integrated to information and work with screen reading software. We would suggest that it should be properly tested by a provider such as the Shaw Trust.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

The proposals lack strategy of how it could be realistically and reasonably implemented. The timescales are incredibly optimistic when managing such a wide scale implementation.

Customer expectations should also be managed accordingly – and interlinked with the redress solution. The cost of implementation should be properly budgeted for and any existing franchise obligations need to be considered

We would stress that many rail users with disabilities would still prefer “turn up and go” though – true equality.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Key issue is the range of assistance notice operators request, which makes phasing anything in difficult.

The range of stations without staff also make the two hours notice an issue. One way to overcome this might be for drivers to assist where required (like in Europe). We recognise the challenges with this and ask that the ORR, RDG and DfT work together to examine a way in which this could move forward.

The Passenger Assist Technology must be rolled out before any reduction is phased in.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We believe that any different modes of train operation shouldn't mitigate the assistance provision requirements of a TOC.

The DPPP should state specifically what outcomes a customer can expect and standard processes developed by TOCs to ensure complete compliance. Success and failure should be properly and adequately recorded.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Any form of redress should come under 'delay repay', normalising the exceptions to ensure a quick response, rather than making a separate process. The crucial piece of this is how it is communicated to customers.

The value of redress should be developed by the industry overall and be identical between operators so that the customer knows what the outcome will be. The ORR should approve the final processes and values, with consistency across all TOCs. Where there are multiple TOCs involved, there should be a clear process for managing a redress across a journey and agreed prior to commencing.

Any redress system should be tested for simplicity and accessibility to ensure that customers can make use of it without requiring expert knowledge of processes.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We agree that the NGT should be implemented. The hearing impaired and deaf community must be properly consulted though to identify the best way to implement this alongside wider ways to communicate issues during a customer's journey – such as a train being cancelled due to failure during its journey or changes to service.

Other channels for communication should be considered, including WhatsApp, Facebook Messenger, SMS and Twitter. NGT, whilst being a suitable tool, is not always the preferred method of communication for all deaf customers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

The proposals would require stronger partnership working with the licencing authorities and TOCs to enable better alternative transport. There is no legal requirement for this and TOCs cannot easily influence changes.

One alternative might be to agree methods of 'more accessible' transport, such as low floor buses or tail-gate lift equipped mini buses. There might also be an opportunity to work with Community Transport schemes or equivalent small vehicle operators to ensure that alternative transport is suitable for the customer.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

This is a common sense approach which relies on staff being in the same place each time. The way in which staff are contacted should be further discussed and designed by TOCs to be identical across the network whilst being simple for all customers – perhaps a remote "doorbell" at a meeting point, for example.

Any solution should be accessible to all, including those with hearing, visual and learning impairments.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Mobility scooters are available in two forms – class 2 and class 3 vehicles. The categorisation of scooters as “small”, “medium” or “large” is misleading.

The issues have arisen from an unregulated retail industry selling mobility devices without the proper and full education to the customer. Therefore we would suggest the following should be adopted:

- The Rail Delivery Group, RSSB and Mobility Scooter manufacturers work together to identify a kite-mark scheme
- The RSSB agree the requirements for travel, such as folding or the customer not travelling in the scooter if it is not crash tested.
- TOCs agree a process to educate customers
- This is then expanded to other medical support aids such as rollators or hand-bike attachments on wheelchairs.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- **a) passengers do not purchase tickets they cannot make use of; and**
- **b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

A)

The question around tickets that cannot be used focuses on First Class travel, although there may be some journeys that will result in a customer being onboard a train that is too long for their destination station platform – Chiltern Railways loco-hauled services from Marylebone to Kidderminster are an example of this.

At the core, any data provision needs to be contained within a national data system and owned by a TOC before it can be implemented. The logical area for this would be National Rail Enquiries. We would suggest that this should be properly examined and costed by RDG before a proper decision is taken.

b)

This information could be communicated through TOC control systems, although there are questions of how up to data information might be. It requires further investigation by TOCs to identify the best ways to do this, as well as identifying a method of opportunity to remedy issues.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

There are many examples available around with UK within the TOCs. For example, Greater Anglia run a successful Stakeholder Equality Group and offer integrated video assistance within their TVMs.

The Greater Anglia Stakeholder Equality Group also provides input to the training programme, feedback on the new rolling stock specification and support to ensuring changes to business as usual practise does not impede on the customer expectations of service.

Other good examples should be requested from the TOCs as well as the public and made available to the industry through a knowledge base.

Q25. Do you have any other comments or views on improving Assisted Travel?

Many of the aspirations within this document are laudable and the right thing to do. There remains a question about a strategy for delivery, ownership of that strategy and the costs of the delivery.

We would like to see a coherent, industry owned and supported strategy that can deliver a meaningful change, as well as a properly managed delivery of outcomes.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Govia Thameslink Railway
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

The DPPP aims to support passengers with wider accessibility needs, beyond those with disabilities such as passengers with a short-term condition who may not consider themselves as disabled, mums to be, elderly, those with language barriers etc. GTR therefore supports in principle a wider definition (such as either of those suggested) that reflects our approach to delivering accessible services.

Our internal Access Advisory Panel (AAP) has tended to support ‘Accessible Travel Policy’ given the overall objective of supporting passengers with a spectrum of access needs.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?**
- b) Is this still a meaningful title for this leaflet?**

(a) GTR supports the principle of simplifying the existing 'Making Rail Accessible' (DPPP). The GTR version (dated Feb 2017) is over 80 pages long and we don't believe in its current form it is a particularly effective document for advising passengers of our accessible services.

We support the principle of a more concise format with a logical ordering of material as suggested on page 27 of the consultation paper. There is also currently little consistency between the layout of booklets published by TOCs. Whilst there should be scope for each document to reflect the TOCs offering (for example differences between commuter and long-distance operator's operating models), we would welcome working with ORR/RDG to provide a greater level of consistency between TOCs to simplify the message to passengers as far as possible. We would also suggest that alternative formats should be available 'on request' rather than routinely in place at stations, and information should be available online in appropriate formats to support customers to accessing information independently.

However, where content is moved from hard copy to online formats, pragmatic consideration should be given to updating online information and we would suggest a structured review period (perhaps a 6-monthly review to enable TOCs to review the online information and to update in a consistent manner). This would also include the updating of maps and other non-digital collateral on stations and on train so there is one version of the truth that everyone can support and rely on. Digital information is the way forward and GTR support this. Fundamental changes would need to be made to how the CMS of Knowledgebase works to enable full integration with TOC websites.

We feel that the format of the revised leaflet should be a more concise and user-friendly source of information which refers to where passengers can find further information, for example assisted travel, scooter guide, priority cards and other travel support that is available.

(b) As Question 1 above, GTR supports the change in the title of this document.

GTR would also support a high-level industry policy customer document. Whilst appreciating that supporting detail for individual TOCs would differ, given many customer journeys cross TOC routes, GTR feel that there is value in an industry policy document to provide confidence around core and consistent promises/commitments the rail industry makes.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

The Station and fleet accessible information accounts for some 40 pages of GTR's existing booklet, which may be off-putting for passengers. Clearly this information is prone to becoming obsolete e.g. completion of a new accessible toilet at a station. We can see merit in moving such information from the printed document to an online source, although consideration should be given to the resources required to update this information.

Our Access Advisory Panel also support this approach, for example "I think the very detailed info should be part of the policy keeping the passenger leaflet as simple and therefore usable as possible. The more detailed information should always be easily available for those who want/need it."

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

GTR has (since Sept 2016) widely consulted with our Access Advisory Panel (AAP) which includes passenger representations from across our network from across the spectrum of access needs. In addition to wider stakeholder engagement (such as local mobility forums), we regard the AAP as our key resource to consult on our accessible policy. We would therefore fully support consulting our AAP regarding DPPPs.

A typical point raised by our AAP was "Broadly I agree with the proposals set out. The most important parts are involving those with accessibility/inclusion needs at the start and ensuring information and updates are disseminated quickly through the various channels to the user. Also, publicity to those who need to know changes are coming."

GTR also proactively engages with many other stakeholder groups across our large franchise area e.g. local mobility forums, charities, special needs colleges. Whilst we welcome support and engagement with these groups we believe our AAP are best equipped to provide formal impartial challenge/support to enable us to develop strong accessible support policies.

GTR also has extensive additional sources of 'intelligence' to monitor delivery of our accessible services through for example passenger contacts (all passengers who book assistance are invited to complete a short survey by phone or online) or through our extensive accessibility mystery shopping programme etc.

We believe that our approach is already highly collaborative and allows us to thoroughly explore accessibility issues but we are unsure how far the ORR expect us to incorporate this input or how much weight they place on stakeholder/AAP contribution.

In relation to the practicalities of the one month timescale at paragraph 2.37 of the consultation document, we would question whether one month allows sufficient time to produce, print and distribute the document especially given the crystal mark accreditation requirement. In addition, this information could be available on a website in the interim.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

GTR acknowledges the inconsistencies highlighted by the ORR of station (step free) classification across its estate. This inconsistent definition and format creates ambiguity for passengers, assisted travel call centres and front-line teams when planning effective accessible journeys.

AAP input includes "I was surprised to read that Operators may not have this somewhat essential (and I consider basic) accessibility information in a centralised database of some sorts. If they don't they should have and I am very much in favour of standardising the descriptions of this information across the network and different operators. I consider the provision of accurate and standardised accessibility information across the network and operators should be a basic minimum requirement."

Accurate and consistently presented station information is therefore critical to the day to day delivery of accessible journeys whether booked (via a call centre) or un-booked (journey planned independently by passengers). We do not believe the existing Knowledgebase system delivers this aim and we see RDG as pivotal in developing such a consistent information source. This information source should include the following:

- Efficient processes to support TOCs in providing dynamic information that can impact accessible travel such as lift/escalators, on onboard toilets etc.
- An easy to use format that enables all to update quickly and accurately.

We consider that the five-step approach proposed by the ORR on page 36 of Annex B does not help clarify information to passengers. Our AAP agreed that there were "too many classifications making it even more confusing". We would support a simple three step approach to step free classifications, such as a red, amber & green guidance. For instance:

- red would indicate no step free access to and between all platforms;
- amber partial step free access, e.g. platform in one direction which informs the passenger and assisted travel to carefully check;
- green indicates steps free access throughout and to/from the station.

GTR have consulted our AAP to ensure that proposed changes deliver a material improvement for our customers providing passengers who need additional support with greater confidence to travel. GTR strongly recommends that changes are sense checked with passengers and passenger groups to ensure that they maximise this opportunity to deliver tangible positive outcome for passengers.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Reliable bookings are underpinned by the base data in Knowledgebase being accurate. We look to RDG leading on a timely replacement for Knowledgebase given its importance in journey booking and independent journey planning through National Rail Enquiries. A key issue we want to address is bookings that are set up to fail from the outset due to incorrect or out of date information on Knowledgebase. Our Assisted Travel team already carry out checks for all bookings made but they are reliant on the information available to them from this system. Integrity of the source data is key to mitigating the risks.

The implementation of additional checks that are required during the booking process could impact resources and have cost implications so careful consideration would need to be given to this. Also as above, if the information on Knowledgebase is inaccurate any potential issues may not be identified.

The new proposed Passenger Assist system should alert availability of station facilities such as lifts and toilets that may be available at the time of booking though not at the time of the journey and vice versa.

In relation to failed bookings, we would like more guidance on how the ORR/Ombudsman would handle situations such as where a journey fails due to an incorrect booking made by another TOC or other/unregulated party e.g. Trainline. GTR analysis has demonstrated that all parties able to book assistance do not always check the current station accessibility information. GTR would like clarity as to how the ORR would propose to deal with such issues with respect to both licence reviews/actions and in any public reporting.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

GTR supports the principle that TOCs should work in partnership with passengers to deliver consistent effective accessible travel and give passengers the confidence to use our services. We (and several AAP members) support the promotion of best practice (top tips) to clarify how passengers can most effectively obtain assistance at the station and onboard, and how they can help us to help them such as those examples highlighted on page 49.

Within this messaging we would also strongly advocate that the opportunity is taken to create clear and reasonable passenger expectations and passenger best practice. For example, to remind passengers of the need to allow sufficient boarding time before departure in order for staff to safely deploy a boarding ramp and follow phone ahead procedures.

Root cause analysis of relevant GTR complaints and feedback indicates that by not setting clear and consistent customer industry expectations for both booked and un-booked assistance that customers face unnecessary distress and worry. Key areas include:

- the above point around arrival time to ensure that assistance can be provided (e.g. notably for un-booked assistance. Staff members may already be providing booked assistance or service to another customer;
- for booked assistance it is commonly recommended that passengers arrive 20 minutes before their train is due to depart, no industry-level expectation is set for un-booked assistance and GTR feel that even the term 'turn up and go' is misleading to customers and creates an unclear expectation, and;
- finally, the time to meet a customer to provide assistance off a train (typically at terminus stations). Customers may have to wait up to 7 minutes for ramp assistance but expect to be met on arrival.

We consider that it is important that all TOCs follow a similar format and include key essential information that applies consistently across all TOCS so as to make travel easier for passengers.

We already offer a freephone number for on the day journey support on parts of our Southern network. Any extension would simplify the support offering to passengers, although would have resource implications for our control centre.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

GTR agree in principle with an assistance handover protocol given the reality that miscommunication between stations underpins the majority of failed assists. These checks should however not be overcomplicated so as to detract from the various other duties our frontline teams have to undertake. Several AAP members support this principle, e.g. "I was surprised to read that Operators may not have this somewhat essential (and I consider basic) accessibility information in a centralised database of some sorts. If they don't they should have and I am very much in favour of standardising the descriptions of this information across the network and different operators. I consider the provision of accurate and standardised accessibility information across the network and operators should be a basic minimum requirement"

The new proposed Passenger Assist staff app could enable this to be done easily by staff and would be able to be tracked by stations and passengers. Such an approach should reinforce personal accountability of station staff and clarity as to who has ownership of assistance at each point of the journey. However, GTR would highlight that the timeframe for RDG delivery of this solution has not yet been established, nor have the requirements of TOCs and it therefore remains a proposal. Therefore, whilst GTR are supportive we cannot commit to this until the RDG industry solution is fully understood and committed to.

GTR would also highlight that, again linked to expectation setting with passengers, that handover protocols for un-booked assistance should be deemed 'requests' not 'bookings' until the destination station team have confirmed their ability to provide the assistance.

Should this be put in place we would expect to it to drive an increase in customer confidence and a reduction in failed assistance.

Reliability (Chapter 3)

Q9. What are your views on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

GTR with input from our AAP don't believe that provision of a dedicated assistance telephone line would support increased reliability of communication between stations. Whilst large stations such as London Victoria already have a dedicated assistance line the majority of our stations are partially staffed so any assistance line would have to be directed to a remote location such as a hub station or Control. We don't believe introducing these additional contact points would aid clarity of communication, and may in fact just add another additional layer of communication.

As stated above we believe that robust and reinforced hand over process is the most effective way of tackling miscommunication between stations.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

The training proposals are comprehensive and fit largely with our current contractual requirements and practices. However, we believe more consideration should be given to whether the same requirements should apply for every member of staff given the size and diversity of our workforce. Accessibility training is included for all staff as part of our induction course. But our focus has primarily been on the customer service front facing staff. Training to all staff would therefore be additional to our current approach. This clearly has implications and imports more cost that we have not budgeted for. We believe consideration should be given to operators within a current franchise contract and the specifications as set out only apply to new and up and coming franchise contracts who can properly plan and implement the proposal.

In regard to the ten key areas of content, we believe that our current training already covers the majority of described areas. We have in the past invited the Powerful Trainers (from the Aldingbourne Trust) to run a session during the day and are hoping to gain funding for this moving forward.

Our AAP members were broadly supportive of involving disabled people in delivering accessibility training e.g. "People and the quality of the training they receive are at the heart of assisted travel. I would like to see greater involvement from those people with access difficulties into this training process. I think impact statements from "Real Passengers" are very useful. I agree with the proposed content and support regular training for staff about assisted travel"

We are also looking into involving our AAP in supporting staff training, e.g. by way of a video of them talking about their experiences using rail, which would meet the ORR proposal of involving a disabled person in training development/delivery. Also, the proposed content includes a section on accessibility in stations, but we believe it would also be useful to include accessibility on board/during the journey, which would be wider than just providing safe assistance on to the train.

Hard wiring accessibility awareness into training is a good thing and will help to create a change. However, practical considerations do need to be taken into consideration in terms of franchise contracts (specifications etc.) and costs. GTR would also recommend that the ORR consider reviewing DfT future franchise specifications on the same.

GTR note that the review of existing TOC training completed by the ORR has yet to be provided and would appreciate line of sight of the GTR review as this would have assisted in responding to this consultation question.

GTR would appreciate clarity from the ORR on their proposed approach with respect to Network Rail (NR) Managed Stations as to whether this would be an ORR requirement of NR to deliver to (noting that NR are members of the Ombudsman for their managed 'station liabilities'). This would not be within the mandate of GTR to enforce this requirement contractually with NR for their managed stations.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

GTR consider two years is a reasonable timescale to update and revise training packages given the size of our network and the number of staff that need to undergo the training. However, as stated in Question 10 we believe that more consideration should be given to whether this should apply to all staff rather than just customer facing teams. This could be a very slow and onerous training programme, and due to the diverse workforce TOCs have, some staff may get more value than others from the same course (for instance station staff compared to fitters at an engineering depot or admin staff).

If the proposal that training is to be given to all staff is implemented, we would seek clarification and more explicit guidance from the ORR about how this should be applied. For instance, such as whether there are different requirements on the amount of training customer facing staff receive compared to non-customer facing staff.

Consideration also needs to be given to the current contract terms of some franchises. GTR considers that refresher training needs to have a blend of both industry hot topics and TOC specific areas. It is important to include wider industry accessibility issues but it is also imperative that it is tailored for individual operators and their specific operating models. This is to ensure that focus is given to the areas that impact most on customers with access needs whilst travelling on the TOC's specific network.

It is also important to use a multitude of training methods (i.e. online/self-directed learning, audible learning and not just classroom based) in order to ensure it appeal to different learning needs/styles, as well as efficient training delivery which factors in the operational reality of the railway.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

It would be logical to take the opportunity to provide more information on and promote rail accessibility support to DPRC applicants. Consideration needs to be given to the fact that the majority of DPRC users do not seek assistance as demonstrated through past ATOC / RDG research. We believe that there is value in promoting assisted travel to prospective passengers through for example local and national charities, who may have a wider scope of people that are unaware of the support available.

At present GTR's ticketing website does not refer passengers to the assisted travel website and is operated separately. Careful consideration would need to be given both to the system development and funding. Furthermore, there would be unbudgeted resource implications on call centres including assisted travel. We would question the value of implementing this particular proposal if awareness of the range of travel support is increased through enhanced RDG and TOC marketing initiatives.

GTR agrees that now is a good time for the RDG to promote assisted travel and this can be incorporated into its publicity of the proposed new Passenger Assist system. However, we consider that this should be developed collaboratively with TOCs. GTR working with AAPs would also recommend that when promoting assistance the opportunity should be taken to create awareness of booked assistance and enabling passengers to have full awareness of all their options and choice – and not simply a focus on un-booked assistance. GTR research has highlighted a low awareness of booked assistance support being available and increased awareness of this would encourage more people with assistance needs to travel by rail.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

In addition to our AAP, GTR already voluntarily undertakes engagement with and has contact links with local groups across our network. We also hold wider stakeholder events that promote awareness of our travel support and offer 'Try a Train' events with local access groups. We consider that these links benefit us and the passengers who travel with us. We have also recently expanded our accessibility team so as to allow greater scope to focus on and build relationships with external stakeholders. GTR and our AAP consider that simply promoting Passenger Assist would be too narrow and there are TOC-specific assistance support tools beyond just Passenger Assist which GTR promotes and will do more to promote as a package of support options available to individuals.

However, a more structured approach to engagement and reporting would need to be reflected in terms of resourcing. Also, implementing onerous requirements may negate the value of working with external groups by making it just a tick box exercise rather than delivering actual value for passengers. GTR therefore feels that this should be promoted as a best practice activity, rather than mandated through licence conditions. GTR would be concerned if the ORR were to define specific set requirements for TOCs and mandate through the licence. GTR also consider that, as an industry action, RDG should lead an on-going campaign.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

GTR supports this proposal in principle and believes that our websites already meet the majority requirements. The importance of consistent web sites is supported by several AAP members e.g. "Anything that promotes the "joined up" distribution of accessibility information and brings together the different resources currently available can only be a good thing."

We agree that the term 'Passenger Assist' is consistently used when describing the system to book assistance to ensure there is clarity for passengers.

Should this proposal be implemented we would seek clarification on the frequency and basis of evaluating W3C compliance.

In regard to the proposal to have all of the information on one web page, we would be concerned that this may result in the information not being clear and/or easy to navigate. We would suggest an alternative approach may involve a main page that provides links to more detailed information on different topics such as station accessibility.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

GTR are keen to ensure that changes to this 'recommended' notice period will deliver a material customer benefit with booking history providing a useful data source to understand current behaviours against which to gauge the customer benefit of each of the proposed options.

Our dedicated assisted travel team have provided us with insight from December 2017 up to November 2018, which shows trends on how far in advance passengers book assistance. This shows that 70.7% of bookings are made more than 24 hours in advance, with an average of 4.6 days prior to travel.

GTR would highlight that, noting the RDG proposed booking assistance supplier changes, that terminology is critical. For example, in using the app or a webform these are 'booking requests' and are not 'bookings' until the TOC provides a confirmation to the passenger. In sending the request that customer cannot consider the assistance as confirmed/booked.

AAP inputs included;

"Option 1. By 10pm the day before travel. It is important that assisted travel does not fail and I believe that this option gives the best chance of success."

"I think the industry has to decide what current technology and staff numbers can cope with – there is no point in offering something they cannot deliver"

"AAP inputs include "Option 1. By 10pm the day before travel. It is important that assisted travel does not fail and I believe that this option gives the best chance of success." and " I think the industry has to decide what current technology and staff numbers can cope with – there is no point in offering something they cannot deliver"

Option 1. Up to 10pm the night before

This closely reflects our current offering for assisted travel and would reflect our call centre opening hours. In addition, should passengers contact our call centre within less than our recommended 24-hour notice period our advisers will always endeavour to contact station or onboard staff in order to enable the passenger to travel as per their request.

This option would enable consistency amongst TOCs and would be a logical first step. GTR would also suggest that this is a simple customer message which would not require caveats around contact centre opening hours etc.

Option 2 .A minimum of 6 hours before travel

Insight collected by our assisted travel team show that at present only 5.6% of passengers who book assistance with us book six or less hours in advance.

Implementing this proposal would mean a more significant change and would require substantial updates of our processes, particularly in responding promptly to webform bookings. We would also need to carefully consider resources and the realities of short notice staff shortages at smaller stations, as well as how this is communicated in order to ensure that alternative arrangements are made. Reducing notice periods at larger stations that are fully staffed (early, lates & nights) would be more straightforward. GTR also note that our contact centre opening hours are not 24/7 and this would involve a material change and cost review.

Option 3. A minimum of two hours before travel

Information provided by our assisted travel team show that at present only 2.2% of passengers who book assistance with us book two or less hours in advance.

The level of staffing required to meet this expectation would increase costs considerably and would require the biggest change to the current system. This is particularly the case where TOCs such as GTR have a varied operating model including a mix of DOO, DCO and partially staffed stations. We would support a gradual and considered reduction in the booking window based on detailed trials.

In conclusion, for the purpose of this consultation we see option one as the best starting point to ensure all TOCs are aligned on notice periods. This supports the delivery of a simple customer message, with the long-term objective of working towards options two and three when possible – with consideration as to inclusion within future DfT franchise specifications. In line with this, GTR would also suggest that changes to the recommended booking notice period should reflect the DfT's strategic/long-term DfT/industry plan to ensure industry operating models support on-going industry delivery.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

The new proposed RDG Passenger Assist system should be a positive step towards implementing a reduced notice period. However, this will still be reliant on a robust and accurate information database.

Several AAP members would generally welcome an aspiration for a reduced booking window. One member has suggested a phased approach “They have to set the phase in targets with what technology and staff numbers will allow...there is no point in offering something, they cannot deliver”

A controlled ‘roll out’ of a reduced booking window may be workable for the many larger fully staffed stations on our network, though again based on meaningful trials.

Options 2 and 3 would both present quite significant changes to our processes as indicated above (and contractual costs). If this approach were to be adopted, we would strongly urge the ORR to;

- Define a clear customer proposition for un-booked and booked assistance based on detailed passenger inputs, and;
- To implement any reduction in the booking period based in trials carried out with a range of TOCs to ensure that processes are thoroughly tested across the range of operating models in place (e.g. DOO, DCO, partially and unstaffed stations). Given that GTR operates across these modes, we and our AAP would be more than happy to work with the ORR in testing a reduced booking window through a phased, measured approach.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We recognise the limitation of taxis - passengers ultimately come to us because they have chosen to travel by rail and we do all we can to limit the use of accessible taxis. Primarily taxis are currently used to enable a passenger to travel:

- At a station that is contracted to be permanently unstaffed (where passenger wishes to board a DOO service);
- Partially unstaffed (whether due to the station being designated as 'partially staffed' or due to an unplanned unavailability of staff e.g. due to short notice sickness etc.) - again, where passenger wishes to board a DOO service);
- At a station that is not accessible/step free preventing the passenger reaching the platform.

At GTR, with the introduction of DCO services (operated by On Board Supervisors) on our Southern network in late 2016, passengers are advised when travelling from unstaffed/partially staffed stations (through posters, supported by audible/visual messages) to contact our dedicated team at our Control Centre via our Help Points, free phone number or text number. Whilst we will normally (based on the passenger requirements/circumstances) assist the passenger onto the next available (staffed train) there are occasions when an accessible taxi will be arranged (e.g. during disruption when we are unable to confirm availability of an OBS or another staff member to deploy the ramp).

We have also, from May 2018 initiated a trial at 10 unstaffed/partially staffed stations on our Southern network served by DOO Thameslink services. Whilst no change for booked passengers, at these stations we do ask un-booked passengers (again via posters audible/visual messages) to contact our Control Centre 20 minutes before the train's departure time. For these stations (only) we will deploy mobile staff (with vehicles and are located within a 20 minute radius of the 10 stations) who drive out to the station to provide boarding assistance (normally deploying a ramp). This trial is currently being evaluated for review early 2019.

At the remainder of unstaffed/partially staffed stations on our established DOO routes (Southern, Thameslink and Great Northern) passengers are also able to speak to the same Control Centre team (via Help Points), who will again arrange a taxi if appropriate based on the passenger's specific situation.

We are working closely with our taxi supplier to maximise both the quality and availability of accessible vehicles. However, we (and our AAP) very much support the principle of limiting the use of accessible taxis, and where they are used, enabling passengers to obtain 'on the day support' (during the journey) from our Control Centre in cases where station or onboard staff are unavailable.

As noted at Q15, GTR would also suggest that changes should reflect the DfT's strategic/long-term DfT/industry plan to ensure industry operating models and franchise specifications support on-going industry delivery.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We fully recognise the importance of delivering reliable assisted travel. If we fail to deliver assistance the customer is entitled to the cost of their ticket back, irrespective of any gesture of goodwill we may make. This commitment is already detailed in our Passenger Charter and forms part of our standard way of working.

We believe that our approach, supported by the recent introduction of the Rail Ombudsman, provides appropriate redress for passengers who have not received the expected level of assistance.

As noted in earlier responses above, as customer expectations are not always clearly set (notably on an up to 7-minute wait at destination terminus station for assistance / ramp provision) the definition of what constitutes a 'failed' assistance is not always certain.

GTR would suggest that with the launch of the Rail Ombudsman that further redress above the existing passenger charter commitment is unnecessary with the Equality Act and the CRA providing additional legal routes for passengers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We already subscribe to a Text Relay service at our Assisted Travel Call Centre. The service is lightly used (less than 20 contacts per period).

We also have the capacity to communicate via SMS text (for short messages by passengers using older mobile phones), with this facility being in place at both our Assisted Travel Call Centre and our Control Centre. Usage of this facility is very low.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

Our AAP welcomes the ORR's aspiration to improve provision of accessible replacement vehicles. For example, a wheelchair user member said "The practice that still exists of providing inaccessible coaches of bus replacement rail routes and taxis that are inaccessible needs to end. I would therefore welcome a move towards best practice whereby this no longer occurs and reasonable endeavours have been taken by the TOC to source accessible vehicles". Another member representing passengers with hidden disabilities added

"Substitute and alternative transport (Buses and coaches rather than taxis or PHVs) is very often not suitable for passengers with hidden disabilities, e.g. those with urgency issues for whom travel without access to a toilet is not a realistic option. This is a perpetual problem. Access to taxis or PHVs for those that cannot bear long replacement bus services needs to be properly addressed as a matter of urgency and policies and procedures put in place asap"

The DfT have not introduced compulsory obligations on private bus (or taxi) operators to make their vehicles accessible, or to ensure that drivers are trained in accessibility awareness. GTR would appreciate views from the ORR regarding the expectation for TOC delivery in this area, given the lack of compulsory regulations on bus and taxi operators. Whilst GTR endeavours to source accessible alternative transport, TOCs face challenges in readily sourcing certain types of accessible taxis and buses/coaches due simply to the numbers available not due to a lack of prioritisation of this.

Whilst the contracted Rail Replacement Team will try and maximise the use of accessible buses (both planned and unplanned), should the ORR place the onus on rail operators to solely source accessible vehicles, irrespective of unbudgeted costs incurred, we would be unlikely to resource our overall requirements for buses during periods of peak demand (such as large planned possessions required to maintain our network). Furthermore, for longer distance rail replacement services, we will on occasion's use coaches which offer greater comfort, baggage space though tend not to be step free.

With regards taxis, whilst we are as already stated proactively working with our taxi supplier to maximise availability of accessible taxis, given the relatively low numbers of accessible taxis available across the UK fleet, we would simply not be able to meet demand at our stations if we only engaged with those operators who provide accessible vehicles. This would impact all customers including those with access needs.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Clearly a number of principles could be adopted for putting passengers in touch with staff who can provide (or arrange assistance) and AAP inputs confirms the need for passengers to be able to receive journey reassurance. One of our members stated “I think that every effort should be made to make this possible using all technologies available. Help point, text, phone, live chat, what’s app etc.”

At present, passengers are able to seek assistance from our Control Centre through the means identified in Q17 (or Assisted Travel for bookings or journey planning).

However, if calls were to be directed to station staff at a remote (albeit ‘hub’) location, we believe this would add additional risk to the process as staff could very well be carrying out other duties and unable to answer the phone. For example, Eastbourne is an ideal ‘hub’ location but staff there are often engaged in train dispatch duties and may not be available to respond to a call. Furthermore, having taken a call, they may not have time to resolve the issue.

Due to this, GTR are not confident that this would be of any material benefit to passengers and there is a risk that this would negatively impact passenger experience. GTR would therefore recommend that ensuring contact points for GTRs dedicated assistance teams within stations and through static data (e.g. websites) is of greater benefit to passengers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators’ policies on scooters and mobility aids we should consider as part of the guidance review?

The carriage of scooters/large wheelchairs can be a source of frustration for passengers and confusion can arise at stations as to the type of scooter that we can accommodate on our trains. Our AAP members have highlighted situations where scooters have taken up the whole vestibule area, making it difficult for able bodied passengers to get off, let alone those with mobility difficulties or sight impairments. The ability of staff (station and on board) to enforce this is limited, and puts them in a very awkward position particularly given the difficulties of demonstrating that the given scooter is suitable for rail travel.

Added to this, the scooter policy varies across train operators, with some operators (including those who intersect with our own services) requiring scooter permits, which can generate failed journeys. GTR will accommodate ‘reference’ scooters on all of our trains and we do not operate a permit scheme. We have recently updated our Scooter Guidance, which is available as a downloadable document on our web site, based on input from our AAP. Whilst TOCs set their own policies (no doubt assessed on safety related criteria/rolling stock design), we would support working with ORR & RDG to proactively communicate how users of scooters and larger wheelchairs can safely take advantage of the rail network.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

(a)

This would seem logically to be the correct thing to do. However, in practical terms this wouldn't be straightforward because the stock type and formation information is not available in the journey feed (for online and ticket office sales). The only way to manage this practically would be for rolling stock formation to be incorporated into the journey feed. It should also be considered that rolling stock may sometimes be substituted for a different type at short notice which might mean that a booked accessible train becomes inaccessible at short notice.

This would be even more challenging for ticket machine sales, even if linked to a website, as it would be difficult to prevent purchase of a ticket that the passengers couldn't use unless their need is very specific (e.g. no steps).

(b)

We are fully aware of the difficulties experienced by passengers unable to use an accessible toilet, whether at stations or onboard. In early 2018, we briefed our staff to visually check that the onboard toilet is working whenever they assist a passenger onto a train at a terminus station. If it is not working, they will then speak to the passenger and decide on the most appropriate alternative e.g. assistance to an alternative part of the train where the toilet is available or to an alternative train. NB This process has not been implemented at intermediate stations given the relatively short dwell time on GTR services. However, based on input from our AAP we are at an advanced stage of exploring how real time on board toilet status information can be provided to our station and on-board staff through their mobile devices.

Our AAP are also supportive of raising awareness of passengers who need to use an accessible toilet, for example signage by accessible toilets that encourages passengers who don't require additional space to use alternative toilets in order to maximise availability for those unable to do so.

GTR would support, in principle, making information directly available to customers regarding facilities that are not available 'as advertised' e.g. accessible station toilets and accessible train toilets. However, would note for stations that this data needs to be accurate and the industry/RDG-led Knowledgebase would not currently support real-time changes to accessible toilet status. As noted above for accessible train toilets, work to ensure information is real time and accurate by trialling and extending across station teams is at an advanced stage and should this be successful GTR will then be investigating the feasibility of making this directly available to passengers through defined channels. It is crucial for passengers to benefit and under legal obligations that any additional information being provided is accurate and can be relied upon by passengers planning their journeys.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

As highlighted throughout this response, we highly value the benefits of having an AAP as a basis to gain constructive challenge, feedback and support from passenger with access needs in delivering accessible services.

Staff engagement is fundamental. We have a growing internal network of 'Access Ambassadors', primarily made up of staff members who care about accessibility and work hard to promote great accessibility within their geographical areas.

We support the idea of providing staff with an aide memoire (or something similar) to accompany accessibility training and could possibly add reinforcing this with a staff 'intranet' site including quick access to accessibility related documents, policies, briefings etc.

AAP members are keen to continue our focus on promoting awareness of support such as Priority seat cards, Space for Assistance Dogs, Seats for companions who have a reliance on the co-operation of other passengers and raising awareness of passengers on how these facilities are used.

GTR have held over 40 'Try a Train Events' to enable passengers with access needs to make a sample journey to increase their confidence to travel. As well as benefitting participants, our front-line teams also benefit by gaining a perspective of the challenges often faced by the participants.

Q25. Do you have any other comments or views on improving Assisted Travel?

We, closely supported by our AAP, are determined to continue our focus on providing passengers across the network with the confidence to use our network and welcome the opportunity to input into this consultation.

GTR working with our AAP and wider passenger groups would highlight that key outcomes which could materially benefit passengers would include; creating clearer customer expectations, simpler customer-facing policy documents and ensuring that there has been joined-up consideration from a licence (ORR) and franchise specification/ future strategy perspective (DfT) to ensure that these are aligned and the industry can consistently deliver into the future.

We note that separately the ORR have subsequently contacted GTR complaint contacts regarding data requirements and GTR will respond separately to this request for views around additional data provision.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People's Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Guide Dogs for the Blind
Email*	[redacted]

*This information will not be published on our website.

Guide Dogs supports the independence of people with sight loss in the UK. Alongside our service provision, we campaign to remove barriers that prevent blind and partially sighted people living their lives with the same freedom as people with sight. Current estimates suggest over two million people with sight loss are living in the UK of which around 360,000 are registered as blind or partially sighted.¹

As the ORR recognises, there is a clear need for improvements to the accessibility of rail travel. Although blind and partially sighted people rely on public transport to get around, research from RNIB shows that only 11% frequently travel by rail, and over half of those have experienced difficulty in doing so.² Passenger Assist is a key element in enabling people with sight loss to travel and we welcome changes to improve standards and deliver a more consistent service across the rail network.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

¹ [RNIB](#)

² RNIB Passenger Experience Guide

We agree that the name of the policy should reflect the goal that rail operating companies aim to achieve, as well as the social model of disability (which emphasises the barriers in society to full participation for people of all abilities). We favour “Inclusive Travel Policy” which more clearly includes people with sensory and cognitive disabilities in addition to physical disabilities and mirrors the Department for Transport’s move from an Accessibility Action Plan to an Inclusive Transport Strategy. Inclusivity also suggests that the environment has been designed to accommodate the needs of as many people as possible from the outset.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

a) Is there anything you consider is missing from the required content?

b) Is this still a meaningful title for this leaflet?

a) We agree with the proposed content in the revised passenger leaflet, which focuses more clearly on the assistance passengers can expect at every stage of their journey and practical information about what to do if things go wrong. We support making this document more concise and passenger-friendly.

As part of the move to a more concise and passenger-friendly document, ORR should consider standardising the layout of this leaflet between Train Operating Companies. While we accept that individual operators will want the design of this leaflet to reflect their brand, consistent layout and formatting is more accessible for people with vision impairments. We recommend that these leaflets are co-produced with a representative group of disabled passengers.

b) The title of the leaflet should make clear that this is a practical document which includes information on what assistance is available and how to obtain it. This would clearly distinguish it from the policy document – for instance, including “how to get assistance” in the title. It could also reflect any changes to the name of the policy (see question 1). This is another area where input from the target audience of the leaflet would be invaluable.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We agree that requiring this information as part of the policy document would help make the passenger leaflet shorter and more accessible. However, this information must still be readily available to disabled passengers online and in alternative formats. It should also be available to station staff for reference when supporting disabled passengers in person. We recommend that this should also be available through the Passenger Assist app.

As information on station and rolling stock accessibility moves to the policy document, this would also be an opportunity to review what information is provided. We welcome the proposed inclusion of details of provision of audible announcements at stations and on rolling stock in the policy document. There is however scope for wider coverage of features which support the needs of people with sensory or cognitive disabilities such as sight loss, including:

- Provision of tactile paving in and around stations
- Colour and tonal contrast of rolling stock
- Accessibility of ticket machines
- Accessibility of toilets (including audio description)

Providing this additional information would help people with sight loss make informed travel decisions and improve safety. As a minimum, this document should make passengers with sight loss aware of platform edges where there is no tactile paving.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We agree that rail operators should be required to provide evidence that they have given local groups, such as their accessibility forum, meaningful involvement in the development of these policies. We recommend that disabled passengers should be involved at an early stage of the process to ensure that their views can be properly taken into account.

We welcome the proposal for operators to make documents available online on day one and printed copies of the passenger leaflet available within a month of the start of operations. We recommend the same deadline for the availability of alternative format leaflets, including audio and large print.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

Providing information on step-free access in a clear and concise format is obviously important for passengers with physical disabilities. However, as with the provision of information in the policy document, reviewing the classifications for step-free access provides an opportunity to consider whether additional accessibility information (see answer to question 3) could be provided in a similar format for passengers with sensory or cognitive disabilities – for instance, a red/amber/green rating on accessibility for people with sight loss.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

We strongly agree that there should be mandatory checks on station accessibility information when booking assistance. Passengers should be able to make informed travel choices based on accurate information. If booked assistance is not possible due to lack of staff availability or inadequate station infrastructure, this should be reflected at the booking stage. This would allow passengers to seek alternative accessible transportation at the booking stage rather than making a booking, turning up, and failing to receive assistance, which is a stressful and frustrating experience.

Booking agents should receive guidance on how these checks relate to a passenger's disability – for instance, assistance may be possible for a passenger with sight loss in a station without step-free access or ramps, where it may not be for a wheelchair user. This should also be reflected in the Passenger Assist app.

The proposed changes to booking assistance again underline the importance of having other accessibility information available. Currently, booking agents can only check the availability of staff and step-free access, leaving passengers to check other aspects of station accessibility as discussed in the answer to question 3. A booking for passenger assist may still be "designed to fail" as even if the basic information is checked, there may be no way for a passenger with sight loss to locate staff members for assistance at the station. With better availability of information, this could be checked at the booking stage as well.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We agree that existing guidance for passengers on assistance is inadequate. The standard Passenger Assist text for passengers only refers to turning up early enough to receive assistance, with no guidance about how to contact staff or what to do if things go wrong. This guidance would be particularly important for people with sight loss who may be unable to locate staff for assistance on their own.

We agree that any guidance should be developed in collaboration with disabled passengers to ensure that it is appropriate – for instance, advice to meet at a station help point, to board a specific carriage, or ring a number displayed at the station to make contact with staff is unlikely to be relevant for passengers with sight loss who may not be able to locate these independently.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

We agree that a handover protocol is a much-needed step to improve the reliability of assistance. It is essential that the alighting station should have details of passenger name, disability, assistance required, train details and passenger location on the train, regardless of whether a passenger has booked assistance or not. Standardising handovers should help address the problem of assistance failure part way through a journey. Additionally, in capturing each passenger's information, the handover protocol should prevent problems when multiple passengers requiring assistance are travelling together. There have been instances where the assistance needs of passengers within a group are not clear to the receiving station.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

We support the introduction of a dedicated assistance line to improve communication between stations. This is an essential step to effectively implement the handover protocol discussed in question 8.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We strongly support strengthening standards for disability equality training for staff. For disabled people, properly trained transport staff can make the difference between travelling in confidence or feeling unable to leave home independently. It is concerning that no operator covers more than 80% of the proposed new training, which includes topics that are vital to understanding the needs of disabled passengers.

We welcome the inclusion of specific sections on understanding vision impairment and recognising, communicating and guiding people with vision impairments. We recommend that the training should also include a section on assistance dogs, their roles and their legal status.

We agree that disabled people should be involved in the design and delivery of disability equality training, in line with recommendations in the Department for Transport's Inclusive Transport Strategy.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

We agree that this training should be brought in as soon as practical to ensure that disabled passengers see the benefits of improved training as soon as possible.

In principle, it would be appropriate for refresher training to focus on priority areas for improvement for individual operators to effectively target improvements.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We agree that rail operators and RDG need to take action to increase awareness of Passenger Assist and support ORR's recommendations in this area and around Disabled Person's Railcards.

However, for people with sight loss, a printed leaflet will not always be the appropriate format to provide information about Passenger Assist when purchasing a Disabled Person's Railcard. We recommend that this information be provided in alternative formats, and promotion of Passenger Assist be considered for digital Railcard purchases. Additionally, Passenger Assist could be promoted on the Railcard itself (for example, via a QR code that passengers could scan). We agree that passengers should be prompted, with appropriate sensitivity, on whether they need assistance when making bookings using a Disabled Person's Railcard.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We support these recommendations to improve awareness of Passenger Assist and as one of the largest charities working in the sector, we would be happy to work with rail operators to promote Passenger Assist to our service users. When working with groups of passengers representing the views of people with disabilities, it is important that the group reflects a broad range of experience of using rail.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

We agree that there should be a consistent term used to refer to Passenger Assist, and that key information should be available on a single page linked from the home page. For people with sight loss and other disabilities, the accessibility of a website determines whether, in practice, key travel information is available. We agree that ORR should monitor compliance with W3C accessibility standards, but we believe that instead of requiring operators to “work towards” them, it is now appropriate to require operators to meet these standards. To pass government accessibility requirements, public sector websites and apps must meet W3C standards, work on screen magnifiers, screen readers and speech recognition tools, and include people with disabilities in user research. We see no reason why rail operators should not meet these same standards when delivering a public service with support from the public purse.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

We believe that people with sight loss should be able to travel as freely and easily as anyone else. DfT highlighted the importance of spontaneous travel in the consultation on what became the Inclusive Transport Strategy. Many guide dog owners currently find spontaneous travel difficult or impossible because outside of areas such as London, where Turn Up and Go assistance is standard, there is no guarantee that staff will be available to assist. We believe that a high and consistent level of Turn Up and Go service should be the goal for rail operators.

Alongside this, we support a reduction in the notice period required to book assistance to enable spontaneous travel. We know that some guide dog owners prefer to book assistance to ensure that it will be available, but would value the flexibility of being able to do so at short notice. We support Option 3, which would require a minimum of two hours’ notice before travel. A two-hour notice period would deliver the maximum benefit and flexibility to disabled passengers and make a significant step towards genuinely inclusive travel.

As noted in the consultation, a small number of rail operators already provide or intend to provide assistance at two hours’ notice. This shows that this level of service is possible with the right investment. However, without tighter minimum levels of service set by the ORR, there is no guarantee that rail operators will work towards this goal. In 2017,

Southern withdrew their commitment to Turn Up and Go services in a move which attracted strong criticism from disability groups.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

As discussed in the consultation document, shifting the requirement to give notice to up to 10pm the day before travel would require little in the way of new processes or additional technology. We agree that this could be implemented in this calendar year to deliver some benefit to passengers while rail operators are working towards shorter notice periods. We understand that delivering same day booked assistance will involve a more substantial shift in rail operators' infrastructure, but the benefit to disabled passengers in enabling spontaneous travel justifies the cost to rail operators.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We agree that rail operators should be required to consider staffing on trains as well as at stations when assessing the risk of assistance not being available. Rail operators considering DOO or DCO trains should put into place alternative arrangements for accessing assistance on the train which must be accessible for people with sight loss. For instance, a single, national freephone number could be provided at the booking stage or by station staff to access assistance.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We agree that operators should be required to compensate passengers who have not received the level of assistance they booked. This would strengthen reporting of these incidents and incentives for operators to improve their services. The process for obtaining redress should be simple and accessible for people with sight loss.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

There are a proportion of people with a vision impairment who also have a primary or secondary hearing impairment. Therefore, we would like to ensure that the proposed revision also meets their needs.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We agree with the proposed amendments to the Guidance to require operators to improve accessibility of alternative transport.

Where rail replacement bus services are in operation, rail operators should ensure that assistance is available for passengers with sight loss to locate the correct bus service. As rail replacement services are unlikely to be equipped with audio-visual next stop and destination announcements, operators should provide alternative audible information on board.

Travelling by taxi or minicab can be challenging for guide dog owners as a significant number of drivers are not aware of their legal obligation to carry assistance dogs. Although refusing an assistance dog owner is a criminal offence, according to a 2016 survey, 42% of assistance dog owners reported that they had been turned away by a taxi or minicab driver over a twelve-month period.³

We therefore agree that the Guidance should not recommend operators increase their use of taxis, and that passengers who require assistance should be able to make as much of their journey by rail as possible. Where taxis are used, drivers taking rail replacement bookings should have an appropriate qualification including disability equality training – for instance, the BTEC Introduction to the Role of the Professional Taxi and Private Hire Driver includes an element on disabled passengers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We agree that passengers should be informed how to contact a member of staff for assistance and service information. However, people with sight loss may find it difficult to locate a help point unaided or may not have enough sight to read a displayed freephone number. This contact information should be provided in a range of formats that are accessible for people with sight loss – for instance, through audible announcements, information online and on the Passenger Assist app.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

³ Guide Dogs, [Hail Storm](#), 2016

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

We agree that where possible, rail operators should provide information about reduced accessibility of stations and rolling stock – for instance, when audible announcements are not working on a train. We also recommend that operators consider what arrangements are in place to ensure disabled passengers who require seats can be seated in situations where priority seats are occupied or a train is overcrowded.

Real-time information on the availability of accessible toilets would obviously benefit passengers who need to use them. However, few accessible toilets on trains are genuinely accessible to people with sight loss. Without a consistent layout, it is impossible to learn where features such as the door lock are. Although some trains have announcements in the toilet which are triggered when the door has been closed but the lock has not been pressed, these have not been used to improve accessibility by describing the layout of the toilets for passengers with a vision impairment. We recommend that ORR highlights audio description of toilet layout as good practice.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

We support the decision of some rail operators to allow assistance dog owners to book a space next to them on the train to ensure there is enough space for dog and owner, and would encourage further adoption of this scheme.

Q25. Do you have any other comments or views on improving Assisted Travel?

It may be of interest to note that Guide Dogs has been working with a number of partners through Innovate UK on the Journeys Unlocked project. Whilst a large part of this involves testing new and existing technologies to enhance independence and confidence of vision impaired rail passengers, it is also considering low tech factors such as the availability and quality of passenger assist services. We would be happy to share details of this evolving project.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	GWR
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

GWR would support this change in terminology. Our preference is for "Accessible Travel Policy" as it more clearly represents the subject matter of the document.

As a matter of practicality, ORR should consider whether this new terminology should be phased-in or should change on a 'go live' date. The former would allow for an implementation period during which documents including posters, staff training materials, apps and signage (including the new signage that would be required) could be updated. The latter might not only reduce the opportunity for passenger confusion in the change-over period, but a single 'go live' date might create a focal point for publicity and generate its own publicity, announcing a step forward by the industry.

In either event, enough time should be given to update various hardcopy document (which will need to be ordered, printed and delivered) and electronic materials (which may require some re-coding).

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

Our current passenger-facing document is currently over 50-pages and contains much of detail which (whilst current required by DPPP Guidance) will rarely be of use to passengers and often becomes outdated quickly. Producing a more concise and user-friendly guide would be a benefit to both passengers and staff. It should provide passengers with the core information they need to feel confident about travel. It should provide staff with a useful reminder of core information (should it be needed) and a document with which they can more easily become familiar, which may in turn help them assist passengers.

For this reason, to be of greatest use, and to enable passengers and staff to become familiar with its content, we suggest this core document should contain reference to information which is unlikely to change as a result of operational changes (e.g. changes to specific stations and rolling stock). For example, the section of "What to expect...at the station" could state in general terms the accessibility services available at different types of station (manned and unmanned) and contain a link and reference to where individual station accessibility information can be found.

In terms of content, the areas outlined in the consultation seem logical. The four main sections (before travelling, at the station, on the train and if things go wrong) are all areas passengers require information on.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

GWR has many stations that are currently undergoing upgrades and improvements to introduce new rolling stock. Recent examples of this has been Bristol Parkway and Bath Spa where platforms have been extended/built to accommodate longer trains. As well as introducing new rolling stock GWR is also cascading existing stock across our network. We are not unique in this respect. Passengers are aware (e.g. through government statements and news coverage) that this is a period of considerable investment and change in the railway.

As noted in response to Q2, we believe there is a strong case for a 'core' document (the leaflet) containing information which is more likely to remain accurate for a longer period of time. However, we do not necessarily think it must follow that all other accessibility information must go in a single separate document (the 'policy document').

We have reviewed the list of proposed content in Section 2.1 of the draft revised Guidance and noted the suggested requirement that the policy document "*must be produced as a A4-sized document in both Word and pdf format*". However, having to update a single document may create an unnecessary problem since the need for updates could be relatively frequent and, as a matter of practicality, very large electronic documents can become unwieldy and unstable over a certain size.

We suggest that the information most likely to frequently change – rolling stock accessibility information and station accessibility information – could instead be provided in an electronic format which is capable of being printed in A4 or which can be provided (on request) to passengers in accessible formats. We would not object to ORR prescribing the layout of that webpage to ensure it is standardised across all operators. However, we think this would be most beneficial, particularly in ensuring passengers have the most up-to-date information.

This would have the benefit of providing a trustworthy source of the most up-to-date information, whereas also requiring such information to be in the 'policy document' might confuse passengers if there was any lag in updating this document and therefore a discrepancy between the information on National Rail Enquiries (NRE) and TOC webpages and the 'policy document'.

A further reason that it might actually be more beneficial (for all) if this information were to be included on NRE and TOC webpages with a link in the 'policy document' is that this would fit with the proposed new requirement to introduce mandatory checks at the assistance booking stage (see Q6). If a passenger wants to check station or train-specific information prior to booking then they can check the website (which can be designed to be capable of change, e.g. in font size, for accessibility); if they do not then they can receive the confirmation of what is available and the best option for their proposed journey when they book assistance. Having this information additionally included in the 'policy document' might therefore simply create another thing which needs updating, but which will not actually need to be referred to during the booking process.

Our network is continually being reviewed, with accessibility a prime focus. We have minor works projects each year that help increase accessible facilities such as; accessible ticket desks (e.g. Penzance/Twyford), accessible toilets (Newton Abbot), accessible waiting shelters (Oldfield Park) amongst other accessible features. We have applied for access for all funding and predict continuous investment in improving the accessible facilities at our stations. We also have new stations being built at Worcestershire Parkway and Reading Green Park both of which will be fully accessible at opening, in line with the current DFT Code of Practice. All this information is required to be updated and due to the frequency of it happening currently, it is vital that we can update this information quickly and accurately for our customers.

As such, we would, for example, propose amending draft revised Guidance Section 4, paragraph A2.2 to read (amended wording underlined): "*Rolling stock and stations accessibility information must be kept up-to-date and made available to passengers online, in a format that can easily be accessed using a personal mobile device and The location of this information should also be explicitly cross-referenced as part of the policy document as per section A2.1, including in accessible formats.*"

Regarding the proposal for this document be available "on request", we think this phrase should be clarified so there is no doubt as to what an operator's obligation is in this respect. We suggest this should mean that a hardcopy should be sent to the passenger from a central distribution point following their request. If "on request" was defined to mean providing a

hardcopy to the customer immediately (e.g. at manned stations) then it would defeat the main benefit of the document as the distribution costs of updating it would still be incurred.

As a minor additional point, we agree with the remove of the current square brackets around “normally” in Section 4 paragraph A2.2; operators should “*provide an overview of the types of rolling stock normally in use on their service*”.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We have noted a discrepancy between the consultation document and the draft revised Guidance. The consultation document talks of a requirement that documents have “*sought and where possible incorporated feedback from local groups....*” The draft revised Guidance says in both the 'Approvals' and 'Review' sections that “*operators **must** confirm that they have sought and incorporated feedback from local groups...*”. For the reasons explained below, we do not think either of these should be the wording of the Guidance requirement.

Passenger input into this process should have parallels with the consultation process in other areas (such as timetable revision). We suggest that the requirement should be to “give due consideration to” or “take reasonable account of” (or similar) rather than a mandatory requirement that operators **must** incorporate such feedback.

Disabled access is an emotive issue and an area in which groups and stakeholders have strong opinions. Our concern is that when a consultee seeks something which an Operator thinks is not viable or not the best option (perhaps for a variety of good reasons) but it is nevertheless “possible”, stakeholder groups (who are increasingly well informed and will have read this Guidance) will refer to this wording as leverage for a position that what they think **could** be done, **must** be done (which is what the draft wording suggests).

Further, it is not clear who has the final assessment of what is “possible” and whether factors such as cost versus benefit should be given weight in such an assessment. Under the Equality Act 2010 whether a particular adjustment is “reasonable” falls to be considered by a variety of factors (non-exhaustively) stated in the statutory Code of Conduct (and also quoted in part at the start of ORR’s draft revised Guidance). Where it is “possible” is only part of the legal and practical assessment.

We would also like to see some clarity about how this will be monitored and assessed. There is also the added concern that requiring stakeholder approval and input, could delay the process in producing the document. This is due to the wide geography of our network and ensuring we have a fair and equal representation from across it. This would become increasingly problematic when the intention that has been outlined in the consultation is to reduce parts of the approval process.

We would like clarification on the framework being proposed to approve the DPPP and specific timescales for both operator, but also the ORR. To achieve shorter turnaround times on DPPP documents, we would need a quicker approval process from the ORR.

Further, either as part of the Guidance, or separately on ORR's website, the industry would be assisted by a flow diagram, perhaps similar to those ORR has produced for 'How to apply for track access'. This would give everyone a clear picture of whether the timescales for approvals and review need to be changed.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The general principle to this is a good one. Ensuring that disabled travellers, their companions, and those staff who manage bookings have up-to-date accessibility information on the National Rail Enquiries website and on the Operator's website is ultimately helpful to all and can ensure a passenger has an informed expectation of the circumstances at both the station of departure and arrival. We know that inaccuracy in this information can lead to difficulties in the passenger's journey and contribute to disappointed expectations. This can also be a reason for a passenger to claim under the Equality Act.

We have a practical concern about the time it would take to assess our stations to ensure we have captured the full range of information required by Appendix B of the draft Guidance. Some of the distinctions between categories require measurements to be taken by qualified professionals. Whilst these may already have been undertaken in part, further measurements would be needed. Currently, we have an understanding and base knowledge of all our stations, but to our own standards. To ensure completion of the information required by Appendix B, this would require a review of all our stations across the network.

Our proposal would be to do this within a sensible and defined time, that is reasonable for the large size of our network and the significant number of stations we manage, and considering the extra resource/cost required from the business to ascertain this information. We anticipate that other operators, particularly those with remote stations in rural areas, will face similar difficulties. It is right that the ORR's decision should take account of the specific circumstances and inherent complications that will be faced by different operators.

If the ORR is minded to allow time for operators to collate this information, this does not need to hold up other proposals. What would be required in the interim is a clear statement, for each station, of the information currently available, when that information was last updated, and a target date by when the operator will aim to update that information to the required standard. Then disabled travellers, their companions, and those staff who manage bookings will have a clear picture which can help manage their expectations.

The Rail Delivery Group (RDG) are currently undergoing producing an accessibility map. We suggest that during any interim period this could be used to ensure that the RDG's good work is put to effective use. As part of this, the RDG are outlining a step free definition for this map. We would suggest a collaboration between the RDG and the ORR to ensure the same definitions are used.

There has also been criticism of the Knowledgebase system, especially entering large amounts of data. If we were to do a large update to all our stations on the new criteria, we would need to have confidence with the Knowledgebase system. It would be advisable to have that system updated to a more reliable and user-friendly system, before ensuring mass updates across the UK network. If not, the feasibility of such an upload must be tested before the ORR makes it mandatory by amending the Guidance. Otherwise, there is a risk of the ORR mandating something with which the industry cannot practically comply with or deliver.

Regarding the five categories proposed and the extent of information that needs to be provided to passengers about the specifics of a particular station, there is an optimal trade-off between making enough information available to disabled passengers (which we recognise is essential to help them plan and to manage expectations) and providing so much text and information that it risks become more daunting / confusing than helpful. ORR should consider if the way it intends to mandate making this information available to passengers can be improved. For example, could operators use a standard set of graphics or icons for each category rather than writing? Might this be unhelpful for disabled people using text readers?

In this respect, the proposed revised draft Guidance is currently unclear about what exactly this information should look like. Section 4 paragraph 1A(k) requires “populating” a “field” with a “step free access note (using the classification in Appendix B)” but is not clear on what level of detail is actually required.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

We feel this is a strong initiative and will ultimately result in a more reliable booking process. However, we would be interested to know how this is truly being monitored going forward.

We do, however, have concerns about how this system may work where the journey fails (or is different from that expected at time of booking) as a result of changes to station accessibility information, particularly where that station is operated by another operator, or where another Operator performs the booking checks inaccurately. For example, if Operator B provides a Passenger Assist booking and inaccurately checks the information provided by Operator A about its station(s) and there is then problem with the journey, we question how Operator A is expected to deal with the resulting passenger complaint. The passenger will (understandably) be likely to see this as Operator A’s fault (since it experienced the problem at its station, rather than at the point of booking) and may not have an appreciation of Operator B’s involvement and their responsibility in the booking process. The passenger is still likely to want to claim from Operator A (and potentially bring a claim for breach of the Equality Act) and any argument from Operator A that this only occurred because Operator A’s failed to follow the mandatory booking checks is not likely to be warmly received.

There may also be a similar issue where booking has failed because of incorrect information (e.g. on knowledgebase) provided by another operator.

The proposed draft wording of Section 4 paragraph A1(c) of the draft Guidance is unclear. It currently states that: “*When bookings are made via a contact centre and the journey involves a station with an accessibility classification A B, C or D (see Appendix B) the operator must ensure*

that relevant accessibility information on the National Rail Enquiries station web pages) (see commitment j. below) is checked and communicated to the passenger to ensure assistance can be provided at every stage of the journey." [emphasis added]. Taking this in sections:

- It is not clear what "*relevant accessibility information*" should be provided at the point of booking. If the ORR's proposal is that detailed accessibility information should be made available and kept up-to-date on the NRE website, then should the operator at the contact centre simply communicate the accessibility category of the departure and arrival station platforms, or provide the fuller details available on the NRE website, or will an operator have flexibility as to how much information to provide at this stage?
- We presume the reference to "*commitment j*" should be to "*commitment k*".
- We think that the word "*checked*" should be changed to "*consulted*" or "*viewed*" (or a similar word). This is so it is clear the operator is not required to validate (which is the other meaning of "*check*") the accessibility information provided at third party stations is actually accurate or something for which it is responsible for.
- It is not clear what "*communicated to the passenger*" means in context. Is the contact centre required to communicate accessibility information to the passenger whilst they are on the phone (so that, for example, the passenger can make a decision about whether to use a different station with a different accessibility classification), or should this information follow with confirmation of the booking, or will an operator have flexibility as to how and when this information should be provided, and in what detail?
- We strongly suggest that the words "*to ensure assistance can be provided at every stage of the journey*" should be amended or removed. As an operator it is reasonable to expect that we will check the accessibility information of the departure and arrival stations at the time of booking. However, that accessibility information could be out-of-date for reasons over which we have no control (e.g. the station is operated by another operator or Network Rail and they have not updated the information) or may have become out-of-date by the time of travel (e.g. a lift becomes out of order), or the staff at that third-party station may fail to provide assistance. In these cases, we (as the operator handling the booking) cannot "*ensure assistance can be provided at every stage of the journey*". We suggest this is removed (or changed to state: "...*to ensure that the information indicates that the journey can be completed by the passenger*"). This would still meet the ORR's concern to avoid allowing "Bookings designed to fail from the outset".

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

This looks like a sensible proposal. However, it is not clear if this obligation will form part of the revised DPPP Guidance if the new General Guidance wording for passengers is not ready by early 2019.

We think the ORR's proposal that such General Guidance could be attached to booking confirmations and provided as a link on the NRE webpage is a good one. We think it may defeat the objective of the Passenger Leaflet (as being a short document containing 'core' information) if the General Guidance was also included in it, if that is what the ORR is suggesting where it states that "*this information could also be added to each train and station operators DPPP*".

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Producing a formal handover protocol, ultimately will help with consistency across the industry. Figure 3.10 is a clear and straightforward approach to this, and if it is kept to those key headings and not expanded, then we think this approach will work well. Our view is this handover needs to remain as simplistic as possible, otherwise key information can get lost in the process.

What is not clear is how the timing for implementation of this proposal will work since (as noted) 'Stress Tests' of this new protocol are scheduled for early 2019 in Northern and South Western Railways by which point the consultation phase for this proposal will be closed. It may be worth deferring a decision on this until after the outcome of the "stress tests".

We seek the benefit of mandating a single communication medium for conveying the information required by the handover protocol. The current proposed wording in Section 4 paragraph A1(e) anticipates that the correct medium is a phone call. We query whether this is the right medium. We are aware of current trials of the Passenger Assist app and can envisage a way that an app could be used to convey the information (perhaps with a notification to the passenger at the same time, so they can have confidence the information has been passed on). This would have the added (and very valuable) benefit of creating a paper trail of the instructions given. This might, in turn, make it easier to suggest improvements and allocate responsibility if this is the part of the process that leads to a defect in the assistance provided.

The ORR should further investigate whether the RDG Passenger Assist app would be a potentially preferable solution to the problem. GWR's own current experience is that we have moved the emphasis from staff onto using the current app and have provided all front-line staff with smart phones to accommodate. The new assistance app is to be introduced throughout all TOC's in 2019. It seems this would be an effective way of ensuring the message is passed onto the next station, especially if they have not been able to reach that station on the phone.

Based on the above, we suggest the ORR engage further with the industry to ensure the specified mode of communication and content for the handover protocol is suitably future proofed and as effective as it could be.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This would create a large administrative burden on the business and would be costly to implement. For a lot of our stations, having a duplicated designated line will be ineffectual, as it will still be the same member of staff that has to answer the call. Designated lines for the larger stations are already in place, however these stations have designated teams for assisted travel to answer those phones. For the large portion of our stations, staff members have multi-faceted jobs and therefore the main station number is used. We struggle to see any benefit to introducing a dedicated assistance line within this setup.

Where we do see value is in having to provide a designated number for assisted travel rather than a designated line. We have found that stations can have a vast number of phone numbers in use and therefore ensuring stations have a specific number for assisted travel, would help greatly. We feel that this project would be best led by the Rail Delivery Group who have recently introduced station connect and aspire of further adapting the system to include designated numbers for assisted travel.

As noted above, it not clear is how the timing for implementation of this proposal will work since 'Stress Tests' of this new protocol are scheduled for early 2019 and the ORR should further investigate whether the RDG Passenger Assist app provides a potentially preferable solution.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We have not had confirmation on how GWR's current training has been scored. As such, the answers to question 10 and 11 are given without this knowledge.

The training proposals are extensive and would provide staff a thorough knowledge of all of the core areas in terms of accessibility. Our concern is that the ORR has proposed 10 different areas that we would need to include in the training. This is a lot of information to provide to staff. It may be too much information to process on a day's training course.

We recognise there is an important balance to be struck here:

- Training must be sufficiently comprehensive to ensure that staff have an appropriate level of knowledge. This is in every operator's interest, both to ensure a good service for disabled passengers and to reduce the potential for claims resulting from staff acting without a suitable level of knowledge.
- However, training must also be provided in a way in which it can actually be digested and understood by staff. Ideally the training (or at least aspects of it) would be provided in a way which minimised the resulting disruption to operating capability. Ideally the

training would be provided in a way which could be revisited by someone who felt they did not 'take it in' the first time or wanted a refresher.

We suggest that this balance could best be struck by a combination of classroom based and modular online learning tools. Online learning tools have a number of benefits. They can be made available to suit working patterns. They can allow people to work through material at their own pace.

Online learning tools can include an element of automated testing of each individual to ensure comprehension. They can be used to create an audit trail of who has done what part of the training and when. This would directly support the proposed draft Guidance wording at paragraph B3 that operators "*must set out in their DPPPs what mechanisms they have in place to monitor and evaluate performance, which should include the use of measurable criteria where appropriate*". We do not suggest this needs to be in either the leaflet or the policy document, but this would assist in "monitoring and evaluating performance" since the performance of staff is a key aspect of this.

It is conversely harder to validate the effectiveness and quality of classroom learning. Taking staff away from daily activities for a day of classroom learning would also require considerable organisation and business planning, in particular to ensure necessary on-the-job staffing levels were maintained. We therefore disagree with mandating (as per the revised draft Guidance wording at B6(f)) that "*Disability awareness training or disability equality training must be delivered in the classroom*". This may be detrimental to its effective delivery.

We have used online training effectively to deliver vital information, such as the new GDPR rules and regulation and operational safety matters, to good effect. We found that people were able to digest the information at their own pace and at a time convenient for them. Part of this training included an online test, which helped reaffirm the understanding of the area and gives the business assurance that the training has been digested and understood.

Regarding the extent of information and modular learning, we suggest that it would be more effective to provide clear and concise information that staff will remember and use, rather than trying to inform staff of everything possible we would ideally like them to know. For the same reason, training could be suitably tailored. We therefore question the utility of mandating (as per the revised draft Guidance wording at B6(a)) that "*All staff ...including senior and key managers*" must receive the same level of in-depth training.

Although the ORR has not asked for specific comment, we further suggest that the proposed requirement that "*Operators must confirm at the time of submitting their Accessible Travel Policy for review that all statistics...used in training are up to date*" is unnecessarily prescriptive and places an unnecessary compliance burden that does not give rise to a proportionate benefit (particular as historic statistics may be more useful).

Another concern is the cost to the business. The consultation states that: "*For franchised operators, training budgets will be based on what was bid and contracted.*" This leaves us with little flexibility, especially being towards the end of our franchise, where there is no budget. To deliver the proposals effectively, including using disabled people to deliver the training, will come at a large cost to the business.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

The timeline of delivering the training, is directly dependant on how GWR's training has currently been scored. If we are required to implement an extensive new training proposal to all staff, then two years is not enough time. To provide some context, GWR recently have put all members of staff through a new customer experience two-day training course. Due to the number of staff involved it has taken over two years to deliver the training (excluding additional time creating the course and training the trainers).

The ORR's proposal suggests that each operator would have to produce a new training course with external input; train our trainers on how to deliver this training; and then ensure every member of staff has gone through the training. Two years to deliver this, on a network as big as GWR's, with our current training resource in place, is not realistic or practical.

Refresher training should be targeted towards priority areas for improvement for the whole industry. This would allow the industry to provide a consistent approach and ensure customers are receiving the same level of service, no matter who they travel with. From this base level of training, Operators could then tailor any further training to the needs of their network.

We also request greater clarity as to what is envisaged by the phrase "refresher training" or whether the content and mode of delivery will be a matter for individual operators. This is because, at the extreme end of the spectrum, if refresher training was as detailed and intensive as the initial training and with a requirement to deliver it every two years, then it would be difficult to administer, manage and will be expensive. We think it would, in practical terms, mean that just as the first cycle of training was being completed then it would be time to start the next cycle of refresher training. This would not give our training team enough time to evaluate and reflect on feedback from the previous training, so that they can then properly design a refresher course that targets priority areas. Any refresher training needs to consider time for the training team to be able to evaluate the previous training, as well as time to re-design or amend the course. We also note that for courses such as First Aid, the current requirements are for a refresher course every 3 years. We feel this is more of an appropriate timescale for refreshing disability training rather than the 2 years being suggested.

For the reasons noted in response to Q10, we would suggest that refresher training could be delivered via modular online learning tools which could include an element of automated testing of each individual to ensure they are adequately refreshed (or given additional training if not). It could also be used to create an audit trail of who has done what part of the training and when.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

GWR supports this proposal. As explained in response to Q1, from a publicity angle, we can see there being greatest benefit in a largescale 'media push' around a single 'go live' date, creating a focal point for publicity and generate its own publicity, announcing a step forward by the industry. Thought will need to go into ensuring confidence that the new system works and can deliver the levels of competence desired, before delivering the publicity, to ensure a positive customer reaction.

It is essential that we do not over promise, and thought should go into setting customers' expectations. Whilst GWR recognises that the policy of the Equality Act 2010 is to ensure that disabled people receive a standard of service as close as it is reasonably possible to get to the standard normally offered to the public at large, what amounts to a reasonable adjustment to services must be considered in all the circumstances, including legitimate organisational constraints, and the proportionality (including time and cost) of measures to address these constraints. A clear example of this is wheelchair spaces, where there is only a finite number of spaces per train. It is important that passenger expectations align with legitimate organisational constraints and this needs to be reflected through the promotion of passenger assist.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

GWR already works with local authorities, service providers and disabled access groups. We feel that the process has clear merit and really helps to engage with our local communities. Our query would be whether this must be so strictly mandated and monitored as in the way proposed. As noted in our response to Q4, if this process becomes mandatory and regularly monitored, then it is possible that some third parties may seek to use this requirement as leverage for change. If that change is merited, then the process has worked. But it is possible for a situation to exist where the capability and resources of GWR, and the aspirations of user groups for a better system, may not align.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

GWR supports this proposal. We would like some more detail in defining what level of W3C standards need to be achieved - Level A, AA, or AAA. The revised Guidance should allow a reasonable implementation period to allow for coding and sandbox testing of new functionalities before providing them to customers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

Not 'one size fits all'

Although we recognise the attraction of a simple, uniform, nationwide standard, the ORR must have due regard to the issues facing individual operators. It seems likely that some operators will consider that shorter notice periods are achievable, based on the specific characteristics of their franchise. However, the ORR should only specify a minimum level which is actually achievable for every franchisee (noting that, for some franchises, shorter times may already be committed obligations of their Franchise Agreement).

We recognise the need to be ambitious but also to ensure the proposals are deliverable. This is particularly acute in this context, where a service failure driven by an undeliverable ambition could result in failing some of our most vulnerable customers, as well as exposure to potentially costly legal claims.

Further there is a risk that trying to reduce the notice period whilst also making other changes (such as introducing mandatory checks that must be carried out at the time of booking, and a mandatory handover protocol) risks making too many changes at once. If systems then go wrong, it may be more difficult to identify which of the new areas has created difficulty. It would therefore seem more sensible to let some changes 'bed in' before introducing this further change (which will almost certainly become more or less realistic in light of the other changes).

By 10pm the previous day:

This is by far the most practical and achievable option but not without its problems. Currently we operate our call centre until 11pm and therefore the introduction of bookings being accepted until 10pm can be accommodated. It was noted in the consultation that other call centres will be expected to increase their opening hours in the medium to long term, this will mean in the short-term, the workload for our call centre is likely to increase from the early evening period.

Currently our stations produce and print the assisted travel booking schedule the evening before, so it is ready when staff turn up for the morning shift on the day. Many of our stations will become unmanned well before the 10pm deadline being proposed. This could lead to passengers who want to travel early in morning and only booking their assistance late the night before being missed off the list.

If this was to be implemented, then a monitoring process would need to be put in place to look at the booking patterns, especially close to the 10pm deadline, which would be the time with the highest risk in not delivering the assisted travel.

Six hours and two hours before travel:

Both the six hours and two hours deadline are currently not manageable on the GWR network. The first major issue with this is that the passenger assist technology is not suitable to do this. Currently, when making a booking, we are not able to see how many booked assists are in place for any train. The length of journeys on our network vary greatly from short distance trips, to journeys of up to six hours. This would mean that the train could have been travelling for several hours when the customer then requests assistance. This means the customer may book the wheelchair space two hours before travel, however on that train there is already an un-booked wheelchair user in the space. Alongside this, there may be a high level of assisted bookings already on the train, and due to the short notice period, the station may not be able to allocate enough staff to assist the passenger on/off the train in the allocated time. The updated passenger assist system should help, however we would need to trial the new system over a period of time to see what the new capabilities could mean for our assisted travel service.

The technology on the trains themselves would have to be updated to ensure a same day notice period would work. It would need to be highly accurate with right time information. This would be needed to be able to communicate any changes that occur to a train throughout its journey and therefore a customer looking to join that train will have accurate information whether they can book a space and receive the level of assistance required. The train fleet at GWR is diverse and would require a significant investment to ensure all trains were able to communicate right time information (by retrofit).

A further concern with the shorter notice period, would be the added pressure in the more rural areas of our network. On the GWR network, we provide trains throughout Devon and Cornwall. In these areas there is a high proportion of elderly and disabled passengers. A lot of the stations throughout this part of the network are often small stations and have limited staff presence. In the current booking system, we have enough time to organise suitable resource for the booked assists for the next day. With a same day notice period, this is not possible. This could potentially lead to several assists being booked for the same train, at a station that is single staffed. This could result in providing a substandard service, as well as creating delay minutes on the network.

For shorter notice periods, it will be imperative that the message and guidelines to our customers is clear. From attending the consultation briefing it was implied that passengers using the app would in the first instance only be requesting a booking. It is not until they receive confirmation that we can cater for their request for assistance is the booking confirmed. If this is not clearly explained to customers, then they will think that once they have requested assistance they will receive it. This will leave the customer believing that we have failed to provide assistance. It would also be vital that the customer app cannot make booking requests outside of the TOC's DPPP.

Until the technology can reliably work throughout the UK rail network it is not deliverable to provide a consistent same day service for assisted travel. Reliability and consistency should be the focus for assisted travel, ensuring customers are provided with a service they have confidence in.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

GWR suggests that bringing all bookings up to 10pm the previous day could be phased in on or before 12 months from implementation of the change in Guidance.

To maximise the prospects of a successful transition, we would recommend initially limited advertisement of the change of the process to enable it to be stress tested. Our suggestion would be to update DPPP documents and websites with the new information. This should allow a gradual release of the change of service and allow us to monitor the change more organically. After analysing the change and evaluating any problems, we can then look as an industry at how to advertise this further.

The shorter notice periods of 6 hours and 2 hours are currently impractical for our network (see q15). If either was to be introduced, then we would need a much longer period to implement this. An indicative suggestion of a possible timescale is:

- **10pm the night before:** within 12 months of the change in Guidance;
- **Not more than 12 hours before travel:** by the end of 2022; and
- **Not more than 6 hours before travel:** by the end of 2024

These are indicative suggestions only and would need to be considered in further detail and considering developments in technology (such as use of the Passenger Assist App and whether this may prove to be a useful enabler in this context). To introduce same day assistance bookings, the industry would need to be confident in providing a reliable and consistent assisted travel service. If the system is not robust there would be a likely reduction in the customer service received and bookings will be missed. This could result in failing some of our most vulnerable customers as well as exposure to potentially costly legal claims.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

GWR agrees it is imperative that accessibility is tailored to the specifics of the franchise / routes of operation. We therefore welcome a proposal that would allow operators to undertake a consider assessment of how best to provide accessible transport options.

We note that ORR has suggested that it "*proposes to seek evidence of such assessments as required but this may include as part of the approval process*" (Consultation paragraph 6.34). We do not currently see this reflected in the draft revised Guidance. We would want to see the proposed wording of this provision if ORR is minded to include it.

Part of the ORR's proposal in this respect is contained in Section 4 paragraph A1(g) that "*in cases where assistance to board or alight from a train at an unstaffed station using a ramp is*

*arranged, the operator **must** ensure that they make a member of staff with a ramp available to deliver the assistance*". We suggest this is unnecessary prescriptive. This part of the ORR's consultation is titled 'Flexibility' and is about providing flexible solutions. Ultimately, if an operator's failure to provide assistance results in a disruption to the journey the passenger will be entitled to compensation and (in severe cases) may also bring a legal claim. It is already in operator's interest to see that appropriate assistance is provided. However, it should be for the operator to work out the most appropriate solution.

For example, the most effective solution may be to contract for suitably qualified and trained personnel (who may not be staff) to provide a mobile, travelling and/or locally on-call service to assist with deployment of the ramp at unmanned stations. As noted above, the ORR should not set prescriptive mandatory requirements unless it is satisfied they are appropriate in all operational cases. The ORR's proposed wording here may be appropriate in many or even most cases, but operators should have the flexibility to decide on the appropriate solution.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

GWR largely agrees with this proposal. We currently offer redress when the arrangements for assistance fail. This is the full cost of the train journey and is outlined in our DPPP.

There is a risk to the industry in mandating a redress obligation but specifying that "*the form and value of this compensation **may** be determined on a case-by-case basis to allow operators to consider the circumstances of the case*" (draft revised Guidance Section 4, paragraph A8). The risk is that some operators (for their own reasons) chose to specify a standardised redress mechanism rather than state that they will make an assessment on a case-by-case basis. From our own experience, it seems likely this will create a scenario where a disabled passenger (when receiving defective service from another operator) will then suggest that this is the minimum that should be offered. This creates the possibility of inconsistency and/or tactical approaches on claims (backed by the threat of EA2010 litigation) rather than seeking to receive an objectively appropriate level of compensation assessed on a case-by-case basis.

In light of the above we would suggest this wording is amended to state that "*operators **must** include a statement in the passenger leaflet [and 'policy document'] that when assistance has been booked but has not been provided then compensation will be provided and that the form and value of this compensation will be determined on a case-by-case basis to allow operators to consider the circumstances of the case*".

To manage disabled passenger expectations, the ORR might also mandate that such a statement in the passenger leaflet should also explain that "*in cases of minor defect, this will usually be a proportion of the ticket price*"

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

This is a sensible proposal although there is a mismatch between the wording of the consultation (paragraph 6.47) and the wording of the draft revised Guidance (Section 4, paragraph A2.4). We are in favour of the proposal in the consultation document to "work with RDG to explore how this can be delivered and in what timeframe". We are not in favour of the Guidance wording that "*Operators **must** state their commitment to ensuring that all telephone services include providing a text relay number...*".

Our primary concern is that text relay requires that, whilst the person speaking (i.e. the train operator's staff speaking into the phone) can simply use a landline number, the person receiving that speech as text (i.e. the disabled person) needs an internet-connected device (such as a PC, laptop, smartphone or tablet) to view the text. To make this an effective commitment would therefore require every station in the country to have either wi-fi or a strong reliable 4G connection. Currently this is not available at every station.

Considering the above, it might harm disabled passengers' confidence in accessible transport to incorrectly tell them that operators are committed (at least presently) to ensuring that all telephone services include a text relay number, only for them to later find they cannot make use of it when needed because they do not have a wi-fi or strong 4G signal.

GWR is therefore in favour of this proposal in principle but suggest it needs further thought before mandatory wording is inserted in the Guidance. The ORR might also consider if a text-based communication service offered by the Travel Assist app might be designed in a way which adequately address the problem the ORR seeks to address with text relay.

If text relay is proposed as part of the solution, operators will presumably need to incorporate an understanding of text relay into the training provided to call centre operatives so that they know what to do when receiving a text relay call (e.g. needing to annunciate more slowly and as clearly as possible to ensure the text is accurately converted). The ORR would need to make allowance for the roll-out of such training.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

GWR agrees with the spirit and intent of this proposal. However, in practical terms, adherence to the proposed Guidance wording would be very difficult (and potentially impossible, for reasons outside of GWR's control) to implement throughout the whole GWR Network.

As an initial point, there is a discrepancy between the wording operators have been asked to consider as part of the Consultation, and the wording proposed in the draft revised Guidance.

GWR can support the wording of the Consultation but, for reasons explained below, cannot support the wording of the draft revised Guidance (which is incapable of being complied with).

The wording of the Consultation proposes that operators will be required to:

1. Work with 3rd parties to explore how **more** accessible rail replacement services (buses and taxis) might be provided in cases of delay, disruptions and emergencies;
2. Work with third party taxi providers to explore how accessible taxis might be made **more widely** available to provide alternatives to rail travel where required by passengers;
3. Report to ORR on the accessibility of rail replacement bus services; and
4. "Make reasonable endeavours to ensure drivers of rail replacement bus services and taxis have been trained to provide appropriate assistance to rail passengers"

(Point 4 is state at Consultation page 11, bullet 9, the other points are at Consultation page 94).

By contrast the draft revised Guidance includes obligations that:

- *"Where access by Private Hire Vehicles to stations is regulated under contract with the station operator, the terms of the contract **must** include, from the earliest opportunity, the requirement for the taxi operator to provide wheelchair-accessible vehicles and drivers trained in disability awareness."* (Guidance, paragraph A1(j)); and
- *"The accessibility requirements for buses and taxis is set out in separate legislation to that referenced in section 1.3 of this guidance [FN13: the PSVAR]; the accessibility of these services is neither monitored nor regulated by the ORR. However, in cases of delay, disruptions and emergencies, operators **must** consider how the rail replacement services and taxis provided are as accessible as possible. Operators must also make reasonable endeavours to ensure drivers of rail replacement bus services and taxis have received appropriate training to provide assistance to rail passengers."* (Guidance, paragraph A4)

Paragraph A1(j) is unnecessarily restrictive. What is required is that there are a suitable number of taxi operators to provide wheelchair-accessible vehicles and drivers trained in disability awareness. Creating an obligation that all taxi operators must comply will have the negative consequence of reducing service provision to all non-wheelchair using passengers as taxis that could previously access the rank would be prohibited from doing so. This may have severe consequences where non-wheelchair using passengers rely on an available flow of taxis to and from the station.

Based on the above, suitable alternative wording would be that *"...the station operator may stipulate terms of the contract which include the requirement for the taxi operator to provide wheelchair-accessible vehicles and drivers trained in disability awareness in order to ensure suitable provision of wheelchair accessible vehicles at that station"*.

Similarly, with respect of paragraph A4, what is required is that there are a suitable number of taxis and/or replacement buses to serve the needs of disabled users, not that all such provision should be *"as accessible as possible"* (which would be a requirement above the legal duty imposed by the Equality Act 2010).

Further, just as the ORR recognises in the suggested wording that it has no control over regulating buses and taxis, neither do rail operators. It is therefore unreasonable to mandate that Operators must also make *"reasonable endeavours"* to ensure drivers have received *"appropriate training"*. Is it suggested that operators would have to review the training material provided or seek assurance for drivers about the level of training received? How far does reasonable endeavours go, and what amounts to appropriate training? Do all drivers have to

receive such training, or just a suitable number to meet demand? If an operator can ensure suitable provision via wheelchair-accessible taxis, does it still need to make reasonable endeavours to ensure replacement bus drivers are trained? This is not realistic in cases of short term "*delay, disruptions and emergencies*".

Our concern is that the ORR may be mandating a level of compliance which is, in practical terms, uncertain in its terminology and impossible to attain. The ORR's proposal appears to run contrary to the evidential basis for making the proposal (as set out in Consultation paragraphs 6.51 and 6.52, which notes, for example, that a stipulation that only wheelchair accessible taxis could apply for hire at stations would mean 42% of taxis would then be excluded, and that the problem would be more acute in rural areas where accessible taxis may be readily available).

Having said the above, GWR supports the intention behind this proposal, particularly in the case of organising replacement transport for major engineering possessions. With a major possession, operators are often given a reasonable timescale to plan, including acquiring suitable rail replacement transport. It is during this time that areas such as driver training and availability of accessible vehicles can be explored. For example, during electrification work between Bath and Bristol, we were able to acquire new buses from First Group that all had a wheelchair space. Where we will struggle to implement the above, is for sporadic accessible vehicle requests/ short-term rail replacement needs especially where the disruption affects some of our more remote stations (e.g. on branch lines in rural areas). This is especially the case for longer rail replacement journeys where coaches are required rather than buses. Some areas, such as Devon and Cornwall, there are limited coach suppliers and we struggle to acquire enough vehicles, regardless of limiting this further with specific requirements. This is also the case where major events are taking place within the region which puts pressure on the availability of suitable road transport. Examples are the Royal International Air Tattoo at RAF Fairford, Glastonbury music festival and the Cheltenham Gold Cup festival, etc.

In terms of the specific practicalities that would be faced by GWR in implementing the proposed requirements, adherence to the proposed Guidance wording would be very difficult (and potentially impossible, for reasons outside of GWR's control) to implement. The main reason for this is due to the variety of size and geographical location of the stations. Some of which have limitations of the access roads which can be down country lanes and have low bridges and don't having adequate turn around points that are required for coaches and buses. We operate from a variety of different areas that all have different transport options with regards to rail replacement transport. Sourcing rail replacement transport within a short period of time often leads to a wide range of transport companies being used due to the availability of Rail Replacement Services (RRS) in an area, the number of passengers that must be moved and the size of vehicle that can access the station. To consult and assess with all these operators across our network would result in a huge project, which would take large amounts of time and resources to complete and then keep up to date.

Considering the wording proposed in the Consultation (as opposed to the draft Guidance):

Item 1 could be done with a few operators on parts of the network. Consulting with these companies will help to establish the needs and requirements of ourselves and our customers. However, how many of these operators would we need to consult with? We would also question how much influence we would have in persuading these operators to make major changes to their services. Bus companies that provide RRS are not plentiful and when the requirement for RRS are overlaid, we often do not have a choice, or have a limited choice of who we use. We also need to balance this with our safety procedures to ensure we procure the safest specification of coach or bus for our passengers. To ensure a joined-up approach the

Department for Transport should also be involved to help instigate change with these 3rd party operators. The ORR's consultation notes that the Government's Inclusive Transport Policy might drive such a change. So, a better option would be to influence change through policy with the DfT's Inclusive Transport Policy rather than placing an onus on operators over which they have limited leverage or control and any success would be local, limited and inconsistent.

Item 2 will be particularly problematic to implement. GWR do not control the taxi rank at many stations and private hire accessible taxis are not always situated close to (particularly remote rural) stations. There are also a huge number of private hire taxi companies, which often are isolated to certain geographic areas. To effectively work with companies across the whole network would be a huge task that would take a lot of time and resources.

Item 3 would be dependent on the information required. Currently a service provider coordinates our rail replacement bus services. Although they have a record of all suppliers on their system and the size of vehicles that they hold, they do not have accurate detail for every Operator concerning their accessible vehicles they operate. This is because their supplier base is so large and bus operator's fleets can change frequently. It would, therefore, take some considerable time to go through the whole Supplier base to obtain this information and keep it up to date. It would also be difficult to report on those vehicles that have been provided for RSS that were accessible, due to only registrations and driver's names being provided when Operators 'book on' for their shift.

Item 4 will also be problematic as currently worded. It may be easier to achieve this for replacement buses, where the service contract between the Operator and bus provider already frequently includes this requirement (or this could be inserted as a standard term, where not already present). However, the position with taxis and private hire vehicles (PHVs) will be more difficult. It is not clear how we can commit to a reasonable endeavours obligation when we may have no control over whether taxi drivers are trained or not. Would it be more achievable for the obligation to be "*reasonable endeavours to enquire whether drivers of taxis have been trained*"?

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Help points are provided at all GWR managed stations and are already utilised for this purpose. All stations also feature welcome posters with key contact information. Our call centre is open from 06.00 to 23.00 currently and passengers can also utilise National Rail enquiries 24-hour call centre.

We would be supportive of this practice being replicated throughout the industry, however we recognise that there are certain stations where help points are not currently provided, and mobile phone reception may be poor which could present issues. Consideration should be given to these locations on a case by case basis, and timescales agreed by which compliance must be achieved.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Currently GWR require passengers to apply for a scooter permit and already cover many areas highlighted in the consultation. This is an effective method of providing confidence and reassurance to both customer and employee, that the customer can travel using their scooter.

When it comes to scooters, it is essential that policies around this consider other legislation such as the Health and Safety at Work Act. We must consider the staff that implement these policies. With specific regards to scooters, the amount of strength needed to push a scooter and person up a ramp is considerable. Having strict restrictions on the size and weight of scooters helps to limit this risk. The GWR network is extremely diverse and has different platform widths which impact on the length of ramp that can be deployed and the weight the ramp can safely support. Also, we operate different trains with varying doors sizes and door configurations, plus different widths of train internal vestibules and corridors means turning circles and manoeuvring a scooter can be limited. This makes it is essential to be prescriptive on what is allowed in terms of the size and weight of a scooter for the safety of other passengers and staff.

Linked to the above submission, GWR cannot support the proposed "presumption of carriage" meaning that operators must allow scooters to board unless they can support evidence to the contrary. The risk of potential harm (and liability for potential harm e.g. under Sections 2 & 3 Health and Safety at Work Act, even where there is no actual harm) outweighs the objective.

As a proposed alternative solution to meet the ORR's aspiration, GWR would support a system where there is a "presumption of carriage" where the scooter user can provide industry-authorized / recognised evidence that the scooter complies with relevant safety and physical constraints to be safely transported. This would be similar to the system operating in the UK coach industry in which wheelchair users provide the make and model of their wheelchair to the coach operator; the coach operator then uses a contracted third party to validate whether that model is compatible with relevant safety constraints and regulation; if clearance is given, the coach operator can then record this on a database to avoid repeating this in the case of future travel. As the database was built up, this could be used to provide the "presumption of carriage" the ORR is seeking.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

GWR supports proposal (A) which seems eminently sensible provided that, in the case of journeys made impossible to physical constraints at station, the National Rail Enquiries database has been brought up to date to make it possible for the operator to validate that they are not selling a ticket the passenger cannot use.

Ensuring that customers have a full and accurate expectation of what they are purchasing before they begin their journeys, ultimately results in less journeys not meeting the customers' expectations and therefore providing a more positive customer experience.

One potential difficulty is whether there is an effective means of ensuring that third party ticket sellers (including other Operators, but also companies such as TrainLine.com, redspottedhanky.com, raileasy.co.uk, etc) give such warnings prior to booking. Should this only be an obligation where passengers are booking through the Operator's own website or call centre? On the GWR network, we operate a variety of rolling stock that have a variety of different characteristics. Therefore, local knowledge of these characteristics is essential and may be difficult for a third-party ticket seller to properly portray.

[(B) This requirement has merit; however, we do not feel enough understanding has been gained as to the requirements which would be placed on the TOCs to deliver this to the level which the ORR sets out in this consultation.

We have clear processes in place which deal with the issue of accessible toilet facilities being unavailable on board our trains, which include intervention by cleaning teams and on-board staff. Where reasonably practicable, we would also look to take trains out of service if the toilet provisions have become out of use. We are confident that our current approach meets the needs of our customers.

Thought will also need to go into how this information is supposed to be provided on Driver Only Operated (DOO) services. All systems will require someone inputting accurate information. If there is no onboard member, then there will be no one to update the system. If it is a system that the customer can input into (e.g. perhaps through an GWR App available to disabled travellers), then a system of ensuring that this process is not abused and ensuring all information is valid will need to be in place.

GWR would be happy to work with other operators and the RDG in being able to better get information of toilet availability to customers, including the use of CIS screens at stations. GWR would advise the ORR that it would be better to see how new innovations like the auto reporting functionality, CIS screens, Passenger Assist App and Transreport 'bed in' and whether they result in effective improvements before the ORR decides whether and how to significantly shift the landscape of the Guidance.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Stipulating that “may” means “good practice”

GWR is concerned about the proposed draft Guidance wording that *"it explains what an approved Accessible / Inclusive Travel Policy ‘must’ contain as a minimum in order to comply with the licence condition. It is also intended to set out recommended good practice that an approved ... Inclusive Travel Policy ‘may’ contain"* [emphasis added]. Outside the EA2010 landscape the use of the phrase *"recommended good practice"* would not be problematic. However, use of this phrase is problematic because of its meaning in the context of the EA2010 duty to make reasonable adjustments.

As the ORR rightly notes in pages 5 and 6 of the revised draft Guidance, what is a reasonable adjustment *"depends on all the circumstances including"* the factors listed by the ORR (amongst others). It therefore cannot follow that what an operator **"may"** do, as stated in the guidance, **must** be recommended good practice. In the context of the duty to make reasonable adjustments, this creates the presumption that an operator must do it, unless there are countervailing factors against doing it. Not all the circumstance in which the word "may" has been used in this Guidance are appropriate in this respect. For example, some of them are not things which an operator must do unless it can show otherwise but are genuine choices which an operator may or may not implement.

GWR's proposal is that "may" should be redefined in the Guidance. For example: *"[the Guidance] is also intended to set out suggested proposals that an approved ... Inclusive Travel Policy ‘may’ contain"*.

Additional Practices which have been implemented by GWR:

Assistance cards- These could be produced and distributed through the network. A lot of feedback we have had on this area is that people can be reluctant/feel uncomfortable to show cards/passes identifying their disability/needs. We are looking at more subtle/informal solutions such as the sunflower lanyard used at major airports. It is an area where allowing different approaches will help produce solutions that suit a variety of people and their needs.

Priority seat cards- This measure is already provided by GWR.

Dedicated Assistance team’s at large stations- This is dependent on the definition of large, as most of our major stations have dedicated assisted travel teams. However, at most of our other stations it is common practice for the dispatch team to assist.

Space for assistance dogs- We are undergoing a major overhaul of our train fleet, which will lead to more priority seats which have extra leg room where dogs can sit on the floor. Our assisted travel team are aware of the needs for passengers with assistance dogs and will look to book them in suitable seats.

Seats for companions- This is difficult to implement with our new IET trains. The main issue is that the wheelchair spaces are solely in First Class for a large portion of these trains. [The internal specification was mandated centrally by the DfT within the IET procurement process.] Currently we allow the wheelchair user and one other person being the carer/dependant in that area. We do make reasonable adjustments, however for parties where there are considerably

more than this and have standard class tickets, they will have to sit within standard class. The main reason being the number of first-class seats available. If we were to allow access for large parties, it could lead to passengers with first class tickets, not having access to their seats (in which event our Passenger's Charter commits us to providing them with compensation). On our other fleets, and where there is a standard class accessible space, we try to make every effort in booking a group as close to the accessible space as possible. This is dependent on the availability of seating. To do this we would advise passengers to make their booking early through our assisted travel team.

Video relay services- This is a new concept for the industry and therefore more research will need to be done to evaluate the value impact of implementing this.

Station Navigation- This technology is in the early stages of development and many of the concepts outlined have not been fully trialled/implemented. It is an area which is worth monitoring and trialling but needs to be fully developed first in order to implement across a network.

Q25. Do you have any other comments or views on improving Assisted Travel?

Section 1 of the Guidance: Statements of the law

GWR is concerned by some of the explanations of the law included in Section 1 of the draft revised Guidance. The ORR should take specialist advice to ensure the absolute accuracy of the statements of the law in this section as the Guidance may well be read (and relied on) by disabled passengers and others. Whilst we do not object to Section 1 providing some form of easily accessible guide to the law, this should not be at the expense of the accuracy of those statements (even where further explanation is needed to properly explain it).

For example:

- A non-legally trained person reading the statement that the "*duty to make reasonable adjustments...applies where a physical feature puts a disabled person at a substantial disadvantage*" might take that statement at face value. In fact, the application of this duty to railway is very limited in light of Schedule 2 paragraph 3, which states that "*It is never reasonable for [an operator] to have to take a step which would...involve the alteration or removal of a physical feature of a vehicle used in providing the service...[where it is] a vehicle built or adapted to carry passengers on a railway or tramway (within the meaning, in each case, of the Transport and Works Act 1992).*"
- It states that "*Operators need to be mindful of the requirements of the Regulation when developing policy and practice. In particular, Articles 19 to 25 inclusive...*". However, only Articles 9, 11, 12, 19, 20(1) and 26 of the Regulation are in force in the UK (and the remainder may never come into force as a result of Brexit).
- there are references to "persons with reduced mobility" which should be references to "disabled persons" under EA10.

The particular relevance of this point is that GWR is aware of disabled passengers that keep themselves very well informed, including by reading statements produced by Regulators. Such statements therefore need to be legally and factually accurate because it will be an operator who then has to explain to passengers why their interpretation of these statements may be inaccurate.

Section 4, Paragraph A2.5: Websites

It is not clear that it would actually be useful to users to make it mandatory that all of the types of information list in this section must be provided “*on one page*”. Proposed content includes (amongst many other items) “*information of on-board facilities and station information, including accessibility information, staff availability, contact centre opening hours, disabled parking spaces*”. This risks creating a large inaccessible document that is difficult to read and takes a long time to load. Would it not be better for one page to contain all the links in one place, rather than all of the underlying information?

Section 4, Paragraph A3: Ticketing

The ORR recommends changes to the ticket booking section of Operators’ websites at the first available opportunity and, where necessary, their contact centre call handling procedures, so that when passengers indicate they have a Disabled Persons Railcard this acts as a trigger for the website or call centre staff to ask whether they require assistance with any aspect of their journey. It is not clear what the time will be allowed for implementing compliant practices. This will require amendment to call centre training and script documents.

The ORR must allow testing and, if testing confirms it is possible, a sufficient implementation period for operators to construct coding, sandbox testing, and confirm the functionality of (in particular) its website to meet the proposed mandatory requirement that “*the operator **must** ensure that passengers are unable to, or warned against, purchasing tickets they cannot make use of on the operator’s services e.g. due to the accessibility of rolling stock (e.g. when purchasing first class tickets, passengers should be warned if there is no wheelchair space in first class).*” The ORR should only introduce this mandatory requirement once it is confirmed that key back-office functionality used by all or most TOCs can support such a trigger.

How will the ORR regulate third party ticket sellers (such as TrainLine.com, redspottedhanky.com, raileasy.co.uk, etc, and ‘Ticket Splitting’ websites) to ensure they provide equivalent functionality?

Section 4, Paragraph A7.3: Third party provided facilities (in stations)

The draft Guidance states: “*Operators must set out how they will ensure that services and facilities provided by third parties are as accessible as possible.*” Operators can “*seek to ensure*” compliance, they can make stipulations in sub-leases and contract, and they can even take action against those that do not comply. However, operators cannot guarantee that they “*will ensure*” compliance. That is a matter for the third party. The proposed wording might also give the (presumably unintentional) suggestion that operators are required to fund third parties so that it can ensure the services and facilities are as accessible as possible.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People's Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Heathrow Express Operating Company
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

Heathrow Express agrees with the view of replacing Disabled Persons Protection Policy with either of the other options as it more accurately reflects the nature of the policy and its purpose for individuals.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- A) Heathrow Express feels this format and the content list covers all elements of the customer journey.
- B) We agree that the title of the document still clearly outlines what the purpose is.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

As an operator of one type of rolling stock, calling at only 3 stations we would prefer to continue to include this information in the passenger leaflet. We are happy to also include in our policy document if the amended guidance requires such. We appreciate that for many companies the requirement to include large numbers of rolling stock types and stations is prohibitive and support them being able to display this information in other ways.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

Heathrow Express agrees with the proposed changes to the review and approval process. In terms of the timescales of ORR approval, it is assumed the ORR will be more closely managing the response times of third parties so that this does not delay approval in the timescale indicated.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The new wording is a vast improvement and provides much more clarity, and therefore Heathrow Express agrees with this change.

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Reliability (Chapter 3)
Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?
As Heathrow Express do not operate a pre-booking service, all of our services are a fully accessible, turn up and go service, this is not applicable. We will however ensure that station accessibility information is fully available on our website and other channels as per current requirements.

Reliability (Chapter 3)
Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?
We fully support these changes and challenge the ORR to include classification of whether the service is step-free between the train and the platform (or require operators to make it explicitly clear in their passenger leaflet whether a ramp can be deployed safely at specific stations).

Reliability (Chapter 3)
Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?
Heathrow Express already operate a 'call-ahead' process to ensure station assistance is available for the customer arrival. We support the roll out of this further to other operators to ensure consistency in service.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Heathrow Express fully supports this proposal, despite the fact we already have a local level operating procedure to deliver this initiative.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

Heathrow Express fully supports the proposed content and challenges the ORR to push further to ensure that the real-life experiences of disabled people whilst travelling by rail specifically is included in the requirements.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

1. Heathrow Express supports this proposal.
2. Heathrow Express supports industry mandated refresher training content based on industry wide customer feedback, coupled with specific issues related to the specific operator.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Heathrow Express fully supports these proposals.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

Heathrow Express supports these proposals – specifically we will leverage our relationship with Heathrow Airport to emulate elements of the more stringent requirements of the Civil Aviation Authority.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

Heathrow Express supports these requirements.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

This does not impact Heathrow Express as we operate a turn up and go service. The table on page 78 incorrectly states Heathrow Express requires 24 hours notice. We do not take part in Passenger Assist and all we ask is customers arrive at the station 15 mins before the train they would like to take. If a customer would like assistance at Heathrow or Paddington this is booked directly with Network Rail or Omniserve.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

This does not impact Heathrow Express as we operate a turn up and go service. The table on page 78 incorrectly states Heathrow Express requires 24 hours notice. We do not take part in Passenger Assist and all we ask is customers arrive at the station 15 mins before the train they would like to take. If a customer would like assistance at Heathrow or Paddington this is booked directly with Network Rail or Omniserve.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

Heathrow Express has a person onboard trains and all stations are staffed during train operating hours. We generally support the proposals as described in the consultation but believe autonomy should be given to operators to ensure compliance with their obligations as part of their DPPP.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Heathrow Express would prefer to continue to investigate assistance failures in line with our complaints handling procedure. This would allow for each case to be investigated and redress provided on a case-by-case basis.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Heathrow Express support sthe initiative which should be shaped by RDG and include the entire rail network.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

Heathrow Express support this proposal.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Heathrow Express supports this proposal, however in the context of our operation our stations are staffed from first to last train and we have a person onboard each of our trains.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Heathrow Express broadly supports this proposal. In terms of a 'permit scheme' due to the nature of our customer demographic, this would not be a suitable method of identifying suitability of travel for our operation.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

- a) This is not an issue on Heathrow Express – we have accessible First Class accommodation. If we cannot accommodate a customer in First Class, due to other customers already occupying accessible wheelchair spaces for example, this would be covered under our First Class Seat Guarantee and we would provide a full refund of the ticket price.
- b) Heathrow Express support the proposal to investigate further the

practicality of making this information available to customers as early as possible in the customer journey.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Heathrow Express has no further comment on these examples of good practice, however we would encourage the ORR to provide a forum for best practice sharing across the industry and how we can learn more from other industries.

Q25. Do you have any other comments or views on improving Assisted Travel?

Heathrow Express have no further comments at this time. We commit to continuing to support the development of improvements to assisted travel in the rail industry.

Thank you for taking the time to respond.

24th January 2019

[redacted]
Head of Business Development

To:

Consumer Policy Team
One Kemble Street
London
WC2B 4AN

E-mail: dppp@orr.gov.uk

Dear Consumer Policy Team

Improving Assisted Travel: A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)

As one of the UK's leading Open Access Operators, we currently use a fleet of four trains to provide services to customers along a dedicated line of route. Our approach to this consultation is thus tailored to the type of service that we offer and the commercial and regulatory environment in which we operate.

Thank you for affording us the opportunity to respond to the consultation related to the above matter, please find attached our comments.

1) What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

Hull Trains fully supports the change in terminology from 'Disabled Person's Protection Policy' to something which is clearer to customers as to the content of the document. As such we would suggest that the customer and policy documents are outlined more clearly under the descriptions:

- Accessible Travel: A Customer Guide
- Accessible Travel: Our Policy

For any change we would seek to understand whether this new terminology should be phased-in or should change on a specified 'go-live' date. Sufficient time should be given to update the various hardcopy document which will need design and verification, therefore we would prefer a gradual phasing in approach to be taken.

2) What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?**
- b) Is this still a meaningful title for this leaflet?**

We welcome a shorter customer facing document which continues to provide the key pieces of information which our customers require to make informed choices about their travel. We believe that the information should be standardised in order to provide a consistent approach from the industry.

As stated in our response to question 1, we have made suggestions as to the title we think befits the leaflets.

In the current digital age that we live in, we believe that a move towards the use of digital formats for documents would be more appropriate. We note the comment from your stakeholder engagement research that supports the view that regular users rarely read the existing literature and so a more environmentally friendly approach to the production of this document would be welcomed. We believe that production of documents 'on request' is best approach. Furthermore, our new website, to be launched in March 2019, gives us improved flexibility and responsiveness about the content of information on the website.

3) What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We believe that this information is important to allow customers to plan their journeys effectively, however as mentioned in the answer to the previous question, with the move to digital we believe that this information should be provided online and a link to this referenced within each document. This approach allows for quicker, more accurate updates and, as has been described in point 2.31 of the consultation document, would allow for station, on board and assisted travel colleagues, to provide this information to customers more easily and effectively. Rolling stock information, in particular, is less centrally available than station information, so a more defined location, be it through a system akin to knowledgebase, would assist both staff and customers.

4) What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We would welcome a more structured review process whereby timescales are specified not just for operators, but also for the ORR so that there is clear accountability on both parties to ensure a timely delivery of documents.

We welcome the inclusion of the views of a local accessibility panel, as part of the approval and review process. Along with a number of other operators in Northern England, we already consult a panel of representative stakeholders on important issues affecting the provision of accessible facilities on our trains and the stations at which we call. Whilst a local approach is important, we would be supportive of a more national panel which is established around defined relevancy parameters and with suitable knowledge of the rail industry. It would be helpful if this was led by either Rail Delivery Group or the ORR itself. We would also comment that whilst their opinions should influence approaches taken, any finalised policies should ultimately be decided between the TOCs and ORR. Our concern is that when a consultee seeks something which is not viable or the best option, but is possible, they may refer to the wording as something which must be done, rather than could be done (as the draft wording suggests). In addition, it is not clear who has the ultimate control over what is 'possible' and whether other factors such as cost versus benefit are

taken into account. We would therefore like to see some clarity from the ORR around how this would be monitored and assessed.

5) What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

As an Open Access Operator, whilst we do not manage any stations, we see that there is a clear need within the current documents available to provide a consistent national standard in how operators advertise station 'step-free' access. Within the classification system however, we would also like to see that consideration is given to other accessible features to ensure that a wide range of needs are considered, thus encouraging operators to provide more consistent facilities for disabled customers and older people.

6) What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Our assisted travel colleagues are already expected to check station accessibility information as part of the process used when booking assistance for customers. At present, however there is no method of logging that this information has been accessed during the booking process.

Whilst checking information may indeed identify an issue with the provision of assistance at a station, it will also increase call handling times of what can already be a lengthy process. We would suggest that the ORR may wish to undertake market testing with disabled passengers to assess whether they want this content explained as part of the call process. This could be done in conjunction with operators stress testing Knowledgebase to assess its capability for supporting the proposed system and information requirements. If the ORR then concludes that there is a strong case, supported by passenger feedback, and if operators report back that the proposal can be supported by the infrastructure, it could be introduced at a later stage. Prior to the introduction of any mandated checks we would therefore seek to work with the ORR to verify the process for such checks.

7) What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We would always welcome the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys. It is important, however, that consideration is given to the different services that different operators provide and, as an Open Access Operator, our abilities to influence the services provided by other operators at the stations at which we call. We would also add that outside the Equality Act 2010 landscape the use of the phrase "*recommended good practice*" would not be problematic. However, use of this phrase is problematic because of its meaning in the context of the EA2010 duty to make reasonable adjustments. We would propose that "may" should be redefined in the Guidance. For example: "[the Guidance] is also intended to set out suggested proposals that an approved ... Inclusive Travel Policy 'may' contain".

8) What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

We would support the introduction of an assistance handover protocol. Furthermore, we would welcome the inclusion of a protocol between station and onboard teams where the station team informs the train manager of a customer requiring assistance, thus acting as a failsafe in the event of assistance failing at the destination station. We understand that this may not be achievable universally across the rail industry, but it does create an additional check into the process where some operators are able to involve on train staff in this way.

9) What are your views on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

We would welcome the introduction of a of dedicated assistance line for all GB mainline stations, although note that some clear guidance needs to be given to Station Facility Operators about the operation of this line, including what happens if calls are unanswered. We would suggest that the attention is therefore instead given to whether it is better to fund an assistance line or focus on the forthcoming, more innovative, Transreport system and benefits this will offer.

10) What are your views on our training proposals? Do you agree with the proposed content?

We agree that Disability Awareness Training forms an essential part of staff education. Our current training is delivered with the support of our sister operator, TransPennine Express and we recognise that the training material provided to the ORR as part of their review does not address the 10 elements of the proposed requirements. Having discussed this with TransPennine Express, we agree with their comments that a literary review of training materials is insufficient and would welcome participation by the ORR in any training to assure its suitability.

11) Do you agree that:

- a. **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- b. **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

We would support the need for refresher training for all colleagues and the timescales to be applied for the development of such training. We would however seek a clearer understanding of the expectations of such training, noting that innovative approaches to training be considered acceptable so that training can be managed without the need to necessarily release staff in full from their duties. We do not believe that specifying a 'classroom' based approach should be mandatory for such refresher training. We intend to work alongside TransPennine Express who have an intended programme of refresher training and we would ask that the ORR give flexibility to committed dates by which training must be provided so that the priority areas mentioned in the consultation can be accommodated.

We believe that refresher training should be focused on TOC specific parameters in the first instance, however industry wide requirements should indeed be included to encourage a more consistent approach from operators.

12) What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We believe that RDG should take the lead in publicising and highlighting the benefits of the Passenger Assist system, noting that the ORR research has shown a clear lack of knowledge of the service and what it can offer existing and potential customers.

In doing so however, it is essential that the new Passenger Assist system, to be delivered later this year, is allowed to be fully bedded in and tested so that customers expectations can be met and the system is robust enough to meet demand. It is also important that the industry is able to convey to customers the levels of service they can expect, i.e. unstaffed stations may afford an entirely different level of service than those which are staffed. We believe that the ORR must therefore give careful consideration as to how this is done and consult further with operators on the deliverability of specific proposals.

13) What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We already readily engage with a wide variety of local and national stakeholders in a variety of ways to promote our services, taking actions, where appropriate from these engagements. As a commercial, Open Access Operator we believe this offers greater benefits on a voluntary and commercial basis where recommendations are implemented for their benefits to customers, rather than making this an issue of regulatory compliance. That said, we see the clear benefit of a centralised, RDG led approach which can offer a cost-effective solution for the industry, and more importantly, a consistent approach to customers.

14) What are your views on the proposal for more prescriptive website requirements?

We welcome the proposal for more prescriptive website requirements in that this will bring about more consistencies in the availability of information for customers. In March 2019 we will be launching a new website and will continue to develop our accessibility information in line with customer demand and ORR requirements. In view of the fact that many customers choose to purchase tickets from third party suppliers, we believe that it is important that any requirements are also applied to them so that the touchpoint journey for a customer obtains the right information at the right time to meet their needs. In setting any requirements sufficient timescales should therefore be specified based on a clear understanding of the nature of such changes, enabling us to code, debug, UAT and deliver a robust website.

15) What are your views on the three options for reducing the notice period for booked assistance?

We fully appreciate the views of stakeholders in requiring as minimum a notice period for booking assistance. In view of our service operation as an intercity TOC we are supportive of the option of '10pm the day before travel'. A shorter timeframe would be very difficult to achieve given the

reservations systems that we currently use; the current opening hours of our call centre and the service pattern that we operate.

16) How do you consider any reduction might be phased in? If so, how might this happen?

We believe that any introduction of a change in notice periods should be linked to the introduction of the new Passenger Assist system due to be launched later this year, so that it is more consistent across the industry. We would also need at least 5 month's notice to make internal changes and procure and install hardware to enable us to comply with the '10pm the day before travel', as we would be subject to third party permissions for the installation of equipment.

17) What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We are committed to providing on-train staff on all of our services until the end of our Track Access Agreement and as such are not in suitable position to comment on this element of the consultation.

18) What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

At present, we deal with any claims for redress individually based on the details of each case. Whilst this is not formalised within any existing literature, we do record such instances within our customer relationship management system. We believe that, as has been mentioned in the consultation paper, the existing Consumer Rights Act provides sufficient routing for redress by operators.

As an Open Access Operator we do not operate stations - assistance is provided for our customers by the SFO or a third party supplier, funded through the Station Access Contract (SAC). We believe it is essential to address the shortcoming of the current approach to ensure that TOCs only issue redress where they can be determined as being responsible directly for the assistance failure, or a mechanism for re-charging through the SAC is introduced. Should the ORR institute mandatory arrangements we would seek clarity on responsibility for which company should take accountability for this and how any system managing this is arranged.

In considering such a system, we would strongly request that there is an understanding of our position as an Open Access Operator; such that any compensation is assessed on a case-by-case basis and in light of all the circumstances, as it is indeed now. The risk of a more rigid system is that it may be open to abuse or may involve customers receiving more than the cost of their ticket purchase in redress for any failed assistance.

19) What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We currently utilise the Text Relay system which is compatible with all numbers and believe that all TOCs should have a single contact number and promote the use of the Next Generation Text Service for any customers requiring text relay services.

20) What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We have consulted with our road transport supplier to assist with our response to this question within the consultation. We have structured our response to this question into four sections.

- **Accessible Coach / Bus Availability**

Rail replacement services make use of vehicles within the private hire coach market, and as such, availability is subject to demand, and can be heavily influenced by the time of day (e.g. competing with dedicated work to provide school bus services) or time of year (e.g. summer coach tours market). Early planning is essential to ensuring vehicles are recruited to meet the needs of the replacement transport operation.

As a long-distance operator, our preference is the use of executive coaches over service buses as they offer greater comfort, luggage storage and toilet facilities for customers. We recognise the benefits offered by using service vehicles (single or double decker buses) where capacity needs to take precedence over luggage storage or comfort over short distances. It should be noted that service buses are unsuitable for use on journeys which would require long periods of travel at motorway speeds. It is widely accepted that coaches cannot accommodate wheelchair users, and have stepped access, often steep, whereas service buses offer low floor access, and therefore offer similar levels of access to our trains, but without the comfort or luggage capacity.

Currently, our road transport suppliers' vehicle databases utilise these assumptions. To review and record the accessibility of the coaches owned and operated by every operator listed on their database would be a significant undertaking, and development of their database would be required to support the recording of this information. They have also raised concerns over the ability to maintain the accuracy of this information as coach operators frequently change and upgrade their vehicles to meet market demand.

The issue with the use of service buses beyond comfort and suitability is availability. Many operators do not carry excess vehicles in their fleet, and therefore availability is low, particularly at peak times.

All elements considered, the current approach taken to supply rail replacement, using private hire coaches, remains the only viable option to meet the requirements for demand. On average, for each train which is removed from service, a minimum of two coaches are required, and this is set to increase as we begin to operate longer, higher capacity trains. To insist that all coaches/buses used for rail replacement are accessible would eradicate our ability to meet customer demand. This would be compounded if this approach was applied to all TOCs, as we would be competing for a very small portion of the coach/bus market.

Before such a change can be implemented, we believe that the ORR need to work with the Department for Transport to influence changes within the private hire coach market to increase the availability of accessible coaches. We note that an objective of the DfT's Inclusive Transport Strategy is to influence changes to the private hire, taxi, coach and bus industries to address

accessibility for these forms of transport. We would therefore ask that the ORR considers the impact of proposed measures by the DfT under their Inclusive Transport Strategy before introducing new guidance to mandate change driven by TOCs.

We do not feel that the ORR have suitably assessed the impact which insisting accessible vehicles be utilised for all rail replacement services would have upon the industry's ability to keep customers moving. We believe the approach currently used, of providing an accessible taxi where a coach service cannot be accessed remains the best approach for all customers in recognition of the current state of the coach and bus market. Until this market moves to using accessible vehicles, TOCs remain unable to specify this requirement and we would strongly oppose any proposal to introduce this requirement through the guidance.

- **Accessible Taxi Availability**

The availability of accessible taxis is higher than that of accessible coaches, however, as stated in the consultation document, often the provision of these vehicles is concentrated to highly populated urban areas. The issue faced by the industry is that often, the inaccessible stations, where accessible road transport is required, are rural, and so availability of these vehicles is severely diminished.

Our road transport providers are confident that an accessible vehicle could be supplied at these stations in an emergency/unplanned scenario within a period of 90 minutes. We recognise that this may not exceed aspirations, however, until the taxi and private hire operators increase the quantity of accessible vehicles within their fleets, this will continue to be an issue for the rail industry.

As with the availability of accessible coaches, this is not an issue which we feel can be addressed by the TOCs. The ORR need to work with the DfT and local authorities to influence change within taxi and private hire legislation to increase the provision of these vehicles across the UK as mentioned above in relation to the DfT's Inclusive Transport Strategy.

On this basis, we would oppose any change to guidance with respect to the provision of accessible taxis.

- **Coach / Bus Driver Disability Awareness**

As set out within the consultation, disability awareness training is a requirement for all bus and coach drivers, however, as a TOC, we have no process for assessing or influencing the content or quality of this training as it is provided by the operator, not ourselves. We do not feel that the guidance should make any reference to the requirement for coach or bus drivers to have undertaken this training as it should be an assumption within their industry.

- **Taxi Driver Disability Awareness**

As set out within the consultation document, there is currently no requirement for taxi drivers to have completed disability awareness training. We feel it is unrealistic to impose requirements upon the TOCs to require this training to be completed by any taxi driver who could realistically be called upon to provide alternative transport to/from a railway station when it is not a national standard or requirement.

Prior to any changes to the guidance being introduced in relation to this requirement, we would appreciate the opportunity to discuss this further with the ORR to set expectations with regards to:

- Who is responsible for delivery of the disability awareness training for taxi drivers?
- Who is responsible for determining the suitability of the training provided, and verifying content (to avoid inconsistencies)?
- Who covers the cost associated with providing and maintaining disability awareness training for taxi drivers?

Whilst it is recognised that the taxi provider may be subcontracted by the TOC, it is ultimately the responsibility of the taxi operator to ensure they are providing the required assistance in line with the EA 2010, and whilst the TOC can provide guidance, we cannot take away the responsibility for the operators to ensure their compliance.

21) What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

As an Open Access Operator we do not have any direct control over station information, however we would welcome the provision of such information and a consistent industry approach to this matter. That said we would note that acknowledgement is made that those TOCs that have more geographically remote and unstaffed stations may need mitigations as part of the proposal.

22) What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

We are currently planning to introduce a scooter permit scheme in the near future, based on risk assessments for their use along the route on which we operate. We do not agree with the proposals put forward by the ORR with regards to the changes to carriage of mobility scooters on board trains.

To assume that all scooters are able to be conveyed in an assembled state would introduce safety risks and set a dangerous precedent, undermining the scooter permit schemes which are in place to protect customers and staff alike.

There is no communality of standard for mobility scooters, unlike wheelchairs, therefore to assume all can be suitably accommodated incurs risk, hence why we intend to introduce a scooter permit system, having seen the benefits shown elsewhere in the industry to staff and customers in the clarity this provides.

We would support the ORR in the presumption of folded mobility scooter conveyance, where the scooter has been folded prior to boarding.

23) What are your views on our proposals to clarify the guidance to ensure:
a) passengers do not purchase tickets they cannot make use of; and
b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

In relation to point a) we feel that this issue must be addressed by the ticket information system providers who can provide linkage to fleet information provided by TOCs. We therefore feel that it is not appropriate for this to be included within the guidance as we do not have direct control over this. A more appropriate approach could be for this to be included as a requirement of the RDG TIS accreditation process, phased in over a period of time to allow retail system suppliers to adapt and develop their products to meet it.

With regards to point b) we utilise an existing process to notify customers when our accessible toilet is out of order. This is reliant on the information provided through DARWIN being cascaded out to customers through a number of third party systems, including those at stations. We are therefore happy to work with other operators and RDG to ensure that customers are made as fully aware as possible in advance of travelling of any toilet issues, but would ask that note is taken of our reliance on other providers. Furthermore, there are a number of other train features which can impact on the comfort and ease of a customer's journey, so would suggest a more holistic, best practice approach be taken where the industry can highlight failures of all of these more effectively.

24) Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

We welcome suggestions for service improvements and would expect these to continue to be discussed at RDG's Accessibility Delivery Group involving all operators so that there is flexibility in determining what works for each operator, rather than mandating 'best practice'.

Thank you for the opportunity to offer our views through this consultation, we look forward to seeing the final outputs and understanding how we can work alongside our industry partners in providing an enhanced service to our disabled and elderly customers.

Yours sincerely

[redacted]
Head of Business Development
Hull Trains

Firstly, and most importantly – Assisted Travel is a backstop, it's the fallback position where proper arrangements for Accessible Travel are NOT there. While for the moment, we need there to be Assisted Travel, and some people may always need it, the best solution is to ensure that travel on trains is, for most at least, Accessible. To eventually achieve that, it would require that ALL new train carriages, or at least one carriage per train (to be clearly signposted) is fully accessible for those using wheelchairs, scooters, and other walking aids. I have recently been looking at these arrangements in other countries, and a fully accessible carriage, with its stopping position clearly signposted on the platform, seems to be the developing norm. I would like to see our railways at least having a policy to work in that direction. It would also require that ALL stations have step-free access to platforms – that is not currently so, and there should be a firm policy to provide this by some fixed date.

As to your various points:

Better information would obviously be good,

Being able to book Assisted Travel on the day, or at least by 10pm the night before, would be an improvement

Being able to contact someone at every station would be good

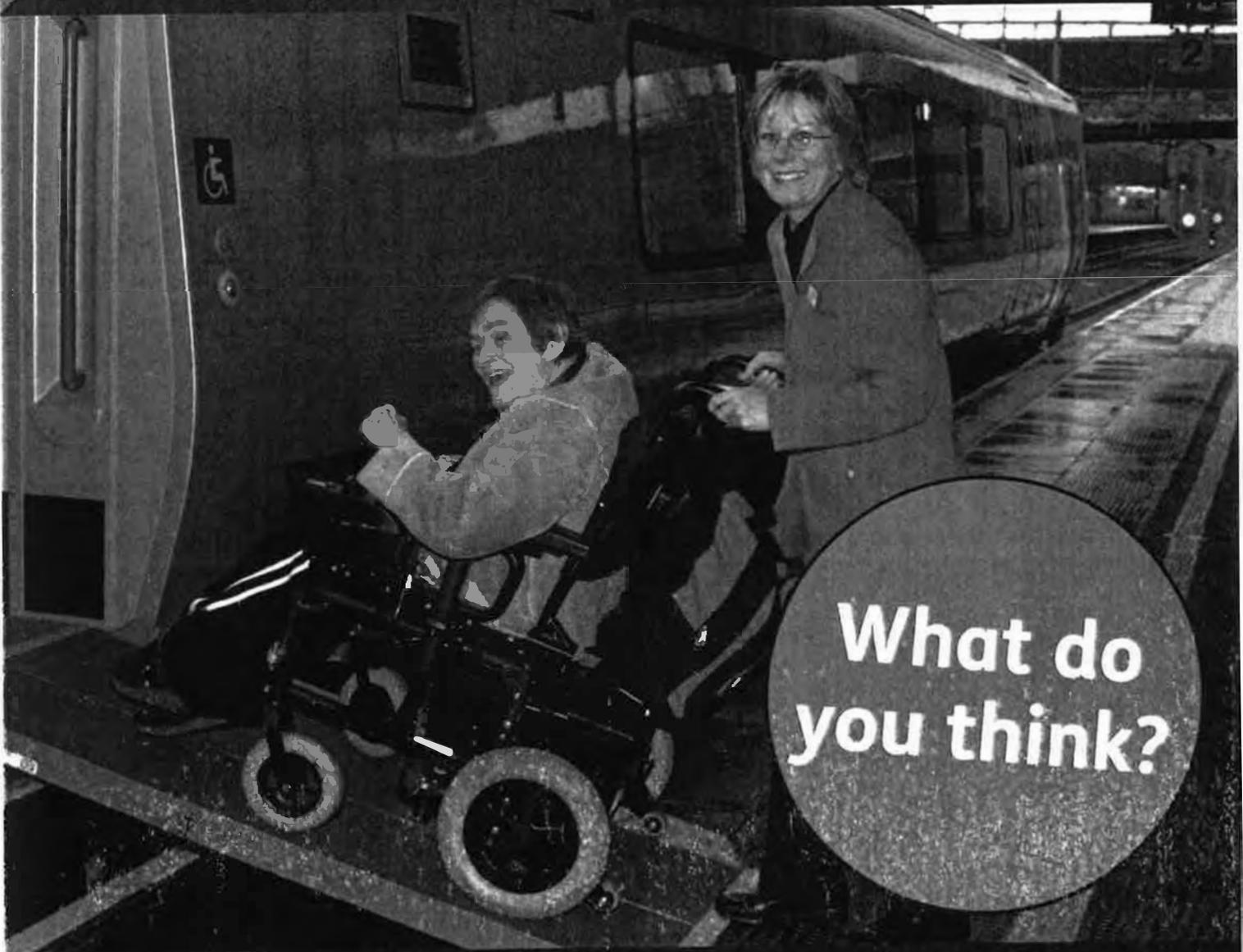
Involving Disabled People in staff training would be good (they should be paid for this!)

But all these points only improve how we cope with a train system which is not Accessible.



OFFICE OF RAIL AND ROAD

Improving assisted travel



What do
you think?

Changes to the rules for train companies

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Introduction



This document explains how the **Office for Rail and Road (ORR)** wants to change how it makes train companies help disabled people to travel by train.



The **Office for Rail and Road (ORR)** is the government organisation that makes sure that train companies do their jobs properly.



One way train companies help disabled people is called **Assisted Travel**.



Assisted Travel is where you can ask for someone to meet you and help you to get on or off the train, carry your bags or provide other help.



You can book in advance or ask when you get to the station.

There is no extra cost for assisted travel.



Our research found that:

- 7 out of 10 disabled people had not heard of assisted travel.



- 6 out of 10 disabled people said that they would use assisted travel if they knew about it



We want to know what you think.

Please read through this document and tell us what you think by answering the questions.



We need your answers back by Friday 18th January 2019.

A new name



The ORR has to make sure that train companies help disabled users to travel by train.



We do this by making train companies write a policy called a Disabled People's Protection Policy.



We want to change the name of the policy to either:

- Inclusive Travel Policy, or
- Accessible Travel Policy

Question 1: What is your preferred option for changing the name of the policy?



Accessible Travel policy

Passenger leaflet



People say that they want to find out about **Assisted Travel** by a leaflet or booklet.



Rail companies have different types of leaflets.

Some are hard to understand.

Some have too much information.

Many are hard to find.

We think there should be a new simple leaflet with these headings:



- Introduction: What the leaflet is and who it is for
- Assistance: what it is and how to get it
- What disabled passengers should get:
 - Before travelling
 - At the station



- On the train
- If things go wrong
- Where to get more information



The leaflets train companies have now are called 'Making Rail Accessible: helping older and disabled people'

Question 2: What do you think about the ideas for this leaflet? Is there anything else that should be included? Do you think the title needs to be changed?



The ideas are a good idea and sound like they would make train travel easier for older and disabled people

Policy document



The ORR says that each train company should have their own policy document.



These must give details of how their trains and stations are accessible to disabled people.



People can ask for a copy of the policy document or find it on the internet.



They can get accessible versions of the policy documents.



Many companies have been putting a lot of detailed information about how their trains and stations are accessible into their leaflets.

This makes the leaflet very long. Information can easily get out of date.



We think they should put the details in the policy document and only have the most important bits of information in the leaflet.

People would still be able to get this detail on the internet

Question 3: What do you think about putting non customer friendly information in the policy document rather than the leaflet?



Sounds good but I think there should be a debate with information explaining the pros and cons of each proposal

Checking the policies



We want train companies to have to talk to local disabled people when they write their policies about assisted travel.

Question 4: What do you think about this change? Are there any other things we could do to make it better?

I think this should be
compulsory for all train
companies

Reliable services



When we asked, people said that:

- Generally they liked the Passenger Assist Service, but
- 1 in every 5 people did not get all the help that they had booked



This section looks at:

1. Ways to make it easier to understand how accessible a station is
2. Ways to make sure that when you book assistance you get the information you need
3. Ways to make assistance to work better at the stations



1. How accessible is the station?



We want train companies to use the same easy way of explaining how accessible a station is.

We think there should be 5 categories: A, B, C, D and E.



A. There are no steps. You can get anywhere in a wheelchair



B. There are good ways to get to all platforms in a wheelchair



C. There are some ways to get to all platforms by wheelchair



D. You can get to some platforms by wheelchair - but not all



E. You can't get anywhere in a wheelchair

Question 5: Do you think that these categories are helpful?

These are very helpful and should be introduced across the whole network.



2. Booking your assisted travel



People book their assisted travel either:

- By telephone
- By email
- On a website



In each case a member of staff takes your information and makes the booking.

We want to change the instructions to these members of staff so that:



- They always have to check the accessibility of the stations that you want to use



- They have to tell you what to expect at stations and how to make sure you get the help you need



Question 6: What do you think about making members of staff check the accessibility of stations when you book an assisted journey?

This would reduce the disappointment of disabled passengers being turned away at stations because it is not accessible for their needs



Question 7: What do you think about making members of staff tell you what to expect at stations and how to make sure you get the help you need?

This would reduce stress and anxiety disabled passengers face sometimes when travelling by train

3. What happens at the station



When you are getting assistance to travel from one station to another, the station staff at the first station need to pass information to the staff at the second station to make sure there is someone there to give you the help you need.



We want to create some rules so that staff know what information must be given.



The information might be:

- The passengers name
- What type of disability
- What help they need
- Information about the train



- Where the person is on the train

Question 8: What do you think about these rules?



This could increase passenger confidence and see an increase in more disabled passengers on the rail network

A separate telephone line



We are thinking about making sure train companies have separate telephone lines, that stations can use to communicate about people using assisted travel.



This would be just for train company staff.

It would help information to quickly get through to the right person at each station.

Question 9: What do you think about having a separate telephone line just to communicate about people using assisted travel?



It's a good idea and should be introduced

Better training



Many people think there should be better training for railway staff.



We think that train companies should include these things in their staff training:

- Understanding disabled people and their everyday challenges



- The law about being fair to disabled people



- More information about disability



- How to recognise passengers that need assistance



- The law and rules about helping disabled people to use the railways



- What it is like for a disabled person to use Assisted Travel



- How to communicate with people



- Accessibility in stations



- Making sure that people are safe all the time



- Disabled people should be involved in running the training.



We think that train companies should:

- Have 2 years to update their training programme



- Provide refresher training to all their staff



We are not sure whether the focus of each company's refresher training should be areas that are a problem:

- In most train companies, or
- In just that train company?

Question 10: What do think about these ideas for staff training?

very good idea and should
be compulsory within 2-3 years



Question 11a: Do you agree that train companies should:



- Have 2 years to update their training programme
- Provide refresher training to all their staff

Yes

No



Question 11b: Do you agree that the first areas for people to get refresher training should be areas that are a problem:

A. In most train companies, or

B. In just that train company?

A.

B.

Telling people about assisted travel



We want more people to know about assisted travel.



We also want train companies to:

- Give a leaflet about assisted travel to everyone who applies for a Disabled Person's Railcard
- Ask everyone who clicks 'Disabled Person's Railcard' when they buy a ticket on a train company's website if they want any assisted travel



Question 12: What do you think about these ideas?



Very good and should be made compulsory

Working with local organisations

We think that train companies should give more information about assisted travel by:



- Working with local community groups
- Working with groups of disabled people
- Have their own group of disabled people to help them to understand more
- Working with local services, such as doctors and post offices

We also want them to write a report to us every year so we know what action they have taken.

Question 13: What do you think about these ideas?

very good idea and should be made compulsory

Accessible website



Accessible websites mean they work properly with devices like screen readers.



We want to update the rule that train companies must make sure that their websites are accessible and passengers can get all the information they need.

Question 14: What do you think about a new rule that train companies websites should be accessible and give good information?

I think it's a good idea but might pose a problem on mobile devices as some disabled people might use them as well

When to book your assisted travel



It takes some time for train companies to organise assisted travel for you.



Mostly people book their assisted travel well before they want to go on the journey.



We are thinking of changing the rules for when you can book your assisted travel – so that instead of having to book 24 hours before travel you can leave it nearer the time.



10 pm



6 hours



2 hours

We are suggesting you must book:

Option1: before 10pm on the day before you travel

Option2: at least 6 hours before you travel

Option3: at least 2 hours before you travel



The less time we give train companies to prepare for your arrival at the station, the bigger the challenge for them.



Question 15: What do you think about these options?

The best option would be option 1 as that's a reasonable time frame



Question 16: How should the new rule be set up? How long should train companies have before they have to start this?

I reckon about 2-3 weeks to introduce these sets of rules

Different types of trains

Your journey may use some different types of trains. These may be:



- Trains which only have a driver. No guard



- There may be a ticket inspector or on-board supervisor, but no guard



We think that train companies should:

- Make sure that people know whether there is someone to help them on board the train or at the station, or not



- Think about how they give assistance where they use different sorts of trains that may have no guard



- Have plans for dealing with a situation where a disabled person is in danger of not getting the assistance they need

Question 17: What do you think about these ideas?

I think all trains should have a second member of staff on board as no second person on board could cause some trouble when an incident happens on board like a fight and the disabled passenger gets hurt having no second on board staff will be a problem when giving evidence to police

Compensation



We want to bring in some new rules about what train companies should do if the assisted travel does not happen properly.



The new rules should include:

- Train companies must pay compensation when the assisted travel does not work properly
- Train companies should tell passengers that they can get compensation if the assisted travel does not work properly



Question 18: What do you think about these new rules?

Should ~~be~~ made mandatory and would encourage train companies to treat disabled passengers better

Text relay



Text relay is a new way to communicate which helps people who are deaf or have difficulty with hearing.



The user types the message to a 'relay assistant'.

They speak the words to the person you are calling.

The relay assistant types the reply so you can read it on a display.

Question 19: Do you think that all train companies should be able to use text relay?

all train companies should do this and be made compulsory

Rail replacement buses



If the train can't run the companies will provide rail replacement buses.



If a station is not accessible, you may have to travel by taxi instead.



We want to change the rules so that train companies have to:

- Look into providing more accessible buses



- Look into making accessible taxis more available



- Write reports to the ORR about accessible rail replacement bus services



- Make sure that the drivers of buses and taxis that are provided instead of trains have had training in helping disabled people

Question 20: What do you think about these new rules?

It's a good idea and should be made compulsory

Contacting staff at a station



Not all stations have staff on hand to help.



We want train companies to make sure that people know how they can contact a member of staff to get help.

Question 21: What do you think about this new rule?

only send staff to unstaffed stations if there is disabled passengers joining or alighting from a stopping train

Scooters



Many disabled people are using scooters and other mobility aids to get about independently.

We want the rules to change so that train companies have to:



- Carry the powered wheelchair or scooter where it fits on the train and can be used safely at the station



- Include rollators in their scooter policies



- Consider offering scooter cards and making sure staff know about them



- Tell passengers clearly what the rules on carrying scooters and other mobility aids are

Question 22: What do you think about these rules?

*Need to think about these
changes with people that get
around on mobility scooters*

Are there any other changes to companies policies on scooters and mobility aids we should think about?

No

Warning you that a train is not accessible



We want a new rule which says that train companies have to tell you that a section of the train is not accessible before you buy the ticket - for example First Class.

Question 23a: What do you think about this rule?

Should be made compulsory

Accessible toilets



We want a new rule which says that train companies have to tell people that an accessible toilet is not working before they get on the train.

Question 23b: What do you think about this rule?

Should be made compulsory

Good practice



We are also looking at some other good things that train companies should be doing to help disabled passengers.

These include:



- Assistance cards which help people with a hidden disability to explain the help they need



- Priority seat cards, which help disabled people to get a seat on very busy trains



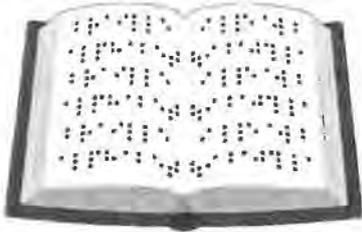
- Assistance staff at big stations all the time

- Space for assistance dogs

- Seats for companions



- Video relay services. This is a way of communicating with people who use British Sign Language



- Ways to help disabled people to get around stations

Question 24: Do you have any comments on these good ideas? Are there any other things we should be aware of?

very good idea and should
be made compulsory

Thank you



Thank you for your views.

We will take your ideas into account when we make the final rules for train companies.

Please now send your answers back to:



Email: **DPPP@orr.gov.uk**

Post:

**Consumer Policy Team
Office of Rail and Road
One Kemble Street
London
WC2B 4AN**



We need your answers by Friday 18th January 2019.

Easy read by easy-read-online.co.uk

Consumer Policy Team
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

Improving Assisted Travel Consultation

Dear Sir

As someone with a disability and who has worked with various people with disabilities, I was very interested in this initiative and the efforts the rail industry is making to improve the access and help available to the 14M people in the UK who have both obvious and hidden disabilities.

I would, however, point out that what is proposed is heavily dependent on IT and that there is a considerable proportion of the population that either do not have computers/smart phone or are, for various reasons, unable to use them. Recent problems with the Universal Credit have highlighted the same problem.

The following are comments on various paragraphs in your document and answers to the questions posed.

Qu 1 - replace the title with 'The Accessible and Inclusive Travel Policy' as 'inclusive' makes it clear to potential users that it covers both the ageing population and those with both obvious and hidden disabilities.

- item 2(i) - p 22 - don't make the leaflet so condensed that it misses out something important that is transferred to the Policy Document .

- item 2.4 - p 24 - restructure the document to more clearly set out the minimum national requirements which all DPPP's must adhere to.

Qu 2 - a) - no

b) - see answer to Qu 1

Qu 3 - I disagree. If rolling stock suitability and TOC equipment restrictions are not in the leaflet, how does a potential passenger plan a journey. E.g - rolling stock suitable but TOC refuses most wheelchairs.

Qu 4 - 2.35 - p 31 - the accessibility/local users groups must include non-rail users to get the greatest possible feedback.

2.36 - p 31 - will two weeks be too short to arrange printing and distribution of hard copy.

2.37 - p 32 - no - the leaflet must be available from the start. It is no good having out-of-date information in one of the two documents.

Qu 5 - Cat B - should this be revised to read "Access via level crossings is permitted (if full barrier and accompanied by a member of staff).

- 3.6 - p 36 - short notice changes. It depends on when they happen, people might have already started their journey.

- Fig 3.1 - p 40 - these maps 'shout out' for a mandated system wide list of standard graphics.

- Fig 3.5 - p 41 - this says 'if you need assistance - don't travel to this station'.

- 3.30 - p 42 - very strongly agree.

- 3.32 - p 42 - national consistency essential.

Qu 6 - strongly agree

- Figs 3.6 & 3.7 - doesn't this again 'scream' for a national wide standard presentation.

Qu 7 - these are a very good step forward but it will need a close watch so that any major changes to stations/trains etc are available to this booking journeys before they come into effect so that advance bookings do not fail from lack of up-to-date information.

- 3.53 - p 49 - extremely useful but how many of this involved do this to help staff.

- Qu 8 - agree - in Fig 3.10 p 56 it is important to ensure that the 'booked (incl seat reservation) information goes automatically to somewhere both in the origin and destination stations where it is certain it all be acted upon. If not, I suggest 'call ahead' to the destination station may be necessary.
- Qu 9 - agree strongly
- Qu 10 - yes - it covers a very wide spectrum
- 4 - p 58 - disabled persons involved with the training - they must included both current rail and non-rail users.
 - 4.4b - p 59 - add 'guide and assistance dogs'.
 - 4.13 - p 61 - Appendix D is good but ensure the training is delivered by qualified trainers.
 - 4.18 - p 63 - this could lead to a disabled/aged person receiving differing levels of assistance during journey. This would depend on how far each TOC had gone in updating/training staff. A clear need for one all-system target date.
 - 4.19 - p 64 - see 4.18
- Qu 11 - second question - concentrate on industry- wide improvement. See 4.18
- Qu 12 - mixed feelings
- 5.5 - p 67 - it is not easy to find because the leaflet and the Disabled Person's Railcard has not been widely publicised by the industry that it is available at CAs, libraries, community centres etc - a key potential link with current non-users.
 - 5.12 - p 69 - the "No Boundaries' exhibitions are rather self- defeating, as the majority of people who see the will be existing travellers. They should be part of Para 5.23
- Qu 13 - agree strongly - para 5.23 is an excellent basis to start the process.
- Qu 14 - agree - the greater the standardisation, the easier it to use and understand.
- Qu 15 - Option 1 - up to 10pm the day before - as I suspect the vast majority of those requiring assistance will not be 'last minute' travellers and, if they are, will be the result of a genuine emergency.
- 6.4 - p 77 - no matter what the advance booking time becomes, when bookings are made, advice is sent to both origin and destination stations. I cannot believe that a '24hr in advance' station receiving a booking from a '10hr in advance' station just ignores the information.
 - Fig 1 - p 78-79 - this again 'screams' for standard practice. At present it appears to be a minefield to be crossed to work out when and how to book in advance. What ever 'advance notice' time is recommended, it is essential that all the Contact Centres are open every day up to the 'cut off' time.
 - 6.24 - p 84 - it would need very, very nationwide publicity with all the proposed stages clearly highlighted.
- Qu 16 - p 84 - see 6.24 above
- Qu 17 - good in practice but how can you closely monitor them, as lapses on any journey will have an immediate effect on passengers.
- 6.33 - p 87 - 'working help points' - these are essential but how many instances are there of these being out-of-order - often vandalised at unstaffed stations where their need is greatest.
- Qu 18 - agree - see 6.37 comments.
- 6.37 - p 88 - investigations and refunds must be done quickly - "that justice is not only done, but is seen to be done" - by those affected.
 - 6.39 - p 89 - why only 50% refund for return tickets if the whole journey fails ??

- Qu 19 - agree, there should be no barriers in an age of increasing technology but see my opening comments on the spread and use of IT.
- Qu 20 - agree with all the proposals as it makes the 2010 Equalities Act a mandatory part of driver training. With the vast majority of buses now accessible, make the "Blackpool" replacement buses - p93 - the standard for all rail-replacement services.
- Qu 21 - see my comments on para 6.33 - Qu 17
 - 6.65 - p 96 - strengthens the existing requirement but the 'help point' out-of-order is crucial to its success.
- Qu 22 - 6.74 is an excellent change to the Guidance. The GWR Permit Scheme requirement that non-permit passengers scooters etc must be stored in luggage racks is highly restrictive and could be construed as discriminatory under the 2010 Equalities Act.
 - the 4th item in 6.74 - ?? amend of scooters that may be carried and any other mobility aids by each individual operator so that potential users have a national picture.
- Qu 23 - a) - agree
 b) - no train should leave its overnight depot if it's only accessible toilet is out of order.
- Qu 24 - Video Relay Services would be difficult to put in nationwide on a single date and piecemeal application would be confusing to potential users - e.g not available at origin or destination stations but available when they changed trains.

Glossary - why no entries for DPTAC, MACS, Transport Focus and London TravelWatch

Annex A

- Section 1 - A.1.3 - bottom p5 - item b) - if refused on grounds of cost - does this result in discrimination in the 2010 Act terms ??
- Section 4 - A.2.1 - where public services are provided - this MUST include libraries, CAs, GP surgeries because this will reach those who don't use public transport because they are unaware of the scheme.
- A.2.4d - first item - amend '.....and accessibility of all stations which either - 'it serves' or - 'their services call'
- B 5 - consulting disabled passenger forums - these must include those disabled who do not travel and why they do not.

Appendix C - see my comments on Qu 8

ORR IMPROVING ASSISTED TRAVEL CONSULTATION RESPONSES - JAN. 2019

Q1 The use of "Accessible Travel Policy" is much clearer and related to its purpose.

Q2 a) Missing content.

Given the fragmented nature of the industry, a listing of all TOC/NR contact telephone numbers and their opening hours needs to be included as journeys often involve more than one operator - increased further potentially if there are delays or disruption. Also need emergency out of hours telephone numbers.

It is not clear if the National Freephone Passenger Assist telephone number could replace all the individual company contact points. If it can it would be a major improvement.

b) The leaflet title "Making Rail Accessible" remains appropriate.

Q3 Station and rolling stock accessibility information must be available at the time of booking assistance. This means it must be available at:

- National Rail Enquiries telephone service
- TOC telephone services + NR
- Staffed stations.

Q4 Paragraph 2.35 : Operators need to state which groups have specifically been consulted and in what manner.

Paragraph 2.37 : New franchise operators should maintain the former TOC policy until these printed

Copies are available and telephone services updated.
Comment on point 5 in paragraph 3.3:

My experience reflects this but the cause was not a failure of communication but a lack of staff available to handle a peak of assistance requirements within station dwell time limits, necessitating concentration on getting wheelchairs on and off the trains.

Q5 Annex A Appendix B not provided so cannot answer.

However, agree with the need for standard classifications to be used by all operators.

Q6 Agree

Q7 The guidance needs to be made available at the time of booking assistance.

Material provided solely on the NRE webpage will be of no use for those without internet access unless it can be communicated by NRE telephone staff.

Q8 Agree with the principle of the assistance handover protocol but find Figure 3.10 confusing.

Surely Call Ahead is required in all circumstances?

What is the definition of a "Mainline station"?

The protocol should apply to all National Rail stations.

Q9 Agree - assuming it will apply to all National Rail stations.

Q10 Agree - assuming "Passenger Assistance" includes "Recognising passengers who need assistance" and

"Communication" in order to maintain all the 10 elements outlined on page 62.

- Q11 a) Agree
b) Tailored to the priority areas for improvement for each individual operator to meet the overall national standards.

Q12 / Q13 / Q14 All agreed.

Q15 The priority should be to ensure that the proposed improvements to the system are embedded and effective ahead of reductions in the notice period. The 6 hour period may appear to be the most realistic national objective.

Q16 Agree - reductions should be phased in

Q17 Some of this section is somewhat vague and imprecise. ORR needs to implement rules not just allowing operators to "consider" assistance provision. The lack of standardisation across the country will impede improvements in passenger confidence in travel assistance.

DOO operation, either as a permanent feature or DCO where the absence of a second traincrew member is allowed should NOT be allowed on routes where trains stop at stations which are unstaffed all or part of the time. Without this assurance uncertainty will prevail and potential passengers will lack the confidence to use the service and, possibly avoid rail altogether. It is the only way to achieve real equality.

Q18 Agree with mandatory redress arrangements for assistance failure but there should be a specified minimum requirements. Without this passengers suffering similar problems but travelling with different operators/using NR stations will experience highly variable outcomes.

Q19 Cannot comment (Non internet user)

Q20 ORR should identify and publicise good and poor TOC/NR practice.

Problems with taxis reinforces the need to ban DOO (in any form) from services stopping at unstaffed stations (all day or part day). It is probable that accessible taxi availability will be poorer in areas served by such stations.

Q21 Agree
The National Freephone Passenger Assist telephone number should also be available. Information should be on a display which is not vulnerable to vandalism.

Contacts need to be available on a 24/7 basis to cover delays/disruption.

Q22 Policies concerning the carriage of scooters should always be made available when booking travel assistance. This information should relate to all the operators ~~to~~ involved in the journey(ies) planned. A national minimum standard would be ideal.

Q 23 (a) & (b) Agree.

Q 24 These examples of best practice are excellent for passengers, especially (from my perspective):

- Priority seat cards and badges. The TfL policy is ideal.
- Prominent desk for dedicated assistance staff.
- Seats for companions

However, if wheelchair accommodation is only provided in the First-Class area, it should be available to the user plus a seat for a companion at Standard Class fares.

Assisted Travel Consultation

I recently read your consultation document and very much welcome that you state that the vision is to empower confident use of the railway by all.

As you are no doubt aware there are currently a number of proposals to introduce Driver Only Operation on trains.

I believe that passengers such as my wife need more than just a driver on a train and that as a minimum there should be a fully qualified and safety critical Guard, as well as the driver.

I believe it is guards and station staff who are absolutely crucial to ensuring confident safe, secure and accessible rail experience for all, but especially the older, vulnerable or disabled passenger.

I want to see more not less staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and re-assurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

I hope you will take on board my concerns and ensure that these essential staff are retained so that my family and I can have the same access to rail transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and safely.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People's Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	
Job title*	
Organisation	Disabled Voices East Riding
Email*	

*This information will not be published on our website.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

Prefer 'Accessible Travel Policy' as it is clear that it is about access to all people. 'Inclusive travel policy' may not be clear to many members of the public.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- a) Difficult to tell if anything is missing as this only gives the headings, not the content. In favour of making it less onerous to read.
- b) Title is fine

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Passengers should have information as to what they should be able to expect in accessibility at stations and in rolling stock! There are many instances where operators are not meeting access requirements (rolling stock on Northern Rail for instance). If this information is displayed at stations for people without a smartphone and the online information is kept up to date, this will be fine. It would help if electronic boards detailed the type of train running.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

It needs to be made clear to operators what constitutes consultation with disabled people. Northern currently seem to have an aversion to even speaking to disabled people as a number of us have been trying to secure meetings with them due to recent changes in rolling stock, ticket machines and scooter policies. They state that they consult but consistently rebuff attempts by disabled people to discuss policies and practices that discriminate against us. It would help if ORR employed a group of disabled experts to review operators.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

There needs to be additional clarification of what 'long' ramps are and what 'short' roads without pavements are. Must have specific figures attached. Also, most inclinometers now give a slope as either an angle or a percentage rather than a ratio gradient, so alternative measures should be given.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Yes, this is necessary. It makes it even more essential that station accessibility information is kept up to date.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

These seem sensible, but should be in an easily readable format as passenger assist email confirmations are often very difficult to read on a mobile phone.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

There needs to be a protocol that is consistent. One thing that seems to have been missed off the list is that the guard checks that the passenger has got off the train at the correct station. This means the guard having a protocol as well for remembering which station the passenger needs to alight at.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This would make sense but there also has to be a protocol for smaller stations that is not being considered here. Protocols should be in place for all stations. Whilst there won't necessarily be a member of station staff at smaller stations, there needs to be a protocol.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

I agree with the content but the part about involving disabled people in the training should read 'must', not 'should'. It is essential that the disabled people involved in training have expertise in pan-disability issues and access. Autism awareness is desperately needed – my daughter has been accused by a guard of being rude as she didn't look at him to speak.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

I would say that they ought to roll this out within a year!

Refresher training should incorporate both elements and also areas that are little used as these can be forgotten.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

It would be very helpful if you could book the wheelchair space and assistance online if you book a ticket with the DPR. It would also be useful if there was a way of registering that the DPR was for a wheelchair user.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

This seems sensible – I would certainly be pleased to promote awareness of this.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

This is needed – assistance and access information is currently difficult to find on a lot of websites and information given can be too sparse.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

So long as it doesn't lead to turn up and go being stopped, two hour notice would be the best, although people may need to be aware that the wheelchair space may have already been booked at that short notice. If it is possible to book at short notice via an app and to be able to use that app to check whether there is a wheelchair space available, it would be good. However, there are still a lot of situations where people may not be able to give notice before travelling (eg. if they missed the train or the train was cancelled or they finished a meeting early) and turn up and go is essential so that disabled people can access the service on an equal basis to non-disabled people.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

That would depend on the circumstances of the station and staffing. It will also depend on the roll out of the assistance app. There needs to be information feeding into the app live, such as wheelchair space availability on each train. The only way that a two hour notice period would work is if that information is immediately available to both passenger and station staff at the same time.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

It isn't enough as it does not consider the situation of a great many small stations that are unmanned and whether assistance would then be very hit and miss. On longer journeys there is also the situation where a disabled person travelling alone may need assistance, such as being able to access food and drink as the buffet cars are usually not accessible (this is part of passenger assistance). There should be a protocol where the guard checks that the disabled person has been assisted off the train at the correct station and this is not possible if there is no guard onboard. There's also the situation if there is a breakdown or emergency. Keep the guard on the train!!!!!!!

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

I would prefer it if they just got it right as it is incredibly distressing when there is a failure to provide assistance, whether booked or not. It is certainly something that I have experienced several times, including twice in one journey on the first time I travelled on a train in a wheelchair. The redress should be an eye-watering amount to spur operators into getting it right all the time.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

There should be no barriers to this being adopted as, if assistance is required by a deaf person and the booking time is reduced to 2 hours, it may mean that they are away from their textphone. Using text relay is necessary to ensure that deaf people can book on equal terms with others.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

It's very worrying for an area like here, where the whole of the East Riding has only 17 accessible taxis on the local authority list. Rail replacement buses should always be completely accessible.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

It would be useful to have a contact, but how would unmanned stations be able to provide assistance if there is nobody at the station? Quite a lot of rural stations are a long way from anywhere else.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

It is an improvement. Being in an area served by Northern Rail and having had a lot of contact with the Scootergirl campaigners, I still feel that it is too open to interpretation. There needs to be a system where trains have to be able to carry a class 2 scooter that meets the dimension and weight restrictions of the wheelchair policy (as is the case for most operators) and that there is no question that scooter users have to dismount and fold the scooter before getting on the train. We are now in a situation where so many scooter users have scooters instead of wheelchairs due to being unable to get a wheelchair that offers enough independence outside the home. The attitude of managers at Northern has been that scooter users are less disabled than wheelchair users, but this is usually not the case. Carriages can and should be adapted to accommodate the slightly larger turning circle of the scooter and suitable ramps should be developed. If operators are giving excuses then they should be subject to a meeting with ORR inspectors, disability access consultants and the Scootergirl campaigners at the station with the

trains they are stating can't be accessed and solutions found. It is not acceptable to be running rolling stock that excludes disabled people with scooters.

Class 3 scooters are not ever going to be suitable to carry in a passenger carriage as they are too big and powerful. There will need to be a public awareness campaign to ensure that people are aware of this. It would be helpful for the government to require scooter and wheelchair manufacturers to give a rating for how possible it is to use public transport with it. I suggest that ORR may wish to endorse scooters that fit the size restrictions.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

- a) This is an improvement – it would actually be unnecessary if there was a way of booking the wheelchair space at the same time as booking the tickets (with the proviso that this space was only available to book in advance by people with a DPR(wheelchair) number – this would mean a change to the railcard system so that people who needed wheelchairs to travel had priority over the space so that someone with loads of luggage or a buggy didn't book it). It is possible to book the wheelchair space at the time of booking the ticket online, then you would be able to see if there was a wheelchair space in first or on the train at the time.
- b) The train should be replaced if there isn't an accessible toilet for long journeys (please sort out so this is done on journey time rather than distance as there are a lot of train journeys up here in the north that aren't going long distances but take longer than getting from here to London). Alternative travel arrangements are only possible for frequent trains. If there is only one train an hour, or every two hours then just expecting disabled travellers to hang around for another train isn't acceptable. Other modes of transport take far longer than train and don't have toilets either, so this would not be a solution. Ensure that the toilets are properly maintained!

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Assistance cards – great idea so long as there is the staff training to go with them.

Priority seat cards – in theory this is great, but a lot of people have found that other members of the public don't respond positively when the train is busy. There needs to be a member of staff on the train who can ensure that people are actually able to use the priority seats.

Dedicated assistance staff – it would be useful to have these on all stations and trains – if it isn't busy, they could also have other jobs but there should always be someone whose job it is to look out for disabled passengers.

Space for assistance dogs – a dedicated space would be far better than the dog having to sit in the aisle where they can be trodden on or be distracted.

Companion seats – definitely needed. It gets very lonely as wheelchair user who is stuck away from everyone else. You tend to feel more like luggage than a passenger.

Video relay services – great idea that I had never heard of before.

Station navigation - very unsure about this as it seems to be a staff saving measure. As a manual wheelchair user, I'm using my hands to push my wheelchair and can't juggle a phone at the same time.

Q25. Do you have any other comments or views on improving Assisted Travel?

There needs to be proper enforcement of the safety standards for rolling stock and ramps and staff usage of them. Ramps need to be tested for suitability at all stations on a route and if there is a station with a particularly high step then ramps made for the train at that station should be provided on the platform. Ramp friction surfaces should be replaced regularly.

I live on the Northern Rail route between Hull and Bridlington. At my station (Driffield) there is a very big step from the train to the platform. Northern has recently started using 150s and Pacers on the line and these have a very large step (around 450mm on the 150s) but the ramps on the 150s are short and very variable in length, ranging from less than 1200mm to 1350mm. This means that the gradient is around 1:3 (at best), which is not safe. Some of the ramps also have a very worn surface and when they are deployed, they only make a single line of contact with the floor of the train and stick up above it slightly instead of having a full flat area resting on the floor. The step is also too great for shorter people and older people who don't have the strength to step up and I have seen several people stumble alighting and one person fall getting onto the train.

I have also had the situation at Hull trains where some onboard staff (not the guard) deployed the ramp the wrong way round with the holding pegs on the platform instead of in the train doorway. Because of the way the ramp is shaped at either end, this made the ramp unsafe. I had to refuse to alight until it was turned round. Other wheelchair users may not have the same confidence to do the same. Not only does this put the wheelchair user and staff at risk, it damages the pegs on the ramp, meaning it is less likely to fit the doorway in future. Staff training must include the correct way to deploy ramps – it is a safety critical job. Not enough care is given to the safety of wheelchair users on trains.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	
Job title*	
Organisation	
Email*	

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

I support this change. The current phraseology is condescending and inaccurate; the replacement would be much more appropriate.

I would prefer “accessible travel policy” because “accessible” is widely understood to mean “accessible to disabled people”. “Inclusive” feels more “corporate speak” and could be read to be about more than “just” disabled people (which is obviously desirable but not in a document purely about accessible service provision to disabled people), so is less preferable. This would still better than the current title though.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?**
- b) Is this still a meaningful title for this leaflet?**

a) the TOC's scooter policy – not just “restrictions” as the draft guidance puts it, but a clear and specific section setting out under exactly which circumstances scooters will or won't be accepted.

b) No, it's a terrible title. As it stands it sounds like management fluff rather than useful practical information for disabled people. I would suggest something like: “Disabled people: Help with travelling with us” or something similar.

The problem is there's a dichotomy in the purpose of the DPPPs. They are ostensibly to provide practical information for (potential) disabled passengers. They are not used for this purpose; they are solely a detailed statement of what each TOC must offer for disabled people, and any extra adjustments they promise on top of the statutory minimum. This is then used by the ORR and occasional people like me to hold station and train operating companies to account for failing to meet the access needs of disabled people. That in itself is a useful purpose but is very distinct from the aim of providing useful information to disabled travellers. I guess this is why you require the DPPP is split into a Policy document and Practical document, but it still doesn't currently fulfil the purpose of providing useful information to disabled passengers. Avoiding corporate jargon would assist in making it more relevant and useful.

I wonder whether attempting to make the document(s) more useful to (potential) passengers is perhaps somewhat of a waste of energy or a red herring, as disabled people simply won't know of its existence or its relevance.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

I think it really doesn’t matter where it is. The information is not very useful for passengers and is not generally used by such. It is used for other purposes e.g. by the assistance booking teams. The amount of information varies between TOCs. I would suggest a universal format of information, preferably in a straightforward, human- and machine-readable format.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

The current ORR DPPP approval letters are published with DPPPs. The letters contain details of reservations or concerns the ORR has had with the TOC and the result of communications to resolve these. This is useful and in the spirit of openness and accountability. I am glad to note that these will be retained.

The current process takes an inordinate amount of time for DPPPs to be approved. This has the result that old, inaccurate DPPPs remain in place for extended periods whilst the new one is being considered. This is sub-optimal given the stated intent of the DPPPs to provide accurate and useful access information for disabled passengers.

I therefore welcome the commitments to improved speed in the process.

Does the 8 weeks between the deadline for TOCs to supply their draft DPPPs, and the deadline for ORR approval of DPPPs, leave sufficient time for the current iterative process of TOC-ORR discussion and DPPP improvement?

The “annual” (theoretically) current DPPP review process gives the ORR an opportunity to check the overall provision of the operator, in general and in the light of feedback the ORR has received. This is useful and I would regret it being stopped.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Error: this consultation question is actually in and about Reliability (Chapter 3)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

There is a difference between something being “step free” and something being “wheelchair/mobility friendly”. You have identified that definitions of such are unclear and vary in interpretation between different licence holders. It would be even better to have clearer language still.

I would suggest:

A: Wheelchair and PRM friendly throughout, though a step from platform to train.

B: Reasonably wheelchair and PRM friendly and step free with the exception of the step from the train to the platform, but not fully compliant with modern standards of access.

C: Step-free, but with significant barriers that could affect wheelchair users and others ability to access all features of the station.

D: Step free access available to some platforms, but not all.

E: No step-free access.

With the added details of the definition you have used, or similar.

The top three are all “step free” – the only difference between them is that some are more wheelchair / PRM friendly than others. Sticking to the dictionary definition of “step free” instead of conflating it with “wheelchair / PRM friendly” is less likely to confuse either disabled people or TOCs, and would hopefully result in information transmission being more reliable and accurate. I support this cross-TOC standardisation but think it would be useful to ditch the current practice of making “step free” a shorthand for “degree of wheelchair / PRM accessibility” as opposed to its literal meaning.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

It is theoretically mandatory now for staff to check station accessibility, or at least in my experience that is how TOCs deal with it. This is a good thing. However, this introduces the significant potential for human error. Additional automated checking for nonsensical elements of bookings would help minimise this.

For example, currently Passenger Assist will quite happily allow operators to book wheelchair assistance to or from stations that have no step-free access, without warning the booking assistant.

When I design a database or spreadsheet for data input, I set up data validation for each entry field. If something nonsensical is input e.g. due to a typo, data not conforming with the correct format etc., my spreadsheets refuse the input or at least display a warning.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

I support passengers being given the information they need to understand how their support will (should) work, and how best to assist the TOC in providing that support.

Contact mechanisms given to passengers for assistance during disruption / at unstaffed stations etc. should not solely rely on phones.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Systemising this information, through human systems and (better still) electronic systems, would make this much more reliable and I support such.

Passenger Assist has the ability to record a passenger's journey status, see <https://passenger-assist.org/energyflow/WebHelp/pa.htm> . This could be utilised. So, could "on the fly" assistance bookings, especially under the new app. Use of such could reduce errors caused by (attempts at) inter-human communication.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

It is a good measure, particularly as a stop-gap, and is likely to reduce failed assistance.

It could be of particular use when re-planning booked assistance due to disruption. Assistance fails much more often during disruption, and staff at stations are often busy dealing with other logistics caused by the disruption so are unavailable to answer station phones.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

The training should start with and continually identify with the Social Model, the barriers disabled people experience, and how these barriers can be reduced or eliminated by actions of railway staff. This is absolutely required as a core of the training, but not present in your proposed curriculum. It should also be the key element in the condensed training for agency staff.

In particular, operators in assistance booking call centres need more training, especially around operator-specific policies, information and procedures.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

I agree on timescales; shorter would be better. As for focussing on priority areas: I don't see why this needs to be exclusive; often there will be overlap anyway between industry-wide priority areas and TOC-specific ones. So: Both. These priority areas should be identified by those that affect disabled passengers the most, not those that affect staff the most (although these may often coincide.)

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Putting the promotion of awareness of passenger assistance in RDG's hands leaves me concerned that it will not be promoted well. RDG have consistently shown that they are unable to deliver much of their obligations. RDG, being a national body with significant responsibility for services, should be brought under a regulatory regime, preferably by yourselves.

Before it is marketed, it needs to be improved such that we can be relatively sure that the assistance required will be delivered. Delay attempting to promote it until the problems with e.g. Knowledgebase, and assistance handover between stations, are dealt with. Otherwise, you risk putting disabled people off by them having a negative experience on their first ever trip.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

I have no firm views as long as the assistance offered to new passengers can actually be delivered.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

I support them.

It's 2019 and website accessibility has been a legal obligation for over 20 years. We should not be "working towards" WCAG compliance.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

I support reducing to the lowest practical national notice period for assisted travel. I honestly don't see why operators' needs should depart substantially from Scotrail, which has a wide variety of stations from busy termini to isolated unstaffed halts, a variety of rolling stock and platform designs, and driver only operation. If they can manage 3 hours, then surely every TOC can.

NB: at my instigation Scotrail had to make clear the hours of checking of booking requests made via its online form, because if one uses the form at midnight it won't be checked for several hours, thus breaking the 3-hour limit.

For certain trains, it isn't possible to book the wheelchair space on the day of travel because the seat booking system, of which the wheelchair space booking system is an adjunct, shuts at midnight. This creates a barrier for me travelling, because there's only one space on that train in which I can travel – I can't choose to stand because there's no seat available, for example. For lower notice periods to work, there need to be bookings open longer for wheelchair spaces.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

I have no opinion on this. I'd obviously like it to happen as soon as possible, but it is for TOCs and the industry to decide what is best practically.

RDG need to pull their finger out and introduce the new "Passenger Assist" app replacement. The current one isn't up to the task of reduced notice bookings as it is very unstable and relies on staff actively checking it because it doesn't notify staff of new bookings.

The National Reservation System needs to be altered so that wheelchair spaces can (easily) be booked even when seat reservations have otherwise finished.

Perhaps sort these two problems first? Though I have severe reservations as to the ability of RDG to achieve anything of the sort, and then not competently or quickly.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

Nobody's going to say "no" to this, are they!

Two things:

- 1) Despite your research and assertions to the contrary, driver only operation has a significant impact on the ability and confidence of disabled people to travel. DOO / DCO should NOT be extended. It should be retracted.
- 2) As DOO seems likely to happen no matter what, then it is essential that you do strengthen operators' obligations towards assistance provision to passengers. NB: for "turn up and go" passengers it is very important that there is a mechanism of non-verbal interaction. Help points are useless because I can't hear the other side. Mobile phones are pretty bad too. You need interactive web chat or some other mechanism for communication.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

I support it.

More work needs to be done on 1) identifying the relevant operator and 2) cross-operator issues.

Consider a journey from Leeds to Manchester Airport. Leeds Station is run by Network Rail. However, they subcontract their assisted travel functions to Northern, who assist me onto a TransPennine train. The comms between Northern's assisted staff, and TransPennine's conductor, fail in some way and when the train terminates early in Manchester Piccadilly, neither the Transpennine conductor nor the Network Rail assistance staff at Piccadilly comes with the ramp, because none of them know I'm on board.

Who is at fault? Network Rail? Northern? Transpennine? And how am I, the passenger, supposed to know?

There would need to be a very clear and simple protocol demonstrating who accepts responsibility and makes the payment, and who is responsible for taking the complaint.

Similarly: imagine I do a journey from London to Appleby. Network Rail staff don't turn up to put me on the train at King's Cross; Northern's staff don't turn up to get me off the train at Appleby. Two separate assistance failures. What happens – do each organisation pay half of the redress?

CHPs are theoretically required to ensure that one lead TOC deals with a complaint, even where there are more TOCs or station operators involved. This doesn't appear to work for access related and passenger assist related issues. There should be a simple procedure where one lead TOC takes responsibility for organising multi-TOC redress for passenger assist failures.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Your understanding and explanation of text relay is seriously deficient.

Anybody with a telephone can accept text relay calls. I make calls using Text Relay all the time, including to book assistance with a variety of TOCs. The other side simply answers the call using their standard telephone, like any other incoming call, and a relay operator comes on the line, explains that they are speaking and listening on behalf of a deaf or speech impaired person, and away you go. The TOC employee simply interacts with that person over the phone just as they would with anybody else.

The idea that you should introduce an obligation that operators should be able to accept calls via Text Relay is very misguided and based on a complete misunderstanding of the system. All operators at all train operating companies are already able to accept text relay calls. They are simple telephone calls. The only way that they could NOT accept such a call is by not answering it, or by hanging up on it, just like with any other voice call.

There are clearly no barriers to this proposal being adopted because the proposal isn't to change anything. I simply don't understand what you think a Text Relay call is like, or why you think it needs something special (equipment? Training?) to receive one. It doesn't, and this section is fundamentally flawed and misguided.

I would recommend, instead, that all operators provide a means to make assistance bookings via web chat. It is so much easier and less clunky than having to make a phone call via a relay assistant. There are many existing technologies out there that would make this simple to implement. I would recommend mandating that instead of a nonsensical requirement that all operators accept text relay calls.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

You underestimate the proportion of rail replacement buses that are subject to PSVAR and are therefore required to be accessible. Nearly all accessible buses and coaches used as rail replacement buses must be fully accessible; and even more still will have to be by 2020. Individuals and companies who drive or book inaccessible coaches or buses for this service are committing criminal offences. You can and should tell TOCs this and encourage and facilitate enforcement via the DVSA and the Police, through to prosecutions of those entities that illegally employ inaccessible vehicles on rail replacement services.

I do not say this lightly. I include as an appendix to this response, barrister Catherine Casserley's analysis and advice on the applicability of the Public Service Accessibility Regulations to rail replacement buses and coaches. She is the most senior UK expert on disability discrimination law, has been involved in most of the leading test cases and drafted the statutory Codes of Practice for the Equality Act 2010 and previously for the Disability Discrimination Act.

Note that she says, when it comes to enforcement,

“There may be more scope for enforcement of the legislative obligations in pressing the Office of the Road and Rail Regulator to take action than there is in using the Equality Act 2010 in a private law action. The ORRR is likely to be exercising public functions and thus subject itself to the public sector equality duty under section 149 of the Equality Act 2010 and must take this into account in determining any issues

I do indeed press you to take action because you are indeed subject to the Public Sector Equality Duty. Please get together with your colleagues in the DVSA, confirm that it is the legal situation I describe, and take action against bus, coach and train operating companies and their employees who flout this law so continuously. It is not acceptable that they and you have been unaware of this obligation.

All buses and coaches with over 22 seats in use on Rail Replacement services must be wheelchair accessible except:

1. Rail replacement services which do not have a published schedule, and EITHER only transport between two stations OR have more than 15 miles between every stop on their route;
2. Vehicles that have been in use on a road for over 20 years and aren't used on local or scheduled services for more than 20 days per year;
3. Coaches first used before 1st January 2005 or constructed before 1st October 2004.

The third exemption falls away on 1st January 2020, leaving only the first two. Train operating companies should be prepared for this deadline, and the number of inaccessible buses or coaches used on rail replacement bus services should be minimal.

Train operators should be required to publicly advertise the accessibility or otherwise of the vehicles in use on rail replacement buses. For example, this coming Saturday there are rail replacement buses in operation between Settle and Skipton, to cover for disruption caused by an RMT strike. There are timetables of these buses published on Northern's website. They give no indication as to whether these buses are accessible, or not. This is unacceptable.

The Department for Transport's guidance to the Public Service Vehicle Accessibility Regulations says:

Operators should note that during this transition period (*meaning before 1st January 2020*) a mix of vehicles on the same route creates uncertainty for disabled people wishing to make use of accessible vehicles. It also reduces the commercial benefit to the operator of more accessible vehicles. This practice should therefore be avoided. Where it is unavoidable, the timetable should show as clearly as possible which services are accessible.

Train operators do not indicate which of their rail replacement services are accessible, on the timetable or elsewhere. One reason is that the national rail systems for scheduling do not allow for such differentiation. As Northern say:

When uploading information to the National Rail website, there is currently only one option to denote rail replacement services which places a bus symbol on the website and it is not possible to identify whether the service is accessible.

The RDG should be made to implement an ability to list the accessibility of rail replacement buses in their database and website, and TOCs should be obliged to state the accessibility or otherwise of rail replacement buses in every rail replacement bus timetable and data feed.

Accessible buses are much preferable to taxis, for the reasons you state and for many more. They normalise, reduce uncertainty and are in general much more comfortable, safe and reliable than attempting to get accessible taxis to isolated stations.

So yes, I agree that TOCs should be obliged to do more to improve the accessibility of rail replacement buses, but would point out that they already are, and yet you aren't enforcing it, and neither is VOSA. I think you are being neglectful, frankly; and now is a good opportunity to deal with the problem head-on.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

I support this goal, but the mechanisms you have specified are inadequate. Help points and mobile phone calls only work for people who are able to use them. People who are hearing and/or speech impaired are stuck. TOCs must provide alternative means for people who can't hear or speak, to get assistance at unstaffed stations.

I further note that the National Freephone Passenger Assist number is only open business hours, not evenings or weekends. This provides no assistance for people arriving at unstaffed stations and needing assistance outside of business hours.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

I welcome the extension of provision for people with scooters, but wish it went further.

I would hope that you would not accept just ANY evidence that prevents an operator from operating a presumption of carriage of scooters; but only convincing and cogent evidence.

If a permit scheme is required, I would suggest a country-wide scheme to avoid passengers experiencing confusion, getting stuck and unpleasantness when going on journeys involving more than one operator.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

- a) I fully support this. I would extend it to include trains that only have inaccessible toilets, not just trains on which the accessible toilet is out of order. I know that trains with only inaccessible toilets should not be in use after 1st January 2020 but if the DPPP guidance replacement comes in beforehand or TOCs / ROSCOs don't hit the 2020 deadline, passengers buying tickets for journeys, and in particular long journeys, should be warned that the stock they are booked onto don't have any accessible toilets (for example, on the 2.5 hour journey from Manchester Piccadilly to Holyhead, often using a rake of Mark 3 carriages with no accessible toilet.)
- b) They shouldn't "consider how" to provide such information, they should "ensure that" they provide information when an accessible toilet is out of order. Particularly for passengers with pre-booked assistance, but also for TUAG passengers, perhaps via CIS.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

"Good practice" and "recommendations" do not deliver what disabled people need: consistent adherence to their rights. Whilst any improvement must be good and encouraged, I would invite you to include these "good practice recommendations" in the main body of the policy, as requirements.

Much of what you deem "good practice" I would consider "essential", for example dedicated assistance staff at large stations.

Q25. Do you have any other comments or views on improving Assisted Travel?

2) Updating DPPP Guidance

- 1) Rolling stock accessibility information in the passenger leaflet is of limited use because it can be very difficult to determine which stock operates a route. Sometimes even train operators don't know what stock will operate what, until the day of travel. This is esoteric information and difficult to parse for the purposes of journey planning.
- 2) I am very glad indeed that you are planning to routinely monitor the accuracy and provision of information on NRE and TOC websites.

3) Reliability

- 1) TOC / NR control centres are not informed of the presence on a train of disabled people (whether with pre-booked assistance or not). When there is disruption, this can mean that disabled people are "missed". TOC systems should integrate with Passenger Assist such that disabled people are flagged when control centres reroute or cancel trains etc.
- 2) I consider it regrettable and reprehensible that stations staffed part-time only have step-free access during the hours that they are staffed because the lifts are locked out of use when the staff leave. That is never acceptable.
- 3) Knowledgebase does not solely have "Yes" or "No" descriptors for station step free access status. It has "wholeStation" or "noPartOfStation". In the specification for the Knowledgebase database, there are three other options: "partOfStation", "allPlatforms" or "unknown" (that latter clearly being inappropriate). This spec is regularly updated and re-approved. Yet despite this, RDG's subcontractors changed the database so that only entries of "wholeStation" or "noPartOfStation" could be accepted. At one stroke, this made the information wildly inaccurate and unusable, because stations with partial step-free access were by necessity arbitrarily classified as fully step-free or entirely not step free. This should be reverted. Another consequence of this decision is that some TOC websites display stations as having "no step-free access to any part of the station" instead of "no", yet this is inappropriate as many of these stations have partial access.
- 4) Stations Made Easy is or was an excellent aid for determining the accessibility of each station. It has been allowed to moulder, grow out of date and to be increasingly difficult to access. This is a great shame. It should be maintained and promoted.
- 5) Currently, it is only possible to book train wheelchair spaces via the passenger assist call centre. This sole space (or one of two or three spaces) must be available in order to travel on a given train. This means I have to phone up to book the space and assistance, despite being deaf. The inability to book wheelchair spaces online etc. has the perverse effect of reducing the communication mechanisms that wheelchair users can use to make an

assistance booking. Previously a couple of TOCs provided the ability to book wheelchair spaces online, but this was removed due to the selfish actions of a few non-disabled people booking the space for extra leg-room, luggage, pushchairs etc. I do not think that preventing such abuse should be impossible. I would recommend requiring TOCs to facilitate the booking of wheelchair spaces online.

- 6) There is a problem with Station Alerts and updating and removing them.
 - a. The field is routinely abused; for example to advertise TUAG at stations, the ability to buy tickets on the train, the requirement to pre-book bicycles or the presence of barrow crossings. It should only be used for extra issues that temporarily affect the availability of features at a station.
 - b. The alert isn't removed when requested by TOCs, leaving inaccurate / out of date information about e.g. broken-down lifts, weeks to months after the problem has been sorted.
 - c. The date that a station alert was made is not given in the alert text nor published on NRE or TOC websites; there is, therefore, no indication how current the alerts are likely to be. I recommend obliging TOCs and RDG to ensure that a time stamp is published as part of each and every station alert, together with recording the intended expiry date.
 - d. I would recommend that lift breakdowns, barrow crossings and so on should be a separate category from station alerts. Where such indicates a lift failure or a barrow crossing etc, this could and should trigger additional checks by the booking agent, via the automated verification method I posit above.
- 7) Many TOCs do not inform onboard staff about passengers with pre-booked assistance who are / should be on their train. This renders pointless those elements of assistance booking dealing with assistance from on-train staff. For example, Northern: they have hundreds of unstaffed stations thus requiring the conductor to put the ramp down for me, but conductors are never informed of my assistance booking. They should be.
- 8) Call centre staff often engage in "scattergun" assistance bookings, on the basis of "better more than less". For example, they frequently book assistance from train staff for boarding and alighting at staffed stations, as well as booking assistance from the station staff. Such is sub-optimal as it is unclear to train staff at which stations they must assist the disabled passenger. Such scatter-gun bookings should be eradicated.

6) New requirements and updates

- 1) It is only theoretically possible to phone up any assistance booking call centre to make assistance bookings elsewhere. In practice, this doesn't generally work for several reasons.
 - a. The call centre are often not aware of local or TOC specific anomalies of import to people booking assistance and may struggle to find them out. This is also true for bookings with "home" TOC call centres - for example, phoning Journeycall in Arbroath to inquire about the accuracy

of station information about accessibility toilets in Hellifield is not going to be fruitful. It is much more the case when dealing with a non-home TOC.

- b. The call centre can't operate third-party TOC taxi booking procedures. So, for example, if I were to use Transport for Wales to book assistance to an inaccessible Northern station or during a Northern strike, the Transport for Wales call centre can't arrange an alternative accessible taxi for that element of the journey.

- 2) I am concerned that the Passenger Assist replacement may be vapourware. It has been delayed several times and was supposed to be implemented years ago, just like Knowledgebase was supposed to be replaced last summer. It isn't happening, and the way it is being introduced is a shambles.
- 3) You suggest that TOCs who shut earlier than 10 pm may need to advertise alternative contact numbers such as the National Freephone Passenger Assist Number. However, this would not be practical in any way because the National Freephone Passenger Assist Number is only open office hours, 9 am to 5 pm Monday to Friday. It is shut every evening and all weekend.
- 4) You state that "no passenger or journey is identical and appropriate assistance can only be determined in discussion with the passenger to understand their needs and consider how best to enable them to make their journey." Yet Passenger Assist call centres follow the same rubric irrespective of the needs of the person. One must fit their categories of assistance rather than the other way round, or no booking can be made. More flexibility is required.
- 5) The national SMS service for deaf/hearing loss passengers is only open 9am-5pm Mon-Fri. This is inadequate. When it is open, it solely instructs deaf / speech impaired people to phone the TOC assisted travel helpline, using Text Relay if necessary. It seems pretty pointless.
- 6) The reason that TOCs are very rarely contacted by textphone is that their textphones invariably don't work. I have tried ringing TransPennine Express's textphone literally several dozen times over the past few years and have never had it answered by a human. Deaf people know that organisations rarely, if ever, maintain their textphones, nor do such organisations train staff in textphone use and said staff don't answer textphones. So deaf people don't even try to use the textphone lines – and the few occasions that they do don't get counted because the calls invariably fail.
- 7) TOCs are under an obligation to contact all disabled people who have booked assistance, that might be affected by disruption on their network. But they have different ideas as to under what circumstances this kicks in. Both Northern and TransPennine say they only do so if there's significant and long-term disruption; so they won't contact me if e.g. a train I am due to travel on is cancelled a few hours in advance. This confusion should be dealt with by the ORR setting out under what conditions this obligation kicks in: how long in advance do the TOC have to be aware of the disruption, in order to put them under the obligation to contact the passenger to make alternative plans? Which body has the obligation: the TOC with whom the assistance booking was made, the TOC operating the disrupted train, or somebody else? It needs ironing out.

7) Additional good practice

- 8) When making reservations in carriages with a wheelchair space, for people without a wheelchair user in their party, the system should by default not make reservations for the seats nearest the wheelchair space unless and until the coach is otherwise at capacity. Otherwise the possibility is that any wheelchair user subsequently booking the wheelchair space will be unable to travel in the company of their companions, because those seats will have been taken by other people.
- 9) “Wayfinding” would be much assisted by the resurrection and updating of “Stations Made Easy”. It is most regrettable that this useful tool has been allowed to go out of date.

Draft guidance

- 1) Section 1.2 states that TOCs are subject to Section 29 Equality Act 2010. Some TOCs are also subject to the Public Sector Equality Duty. Current examples include DRS and LNER. This should be made clear.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	
Job title*	
Organisation	
Email*	

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

I support this, the current policy title does not help disabled people to be aware of the policies which protect their rights on the railway.

I prefer the term accessible, as it is something that I would know is pertaining to how an operator will ensure I can travel by train with equity as a disabled person.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

a) Is there anything you consider is missing from the required content?

b) Is this still a meaningful title for this leaflet?

- a) Yes I would like to see an explicit mention of disabled people's right to un-booked assistance, rights to both accessible station infrastructure ('At the station') and websites ('Before travelling') in this document. Also reference to rolling stock accessibility standards and compliance dates.

A concise document is welcome but a standard layout produced by a cross-sector of disabled people, so the design meets everyone's access needs, is recommended.

- b) As a disabled person who is educated and in work, I feel that my views on the name for a new title are not relevant and I would prefer you consult with a wide range of disabled people about a title that will have meaning, so that disabled people know what policies and practices are in place to further our ability to travel by train.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

I agree but this information should be available in hard copy in alternative formats e.g. large print and easy read from day one at stations and updated versions on request.

The passenger leaflet should still include reference to UK and European rolling stock accessibility standards and reference the DfT target for heavy and light rail to be accessible by no later than 1 January 2020.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

I agree operators should confirm disabled people and their organisations have been meaningfully engaged when developing or revising their DPPPs.

To ensure this is achieved ORR should produce guidance for operators on how they must work with an independent disability consultant to undertake this type of engagement work. The consultant must also produce a short document for approval to

show how the operator has engaged with a wide range of disabled people and their engagement, this could be peer reviewed by your assisted travel stakeholder group.

I agree that operators should make their documents available to the public from the start of their operations, the same deadline be applied to alternative format leaflets in hard copy or audio or BSL at the same time as they are published online.

I support the current annual review process of the DPPP's and advise that the ORR carry on with this process and take into account feedback it has received via monitoring activity and from disabled people and their organisations.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

It is important I can get in and use a station without steps and I warmly support this. However I need much more information on station infrastructure to know if it is truly accessible for me, such as warning tactile at platform edges (as per Code of Practice!), static meeting points and adequate staffing levels.

Whilst I like clarity across all operators and as a wheelchair user would benefit from step free classification, if Knowledge Base is being reviewed, I would much prefer it is being carried out thoroughly and wider access considerations are integrated into a system, as so often wheelchair use is thought of first and foremost. I think this project has the resources to be expanded so that more disabled people can benefit, including those, like me with multiple impairments that benefit from different types of accessible infrastructure to enable my spontaneous and independent travel.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

I agree with the introduction of mandatory checks on station accessibility. If a station is not accessible for a disabled person due to staffing or inaccessible infrastructure, alternative accessible transport should be arranged when assistance is booked to mitigate the stressful experience of having to arrange this when I arrive at the station.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

I agree guidance for passengers about what to expect at stations and when receiving passenger assistance is useful however this should be developed with disabled people and be advisory in nature only. I am cautious that the onus on providing good quality assistance should fall to the staff employed to provide it and not the individual disabled person.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

I fully support the introduction of the assistance handover protocol and believe this will deliver real change for disabled people when travelling by train.

It is important that this process is also followed if the assistance is un-booked.

This proposal would require the standardisation of training by different operators so that the correct information regarding the type of assistance required by people with different types of access needs is relayed correctly.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

I support this and believe that without the dedicated assistance line the proposals for the handover protocol would not be realistic. I like this method to address providing un-booked assistance at unmanned stations, however this is dependent on staff resources being adequate to meet my needs.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

I am very happy with the proposed, significantly strengthened, training modules required for operator, however the training must be informed by the social model of disability and include a section on this.

Senior and frontline staff should partake in this training. There should also be additional training for senior managers on how to resolve systemic issues around disabled people's inequality on the transport system, which is different to the type of issues frontline staff face but often recognise and report at quicker pace than senior management.

I'd be keen that union representatives, especially those with an equalities remit, are also offered this training on an optional basis if they are not already one of the mandatory attendees.

The condensed version of training for agency staff should include sighted guiding training for blind and partially sighted people, along with any other training that involves providing physical assistance to another person.

The training should include a practical session in a busy station, particularly any practical element e.g. sighted guiding element of the training, as this element of the training cannot be experienced in the classroom

Impairment specific sessions should be delivered by a paid person with lived experience of that impairment, who has expertise in this area.

The training should also include a section on assistance dogs, their roles and their legal status.

As not even one operator is covering more than 80% of the proposed training modules, it is important for the ORR to approve the content of training to be delivered prior to it going ahead.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

The training should be implemented as soon as is reasonably practicable.

A refresher every two years for permanent staff is agreeable, it would be better if it was yearly. The training should be reviewed if there is concern identified by ORR's monitoring efforts. I agree with the mystery shopping by disabled people and their organisations, at regular intervals to inform this monitoring.

I agree that industry-specific priority areas to address systemic concerns should be included, however individual operators may need to focus on specific areas which have been identified via monitoring. Therefore, refresher the training package should incorporate both elements.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

I agree with the recommendations but would be more comfortable if this was funded by RDG for DUPLOs to deliver, as they are best placed to know how to promote this effectively.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

I agree, it is vital that any engagement with disabled people is meaningful and led by disabled people's views and opinions on the scheme, rather than simple consultation exercises.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

It has been more than two decades since the Disability Discrimination Act 1995 (DDA) came into force which obliged website owners to ensure that they had accessible websites for disabled people.

When the DDA was merged into the Equality Act it was clarified that not providing a service (such as a website for both public and commercial services) for someone with a protected characteristic, such as disability, was likely to be unlawful discrimination.

Sections 20 and 29(7) of the Equality Act make clear that web providers must make "reasonable adjustments" to enable disabled people to access their services, with section 20(6) clarifying that a service provider must take steps to ensure that information is provided in accessible format.

It is also noted by the Equality and Human Rights Commission's Code of Practice that this is an anticipatory duty, and service providers should not wait for disabled people to request adjustments before making their websites accessible.

Following the W3C Guidelines are likely to be a good parameter on what would be expected from an Operator in terms of creating an accessible website, however i extensive user testing for usability of websites is also needed.

When taking into account the anticipatory duty for websites to be accessible in line with the Equality Act, we do not believe that '**working toward W3C**' standards is sufficient and advise that this should be revised to '**must be compliant with W3C standards**'.

Furthermore, given that the EU Directive on the accessibility of public sector websites is being brought into UK law, coupled with the fact that the rail industry receives

central government funding, operators should keep pace with the public sector in terms of the expected level of website accessibility.

Without appropriate enforcement by ORR the rail industry will not meet the W3C standards, so whilst we welcome the monitoring of operator's websites we would urge the creation of a framework for enforcement if operators do not meet this standard. Penalties should be imposed where websites are not accessible.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

I would prefer expanding operator requirements for Turn up and Go assistance, to push the industry forward and treating disabled people in line with all of their other customers, who can travel whenever they please provided they have a ticket, without the stress that they will not get home.

When using Turn Up and Go I have been left on a train to Edinburgh when I was travelling to Darlington, and numerous other distressing situations which make me cautious of using Turn up and Go, if it is not properly staffed but I would prefer to have faith in that.

I welcome the reduction in notice period as a move toward offering disabled people an opportunity to travel with more flexibility however as a wheelchair user this must be matched with booking system for the wheelchair spaces on trains. As someone who travels frequently for work, when I want to travel at busy times, I often can't get a wheelchair space booked and unless this is improved my ability to travel on some routes will not be improved.

A small number of operators already commit to delivering either Turn Up and Go or a voluntary two-hour booking period, this shows that it is feasible for the rail industry to deliver this, if their resources are allocated to do so.

I believe that for the rail industry to properly deliver a reduction in notice period, the ORR will need to tightly regulate it and act where an operator is not meeting the minimum booking period.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

As soon as possible. An operator makes profits and I believe their resources should first be used instead to invest in ensuring disabled people receive a more equal standard of service than we currently do, I see a reduction in notice period a step toward this.

The ORR have already recognised that Option 1: 10pm the day before travel would not require a huge shift for most operators practices, apart from amending their call centre hours and booking sheet protocol, therefore this should certainly be delivered in 2019.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

I agree with this but think ORR should require operators to produce detailed plans addressing the impact of moving to DOO and DCO trains for Disabled people.

Guards should remain on trains, especially those trains that stop at unmanned stations or stations that do not have a large staff resource at certain points of the day.

The national freephone number to contact assistance staff is a potential safeguard, however I feel that this does not go far enough as mobile phones are not always reliable and assistance points are not consistently easy to locate or use.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

I support this, however I am much more concerned that my assistance is delivered correctly and practices are improved as a result of my complaints. I can not imagine the compensation offered driving the industry to change bad practice but I do welcome redress for when I receive poor service.

I would also want assistance failure redress to include when assistance staff treat me with a lack of dignity or respect, and ways of reporting this developed.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

All means to further D/deaf and others who wish to use text rely services should be encouraged. As far as I am aware most modern phone systems allow for this therefore looking at BSL video relay or text/online messaging services should also be explored as part of this proposal.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

I feel that PSVAR applies to most rail replacement buses requiring them to be wheelchair accessible and that operators have a duty to procure accessible vehicles, as a standard, so would like to see this addressed. When buses are provided there should be efforts so that there is a named person responsible for coordinating assistance and supporting disabled people, as it is a time of great disruption and finding the correct replacement bus is not always easy.

Where taxis are used, it is vital that operator's procurement processes ensure companies contracted are aware that it is a criminal offence to refuse assistance dog owners, and also that their drivers have undertaken disability equality training (either as a stand-alone module or as part of their ongoing training such as the BTEC on Introduction to the Role of the Professional Taxi and Private Hire Driver)

Operators ensure their procurement of alternative transport providers can meet disabled people's access needs, including audio visual announcements or alternatives.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

I agree with this but operators should consider all options of how they can be contacted by a wide range of disabled people. I am concerned that mobile phones are not always reliable or useable for all disabled people, the same applies for help points. I also recommend that the member of staff responsible for every station and the roaming support available, although as they are not placed at a station, they should be reasonably geographically close by so that they can provide support as needed. There should also be adequate resources so this number is available at all times, rather than current contact centre hours.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

I agree with this, however it should be a national scheme to prevent confusion with differing operators and also some operators failing to make reasonable adjustments. If the scheme goes ahead with individual operators they should have to produce a detailed document to prove to you they have fully considered the provisions they make for people that use scooters and other mobility aids to use their trains via permit.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

- a) I support this and believe it should be extended to when accessible toilets or audio visual descriptions are not working.
- b) They should be strengthened to 'must consider'.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

All good practice appears to me to be reasonable adjustments, when I think about it. I think exploring further how the rail industry can employ disabled people in senior positions, looking toward best practice in other industries.

Q25. Do you have any other comments or views on improving Assisted Travel?

Turn up and Go

This is the first revision of the Disabled People's Protection Policy Guidance for train and station operators for almost ten years, and the first post-Equality Act 2010. I would see a regulator to press the rail industry to go beyond their minimum regulatory duties with un-booked assistance. The expanded summary on relevant legislation for operators is great, and including their requirements under Part 3 of the Equality Act 2010. I think it should be clearly acknowledged that operators have obligations under the Equality Act 2010 when referring to spontaneous travel throughout the document or including requirements for Operators to commit to being staffed and prepared for un-booked assistance. I think my omitting this it may indicate operators are not required to anticipate un-booked assistance requests, and thus weaken their understanding of their obligations under the Equality Act. Your Equality Impact Assessment recognises the disadvantage disabled people experience when being required to book assistance in order to travel by train. It's also clear that the Department for Transport's Inclusive Transport Strategy aims for spontaneous travel for disabled people by 2030, however without sufficient steps in place to ensure the rail industry deliver Turn Up and Go assistance, this is unlikely to be the case.

I agree that by moving the notice period substantially, this will make travelling spontaneously easier for me as a disabled person. I am a wheelchair user and travel across the country for work on average twice per week, currently whilst in London I have great experiences of using Turn up and Go, outside of London they are either stressful or the time I have had to wait a substantial time for staff to be available. I am also frequently unable to travel because the wheelchair space is often booked up at peak times when I need to travel and I urge the industry to take action on this.

I would also like to see some level of future-proofing in your Guidance given we are in uncertain political and economic times, as we prepare to leave the EU and availability of staff when the rail industry may be faced with a more challenging operating environment and usually first port of call is frontline staff cuts, disabled people's rights to travel independently must be protected by Guidance such as this.

I also have reasoned concern this may happen, given that Southern Trains in 2017 withdrew its' Turn up and Go service, despite opposition to this decision.

I would like to see:

- Guidance that operators have an anticipatory duty to provide un-booked assistance, as per the Equality Act 2010
- Guidance so un-booked assistance is protected in the future and the importance of dedicated staff
- Targeted recommendations for operators to increase un-booked assistance

Thank you for taking the time to respond.

6.1.19

Dear Sir / Madam,

I would like to let you know about my experiences with TPE in connection with your consultation which closes on 18 January.

I have an arm disability which causes problems with luggage. I travel regularly to Glasgow and Edinburgh and do not need to book assistance in advance. I make sure I book hotels near the stations. However I have had two occasions in the past year when things have gone wrong and despite all the promises in their booklets they have not delivered.

The first was when the Beast from the East struck. I got to Edinburgh about 2 pm and got on a Crosscountry Train right away. It was after 7 by the time we got to Newcastle and having been held up outside the station for some time I missed the train to Manchester. I think it was the only one which ran on time that day! It was a nightmare. Trains were not going anywhere. No information was given and there were no staff on the platforms to help. The screens kept showing train would leave in a few minutes but they did not. My

hearing is not good so I struggled to hear the few announcements which were made. You have to go up and downstairs over the tracks and it was struggling with my bag.

I finally got a train to Manchester from York but it was held up at Huddersfield. My husband had set out to pick me up but had to give up as we didn't know how long it would be and he was exhausted.

The guard announced he was arranging taxis but when I asked he said this was only for passengers who had tickets beyond Manchester. I don't buy tickets from Rose Hill, my local station as the trains were regularly 20 minutes late and I would miss the train north. He said he would check if they would make an exception but he never got back to me. I was left in Manchester at 11 in the morning on my own. It cost me £40 for a taxi. I spent months trying to claim it back but it was only when Transport Focus got involved that they refunded me.

The booklet they produce promises all kind of assistance but they have no staff to sort this out.

I also have a hip problem and need to sit down. The trains are regularly four carriages but I have twice been booked in coach H but only four carriages

have turned up. The last time in November they knew well in advance they were short of carriages but made no attempt to let me know. Fortunately I did manage to get seats.

The second problem was in September. I was visiting my Mum in Falkirk and was due to get a train from Edinburgh just after 4. I set off in plenty of time and was told there were no trains to Edinburgh but the Manchester ones were running. I jumped in a taxi and contacted my husband. I cannot use a smartphone so only have a basic model. My husband checked and my train was the only one shown as running. By the time I got to Edinburgh it was cancelled. There was one person at the information desk and he kept trying to close the shutter. My hand and arm disability meant I could not use my phone very easily. It was my worst nightmare. As other passengers' trains had been cancelled earlier they had secured hotel rooms. Hotels had realised and increased prices. The station hotel wanted over £400. Tourist Information did their best but I couldn't walk far and didn't want to end up on my own where I didn't know. It would have added further to the cost if I'd had to get a taxi. Also I wouldn't have access to information when the trains started again.

A lovely lady at Travelodge helped me find a room at The Holiday Inn Express. It was the last one and cost me nearly £200. As I don't work this was a heavy

Now. If they had provided correct information I could have stayed with my Mum in Falkirk. I get the train regularly and it comes in about 40 minutes before departure. They must have known it wasn't going.

It has taken months but so far I have received £50 in vouchers and the balance has been promised by cheque. In my rush I didn't get a receipt for the taxi and thought the vouchers were fair but they have deducted them from the cost of the hotel. I have got Transport Focus involved.

They have been horrible and don't seem to understand how difficult it is. They sent e-mails telling me about booking advance assistance but don't seem to understand I don't need that.

Their leaflet is very impressive and promises they will sort out taxis, hotels etc if things go wrong. In reality they provide no staff to help. The leaflet is not worth the paper it is printed on!

I hope you find my comments helpful.

Yours Faithfully



Text Relay - Question 19 response

The content of the Text-Relay section of the consultation page 90-91 (paragraphs 6.45-6.47) do not make sense and indicates that ORR do not understand how text-relay services work or that there are existing legal obligations on service providers to accept text-relay calls so Question 19 is problematically formulated.

Existing Legal Requirements to Accept Text-relay Calls

It is already unlawful for any service provider to "not accept" a telephone call from a deaf or speech impaired person whether they are using a text-phone, NGT-lite, a British Sign Language/English interpreter or being assisted by a friend or family member to speak, hear or understand the call.

More information can be found on OfCom's Frequently Asked Questions website at <https://www.ofcom.org.uk/phones-telecoms-and-internet/advice-for-consumers/accessibility/frequently-asked-questions> which explains why refusing a relay call is not lawful with citations from:

- The Equality and Human Rights Commission (EHRC) guidance document "What equality law means for your business" which can be found at <https://www.equalityhumanrights.com/sites/default/files/what-equality-law-means-for-your-business-2018.pdf> (page 24)
- The Information Commissioner's Office (ICO) who have updated their advice after the implementation of the GDPR citing correspondence between the UK Council on Deafness (UKCoD) and the ICO which can be found linked from <https://www.deafcouncil.org.uk/2018/10/17/gdpr-update/>.

Transport operators accepting a text-relay call

To receive a call from a text-relay user, the call recipient merely has to follow the instructions given by the Text-Relay Assistant (sometimes called operator) to take strict turns, speak slowly and clearly and repeat themselves as needed. They do not need special equipment, although training and awareness of the reality of relay and how they can handle their side of the call is definitely beneficial.

Limitations and problems with text-relay calls

It is important for relay-call recipients to know that the relay operator cannot type at verbatim speeds and the OfCom standards for typing speed are a very low 40-60 words per minute. Verbatim speech is between 150 and 300 words per minute. Using text-relay means that the speaker has to speak slowly and clearly, repeat themselves quite a lot and may only be able to speak in short phrases of 5-10 words at a time.

Transport operators should also ensure any call-centres they operator or commission a third party to operate for them follow OfCom and BT's guidance for making the systems accessible at

- OfCom: <https://www.ofcom.org.uk/advice-for-businesses/help-for-disabled-business-customers/disabled-customers-and-call-centres> (under the top tips section)
- BT: <https://www.ngts.org.uk/how-to-use-ngt/ngt-for-business/how-ngt-works-for-business.html>
- Stammering Law also has some excellent guidance at <http://www.stammeringlaw.org.uk/business/voicerecog.htm> and <http://www.stammeringlaw.org.uk/business/onthephone.htm> for people with speech impairments.

Question 19 response

Therefore my response to Question 19 is that this question needs to be reframed. ORR guidance must stress to transport operator service providers that they already must accept text-relay calls and it may be worth directing them to the guidance I link to above.

I would also like transport providers to consider live web text-chat that can do anything that a voice telephony service can offer (in terms of content and opening hours) so that disabled users of assistance and more have true choice.

SMS is not the same as I cannot type well on my phone (for disability reasons) but I can type from a real computer keyboard which is how I would handle such a call. Additionally the SMS services often operate shorter hours than the corresponding voice lines which is not appropriate or equitable.

Information about NGT/deaf telephony

What is NGT Lite

NGT-Lite is simply a software version of a textphone (or Minicom). All a textphone does is convert typed letters to modem-style tones using a standard protocol (such as Baudot <https://www.revolv.com/page/Baudot-code>, CCIT <http://www.linco.org/ccitt.html>).

Textphone to textphone

If two textphone users call one another then they simply type and read to one another each in turn. Sadly most textphone lines don't work, I don't think I have found one which worked without me making formal complaints for months before hand in the last 10 years (as my preference is to communicate directly without an operator).

Textphone user calling someone without a textphone (text-relay call)

If a text-relay user wishes to call someone who does not have a textphone they use text-relay. This means that there is an operator in the call (officially called a Text Relay Assistant) who speaks what the deaf person has typed and types back what the hearing person has said. BT's Next Generation Text-Relay Service NGTS website at <https://www.ngts.org.uk/> explains this with images.

Live web text-chat as an alternative.

One alternative to providing a dedicated textphone line is to provide live text webchat for anyone who wishes to communicate in text as it is not just deaf people who struggle with voice telephony. This is increasingly offered by service providers. This avoids the strict artificial turn-taking of textphones or text-relay and is a more natural modality for modern line.

After reading the document for AAP I have some views on the rail side:

- How will there be able to have Access for All at unmanned railway stations? There is a way by making sure that there is a guard on board the train who is trained to do so.

-If the passenger is joining at a station that has limited staffing and then the lifts are out of order after there is no staff present. How will passengers be able to have access to everywhere in the station? Maybe if that the stations to be staffed at all times and so then there will be access at all times. This does happen at numerous station for example: Tamworth if there is no staff the lifts are locked out of use normally until the next day as there will be staff in that day.

Kind regards,

Rail

Statutory and Subjective Assumed/Asserted Required Personal Assistants –

Office of Rail and Road (ORR) The Disabled Person Protect Policy (DPPP) – “Passenger Assist – Assisted Travel”

Rail Delivery Group (RDG) Ticket Charges and Access Policy

Context of Advocacy

I am an advocate for my 30year old Autistic son. He is subject to Mental Health Statutory provision and an objective multi-disciplinary assessment and Continuing Healthcare Treatment Plan (CTP). An explanation of this CTP is attached.

For more years than I care to say. I have been advocating for PAs who are required by a statutory requirement, not to be charged, a fare for their clients supplied support, in omnibus and rail. Plus, private providers of Goods and Services.

Currently, the Office of Rail and Road (ORR) are consulting on Improving Assisted Travel.¹

John Larkson CEO of ORR states in this consultation.

The ability to travel by rail matters to a great many people; whether for employment or business, to visit friends and family or to enjoy leisure activities. Every passenger deserves to travel with confidence and dignity.

Assisted Travel is a vital service for disabled people and others that may need assistance from railway staff to complete their journey. At ORR, we are committed to ensuring train and station operators, including Network Rail, comply with their obligations to provide this assistance to which rail passengers are entitled. Our vision is 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. (see response document format)²

The Equality Impact Assessment conducted for this consultation states³

¹ http://orr.gov.uk/_data/assets/pdf_file/0004/39676/improving-assisted-travel-consultation-november-2018.pdf

² http://orr.gov.uk/_data/assets/word_doc/0006/39660/improving-assisted-travel-2018-consultation-response-pro-forma.docx

³ http://orr.gov.uk/_data/assets/pdf_file/0003/39675/improving-assisted-travel-2018-consultation-annex-d-equality-impact-assessment.pdf

This document records the analysis undertaken by the Office of Rail and Road (ORR) to enable the organisation to fulfil the requirements placed on them by the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010.

The PSED requires the decision maker to pay due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;

- advance equality of opportunity between people who share a protected characteristic and those who do not; and

- Foster good relations between people who share a protected characteristic and those who do not. In undertaking the analysis that underpins this document, where applicable,

ORR has also taken into account the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD), and in particular Article 9: (Accessibility), which requires appropriate measures to be taken to ensure disabled people have access to transportation on an equal basis with others.

The context of my advocacy and response to this consultation is that no true accommodation of a reasonable adjustment exists, for individuals like and my son. Who do not enjoy access to the rail network as an ordinary person, who do not have such specific detailed needs and who do not encounter additional charges for access to the service and support within the rail network!!

As my son and others do, with similar statutory required Personal Support does in the charges for either a Disabled Person Railcard and charges for his statutory required Three Personal Assistants.

Where locally, the best access is to use a group ticket or pay for all four. For those who qualify access to one of the Social offers such as Student Card, Young Person Railcard, TwoTogether Card Senior Card. Then pay for the PAs support.

The Disabled Person Protection Policy as constructed and as guided in this consultations does not cover the full responsibilities of the ORR through its PSED S149.

Nor does the policy as stated and currently operated meet the UNCrD requirements –

appropriate measures to be taken to ensure disabled people have access to transportation on an equal basis with others.

Where the Equality Act 2010 S20 (7) places and accommodation at the cost of the accommodation to the providers of the goods and services.

Where the Statutory Code of Practice to Goods and Services states on page 90 regarding the Equality Act 2010 ⁴

7.4 The policy of the Act is not a minimalist policy of simply ensuring that some access is available to disabled people; it is, so far as is reasonably practicable, to approximate the access enjoyed by disabled people to that enjoyed by the rest of the public.

The purpose of the duty to make reasonable adjustments is to provide access to a service as close as it is reasonably possible to get to the standard normally offered to the public at large (and their equivalents in relation to associations or the exercise of public functions).

This statement is drawn from Court of Appeal - Ross v Ryan Air – page 14 ⁵

Current Practice Policy and Criterion – Non and partial accommodation.

Rail Accommodation, stuck of an attitude of 1981, in various part accommodation, for those who via their visual presentation and assertion, of a subjective need for a PA/support above general good practice and customer service.

The Disabled Persons Railcard is now in the established arena, of The Social Model of Inclusion (Disability), the UNCrD, EA2010, and the deregulated and included parts of EU 1371/2007. Out of date, by placing charges on access, when the true standard for individuals those who require such PAs. In an accommodation, in comparison to an ordinary reasonable person, who does not have such statutory needs and enjoys one fare and access to any social offer.

Fares that for that reasonable ordinary person, where the administration charge, the customer service and journey, are a single charge and of their own choice.

Where individuals, who are not visually impaired and require one or more PAs, are not considered in the current system. Including the DPPP, Passenger Assist and Assisted travel.

⁴ file:///C:/Users/cynll/Desktop/servicescode_0.pdf

⁵ chrome-extension://gbkeegbaiigmenfmjflcdgdpimamgkj/views/app.html - **Neutral Citation Number: [2004] EWCA Civ 1751**

Where those who assert a need through the use of a Wheelchair and can have 50 per cent off the fare and, an assumed need of a PA. Making a single fare an ordinary person, without such needs enjoys, provided that person stays in the wheelchair for the whole of the journey.

An assertion any person can make and use of such an appliance "the wheelchair" and the auxiliary aid "the PA".

Same for those visually impaired with the relevant voluntary registration of 50 per cent off their and subjective assumed PA. Also, for this visually impaired, access to a season ticket, with the PA travelling free.

Passenger Assist (Making Rail Accessible, Disabled and Older Person Protection Policy)

In each of those above accommodations, book the passenger assist. Visually impaired also able to use/take their assistance dog and PA.

The passenger assist is set out to meet the terms and conditions of carriage of meeting an older person or an individual assertion of accommodation and assistance, without any charges. Without ongoing PA support for the journey.

This meets part of the objective of the deregulated and the principle of the incorporated parts of EU1371/2007, of assistance free of charges and access to tickets at no extra cost, in comparison to the person who does not require such support. To EA2010 S20(7) of no charge to the person who requires such accommodation. Removes the aspect of EA S29 and any detriment for a range of individuals who assert a need for support.

Statutory and asserted accommodations.

Individuals who objectively require PA support are subjected to making choices of purchasing the 1981 Disabled Railcard, with its inherent reduction. A Railcard that Dis-ables individuals with such needs, in comparison to those who do not require such accommodation(s) or make the assertion of a need and use the passenger assist system, without ongoing required PAs support for the journey.

If one PAs, the choice of the purchase of the Two Together card with the reduction exists. Alternatively, full fare for both.

If three PA's pay for Two Two Together cards or pay for four.

Alternatively, if available, pay for a small group ticket, where three PAs or more are required. Alternatively, pay for all four.

Ordinary objective reasonable person comparator

In each case paying to be different, paying for the Disabled Persons Railcard is not an accommodation. It is not a situation a person without such objective declared needs, has to engage in.

This card and the whole system Dis-Ables those individuals who require PA support of any number. Particularly those who have a statutory objective requirement, often two PAs and in my son's case Three PAs.

Use of the two together card, and group tickets are for those with no such needs, who choose to use this social offer for their group social enjoyment and group interaction.

PAs non-negotiable statutory duty carried out, is not one of where this duty is of a frolic of their own. But a required statutory duty and not of a group social interaction, but the inclusion of the client, in that client's community inclusion and social interaction and purpose of the objective statutory requirement.

In any situation where PAs are required, statutory or assumed. Those PAs must be seen as a single entity with their client. An entity of an appliance or an auxiliary aid and one single fare. A fare an ordinary person or group of persons enjoy, undertaking their own social interaction without such needs and of their choice.

The construction of the DPP and RDG policy is not an access on an equal basis to others - advancing equality of opportunity between people who share such protected characteristics and those who do not.

Neither is The Westminster Government and in their English Policy, "Transport for All", National Terms and Condition of Rail Travel, state access at no extra cost. These policies and practices, endorse the Disabled Persons Railcard and current system as described above. A system created to meet the UN 1981 Year of Disabled and, stuck in that year.

The guidance and operation of DPPP/Passenger Assist, should be across the whole spectrum of need. Accommodations need, to be free at any point of required support, just as general good customer service, is given free at the point of a request and delivery. Without any extra burden of charges, just the same as provided to an ordinary person without such needs.

The Lord Holmes Review: Opening up public appointments to disabled people report was published on 3rd December, International Day of People with Disabilities.

At the launch event in Whitehall, Lord Holmes said, "An equitable, inclusive, fully accessible and positive process puts everyone on the same start line. It allows everyone to run whatever race they choose with fairness, dignity and respect throughout. Positive change requires leadership, culture and innovation and I am convinced that substantial, sustainable change is possible."

The Minister for Implementation Oliver Dowden MP CBE said, “I firmly believe that it is essential that public appointees are truly representative of the society they serve.

This current DPPP/Passenger Assist and RDG approach to accommodation does not provide - An equitable, inclusive, fully accessible and positive process and do not put everyone on the same start line. It allows everyone (Train operating companies, RGD and ORR) to run whatever race they choose without fairness, dignity and respect throughout.

Nor does the ORR, RDG and train operators system of an accommodation represent in the DPPP/Passenger assist, Oliver Dowden MP recorded aims in public life!!

“truly representative of society and its needs, which the approach to a public appointment is set out to achieve. Where individuals with any accommodation of needs to participate in public life, do not get charged for their accommodation needs.

I ask of the ORR – Would it charge for an employee, who can demonstrate via a professional objective assessment the need for detailed, skilled personal support to carry out their role with the ORR.

If as it should be a “no charge” to allow that employed person to be part of the ORR. Would the ORR expect that employed person to purchase such a badge of office as the Disabled Persons Railcard?

Then ORR, what is the difference here in access to the rail network for individuals with such statutory declared objective defined need?

The Disability Discrimination Act 1995 removed the DHSS system of registering to be different, in the removal of the Green Card and Supported Employment and quota of employment; for individuals with an impairment with employers of a certain size.

So why does a person register to be different through this 1981 Disabled Persons Railcard and charged for such a badge of office and an outdated accommodation?

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Edinburgh Access Panel
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

THE TITLE “ACCESSIBLE TRAVEL POLICY” WOULD BE MUCH MORE MEANINGFUL

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

IN PRINCIPLE IN FAVOUR OF THIS. THE CONTENT SEEMS COMPREHENSIVE. THE TITLE 'MAKING RAIL ACCESSIBLE" COULD BECOME "MAKING RAIL TRAVEL ACCESSIBLE'

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

YES IN PRINCIPLE IT SEEMS A GOOD IDEA TO SHORTEN THE PASSENGER DOCUMENT IN THIS WAY

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

THE CHANGES SEEM SENSIBLE. IT IS ESSENTIAL THAT THE PASSENGER DOCUMENT IS READY AND ON DISPLAY TO THE PUBLIC IN STATIONS BEFORE THE START OF THE FRANCHISE.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

THE clearest classification is to have three categories only (A) step free to all platforms, (B) some step free access and (C) no step free access. However, step free access does not solve all accessibility problems. If the area around the station is inaccessible passengers may not be able to get to the station. Therefore, Network Rail need to do whatever they can to make the areas leading to the station accessible although this may involve seeking cooperation from third parties such as local councils.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

A GOOD IDEA TO AVOID THE PASSENGER BEING BOOKED FOR ASSISTANCE AT AN INACCESSIBLE STATION PARTICULARLY IF UNSTAFFED

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

IN FAVOUR OF THIS PREFERABLE PROVIDED IN PLAIN ENGLISH IN THE PASSENGER LEAFLET REFERRED TO AT QUESTION 2 ABOVE

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

IN FAVOUR AS POOR COMMUNICATION BETWEEN STATIONS IS A MAIN REASON FOR THE FAILURE OF PASSENGER ASSISTANCE IN SOME CASES

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

IN THEORY A DEDICATED ASSISTANCE LINE ISA GOOD IDEA BUT NOT CLEAR WHETHER THE PUBLIC WILL BE ABLE TO TELEPHONE THIS LINE OR IS IT SIMPLY AN INTERNAL TELEPHONE LINE FOR USE BY RAILWAY STAFF

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

IT IS ESSENTIAL THAT DISABLED PEOPLE ARE INVOLVED IN THE DELIVERY OF DISABILITY AWARENESS TRAINING TO ASSISTANCE STAFF AND ACCESS GROUPS SUCH AS LOCAL ACCESS PANELS CAN HAVE A ROLE TO PLAY HERE.

Staff Training (Chapter 4)

Q11. Do you agree that:

- operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?
- the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

AGREE THAT OPERATORS SHOULD BE GIVEN NO MORE THAN TWO YEARS TO UPDATE TRAINING PACKAGES AND PROVIDE REFRESHER TRAINING. EACH OPERATOR SHOULD BE ENCOURAGED TO IDENTIFY AND FOCUS ON THEIR OWN PRIORITY AREAS FOR IMPROVEMENT

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

YES, ESSENTIAL THAT RDG PROMOTES THESE SERVICES GIVEN THE LARGE NUMBER OF PASSENGERS WHO SAY THEY HAVE NEVER HEARD OF THEM

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

YES, THIS IS ESSENTIAL GIVEN THE LOW AWARENESS OF PASSENGER ASSIST AMONGST ELIGIBLE GOUPS.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

SEEMS A GOOD IDEA. IMPORTANT THAT WEBSITES SHOULD BE AS ACCESSIBLE AS POSSIBLE.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

THE AIM SHOULD BE A TWO HOUR NOTICE PERIOD FOR BOOKED ASSISTANCE FOR BOOKED ASSISTANCE FOR DOMESTIC RAIL TRAVEL WITH 2200 THE DAY BEFORE AS A FALL BACK OPTION

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

I WOULD SUGGEST THAT THE REDUCTION COULD TAKE PLACE WITHIN A SHORT PERIOD OF SAY THREE MONTHS

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

THE JARGON USED OBSCURES THE MEANING OF THE QUESTION. I THINK THE QUESTION REFERS TO THE SITUATION WHERE AN ASSISTED PASSENGER IS CHANGING TRAINS DURING THE JOURNEY WITH DIFFERENT OPERATORS. IT IS NOT ENOUGH FOR OPERATORS TO CONSIDER ASSISTANCE. THEY MUST ACTUALLY PROVIDE IT.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

ALL PASSENGERS SHOULD IN PRINCIPLE BE ENTITLED TO COMPENSATION WHERE AN ASSISTANCE FAILURE HAS CAUSED LOSS AND INCONVENIENCE

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

OPERATORS SHOULD BE REQUIRED TO ACCEPT CALLS BY TEXT RELAY

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

YES, OBVIOUSLY SUCH TRANSPORT NEEDS TO BE ACCESSIBLE

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

YES, BEARING IN MIND THAT BECAUSE MANY STATIONS ARE UNSTAFFED THE MEMBER OF STAFF MAY BE MILES AWAY FROM THE PASSENGER

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

IT IS ESSENTIAL THAT A PASSENGER KNOWS WHEN ASSISTANCE IS BOOKED WHETHER OR NOT A SCOOTER OR MOBILITY AID CAN BE CARRIED. THIS MAY INVOLVE THE PASSENGER BEING GIVEN AN APPOINTMENT AT THE STATION TO CHECK THE DIMENSIONS OF THE SCOOTER OR MOBILITY AID

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

BOTH ARE GOOD IDEAS, ESPECIALLY(B) WHICH WOULD BE MUCH APPRECIATED BY DISABLED PASSENGERS. I PRESUME (A) REFERS TO THE PASSENGERS WHO PURCHASES A FIRST CLASS TICKET FOR A TRAIN WHERE THERE IS NO FIRST CLASS TRAVEL OR THE FIRST CLASS COMPARTMENT IS INACCESSIBLE

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

TRY TO MAKE TRAIN TRAVEL AS STRESS FREE AS POSSIBLE FOR DISABLED PASSENGERS TO ENCOURAGE MORE DISABLED PEOPLE TO TRAVEL.

Q25. Do you have any other comments or views on improving Assisted Travel?

Thank you for taking the time to respond.

Julie Ryder response

Thank you for giving me the opportunity to respond. Please see my comments below:

Q1. Accessible Travel Policy (I feel this is clearer as to who it is aimed at)

Q2

- No
- Title is too long. My suggestion is Accessible Travel Information

Q3 Agree

Q4 Point 2.37 Printed copies of the passenger leaflet should be available from day one of operations, not within 1 month.

Q5 no comment

Q6 Agree – should be integral part of the process

Q7 Agree ALSO ensure its in an accessible format at the right time e.g. Text message / BSL version

Q8 Agree – Comment: how much of this will be included in staff training? Figure 3.10 page 56 – there is a column headed up ‘Disability’ - this leads to assumptions about how the person is dealt with. More useful information would be ‘communication preference e.g. Look at the person, slow down, speak up etc. This would tie into current Guidance much better – see point 4.4c on page 59

Q9 Agree this should be a mobile phone with all numbers for stations required inputted on set up.

Q10 Yes to both content and training duration

Q11

- Agree
- Focus on individual operators based on customer rant and rave scores and comments.

Q12 Yes as long as promotions are accessible e.g. Available in BSL on website

Q13 Agree as long as it is used to engage and inform (and for operator to learn from too) and not simply a tick box exercise.

Q14 Agree and take into account BSL users

Q15 and Q16 Phased in approach to option 3

Q17 no comment

Q18 Yes and info for redress arrangements should be in a clear and accessible format. But what if the passenger doesn't comply then there should be redress for the train company too.

Q19 Agree that operators receive calls via text relay. No comment re barriers.

Q20 no comment

Q21 Agree and that info needs to be conveyed in a range of accessible formats and the member of staff needs to be able to communicate in a range of ways too

Q22 Agree with the proposals

Q23 Agree

Improving Assisted Travel – a consultation on changes to guidance for train and station operators on Disabled People’s Protection Policy (DPPP) – November 2018

- Response from Leonard Cheshire

About Leonard Cheshire Disability

We are Leonard Cheshire – supporting individuals to live, learn and work as independently as they choose, whatever their ability. Led by people with experience of disability, we are at the heart of local life – opening doors to opportunity, choice and support in communities around the globe.

Leonard Cheshire is one of the UK's largest voluntary sector providers of services for disabled people. We work in local communities to provide people with opportunity, choice and support. We have accommodation services – including supported living and registered care homes; and social, education and leisure services – including day support, community outreach services and respite support.

Good quality, accessible public transport enables disabled people to live, learn and work as independently as they choose. Leonard Cheshire research has found that over 40 per cent of all railway stations in Great Britain do not have step-free access available for disabled people¹. Trains are an essential form of transport, particularly for those who cannot drive, to travel longer distances in shorter times. Rail operators have a duty to provide good quality, fully step-free, end-to-end train journeys for all passengers.

Responses to the key consultation proposals are set out below.

Contact details for any matter arising from this response are set out at the end of the paper.

¹ Research and analysis carried out by Leonard Cheshire based on data provided by Office of Rail and Road. Accessibility and mobility data available per station published on National Rail website, accessed October 2018

Key Consultation Proposals

- **Considering passenger needs, station accessibility and staffing (on trains and at stations)**
- **Reducing the notice that passengers need to give to book assistance**

In England, two fifths (39%)² of all railway stations do not have full step free access available for disabled people. Even when stations are listed as step free, disabled people do not know if this means there is step free access to all platforms as well as between platforms. This makes it even harder to plan journeys.

Furthermore, when stations are listed as step free, a ramp is still often needed to board the train from the platform on to the train. This needs extra assistance and often this isn't available which often means that planned and spontaneous journeys are not possible for disabled people. Disabled people should be able to arrive at train stations and catch a train without worrying about providing advance notice.

Whilst the consultation acknowledges differing disabilities. Including sensory and hidden disabilities, the opportunity should be taken to demonstrate the intention to become an inclusive service by identifying alternative provision for customers with sensory and hidden disabilities – for example, passenger leaflets – what is the alternative for visually impaired customers, is there an 'easy-read' version?

For many disabled people travelling spontaneously is not possible; past experience has taught them they cannot be confident that part or their entire journey will not be accessible. The lack of viable transport options, as referred to in sections about transport staff and trains, means disabled people cannot experience the flexibility that non-disabled people do. Disabled people should not be required to book passenger assistance 24-hours or less in advance of travelling, but the option should remain for those who wish to. As a consequence, many disabled people find it difficult to travel without extensive planning or booking in advance.

'I have frequent unplanned journeys due to urgent hospital appointments. I have to ask my care worker or a friend to take me to the station and help me onto the train. If they are not available, I then have to keep my fingers crossed that other passenger(s) will help me get off the train.' Anonymous, e-mail. May 2018

A key matter that must be addressed is the proposed amendment in the revised guidance, section A2.4d. The revision states that, 'Operators must set out how they will ensure that, where reasonably practicable, at every station it is clearly indicated how passengers are able to speak to a human operator that is able to provide assistance'. It is not acceptable that such a fundamental aspect of customer service and safety is qualified by 'reasonably practicable'.

² Research and analysis carried out by Leonard Cheshire based on data provided by Office of Rail and Road. Accessibility and mobility data available per station published on National Rail website, accessed October 2018

- **Involving disabled people in a meaningful way/Improving the content, delivery and frequency of staff training**

In keeping with the Government's 'The Inclusive Transport Strategy' (DfT, July 2018) the DPPP should be replaced with an 'Inclusive Travel Policy' as part of the change in culture required so that, 'services [are] designed through dialogue with disabled people and other groups so that the needs of transport users are identified upfront. Such an approach removes the focus on infrastructure and takes a more holistic approach to the wide range of measures that can support people with visible and less visible impairments.'

Every opportunity should be sought to obtain and consider the views of disabled people whether they are passenger champions, members or representatives of regional or local communities and user groups or individuals. There should exist a culture of seeking continuous improvement in service provision whereby every disabled customer engagement is regarded as an opportunity to gain insight into the challenges and potential solutions for the individual staff member at the time and also for the service as a whole with an expectation and mechanism that the staff member will share the learning. Learning and improvement should therefore not be limited to consultation exercises and complaint forms.

'I asked a member of staff where the lift was. They pointed in a vague direction and said, 'Go over there.' Even though I couldn't see where they were pointing to.'
Disabled person with mobility issues and a visual impairment.

The development of such a culture should underpin the involvement of disabled people in regular staff training – for permanent and temporary staff – rather than being an exercise to meet health and safety or other regulatory requirements. Our survey of over 1,600 disabled adults in 2017³ found that 35 per cent had experienced problems using trains in the past year and in a self-selecting survey carried out in May 2018⁴, one in five (22%) of disabled people reported staff being unhelpful or refusing to help them, with one-third (30%) saying that staff did not know how to help them.

'I frequently use Grand Central and the assistance I receive is second to none. It is not just a pick up and drop off service. I actually feel like a human being receiving a service and not a problem of society. However, I once had to use Virgin trains. The set off from Sunderland was fine, but they failed to inform the next station I was on the train and I had to wedge my wheelchair in the door to stop it from leaving as I needed to get off. I needed to get across three platforms to get a connection and it felt like a mammoth journey. I was clearly a hindrance to the staff as I was not on the job sheet (their words). It is a sad fact that you are not allowed to take electric scooters as they make me require assistance.'

³ ComRes interviewed 1,609 disabled adults in the UK, aged between 18 and 65, from 15th June to 10th July 2017. Data were weighted by age, gender and region to be nationally representative of disabled adults of working age in the UK. ComRes is a member of the British Polling Council and abides by its rules.

⁴ Self-selecting online survey of 287 disabled adults or carers in the UK in May 2018.

With Grand Central I travelled from Sunderland to Kings cross for PhD research and with Virgin I travelled from Sunderland to Cambridge via Peterborough and another station, then onto Cambridge for examiner duties.' E-mail received by Leonard Cheshire, December 2018

- **Improving the quality & reliability of assistance through better information provision**
- **Improving the communication tools capable of being used for booking assistance**

All train journeys must be accessible from end to end so disabled people can access the station and platforms, board and alight from the train and leave their destination station independently and with ease.

Whilst the advance booking system to secure assistance is of value, and the new assistance app is a positive development, Leonard Cheshire too often receives accounts from disabled users across the rail network of the failure of pre-booked support to actually be in place. This causes anxiety – and worse - for disabled passengers, who have told us of feeling stranded and completely helpless, sometimes having to rely on members of the public to enable them to disembark at the correct location.

[In response to whether staff turn up on time when used passenger assistance] 'Not always. I get stuck especially at interchange stations with no assistance... being blind and autistic.....If they do turn up they sometimes put me on the wrong train... so that's terrifying.' Anonymous December 2018.

When the passenger assistance service works well it has the power to help disabled passengers have a positive experience despite the barriers to using trains. Over half (58%) of disabled people said they found passenger assistance easy to use in the past. Passenger assistance is a well-advertised service with 85% of disabled people being aware of it even if they hadn't used it themselves.⁵

The types of comments we received from disabled passengers include:

'Assistance was excellent from departure at my local station to my arrival at Euston every time I travel.'

However, passenger assistance is not always consistent in providing a good level of service, with over one in five (22%) respondents to our survey reporting that it was difficult to use.

'Staff put me on a train without an accessible toilet and didn't tell me - which they are supposed to do.'

Disabled people want assistance which delivers the service they are entitled to so they can travel. Staff do not always follow protocol which is to call ahead at the next station to let them know a disabled person will need assistance. This leaves them

⁵ Self-selecting online survey of 287 disabled adults or carers in the UK in May 2018.

stranded on the train, until they are able to alert a member of staff or if a member of the public helps them.

Our research found:

- 74% of disabled people said there wasn't a member of staff waiting for them at their station of arrival.
- 50% had experienced staff not radioing ahead at their destination station so they couldn't safely disembark the train.

'Assistance forgot to radio ahead and no one had told the guard on the train. So when it was my stop, there was no one to help me off the train. A man on the train got really concerned and tried to alert the guard. I was stuck on the train for another 3/4 stops before he got the guard's attention. When I finally managed to get off, I then had to get another train back to the original stop I needed.' Anonymous, wheelchair user. May 2018

The situation can be exacerbated as an increasing number of rail stations are not staffed, leaving disabled people without essential assistance, especially if the passenger assistance system has failed. Furthermore, not all stations have an emergency contact help-point.

'I can never be certain someone will be there to get the ramp out and help me off the train and I always dread the train coming to my stop. I have noticed that there is less and less staff at stations to help me.' Anonymous, wheelchair user. May 2018

Real time updates are essential for disabled people travelling on public transport. Accessibility features such as lifts are an essential requirement for wheelchair users and those with physical disabilities to travel - so when a lift is closed without any warning, the station and route are no longer accessible, meaning the disabled person cannot continue with their journey. Pre-warning of lift closures and toilets will give disabled people the option to re-plan their journey to a new accessible route.

Real time updates should also be available with regard to rolling stock – it is currently common practice to be able to advise customers as to the number of carriages in a train, the availability of refreshment services, etc. An inclusive rail service should also be able to provide information as to other facilities such as availability and location of accessible toilets, location of wheelchair space, etc.

Real-time information should be available not only to passengers via the forthcoming assistance app but also to passenger assistance booking staff and other staff so that they can best advise and support customers. The real-time information should also be available through text and video relay services.

- **Giving clearer information to passengers that use scooters or other mobility aids**

The proposal that each operator's scooter policy includes a presumption of carriage, extends to other mobility aids and clearly sets out which scooters and mobility aids

are permitted on board seeks to address an issue that is frequently raised by disabled adults with Leonard Cheshire, for example the following social media posts were sent to Leonard Cheshire in December 2018,

'Not allowed to travel with my scooter on any trains. Hence, when traveling I lose my independence.'

'I couldn't book assistance with @tfwrail cos they won't let me book without giving the dimensions of my chair. It's just a standard chair and so within the National Rail guide lines. This is a step backwards as never had to provide info to Arriva trains Wales. Just adds stress!'

Conclusion

The acknowledgement that 'much has changed since the last Guidance was written in 2009' and the research done to inform this consultation is welcome and is reflected in the proposals. However, as set out in this response, much more has yet to be done to remove both physical and attitudinal barriers to achieving accessible rail travel. Implementation of the proposals outlined in the consultation will contribute to this.

January 2019

Contact:

[redacted]

Policy and Research Manager

Consumer Policy Team
Office of Rail and Road
One Kemble Street
London
WC2R 4AN

8th January 2019

Dear Sir/Madam

RESPONSE TO THE ORR CONSULTATION ON CHANGED GUIDANCE FOR TRAIN AND STATION OPERATORS ON DISABLED PEOPLE'S PROTECTION POLICY

Thank you for providing draft guidance for review around Disabled People's Protection Policy (DPPP) for train operators. On behalf of LNER I provide our responses to the questions set out in the consultation.

What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

Firstly we support the move away from the current title. The reference to "protection" within the title does not feel suitable for the nature of this policy and as such the proposals put forward much better represent the policy's intentions. The name Accessible Travel Policy is our preferred option of the two as it identifies more clearly that this policy surrounds accessibility on both trains and stations.

What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance? a) Is there anything you consider is missing from the required content? b) Is this still a meaningful title for this leaflet?

On this point, we also believe that it would be more appropriate for the internal document name and customer facing name to be the same. The passenger charter for example refers to a DPPP while a customer would be unable to find this document and would instead be directed to one of two Making Rail Accessible (MRA) documents. As such, it would be beneficial to change the MRA documents to also be ATP to ensure consistency between internal and external terminology for rail operators. We would suggest the two names "Accessible Travel: Customer Guide" and "Accessible Travel: Policy" as such.

The purpose of the documents should be to encourage transparency about the facilities provided by operators. Any attempt to shorten a notably lengthy document could be done through more basic wording and terminology rather than removing important sections. In terms of additional content we believe that information on accessibility of the operator's website would be beneficial to customers as well.

We fully support the provision of different formats of this document as it is a required adjustment for a document surrounding policies for customers with disabilities. However we believe this should be on request rather than produced as standard. Based on the very low demand for these formats and the cost involved of producing them, it would be more beneficial and cost effective to hold these documents centrally and provide them as required. The requirement to hold these at all staffed stations is considerably surplus to the demand for these documents and we risk setting a false expectation that all stations will have every format available.

What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We raise concerns over the availability of information by transferring station and train information into the policy document. In the first instance, we would suggest customers are directed to the National Rail Enquiries website to find the information in the correct place in its most up to date state rather than adding lengthy sections to these documents – thus making use of the tools created through Rail Delivery Group (RDG) to ensure this data remains consistent. Alternatively if this information must remain in these documents, it is likely that a customer would read the document to find information around planning their journey when they have a potential barrier to access. For them to be able to do this effectively they need information about our stations available within this document rather than within the policy. The information would appear more suited to the Making Rail Accessible (MRA) document as it is not a part of the policy. In terms of the station information itself, it would be logical to have a standard national table of all stations that every TOC should display (i.e. using Knowledgebase or similar) to ensure that the information provided within the documents is consistent. We would thus recommend that the ORR provide a template that all train operators follow and do not deviate from to ensure consistency.

What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

In terms of the approval process for these policies we believe that consultation of customers with disabilities has massive benefits and will assist in the delivery of policies that represent our customer's needs. We do however feel that this should be done through a standardised panel, potentially set up through RDG, rather than risk different customer stances from different regions of vast networks and different TOCs having different levels of compliance based on the customers in their area. We would also ask about the value of requiring that this document meet Crystal Mark standards. While, in concept, we agree with this, we question whether this will potentially contradict any changes that the ORR make upon receiving draft documents from TOCs along with additional costs involved in Crystal Mark accreditation, and whether a general consensus of using clear and basic English would suffice.

Additionally to this we consider the two week implementation timeline from approval to print to be an unreasonable target. Given the time taken for brand teams to produce these documents and other key items going through TOC brand teams regularly, it would not always be possible to deliver on this time scale. We would however encourage a general timeline agreement between the ORR and the TOCs in terms of the process on the whole. This would involve setting specific timescales for how long the ORR will take to provide a reply once a draft update has been submitted as well as when the TOC will publish this. We would also support an agreement of a 'go-live' date to ensure information on new trains or other changes is not published too early or late. Finally we would encourage the concept of face-to-face meetings between the ORR and TOCs on the network to discuss the changes proposed and give the regulator an understanding of how that specifically applies to the area in which we operate.

We would finally encourage editorial rights being granted to the TOC to ensure that minor changes around spelling, grammar and minor wording adjustments can be done without additional ORR approval required to ensure timely changes.

What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

Classifying stations would significantly assist us in ensuring that customers know what kind of facilities are available to them when researching a station. We do believe that the classifications set out are extremely complicated and do not clear up any ambiguity that is already present. As such, LNER believe a more suitable approach would be to categorise as follows: step free, not step free or partial step free access (referencing where to find out more detail). We believe this should be aligned with the Accessibility & Inclusion Map work stream as part of the RDG project with the DfT which aims to set out the categories of 'Step-free', 'Partial step-free' or 'Not step-free'. It should also include information on station staffing hours – a factor which can have implications on station accessibility.

What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Question six outlines a requirement to introduce mandatory checks on station accessibility by booking agents when booking assistance which is something we already deliver. We would encourage this to be improved however through the new passenger assistance system and encourage the ORR to actively ensure that this functionality is at the core of the system and creates a system that pushes information rather than requires it to be pulled from elsewhere.

What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Setting out best practice guidance informing customers of what to expect would allow us to be transparent about the service we provide and as such is supported by LNER. We do believe however this must be clear in setting out what the base level of assistance provision is as to ensure that reasonable expectations are held by the customer. We would also encourage referral to these areas as 'good practice' over 'best practice' thus encouraging that these activities are good activities to be involved in rather than only for select industry-leading operators to partake in.

What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Question 8 mentions the introduction of handover protocol when carrying out assistance between stations on the rail network. We agree with the sentiment of introducing such a process but believe that this should be solved with the new Transreport Passenger Assist app. Spending time putting in place a physical call protocol would be time spent on something that could be delivered in a more effective way when the effort should be addressed to how handover will work within the new app. As such, we would be against an introduction of the style of handover discussed, though would encourage some good practice areas such as informing on board crew once someone has been assisted onto the train as an additional point of call for the journey. Any protocol that is introduced should take into account the changeover to the Transreport app and incorporate this into ongoing changes to what the protocol consists of.

What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

We believe that question 9 has similar issues to the previous point around how the new Passenger Assist app will rectify some existing shortcomings. There is a risk that introducing too many methods of communication introduces potential errors and double bookings. As such we believe the focus of the ORR should be to ensure that the new app delivers the required outcomes that this would have achieved. We would also point out the unnecessary additional instalment of these at stations where there is already only one staff member and would encourage considering alternatives to phone lines such as the app mentioned.

What are your views on our training proposals? Do you agree with the proposed content?

Delivering training to our new staff around disability awareness is something we deliver and support improvement of. As an industry there is no standardisation around the level of training provided and as such we welcome the introduction of training requirements for all operators. We do however

believe that the feasibility of some of the requirements is not deliverable. Training all staff that are new to the business in a classroom or station environment is a logical approach to LNER and would allow us to train more effectively. We do not believe that refresher training for the business every two years should be mandated to be in the classroom as this may not always be the most effective means of training of this nature – prescribed training does not always amount to effective training. There are, in our view, alternative ways of delivering refresher training that do not involve the classroom – be that through e-learning modules or other methods such as additional questions in competency assessments that staff undertake regularly. Given the length of time required for the training it would also be a significant challenge to deliver this on a two-year cycle to all staff. We do also believe that the level of training and how it is delivered should be varied by role to ensure that what we are delivering is proportionate to the tasks that person undertakes and that time is not being wasted. Clarity is required on what needs to be delivered for temporary agency staff and other parties involved in the business who may not be directly employed by us.

Do you agree that: operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?, and that the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

We support the ten proposed subject areas for training to be built from to ensure that this is standard across all operators. We do however feel that it would be more time effective and commercially viable to consider a single consultancy building one training package that all operators can use and adapt accordingly to ensure even more standardisation and make the time scales more achievable. Should our above comments around refresher training not being in the classroom not be considered, we do not believe that the time frame would allow us to effectively deliver on what is required.

What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

The promotion of Passenger Assist through both RDG (question 12) and local organisations by TOCs (question 13) would allow us to ensure that people who need our help know that it is available so we would encourage such activities. We do believe that this will be more effective through RDG as the coverage would be more significant than individual projects by TOC locally. We would encourage use of this to inform people of how assisted travel works and the benefits of booking assistance in advance, especially on journeys that are unfamiliar or involve unstaffed stations.

What are your views on the proposal for more prescriptive website requirements?

We are always striving to make our website even more accessible and believe clearer requirements from the ORR would assist with this and as such would be supported by us. We would like clarity on whether the requirement for a link to the accessibility information from the home page would need to be active promotion or whether including it on the navigation bar would suffice. We would be more supportive of the latter approach as this is the means by which anyone using our website finds what they are looking for. In terms of the compliance on W3C standards clarity needs to be given on what compliance is being monitored – specifically, whether there are obligations on TOCs to meet these standards, to what degree and within what timescales.

What are your views on the three options for reducing the notice period for booked assistance?

We would always encourage independent travel on the railway as this is everyone's right and, as such, shorter notice periods for booking assistance are absolutely our goal. We have considered the options put forward and believe that the implementation of booking before 10pm the night before travel is a feasible solution as this would fit with our current processes – especially in line with the delivery of the Transreport Passenger Assist solution. It is worth noting that a minority of calls are made after 20:00 and most assisted travel teams do not operate beyond 20:00. While we can still take assistance bookings after that time through other members of our customer solutions team, it may be worth considering the practicability of 20:00 over 22:00 in the immediate term. In terms of the other proposals of six hours before and two hours before we would aspire to deliver this though there would be some technical challenges behind it. Firstly we do not have the facility to deliver dynamic rostering and as such cannot staff accordingly at such short notice. This means that we would struggle to guarantee the service if considerable demand was put on our staff. Furthermore being a long distance operator with trains running journeys of up to eight hours there are issues about booking journeys on trains that are already in service – especially in relation to booking a seat, such as the wheelchair space on our trains. We also have concerns around the ability to take bookings two or six hours before for services starting early in the morning; would this be business hours? We would be unable to take a booking after our contact centre had closed. As such, we would support the first suggested option as the best way forward.

How do you consider any reduction might be phased in? If so, how might this happen?

In terms of an implementation timeline if the ORR decides to introduce all three options, we believe that this would be subject to the Transreport Passenger Assist app. Once we have a better understanding of what capabilities this delivers in real time we will be able to make a better determination of the booking notice required.

What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

As different modes of operation, specifically Driver Only Operation, are not being considered for LNER we do not feel we can offer much in response to this.

What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Offering customers redress when things go wrong is something we are committed to doing. As such, we would support the proposal of making customers aware of what we will offer them – something we already provide information on. We do feel that this must be in line with the previously mentioned standards of what a customer can expect from passenger assistance and that this applies to customers who have pre-booked to receive this help. In terms of value, industry standardisation may be of benefit here. Specifically, should there be the consideration of a set compensation amount rather than an amount respective to the journey ticket cost. For example, assistance that fails at the arriving station could ruin the customer's day regardless of whether they spent £2 or £200 on their ticket and as such a ticket refund may not be the best way forward. We would support a proposal to set a standard minimum refund amount and compensate appropriately to the greater of this or the ticket price.

What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Text-relay is a service we already provide to customers contacting us and as such we would happily support further rollout of this to TOCs who currently do not offer this service.

What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

Replacement transport is something that as an industry we rely on when things do not go to plan or when we need to carry out engineering work. As such we think that it would be beneficial for train operators to prioritise those replacement transport service providers with accessible vehicles available as contracts come up for renewal. This is something LNER does through our procurement process.

What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Finding a member of staff at a station is very important for customers who require assistance and as such we would encourage requirements to ensure it is known how to do this. We as an operator make this clear already at booking stage to ensure customers know where to find our staff but we would support this being enforced across the industry.

What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

It is unfair on a customer who purchases a ticket if that train operator cannot provide the level of service so it is of course beneficial that this is prevented. It is however a difficult task to ensure that this information is available as customers do not have to declare disabilities before purchasing a ticket or selecting a train. We would therefore support more requirements around compensating customers who are unable to take advantage of a service where it is impossible to accommodate accordingly. It is worth noting that any requirement to declare information about types of train and facilities that was introduced would have to be imposed on third party retailers as well to ensure effectiveness of any regulation. Furthermore this would be considerably more difficult in a ticket office environment than when booking online given that the same website appearance is not available. There are difficulties about providing information in time due to the short notice impacts that can happen to some train services (i.e. accessible toilet going out of service), so we would propose that there is a cut off point before the start of the journey in which we have to make contact as we cannot always interact in real time.

We have no additional comments around the areas of good practice other than inclusion of these areas to allow shared good practice within the industry. It is beneficial for both operators and customers and as such is strongly supported by ourselves. I would like to thank you for taking the time to read through this response and hope that our comments are taken on board when finalising this guidance and we look forward to seeing the final publication.

Yours faithfully

[redacted]

Accessibility and Inclusion Manager
London North Eastern Railway (LNER)

1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

Merseyrail broadly supports the suggested approach and believe it represents a modernisation of the terminology in line with customer expectations. It is important however that one consistent term is applied to the whole industry to prevent customer confusion.

2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

Merseyrail broadly welcomes the modernisation of this document. Feedback from customers on customer communications more broadly, indicates the approach taken in using plain English in recent changes to documents such as those around refunds and compensation has helped to increase awareness.

(a) Is there anything you consider is missing from the required content?

There is no content missing however we of are the view that this document should also offer an opportunity for TOC's to highlight (where appropriate) the range of services they offer to support customers with additional assistance needs. It is really important therefore that the tone and layout of this refreshed communication is modern and positive.

Some thought should also be given to how this information is communicated. Paper based communication is in general terms a declining medium. Social media, digital and audio are increasingly used particularly in the disabled community as sources of easily accessible information.

(b) Is this still a meaningful title for this leaflet?

Merseyrail's view is that the current title including the word 'protection' is outdated and carries negative connotations. We believe this could inadvertently suggest to customers that the railway is not a welcoming means of travel for disabled customers, which is clearly not the case especially on the Merseyrail network.

3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Merseyrail has no objection to the migration of this information from information leaflet to the policy document however we would suggest this be in the form on an Annex that does not require ORR approval each time changes are made to stations or fleets. We make this point from the perspective of ensuring that there are no delays in changes to station or fleet availability being shared with passengers.

4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

Merseyrail Response to 'Improving Assisted Travel – a consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)'

Merseyrail does not have any objections to the timescales for review and approval set out. It should be recognised that in our particular Concession arrangements that approval will need to be sought from Merseytravel for any material changes to operating policy, which may delay submission to ORR for review. All required steps will be taken to minimise and we will work with ORR to ensure this happens as quickly as is possible.

5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

Merseyrail recognises the need for greater clarity for customers in this area and we are broadly supportive of the proposed changes. We would note however that it is essential that the changes are universally applied and that the resource implications in making the initial changes required to make this work are recognised. A reasonable implementation period reflecting this requirement should be considered together with a clear 'line in the sand' date, where by customers and staff can be confident in the information provided.

6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

As a small TOC with a station estate where almost all stations are staffed from the start to end of service, the vast majority of assisted travel on our network is turn up and travel. We are proud of our track record in this area, with our station and on-board teams delivering what we believe is an industry leading level of service. We do recognise however that an increasing number of customers are choosing to pre book assistance, particularly during times of disruption. In Merseyrail's case the vast majority of advanced bookings are made through the National Passenger Assist system by other TOC's/booking agents. We therefore don't have a strong view on the implementation of mandatory checks. This would certainly not increase significantly workload for our customer relations team for the modest number of bookings they handle directly each week.

7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Merseyrail welcomes the development of best practice and in particular any best practice sharing from outside of sector that is identified as being of a high quality. It is important that any best practice guidance is specific to the customer, for instance on the Merseyrail network research shows that the vast majority of journey happen within the network itself as opposed to other networks nationally. With the 1 hour pre booking requirement and high level of support for turn up and travel journeys on our network, the customer experience will differ significantly from other parts of the UK rail network,

We believe therefore that guidance should reflect the nature of that customer's likely experience with the TOC in question rather than generalised guidance.

8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

As the consultation acknowledges, Merseyrail has had such a protocol in place on its network for several years. This includes handing over to other TOC's at the small number of interchange stations on our network.

Our experience is that it works extremely well. We believe further consideration should be given to the amount of information that needs to be collected from the customer as set out in the consultation. In particular we are concerned about the need to capture the customer's disability type. Whilst we understand the usefulness of this in tailoring the service offered to the customer it does raise concerns.

Our experience here is that whilst many customers are happy to provide this information, many are not. This could lead to challenging conversations in stations with the unintended consequence of making rail travel less attractive. There are also potential GDPR concerns here with potentially sensitive personal information being asked for in public areas. We believe more thought is needed in this area.

9. What are your view on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Merseyrail believe this is a sensible solution, which is already in place on our network. We would be happy to provide our phone numbers for such a line. We do not believe however that a dedicated number and the associated setup costs are appropriate or needed on our network.

We also believe that further thought needs to be given to how this is managed on unstaffed stations. On Merseyrail, this is done through the help points located on those stations rather than by a phone number located at another station. This means that our control room can immediately alter our guards who can in turn provide assistance on the next passing service rather than the customer having to wait for a member of staff to travel from a nearby station to provide the assistance. There is no link between stations and guards and our concern is that the proposal would increase the steps needed (and thus the risk of issues) to provide support to the customer.

10. What are your views on our training proposals? Do you agree with the proposed outline content?

Merseyrail are confident that the training provided to our front line staff already meets the proposed mandatory training requirements. We are therefore satisfied with the proposed content.

11. Do you agree that:

- **Operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**

Merseyrail's training on this subject is delivered in two year cycles and we are confident that this timescale could be achievable.

- **The refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Merseyrail's current training in this area focuses on the priority areas for our TOC and the practical implementation of the training in the customer experiences. We believe this is the most effective way of ensuring our people provide the service our customers expect.

12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We do not have any objections to the proposals.

13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We are supportive of the proposal to work more closely with stakeholders in passenger assist issues. Indeed Merseyrail is already doing so.

Merseyrail's Community Involvement strategy is focussed on working towards improving the society we operate in, improving the quality of life for those within it and driving economic growth in the region. A large part of our work in this area is nurturing and seeking out partnerships with various community groups and organisations across our city region.

Within our strategy we concentrate on 4 key areas: - Investing in our local communities; Educating young people about the railways; Supporting and promoting the local region and Engaging with our communities to improve the society we operate in.

In support of this we have committed to working with organisations who support individuals with more complex travel needs. We continue to widen our network of contacts in our region which enables us to reach as many individuals as possible and communicate how we can support them. Since the beginning of our concession we have worked with numerous service providers, authorities and organisations both practically on our stations and in the classroom.

14. What are your views on the proposal for more prescriptive website requirements?

We have no objections to the proposals. Such information is already provided on individual station pages and via our new interactive accessibility map. Should standardisation be required we will of course undertake this within reasonable timescales.

15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

As is acknowledged in the consultation Merseyrail already operates a 1 hr notice period for assisted bookings on our network. In reality however that vast majority of our assisted travel journeys are made by customers who have chosen to turn up and travel. Currently operational limitations in other parts of the network mean that we cannot offer this services confidently to customers travelling further afield.

In our experience most customers travelling in this way are savvy to this and have already pre-arranged onward journeys from the connection points on our network and we facilitate their journey and handover at this point.

We do not offer an opinion on reducing the notice period for other TOC's but do note that doing so would allow Merseyrail to provide a more seamless experience for those customers wishing to travel further afield.

16. How do you consider any reduction might be phased in? If so, how might this be implemented?

We are of the view that any changes must be well planned and implemented carefully after full communication and training for front line teams. Given the majority of our assisted journeys are within our own network we do not believe we will need to make any substantive changes ourselves but are very conscious of the perceptions of customers who are operator agnostic in terms of the journey they are making.

17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

Whilst broadly in favour of improving the quality of information for customers regardless of their need for assistance, the consultation is not specific around what such improvements might practically include. It is therefore impossible for Merseyrail to comment on these proposals until full details are published.

18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Merseyrail's internal guidance to customer relations staff already provides redress in the event of a failure in this area. This equates to a refund for the full value of the ticket for the leg of the journey being undertaken. We believe that this offers a good level of redress on the rare occasions that we fail to live up to expectations.

19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We have no objections. It is important however that staff nationally are trained on how to interact with such services to prevent lengthy calls and delays in customer service.

20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

Merseyrail already considers such requirements when major disruptive works are being planned. During 2017's Wirral Loop Line Track Renewals for example accessible buses were provided together with larger vehicles on standby for customers with needs that could not be met using the standard rail replacement vehicles. This becomes more challenging during unplanned and short term planned disruption and we would suggest this challenge is reflected in the proposed guidance or requirements/

It will also be important for it to be clearly defined what reasonable endeavours in relation to the suitability of alternative transport such as Accessible taxi's actually means in practice.

21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Merseyrail does not see any barriers to this information being clearly displayed on station welcome posters at each station should this become a requirement.

22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Merseyrail has a clear policy on the dimensions of motorised accessibility aids such as scooters that can be carried on our services. This policy is in line with DfT guidance in regards to the carriage of such aids. This is available at stations in the form of a leaflet and online via our website. Our front line teams have also been fully briefed on the policy to ensure appropriate application and support.

Merseyrail Response to 'Improving Assisted Travel – a consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)'

We believe that we already fully comply with what is being suggested in the consultation and therefore have no comments.

We would not support any change in approach that allows larger sized mobility aids onto services due to the health and safety issues this would undoubtedly lead to.

23. What are your views on our proposals to clarify the guidance to ensure:

(a) Passengers do not unknowingly purchase tickets they cannot Make full use of; and

(b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of Order, providing sufficient time for alternative travel options to be Considered as required.

Merseyrail has long standing quality training for it's retail staff which should prevent such incidents occurring. The nature of our network both in terms of design and of staffing levels mean that it is highly unlikely such an issue should arise.

We do not currently have toilets on our trains on our services and have no plans to offer this facility in the future.

24. Do you have any comments on the good practice areas listed? Are There other good practices that should be identified in the revised

None

Response from Mobility Issues Group for Goring and Streatley.

Responses to questions 1-24

Q1 – our preference is for “Accessible travel policy”.

Q2 - Retain reference to "older" people in the title or sub-title and/or in any accompanying illustration. The needs of people with mobility impairments due to age are important and may be a growing proportion of rail travellers as the population ages.

Leaflet structure (page 27): “At the station” should be more explicit, eg: “At the departure and arrival stations”.

Where a station is not staffed and the leaflet not available to take away, its content should be displayed in poster form. The poster should be located at a height that can be read easily by a person in a wheelchair.

Q3 – Up-to-date information on station and rolling stock accessibility should NOT be in the customer leaflet.

It should be online and, in simple form, on a station poster that points passengers to the online source. The online page for each station must include prominently a “Last updated [date]” field for two reasons: (1) to enable the passenger to evaluate its likely reliability and (2) to introduce an incentive for frequent review / a visible sanction for failure to review and update data. Ideally there should also be a Twitter-style feedback field for aggrieved or public spirited passengers to alert other travellers to real time delays or failures such as temporary closures, lift out of order on platform 4, etc.

The term, “...must where reasonably practicable...” be closely defined to make it clear that cost alone is not regarded as a reasonable excuse for failing to provide a service; as such costs can be factored into the TOC’s business model when bidding for a franchise or the financial terms are reviewed.

Our experience is that there are often discrepancies in existing online information, especially about stations, in particular, on accessibility, booking office opening times and car park capacity. There are also discrepancies between the information shown on the website of National Rail Enquiries and that of an individual TOC.

A useful addition would be a flag or marker on each platform corresponding to the position where the door for wheelchair boarding and alighting is on the trains that normally serve the station.

Q4 - Agree subject inclusion of representatives of "elderly" as well as disabled people. Consultation (para 2.35) with local groups should include consultation with representatives of elderly people (ie, those disabled by age), not only with representatives of people disabled by illness or accident.

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Reliability

Booking stage information (p34): Where a station is accessible (as is Goring & Streatley), boarding and alighting assistance must be available for any pre-booked journey. A booking must not be refused to or from a station that is not normally staffed, or where staffing is part-time, even if the prospective departure or arrival time is outside normal staffing times.

Q5 – Excellent classifications but will the nomenclature be durable and easily understood? - eg: the Coliseum in Rome was once “new-build”; (Birmingham) New Street is no longer new.

Para 3.34 - Unambiguous information on staff provision should not relieve station operator of obligation to have assistance available at any time with boarding or alighting when journey is pre-booked. A means is needed for a passenger when on a train to contact staff at the arrival / alighting station a few minutes before the train is due to arrive to confirm that he / she will need alighting assistance. Ideally this should be station-specific (mobile?) phone number. There is nothing worse for a wheelchair user to have to remain on a train because the alighting assistance fails to show up.

Q6 - Agree subject to specific comments above.

Q7 - Agree subject to specific comments above. Problems are soluble when staff are available. Problems persist where stations, or trains, are not staffed full-time. We strongly favour dedicated assistance.

Q8 - Strongly agree, subject to comments above, especially re: a phone number for the passenger arriving by train to call ahead and dedicated boarding / alighting ramp assistance for any pre-booked journey to an otherwise fully accessible station.

Q9 – Agree strongly.

Q10 – Approve of training plans; involvement of disabled and elderly people important.

Q11 – agree time limit; tailor to TOC’s weaknesses.

Q12 – Welcome RDG plans.

Q13 – Welcome, subject to including “elderly”, not just disabled.

Q14 – Consistency desirable but don’t stifle innovation. “Last updated” field essential for user. Trip Advisor or Twitter feedback facility (maybe moderated) would be a further benefit.

Q15 – 10pm the previous day is the most realistic option in present circumstances. Introduce with some notice, maybe three months.

Q16 – Could be changed to six hours before travel in due course of time. Maybe give advance notice of a phased introduction, say 10pm the day before within three months, reducing to six hours before travel in two years.

Q17 – Agree.

Q18 – Agree.

Q19 – Agree. Barriers include rolling stock with poor A-V facilities, especially sound systems and mumbling on-train staff.

Q20 – Approve but most problems are with routine failures rather than exceptional ones.

Q21 – **This gets to the heart of rail travel problems for disabled and elderly travellers.** These people feel and are vulnerable and need to feel **confident** that if they decide to use rail to travel for, say, hospital appointments or leisure, there will be help at hand if, as non-frequent travellers, they become confused or disoriented; they do not want to be stranded, on a train or a station, with no recourse to human help.

Q22 – This proposal is admirable. However, the purpose of any permit or scooter card scheme must be seen to be to **encourage** travel with mobility aids, not to discourage it. It may come down to subtlety of wording.

Q23 – This is good. In the case of error by the ticket seller the passenger must be able to obtain an immediate refund, in cash if the ticket was bought for cash or to the passenger's credit card account if appropriate. The culture of restricting refunds at booking offices, including the copious refund forms, must end.

Out-of-order toilets: when the disabled toilet of an approaching train is out of order, station staff must be made aware, enabling the staff to encourage the passenger to use the station facility before departure. Also, an illuminated "WC out of order" sign should be located near the disabled access door, so it can be read by the disabled passenger before boarding.

Q24 – All good stuff. Beware a counsel of perfection and don't let the perfect become the enemy of the good.

Additional comments

INCLUSIVE / ACCESSIBLE TRAVEL POLICY Guidance for Train and Station Operators (Annex A)

This would be far clearer, in plain English, and less ambiguous, if it were written entirely in the singular not plural, eg, on p3:

~~“An Accessible / Inclusive Travel Policies~~ ~~are~~ ~~is~~ the vehicle for ~~an [the]~~ operators to set out, for passengers and the ORR, ~~their~~ ~~its~~ commitments and standards of service provision, as well as relevant policies and practices, with regard to disabled people using the rail network. ~~They~~ ~~The policy [it]~~ will also provide an overview of the accessibility of the ~~operators’~~ ~~operator’s~~ facilities and services.

Page 8, para 1.4: As more stations become accessible the issue of providing boarding and alighting assistance will increase. Now is the time to bite the bullet.

Page 13, para 3.2B: It must say that where station is fully accessible but part staffed, boarding / alighting assistance must be provided for any pre-booked journey and that a booking cannot be refused because station is not fully staffed.

Page 15, para 3.3c bullet 4: must say how passenger can contact destination station from approaching train to ensure alighting assistance is available.

Page 17, para A1c: This section contains a potentially inherent contradiction. If a booking can be made for any hours that trains are scheduled to serve a station, that implies that assistance must be available at those hours to anyone who has made a booking. The availability of that assistance cannot therefore be qualified.

Page 17, para A1d: It must mean at the passenger's destination, not the final destination of the train. If a passenger has booked to Bristol Parkway he or she will not want to be put off the train at Swansea.

Page 17, para A1e: The phone number should also be given to the passenger when booking so he or she can call the destination station from the train as it approaches to get confirmation that the passenger will be met by an assistant.

Page 18, para A1g: The blue text is important.

Page 18, para A1h: The purple text is very important.

Page 19, para A1k, I and ii, bullet 3: The purple text is important.

Page 22, under “Stations” – apparent typographical error in line 2 – “both”.

Page 33 B5 Working with disabled passengers, local communities and local authorities – ensure elderly people are consulted as well as disabled.

Apart from these comments this is all good stuff. Overdue but welcome none the less.

Reliability

Booking stage information (p34): Where a station is accessible (as is Goring & Streatley), boarding and alighting assistance must be available for any pre-booked journey. A booking must not be refused to or from a station that is not normally staffed, or where staffing is part-time, even if the prospective departure or arrival time is outside normal staffing times.

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Q19 – Agree. Barriers include rolling stock with poor A-V facilities, especially sound systems and mumbling on-train staff.

Q20 – Approve but most problems are with routine failures rather than exceptional ones.

Q21 – **This gets to the heart of rail travel problems for disabled and elderly travellers.** These people feel and are vulnerable and need to feel **confident** that if they decide to use rail to travel for, say, hospital appointments or leisure, there will be help at hand if, as non-frequent travellers, they become confused or disoriented; they do not want to be stranded, on a train or a station, with no recourse to human help.

Q22 – This proposal is admirable. However, the purpose of any permit or scooter card scheme must be seen to be to **encourage** travel with mobility aids, not to discourage it. It may come down to subtlety of wording.

Q23 – This is good. In the case of error by the ticket seller the passenger must be able to obtain an immediate refund, in cash if the ticket was bought for cash or to the passenger's credit card account if appropriate. The culture of restricting refunds at booking offices, including the copious refund forms, must end.

Out-of-order toilets: when the disabled toilet of an approaching train is out of order, station staff must be made aware, enabling the staff to encourage the passenger to use the station facility before departure. Also, an illuminated "WC out of order" sign should be located near the disabled access door, so it can be read by the disabled passenger before boarding.

Q24 – All good stuff. Beware a counsel of perfection and don't let the perfect become the enemy of the good.

Additional comments

INCLUSIVE / ACCESSIBLE TRAVEL POLICY Guidance for Train and Station Operators (Annex A)

This would be far clearer, in plain English, and less ambiguous, if it were written entirely in the singular not plural, eg, on p3:

~~“An Accessible / Inclusive Travel Policies~~ ~~are~~ ~~is~~ the vehicle for ~~an [the]~~ operators to set out, for passengers and the ORR, ~~their~~ ~~its~~ commitments and standards of service provision, as well as relevant policies and practices, with regard to disabled people using the rail network. ~~They~~ ~~The~~ ~~policy~~ [it] will also provide an overview of the accessibility of the ~~operators’~~ ~~operator’s~~ facilities and services.

Page 8, para 1.4: As more stations become accessible the issue of providing boarding and alighting assistance will increase. Now is the time to bite the bullet.

Page 13, para 3.2B: It must say that where station is fully accessible but part staffed, boarding / alighting assistance must be provided for any pre-booked journey and that a booking cannot be refused because station is not fully staffed.

Page 15, para 3.3c bullet 4: must say how passenger can contact destination station from approaching train to ensure alighting assistance is available.

Page 17, para A1c: This section contains a potentially inherent contradiction. If a booking can be made for any hours that trains are scheduled to serve a station, that implies that assistance must be available at those hours to anyone who has made a booking. The availability of that assistance cannot therefore be qualified.

Page 17, para A1d: It must mean at the passenger's destination, not the final destination of the train. If a passenger has booked to Bristol Parkway he or she will not want to be put off the train at Swansea.

Page 17, para A1e: The phone number should also be given to the passenger when booking so he or she can call the destination station from the train as it approaches to get confirmation that the passenger will be met by an assistant.

Page 18, para A1g: The blue text is important.

Page 18, para A1h: The purple text is very important.

Page 19, para A1k, I and ii, bullet 3: The purple text is important.

Page 22, under “Stations” – apparent typographical error in line 2 – “both”.

Page 33 B5 Working with disabled passengers, local communities and local authorities – ensure elderly people are consulted as well as disabled.

Apart from these comments this is all good stuff. Overdue but welcome none the less.

**Mobility and Access Committee for
Scotland (MACS)**

Area 2F North, Victoria Quay
Edinburgh EH6 6QQ
[redacted]



Office of Road and Rail
Disabled People's Protection Policy (DPPP)

DPPP@orr.gov.uk

Our ref:
2019/02

Date:
17 January 2019

Dear Sir or Madam,

Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)

Please see below a response to your consultation provided by the Mobility and Access Committee for Scotland(MACS).

Yours sincerely,

MACS Secretary

Q1. What are your views on replacing Disabled People’s Protection Policy with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

MACS supports this proposal, because replacing the word ‘disabled’ with ‘inclusive’ will encompass a greater variety of people. Using this new terminology would now include people who have an impairment but do not consider themselves to be disabled, as well as disabled people with hidden disabilities who choose not to declare their disability. People who might not be defined as disabled but who need assistance, such as people who are temporarily impaired due to surgery or an accident, as well as older people, and people travelling with young children, would now be included.

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance? Is there anything you consider is missing from the required content? Is this still a meaningful title for this leaflet?

MACS suggests using the wording ‘making rail travel accessible and inclusive’. MACS welcomes the simplified structure of the proposed document, but would prefer to see a branding which is consistent across all publications, on Meeting Places, on the uniforms/id of staff and on booking pages etc. This also has the benefit of making information related to using the railway more understandable to those who have learning difficulties or for whom English is not their first language. We would however also suggest the creation of a dedicated easy-read document using language and formatting guidelines specifically for this purpose.

Q3. What are your views on our proposed requirement that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

MACS recommends that the passenger leaflet ought to be concise and consistent across the network to give travellers, who require assistance, the confidence that they will receive a consistent service, irrespective of where they travel. Therefore MACS supports use of the terms must and may which will underpin this aspiration. MACS supports the proposed inclusion of information on accessibility of stations and rolling stock in operator’s policy documents so long as information is provided in the passenger leaflet highlighting where this information can be accessed. That said it should be possible for disabled people to find out information about the accessibility of stations and rolling stock easily online without having to delve through a lengthy policy document. The operator’s policy should be readily available on request in accessible formats e.g. large print, Braille, Easy Read, online in accessible PDF format complying to WC3 standards for web accessibility, enabled for mobile as well as desktop devices, and these formats should be kept up-to-date by the rail providers. It is also vital that passengers retain the ability to find information directly from staff either via phone or at a station.

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

MACS welcomes the proposed requirement that disabled people and their organisations are involved in the production of inclusive travel policies and leaflets and is of the opinion that the timescales proposed are realistic. MACS suggests that proposed timescales applying to the publication of leaflets should be extended to allow publication of information in accessible formats and online.

Q.5 What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

MACS welcomes the proposal to classify the level of accessibility of stations, however there are several caveats which we would encourage ORR to consider. We suggest there should be a definition of what is meant by 'step free'. This is because 'step free' could potentially encompass platforms accessed by escalators, which would be satisfactory for people who are mobile and can walk for a short distance, but which would constitute a barrier for a wheelchair user, unless a lift was also present. Furthermore, stations being described as 'step free' can be problematic for people using assistance dogs, because the term suggests that escalators may be present, and in most circumstances assistance dogs are prohibited from using moving escalators. Many London Underground stations provide escalator only access to platforms and it may be difficult for a visually impaired guide dog owner to identify stations which are accessible and have fixed stairs or a lift all the way from street level to the platform. MACS advocates for greater access information about stations to be published to inform passengers about the means by which platforms are to be accessed and this should highlight whether fixed steps, escalators, and lifts are available. We would advocate the use of a classification system based on a matrix of several different factors including the level of station staffing and its geographical size. This is because a step free station with no staffing may be just as inaccessible to, for example, a visually impaired person as a station without level access which is small and has full-time staffing. Additionally MACS believes the guidance and classification should be as simple as possible without relying on external regulations such as the new Build regulations, because this is terminology that many people are likely to be unfamiliar with.

Q6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

There are so many discrepancies in the information available to call handlers that MACS is of the opinion that mandatory checks are essential to ensure a successful assisted journey. This needs to be at the earliest stage in the booking / reservation process.

Q7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

MACS welcomes this proposal because it should empower disabled people to travel by rail because they will know what their rights are, what assistance to expect and know what to do to receive assistance. Statistics show that many people do not use rail travel because they believe it is inaccessible, even if this is not actually the case.

Q8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

MACS welcomes the introduction of the proposed protocol in facilitating a more reliable service which can be depended upon. MACS notes that the proposed protocol appears to only refer to major station. Some stations are not classified as mainline but are the transition station to an Island, and therefore form part of the lifeline service for a community. MACS therefore suggests the term mainline and transition stations is adopted with a description of what constitutes a transition station. In addition, we would suggest a consistent definition of the term mainline, for example, whether this includes smaller staffed stations or those used as a point of intermodal change such as airports.

Q9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

MACS welcomes this development, as it should give travellers more confidence in the system. We would highlight though a dedicated assistance telephone line is only beneficial if there are staff available to answer it. The provision of a helpline with a text relay service should also be facilitated to support those with hearing difficulties who are unable to use a regular telephone. In addition, please see our comment regarding the definition of a mainline station in question 8 above.

Q10. What are your views on our training proposals? Do you agree with the proposed outline content?

MACS welcomes the intention that rail staff should receive mandatory training and refresher training. Scotland's Accessible Travel Framework has a high level action plan which has a theme of Information and customer service, in addition DPTAC has advisory notes on training of staff. If the Rail industry continues to work with strategic organisations and policy makers there is an opportunity for structure training, which could be certified by an awarding body. Employees, irrespective of their industry would then have a baseline qualification in assisting disabled people. This could then be enhanced for the specific details relating to the rail industry. MACS also strongly recommends that any training be co-produced and delivered by disabled people with a wide range of disabilities and requirements.

Q11. Do you agree that operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff, and the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

MACS agrees with the proposed timescales and recommends standardised training components which should comprise the major element of training for all operators. Operators, however, could add complimentary good practice training in addition to the standard modules.

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

MACS welcomes proposals to raise awareness of rail assistance available. The proposals need to be part of a package of awareness raising. We suggest that an additional awareness raising opportunity is linking with Blue Badge enquiries. MACS believes that awareness raising of passenger assist as part of disabled rail card enquiries would be beneficial. This awareness raising should extend to enquiries and applications for concessionary rail travel cards too, for example in Scotland, the Scottish Blind Travel Pass, and elsewhere in the UK, where concessionary rail schemes are offered. We should be aimed at people who may qualify for, but who do not currently make use of concessionary travel or assisted travel services. It is important to note that people who are disabled may not identify as such and thus may needlessly struggle when travelling by rail.

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

MACS welcomes this proposal and advocates that it should be mandatory to work with the stated groups. Without this mandate, working relations would be haphazard and not comprehensive.

Q14. What are your views on the proposal for more prescriptive website requirements?

MACS supports this proposal and would encourage ORR to require operators' websites meet W3C compliance at level AAA. Technology has moved on considerably over the past decade and with this has come a plethora of different terminology. The current proposals are a once in a decade chance to make travel information and travel inclusive, so prescriptive terminology is essential. Currently essential aspects of many operator's websites are inaccessible for people who use screen readers, such as journey planning, and, in some cases, the form for requesting rail assistance.

Q15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

MACS supports the aspiration to have as minimal a notice period as possible for requesting assistance. It is important, however, to work with the industry and not to place unreasonable demands on it. On this basis, in the first instance we would support a six hours before travel option. However as some operators already offer a two hour minimum period of notice then research should take place with these operators to understand how they facilitate this offer and investigate whether this standard could be replicated across operators. Passengers need to be clearly advised as to whether the notice period applies only within business hours of booking offices operation when booking offices are not 24-hour services, or whether the notice period means booking six hours prior to the journey occurring. MACS would like to reiterate that for disabled people to equitably enjoy their economic, social and cultural rights on the same basis as non-disabled people, operators ought to also support, or investigate the potential for 'spontaneous' travel and requests for assistance that have not been booked. This is provided by London Underground, Glasgow Underground and (informally) Scotrail, and all operators should be able to provide this service.

Q16. Do you consider that any reduction should be phased in? If so, how might this be implemented?

MACS would support implementation by end of 2019 or at the earliest opportunity thereafter. As outlined in the consultation document, a range of notice periods exist and we recommend that shadowing and research is undertaken with the operators that currently offer the most minimal notice periods, so that this service can be replicated.

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

MACS asserts that the same standard of assistance should be available irrespective of whether the journey relates to one or multiple train operators or modes. If the rail network is to give confidence to a disabled traveller, that person needs to be sure that there is assistance available across the whole of their journey, they need to know if a train has been delayed or if a disabled toilet is not available. This service can only be provided if staff are available to provide it. The Guidance should therefore describe the provision of staffing required to meet a need for inclusive travel and be cognisant that for many disabled people, provision of information about delays and cancellations needs to be offered in various formats, ideally in person by staff, and not just through visual display screens or through help points at unstaffed stations. For example, a help point is only useful for a visually impaired person if they know where it is located, or to a hearing impaired person if there is a visual screen, or to a wheelchair user if it is not situated at the top of stairs. The presence of rail staff also increases confidence and is likely to deter anti-social behaviour and hate crime.

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

MACS is very supportive of this proposal. All too often assistance failures occur, as outlined in the consultation document. These failures are inconvenient for disabled people, often result in additional costs being incurred whilst completing their journey and do not encourage them to travel by rail. A system of redress could be introduced along the lines of the 'delay and repay' scheme where disabled people would automatically be entitled to compensation if their booked assistance does not materialise. As stated above concessionary rail travel is provided in many parts of the UK, and where this exists operators should be required to financially compensate disabled people when they fail to provide agreed assistance, irrespective of whether the person has had to pay for their travel or not. This right to redress should be highlighted in the passenger leaflet and prominently on operators' websites. To facilitate rail operators with aiding and preventing the need for redress, the advice provided to disabled passengers by the rail booking system needs to be more helpful and specific. For example the online booking system regularly advises the disabled person to make themselves known to rail staff at the station 20 minutes in advance of travel. Identifying rail staff is somewhat challenging for visually impaired people using an unfamiliar station or for people with any impairment visiting a large busy station.

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

MACS recommends that text relay should be available across the network. The only barrier is where the mobile signal is weak, but a web-based alternative should be made available and accessible via a wide range of devices, including those running older operating systems.

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

MACS very much welcomes consideration in the guidance of replacement alternative travel that is accessible. MACS advocates that if a network is to utilise alternative transport because of planned disruption, that disruption event and the associated measures should have an Equality Impact Assessment (EQIA) undertaken as part of the planning. In this the need for accessible alternative transport should be clearly identified and put in place.

In addition a rail provider should have an Incident Plan, which identifies what is to be done in the event of an incident. Again, this should identify accessible transport providers and a shadow contract should be in place to ensure a business link between the 2 parties.

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

From both an inclusive travel and safeguarding position, the Guidance should make this mandatory.

Q22: What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the Guidance review?

MACS supports the recommendations, but would like to see something about carriage of larger scooters in the goods train if available (this must be pre-booked).

Q23. What are your views on our proposals to clarify the guidance to ensure: (a) passengers do not unknowingly purchase tickets they cannot make full use of; and (b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

MACS would like to highlight that inclusive travel is for everyone and wheelchair users and others that need additional space, for example people travelling with assistance dogs must be catered for in the design and layout of both standard and first class carriages, so the Guidance should reflect this.

If practical, operators should inform disabled travellers of any issue with accessible toilets at the earliest opportunity, should advise them of alternative travel options and should make arrangements to assist passengers to continue their journey as per their choice.

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?

MACS believes that the guidance omits including the need for clear announcements and alternative display of the announcement in British Sign Language at either stations or on board.

Network Rail's response to consultation:

Changes to Guidance for Train and Station Operators on the Disabled People's Protection Policy (DPPP)

18 January 2019

This response has been reviewed and endorsed by Network Rail's board in January 2019.

Question 1: What are your views on replacing 'Disabled People's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy' or another term?

- We are supportive of changing the name to make it more passenger focused
- We suggest 'Accessible Travel Commitment' as this makes it clear to our passengers the purpose of the document and gives insight to the information contained within
- We favour consistent naming throughout the industry so passengers know what to look for/ask for in stations

Question 2: what are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- We support a more concise, passenger friendly document
 - Network Rail supports the use of easy-read documents and sees this as good practice
 - Removing less relevant information and having shorter/condensed leaflets would enable operators to continue to provide the most accurate and up-to-date information that passengers need to be able to travel
- We agree that the finding of ORR's mystery shopping research where information leaflets were only available on three out of ten journeys is unacceptable
 - Network Rail wants to support the industry to improve this;
 - We will work with train operating companies to ensure leaflets are appropriately available and prominent at our stations
 - We will continue to train station employees to be aware of the existence and availability of leaflets and provide them where required.
- The title of the passenger facing leaflet title should be consistent with the updated name for the Disabled People's Protection Policy (DPPP), removing unnecessary confusion for passengers and station employees by using different names in the relevant licence obligations, internal documents and external leaflets
 - Naming passenger-facing leaflets 'Accessible travel: helping older and disabled passengers' would provide consistency with the proposed name change in the licence
- The current drafting from ORR requires leaflets to state that assistance between connecting trains is available. We suggest it would be helpful and provide passengers with confidence to state that we (Network Rail and operators) will make those arrangements as part of the passenger assistance process

Question 3: What are your views on our proposed requirements that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

- Network Rail agrees that this information should be readily accessible online and at stations for those that require it

- We support this information being provided separately as part of the policy document rather than the passenger leaflet as this will make the proposed shortened passenger leaflet more customer-friendly, particularly for operators with a large number of stations
- We agree that, given ORR's finding that information has not been made readily available, it would be appropriate within a risk-based approach to monitoring for ORR to monitor this closely. However, we suggest that ORR should continue to assess whether close monitoring is required or if monitoring elsewhere would be more beneficial in encouraging continued improvement across all aspects of assisted travel.
- ORR's position that "information held online must be kept up to date, whether on the National Rail Enquiries (NRE) website of the operator's own website" does not seem to meet the second of the three key elements ORR has described (accuracy, consistency and currency)
 - The rail industry can be confusing and it would not necessarily be clear whether passengers or other interested parties should go to the operator's website, NRE or Network Rail's website for the most current information. We suggest this could be improved and Network Rail is open to working with industry on solutions
- Removing less relevant information and having shorter leaflets would enable operators to continue to provide the most accurate and up-to-date information that passengers need to be able to travel, reducing the printing and distribution costs

Question 4: What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

- Network Rail supports shorter timescales for having policies in place and available to passengers for new licences as this will help deliver the consistency passengers need to travel confidently. There is a question as to why the requirement is only to have leaflets in staffed stations, as these may be even more important in unstaffed stations where there are new arrangements with a new operator
- We agree that non-material changes should not require approval and would appreciate guidance on what would be considered material
- We believe that shorter timescales for review of existing policies is a positive step
 - Network Rail will seek to maintain open engagement with ORR as we review and develop our policy. We expect that this engagement would allow Network Rail and ORR to be aligned in
 - Assessing whether changes are material
 - Understanding the extent to which stakeholders have been engaged in our update process
 - Understanding the reasons for any changes
 - We would hope that this would mean the process and timescales could become even more efficient
- We acknowledge that the substantial updates following the conclusions to this consultation will be treated as new approvals in terms of timescales and will work with ORR on this.

Question 5: What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

- We agree that consistency in defining and representing step-free access is important for passengers and staff to plan journeys effectively
- While 5 categories as proposed would be helpful in the level of detail provided to define the categories, it may not make for quick interpretation and understanding for passengers as the definitions provided in the drafting requires a prior knowledge of relevant buildings standards
 - It would be helpful to understand whether each map online, in stations and on trains would be accompanied by the full explanations. If not, it may be more helpful to use three categories which do not require full knowledge of the relevant standards, but ensure that assistance booking staff have access to the more detailed information to categorise the station for the passenger if needed

- As Network Rail has access to station building data and information, we are keen to work closely with RDG on this work and provide any assistance we can. It would be important that operators still review and assure the accuracy of the data for the stations they manage.

Question 6: What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

- We agree with the requirement for mandatory checks, and agree with ORR that this is only helpful when coupled with new requirements to provide more accurate information on the NRE website for booking agents
- While Network Rail does not take assistance bookings, we will support the industry in this by providing available information about stations that is as accurate as possible
- In addition to proposals set out by ORR, Network Rail would be supportive of the industry moving to one call-handling centre for passengers to call to make passenger assistance bookings, rather than multiple points of contact. We believe that this would improve the experience for passengers.

Question 7: What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

- We support the development of this as a short-term solution but note that with technological solutions the industry could do more in this area in the future.
 - For example, rather than generic expectations, providing passengers with information specific to their booking, such as the meeting point in their departing station and the layout of the station. There is also an aspiration in future to provide not only location specific guidance, but real-time guidance, such as information about disruption to journeys or to lift and escalator availability. There is already significant work underway in the industry that will support this aspiration to become a reality.

Question 8: What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

- We support the introduction of a handover protocol, but recognise that as Network Rail stations are always staffed, smaller stations may face more challenges to implement a protocol
 - The industry should collaborate and agree an appropriate protocol, as a protocol that is unworkable for any party may cause more problems for passengers
- We believe that a consistent standard of training will support the introduction of an industry-wide handover protocol.
- Network Rail also supports the proposals regarding when the procedures to call ahead would apply

Question 9: What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

- Network Rail supports ORR's proposal for all GB mainline stations to have a dedicated assistance phone line
- We also agree with the minimum requirements to have a phone line, that is treated as a priority, where someone can be reached at all times, but suggest that each operator (and indeed each station) needs appropriate flexibility to implement this in the most appropriate way for their station. For example, having one colleague dedicated to answering calls may not be enough in some stations while one line may be adequate to cover multiple stations for some parts of the network.
- We support the requirements proposed in ORR's consultation that would ensure the phone line is not available to the public and that numbers are made available to all other relevant stations.

Question 10: What are your views on our training proposals? Do you agree with the proposed outline content?

- We agree that training should be undertaken by all relevant staff, however some definition of what this means would be beneficial to ensure consistency across the industry and to ensure all staff are trained to the appropriate level. For example, the industry should agree the appropriate training for passenger facing or operational roles, and the appropriate level for assistance booking employees.
- Network Rail supports a consistent quality of training across the industry while also encouraging operators to continually improve
- We support proposed mandatory training elements, and support refresher training which we believe should also maintain the consistent elements of the initial training
- We believe that updating training material and approach should be a collaborative exercise to continuously share experience across the industry, assess effectiveness and improve training
- We agree with ORR's proposal for a condensed version of training for temporary staff as busier times could carry the highest risk of assistance failing
- We support the proposal for training to be designed and delivered by trainers who have lived experience of disability issues
- At Network Rail, our current training offering is delivered by disabled trainers, and has been developed with and by those with lived experience
- Network Rail believes that recruitment processes should seek to identify employees who have the right behaviours to undertake passenger assistance roles, and these behaviours strengthened by quality training

Question 11: Do you agree that:

Operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?

- We believe that 2 years is sufficient time for Network Rail to update and provide refresher training

The refresher training should focus on priority areas for improvement for the industry, or should it be tailored to the priority areas for improvement for each individual operator?

- If there are areas that are consistent across the industry where all operators need to improve, we believe it would be worthwhile for all operators to focus on these areas
- If some operators are already performing highly in some areas, we suggest that they should tailor their programmes accordingly, but should still engage with other operators to share good practice

Question 12: What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

- We support ORR's proposal for ORR to use the introduction of the new passenger assist system as an opportunity to promote what assistance is available and how to obtain it, particularly to those who do not currently travel by rail
- We do recognise that reaching these people will require different approaches to some previous communications and campaigns, for example, those mentioned in the consultation which refer to advertising at railway stations
- We also support providing further information about assistance when disabled persons railcards are issued, but note this still only targets people who already travel or intend to travel by rail
- We support changes to ticket booking pages on operators' websites, but note that this does not affect Network Rail

Question 13: What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

- We support this as it is consistent with Network Rail's service focused approach

- Network Rail routes lead stakeholder engagement and communications strategies and commit to incorporating engagement on passenger assistance where relevant, noting that we do not sell tickets but do manage some of the busiest stations in Great Britain

Question 14: What are your views on the proposal for more prescriptive website requirements?

- Network Rail agrees that passengers or potential passengers should be able to access high quality information relating to their rail journey
- Network Rail has applied World Wide Web Consortium (WC3) web content accessibility guidelines to achieve AA standard on its website.
- We recommend that the industry agrees to commit to a minimum standard of WC3 website accessibility (A, AA or AAA) to be consistently applied to all rail companies' websites
- We believe that ORR should use its position as the industry's regulatory body to highlight the achievement, or exceedance, of such standards as good practice. This will allow rail companies to recognise, share and continue to improve on best practice.

Question 15: What are your views on the three options we have identified for reducing the notice period for booked assistance?

- Network Rail supports a whole industry ambition to reach a 2-hour notice period for booked assistance, but recognise that this may be more achievable for some stations than others
- We agree that the introduction of a mobile app will help operators to meet these ambitious timescales
- We do not believe that committing to taking bookings up until 10pm the night before travel is going far enough to make the service convenient and efficient while providing certainty for passengers
- Committing to taking bookings up to 2 hours before travel will allow passengers to have much more information about travel on that particular day, for example in bad weather or during poor performance booking agents can advise of any timetable variations to minimise unexpected disruption
- The managed stations steering group is exploring the extent to which a turn-up and go service could be provided as this would be the ultimate provision for most disabled passengers. This is far more ambitious and challenging to deliver reliably. We understand that there are implications in relation to the redress aspect, as it is anticipated only to be available to those passengers whose booked assistance fails, rather than when turn-up and go assistance is not available despite best endeavours.

Question 16: do you consider that any reduction should be phased in? If so, how might this be implemented?

- Network Rail recognises that there are costs involved in the ambitions to reduce booking timescales and therefore a staged improvement may be more practical

Question 17: What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of transportation are utilised?

- Network Rail does not directly provide alternative transport; however, we are committed to train our station staff to be more flexible within the reasonable limitations of operators in what alternative transport can be provided (for example if assisting a passenger to a taxi of their own booking)

Question 18: What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

- We have joined the ombudsman scheme on a voluntary basis relating to our passenger facing activities at managed stations, and will promote the option of independent redress via the ombudsman
- We do not have a direct contractual relationship with passengers and under terms of managing public money, would not be able to offer compensation prior to referral to the ombudsman

Question 19: What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

- Network Rail does not make passenger assist bookings, however, we would offer this for passengers contacting the Network Rail contact centre for any other matters

Question 20: What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

- We support operators being required to provide accessible substitute and alternative transport, including disability awareness training for taxi drivers and contracts with transport companies who have accessible vehicles whether buses or taxis

Question 21: What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that can provide assistance and service information?

- We would welcome this at Network Rail stations, at key locations in the station to be prominent to passengers that may require assistance

Question 22: What are your views on our proposals for the carriage of scooters contained in the draft revised guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

- While this is less relevant to Network Rail as it is on trains that scooters are prohibited on some services, we are very supportive of it being included in guidance

Question 23: What are your views on our proposals to clarify the guidance to ensure:

- (a) Passengers do not unknowingly purchase tickets they cannot make full use of**
- Clarifying the guidance to improve clarity for passengers is welcomed and Network Rail can cooperate with operators to make any changes to information provided in stations in this regard
- (b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required**
- While the draft guidance makes specific reference to trains, we will also consider how we can notify passengers regarding accessible toilets in our stations
 - Network Rail will communicate with operators where the effect of an accessible toilet being out of order on a train affects the time passengers need to spend in the station and the assistance they require at the beginning, end or connections on their journey

For any enquiries regarding this consultation response, please contact:

Access and Inclusion Manager [redacted]

The Quadrant:MK
Elder Gate
Milton Keynes
Buckinghamshire
MK9 1EN

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[redacted]
Job title*	[redacted]
Organisation	Nexus (owners and operators of the Tyne & Wear Metro)
Email*	[redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

Nexus welcomes the change in title, but does not have any preference on which of the options is adopted.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

Nexus welcomes the changes to have a more concise, passenger-friendly document. The changes will help ensure the document can be more easily kept up-to-date and readily available for passengers.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Nexus welcomes the inclusion of station and rolling stock accessibility information in the policy document.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

Nexus has existing liaison mechanisms with local groups on an ongoing basis and this ongoing liaison informs changes to the services it provides and commissions. Therefore Nexus would propose that such ongoing liaison should be sufficient, rather than a requirement to specifically seek feedback on the Accessible / Inclusive Travel Policy. This comment is made in the context of the accessible nature of the Tyne & Wear Metro system (see question 25).

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

Nexus notes the criteria for classification A includes "between all platforms" as part of the requirement. This is presumably drafted with reference to the majority of national rail stations, where the station has one entrance to a platform and from there passengers must travel to other platforms, or there may be multiple entrances but facilities such as a waiting room or ticket machine are only on one platform.

This is less relevant for Tyne & Wear Metro as, unless the station has a common concourse from which both platforms are accessed, each platform has its own facilities including ticket machines, service information, seating and help points. Passengers have no need to go from one platform to the other (other than in the case of two interchange stations).

In the case of stations where each platform has its own facilities, in the majority of cases each platform meets the criteria for classification A, but the station would not meet the classification A due to the route between platforms. Nexus considers that adopting the criteria as outlined would mislead Tyne & Wear Metro passengers as it would not reflect the accessibility as experienced by passengers for their day-to-day journeys.

Nexus therefore proposes that the requirement of “between all platforms” should not apply to stations where:

- The platforms are designed to be accessed from different entrances (i.e. there is not a common station entrance that serves both platforms); and
- Passenger facilities are provided on each platform; and
- There is no need for passengers to change between platforms as part of their journey.

This would ensure that, where passengers need to travel between platforms, this is taken account of, but where they do not need to travel between platforms the classification of a station is not affected by this.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

As access to all Tyne & Wear Metro station platforms is step-free, the circumstances described in the consultation document are not applicable to the Tyne & Wear Metro system. Furthermore as the Tyne & Wear Metro does not participate in Assisted Travel and runs its own assistance booking scheme, staff have knowledge of any temporary accessibility issues and access to the information on these.

Nevertheless, Nexus welcomes the principle of the proposals and would seek to adopt this in its booking procedures.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Nexus supports the development of this guidance, although the content may need to be adjusted to be relevant to Tyne & Wear Metro passengers.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Nexus notes this is stated to apply to “GB mainline stations” and presumes it would not apply to Tyne & Wear Metro. Such ‘calling ahead’ is less relevant for Tyne & Wear Metro as the same team co-ordinate both boarding and alighting assistance for a passenger.

The only interface with national rail is at Sunderland Station (which Metro trains call at, and Arriva Rail North is the Station Facility Owner) and at Heworth and Central Station, where there are separate mainline stations adjoining the Metro station. Tyne & Wear Metro has protocols for assistance handover in these situations, and would strengthen these protocols using the guidance drafted by the ORR.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Again, this is less relevant to Tyne & Wear Metro as stations are unstaffed. For Tyne & Wear Metro this would be the existing number used to book assistance.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

Nexus supports the adoption of training packages appropriate to a staff member’s role. Whilst the proposed mandatory training elements are appropriate for a staff member who works in a customer-facing role and often assists customers, some of the contents are less appropriate for other members of staff. For example, is it best use of limited resources to require rolling stock maintenance staff who work solely in the Depot to attend training to understand Passenger Assist or how to provide assistance to passengers?

Therefore, Nexus does not support the complete training package as outlined being required for all members of staff, regardless of their role. Instead a more proportionate approach is proposed, with some elements being mandatory to all staff and others being required for relevant customer-facing roles.

The inclusion of customer-facing contractor staff is welcomed, but again the scope of the training should be tailored to the role.

If the consultation proposal outlined is mandated, then this would lead to an increase in training costs reflective of both the increased cost for trainers and for backfilling staff present on the training. This would in turn require service reductions to be made elsewhere in the organisation.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Nexus considers that a two year period is a reasonable time frame to provide refresher training. In relation to the focus of the refresher training, Nexus' suggestion is that the ORR could provide information on priority areas for the industry as a whole, but give flexibility to each operator. This means that, for example, if an operator has recently tackled a priority area for the industry, it could instead focus on another area it has identified as a priority.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

This does not apply to Nexus, as a dedicated ticketing scheme operates for the Tyne & Wear Metro, consisting of an electronic product (the Gold Card) purchased onto an existing English National Concessionary Travel Scheme smart card. The Gold Card allows unlimited Metro travel for just £12 per year.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

Nexus already liaises with forums and user groups representing those with disabilities. As the Tyne & Wear Metro system covers a compact geographic area, we are able to effectively engage with these groups to improve the accessibility of the system.

As the Tyne & Wear Metro system is highly accessible (see question 25 for more information), Nexus considers that rather than there being a specific requirement on the promotion of the assisted travel service, the working should be around accessibility improvements in general.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

As Tyne & Wear Metro does not participate in the Assisted Travel scheme, Nexus suggests that the term “Metro Passenger Assist” is used for the scheme on the Nexus web site, maintaining alignment with the national branding but making it clear that it relates solely to Tyne & Wear Metro.

Nexus supports increases in web site accessibility, but would suggest the ORR provide more clarity in what it means by “W3C standards”. The Web Content Accessibility Guidelines (WCAG) published by W3C have several versions (with the most recent, 2.1, being published in June 2018). Within each guideline there are testable success criteria at three levels (A, AA and AAA).

The current Nexus website aims to comply with all of the guidelines for UK government websites, as well as all the priority 1 and 2 checkpoints to achieve compliance with the W3C WCAG 2.0, Level AA, and to maintain this standard as a minimum. We are currently working towards compliance with the W3C WCAG 2.1, Level AA, with a long-term aim of achieving W3C WCAG 2.1, Level AAA.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

As outlined in Question 25, the Tyne & Wear Metro is a highly accessible network and in this context Nexus does not have dedicated staff to provide assistance to customers. Assistance is provided by Customer Service Advisers, who spend the majority of their time on stations and trains assisting customers and carrying out security and revenue protection activities.

In considering the notice period required, there is a balance to be struck between providing as much flexibility as possible for those requiring assistance, against the costs of providing such flexibility. This is particularly relevant for operators such as Tyne & Wear Metro where stations are unstaffed and the travel time to meet a short-notice assistance request is essentially unproductive time; this travel time can be made more productive when there is more notice of requests by working in other tasks such as revenue protection duties.

Nexus has already reduced its booking period to four working hours (not the six hours in the ORR consultation document) and expanded the booking times period to 6.30am to midnight, seven days a week. Nexus believes that any further reduction to two hours would have a detrimental effect to the overall service provided to Metro customers. This is for the following reasons:

- A reduction in notice period to two hours would increase the amount of time spent by Customer Service Managers in identifying staff to meet the requests and adjusting staff deployment as necessary. This short notice rework of staff deployment is time

consuming and detracts the Customer Service Manager from other activities which benefit all Metro customers, particularly during times of service disruption.

- A short notice deployment decreases efficient use of Customer Services Advisors as rather than being able to align the assisted travel request with other activities, staff would be deployed to solely meet the request and the travel time to meet the request would be unproductive. In addition to the member of staff deployed to carry out a request, other staff would become unproductive as the loss of a staff member to carry out an assistance request means required staffing ratios for activities such as gateline staffing are not met. This would disrupt planned security and revenue protection activities.

The immediate action that would be required by a Customer Service Manager and Customer Service Advisor to meet a two hour notice period cannot be underestimated. For example during the evening for a request from South Hylton at the extremity of the network, the nearest Customer Service Advisors could be a 40 minute Metro journey away. Bearing in mind the service frequency of 15 minutes, and needing to meet the customer prior to the journey, any request at two hours notice would require deployment of a Customer Service Advisor from their existing activity by a maximum of 30 minutes after the request in order to ensure assistance could be provided.

The longer-term effect of a change to two hours would be a reduction in staff availability and visibility to customers, and a reduction in revenue protection activities which could lead to increases in fraudulent travel and lower farebox revenue.

It should be noted that Nexus will continue to provide 'turn up and go' assistance and assistance at shorter notice periods where possible, but does not consider it can guarantee a response time of two hours.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Nexus does not believe a change from four hours should be made and therefore any phasing is not relevant.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

This does not apply to Tyne & Wear Metro.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Nexus welcomes this and proposes that the redress for assistance failure would be in line with the standard Passenger Charter arrangements for delays to a journey.

It should be noted that under the Passenger Charter, Gold Card holders are not eligible for any recompense for delays to their journey. This is because the annual cost for unlimited travel, at £12 for residents within Tyne and Wear, means that the cost per journey for even a light user of the system is extremely small.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Nexus cannot foresee any issues with adopting text relay at this time. The approach of working with the RDG to explore how it can be delivered and in what timeframe is welcomed.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

Nexus has already taken a number of steps to ensure accessibility of substitute and alternative transport on the Tyne & Wear Metro.

For planned disruption, all bus replacement services are PSVAR compliant and the contracts require drivers to be trained in caring for the customer and disability awareness. For unplanned disruption, in the first instance ticket acceptance on local buses is organised and again all these services are PSVAR compliant. When a dedicated bus replacement service is organised, in the vast majority of cases these are PSVAR compliant. During all disruptions, both planned and unplanned, customer services staff are deployed to stations to assist passengers in accessing alternative transport.

Nexus also has contracts with a number of local taxi firms and has access to accessible taxis for use when required.

Nexus would welcome the ORR providing more clarification as to what the practical expectations are for phrases in the guidance such as 'work with to explore' and 'make

reasonable endeavours'. It may be that this is an area where sharing of good practice would be beneficial.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Nexus welcomes this proposal. All Metro station concourses and platforms have a Help Point to provide assistance to passengers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Nexus already has a well-developed policy on the carriage of mobility scooters and welcomes this clarification being included in the proposals. Mobility scooters are not able to be used on Tyne & Wear Metro stations and trains and this will not change in the foreseeable future, due to the design of station platforms and trains precluding safe use.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

This does not apply to Tyne & Wear Metro.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Nexus suggests that rather than good practice being included in the guidance, the guidance refers to a page on the ORR web site which can be updated with good practice as it is identified. This would ensure that there is a mechanism to share new practices on a continual basis.

Q25. Do you have any other comments or views on improving Assisted Travel?

Nexus' response to this consultation reflects the accessible nature of the system. There are approximately 48,000 independent journeys by wheelchair users on the Tyne & Wear Metro every year, where assistance from staff is not required.

The majority of the system was designed and constructed in the late 1970s and with wheelchair accessibility as a key part of the design. All new stations were designed with step-free access to the platform, and between the platform and train. Where existing stations were incorporated into the system, upgrades took place to improve their accessibility. In this context, the accessibility of the system is different to a great deal of the national rail infrastructure.

Nexus' funding to operate the Tyne & Wear Metro is mainly derived from passenger farebox revenue and government grant. The service is publicly owned and operated and does not make any profit. Therefore, any changes which result in cost increases have to be matched by service reductions elsewhere. In this context, Nexus requests that the value for money of any changes should be considered carefully by the ORR to ensure that the cost is not disproportionate to the benefit gained.

Tyne & Wear Metro does not participate in Assisted Travel, but instead runs its own scheme. This means, for example, that station accessibility information is provided on the Tyne & Wear Metro web site rather than the National Rail site. Factors such as these need to be taken into account when the detailed requirements of the guidance are implemented.

Thank you for taking the time to respond.

NORTH EAST ACTION ON TRANSPORT - RESPONSE TO THE OFFICE FOR ROAD AND RAIL'S CONSULTATION ON THE GUIDANCE ON THE DISABLED PASSENGER PROTECTION POLICY

1. Foreword:

North East Action on Transport (NEAT) is a user-led focus group which works on issues involving all forms of transport in the region that matter to passengers who have a visual impairment. The work we conduct not only looks at improving the access of public transport for all but also gives members and non-members alike the chance to have their voices heard on the issues that matter to them and offers opportunities to engage with transport authorities and organisations to raise and tackle issues as a collective unit.

Over the last year, NEAT has supported a number of transport bodies - whether local or national - in a number of consultations and workshops where we have raised the message of the need for better transport access for people with a visual impairment and better awareness of the disability within the transport sector. We have previously worked with the Office for Road and Rail (ORR) with its prior consultation on Improving Assisted Rail Travel giving our opinions on the need to have better consistency of the passenger assistance provided and the need for relevant and succinct disability awareness training for all rail staff, including a focus on visual impairment. The group is very pleased that our comments were well received as a whole by the ORR and we welcome the opportunity to work together again on its latest consultation to improve the policies and guidance around disabled passengers in rail travel.

NEAT views the Disabled Passenger Protection Policy (DPPP) a vital resource which assures passengers, who have specific needs, that they have the right, as much as the next person, access to rail travel and to receive a high level of support to make a rail journey that matches their needs. NEAT welcomes the ORR's decision to make improvements to the guidance on the policy for rail and station operators. We believe that it will address the need for improvements to coincide with the Equality Act (2010) and also identify the gaps within the consistency of the provision of Assisted Rail Travel and the major areas of the policy which need acting on. The comments that we will provide in this report will hope to address these areas and how rail operators can use the changes to the guidance to adapt the provision of passenger assistance so that their staff can provide it with visual impairment in mind and that travellers can access the support without any barriers.

2. Updating the DPPP Guidance for Operators

Summary of key findings:

As outlined in the previous consultation conducted by the ORR on Assisted Rail Travel, there was overwhelming support from the respondents for the need to update the guidance on the “Disabled Passenger Protection Policy”. NEAT is aware from research that the policy has not been through amendments and improvements since 2009, before changes to legislation around disability rights were made (the Equality Act 2010). A decade on from this, there has also been changes on the social trends and perceptions around disability, generally for the better. Businesses are more welcoming of custom from disabled people and work hard to provide support and remove barriers that allow them to access products or services. This is because the term “disability” is now more of an afterthought rather than a hindrance and that there is a need for businesses to follow trends that help create a more inclusive society.

Over the years, the rail industry has gradually become more open to disabled people and their needs. The delivery of passenger assistance, accessible and reliable information on trains and at stations and a better willingness from staff to help disabled travellers are now all the norm. Having said this, it cannot be denied that these examples of improvements within the industry have been gradual. And as the previous consultation has outlined, there are still areas within the policy and the provision of services which need addressing. NEAT believes that by updating the policy guidance for rail and station operators, they will have the understanding of the role they must play in the provision of accessible rail travel and the need to meet the requirements of all those that need support to access those journeys. Additionally, the changes will reaffirm to disabled passengers - including those with a visual impairment - their entitlement to travel by rail without stress, anxiety and with the right level of support at their disposal should they need it.

Answers to consultation questions:

1. With the general social perception on disability veering away from the term itself in order to reflect social inclusivity, NEAT agrees that it would make good sense to change the name of the policy to represent this inclusivity. The group have considered both suggested names to be ideal ones which match the ORR’s aim for a policy which better represents the social inclusion of disability. Our preference would be towards an “Accessible Travel Policy” because it would mean the policy would have a more to the point and practical purpose of meeting the requirements of visually impaired rail travellers. While “Inclusive Travel Policy” is a good name, the majority of our members pointed out that the policy would not have a formality in terms of its purpose. The members also considered “accessible” to be a more prolific term against “inclusive”.

2. The current passenger facing document “Making Rail Accessible...” should be adapted so that it reflects the views and needs of passengers with disabilities, including visual impairment. The proposed name of the document and its contents set out in the draft guidance isn’t a major concern for NEAT, rather how exactly the contents is displayed and the consistency of the document’s availability and length

with all train operators. NEAT believes that if there is to be a section within the document on “who it is aimed at”, there should be a clear indication to those who have a visual impairment along with examples of services and support that will be given and how staff will carry this out. We recommend that the document should have its sections condensed so as to avoid any more large documents and to include terms which are simple for those reading it to understand and follow. This will help those with a visual impairment to know what they can do to access support for a journey or if they encounter a problem. NEAT also feels it may be beneficial for the passenger facing document to include sections on what information is available on areas such as real-time train times and next stop announcements and how these are presented which will help those with sight loss to prepare appropriately for their train journey.

3. NEAT does see the need to include station information and train accessibility in the formal “Making Rail Accessible” policy document rather than the passenger facing document, and is aware that the document can be made available to visually impaired passengers on request. However, we do feel there is an argument to include at least part of this information within the passenger facing version of the document. In regards to station accessibility, passengers with a visual impairment - particularly those who don’t travel by rail often or are unfamiliar with a specific station - will want to know as much of the station as possible ahead of their journey or as they arrive. For instance how to receive information; where can they find staff for assistance; what facilities like toilets and shops are available; what obstacles must they overcome like bridges, stairs or lifts to get to platforms; are there two platforms or multiple ones where trains could depart from one or the other. This information will help give confidence to a visually impaired person to make a train journey and so would make sense for this data to be available in a passenger facing document as well as the formal policy document. In regards to rolling stock accessibility, a disabled person who may have more additional mobility needs may want to know if there is an accessible toilet on board and where within the train the disabled space is. Otherwise a visually impaired person’s main priority would be to gain support to board the train, find their seat and get off again. Therefore this kind of information could remain within the policy document and passengers could then ask staff if they require additional information on their train.

4. NEAT is very pleased to learn of the ORR’s interest to involve disability groups and organisations within the development and review process for the DPPP Guidance. By doing this, it will allow disabled passengers to comment on what operators should work on and what should be included within documents. This will in turn ensure the documents reflect who it is aimed at and what operators must do to support disabled passengers and meet specific needs as consistently as possible. We agree as a whole with the ORR’s proposals for the approval and review process. We find the timescales for submission of changes and provision of policies to be reasonable and the proposed steps to review any significant changes to policies to be appropriate. NEAT would like to propose a recommendation within the review process of a need to include the monitoring of provision of accessible formats of their

documents. This will help to constitute social inclusion, help both operators and passengers to understand how accessible the information is and what operators are and are not doing to provide alternative formatted information to disabled passengers. The timescale for this process to happen can remain the same but should be conducted so that disabled passengers can have the information to hand within policies and documents that allow them to take journeys by rail.

3. Reliability

Summary of key findings:

It may be easy to think that the provision of passenger assistance refers to the actual train journey made itself. But for disabled passengers - especially those with sight loss - the process of making a journey is far more than that. For them a single journey will include anything from finding trains and buying tickets, to planning how to get to the station. Do they need to change trains? What facilities do they need? A visually impaired passenger may not need assistance for all of these things but all of this has to be considered when they request assistance to undertake a journey. That passenger is reliant on station and train staff to be there to provide the service, support if things go wrong and even if the passenger wants to ask a simple query. Therefore the reliability of assistance throughout the entire stage of a train journey is vitally important.

If the ORR is to encourage rail operators to improve on the reliability of Assisted Rail Travel, two main criteria must be met: First, all staff must have a better understanding of the types of disabilities they will be dealing with and how they are able to support them. Any kind of person with any kind of condition could request assistance to make a journey so it is important that staff are prepared to deliver the service and not just assume that everyone will need the same treatment. To achieve this, staff will need to undergo regular training covering different aspects of disabilities. This will likely include how to recognise the main conditions and how these would vary from person to person; how best to communicate with a disabled passenger; what kind of barriers a disabled person could face at a station and how staff can help to overcome them. The knowledge gained from undertaking disability awareness training will allow staff to deliver Assisted Rail Travel with the confidence that they can help a passenger make their journey with ease.

The second criteria is the need for better communication between staff and the willingness to provide the support. The research within the consultation paper does show that while the level of passenger assistance is good, there is evidence that it is not always clear between staff as to what support is required and that this isn't always clearly communicated from the team that books the assistance to the station staff that delivers it. As mentioned above, a passenger with a visual impairment may require assistance from the moment they buy their train tickets, so booking agents

will need to be clear as to who needs the assistance. One idea would be to offer the assistance each time a “Disabled Persons Railcard” is used to book tickets. Furthermore, operators need to do more to encourage their staff to be willing to support passengers that require a little more help, regardless if they have a specialist of disabilities or not. If there is to be a more social inclusion of disability within the rail industry, then delivering Assisted Rail Travel shouldn’t be seen as a burden by staff. This can be achieved through the proposed training and better understanding of the disabilities they are likely to encounter. If staff are in any doubt as to how to support a disabled passenger, then there is no reason why someone couldn’t plan ahead and assess what are likely obstacles. Above all, and the most simple course of action, is to ask the passenger themselves, simply for the fact that they know their condition and what exactly they need help with to undertake their train journey.

If a visually impaired person is to undertake a rail journey, having information to hand is key to making the decision if that journey is possible. NEAT is in favour of the need for better reliability when it comes to the provision of information like “Accessibility Travel Planners” or “Step-free Access Guides” across the UK rail industry. NEAT understands that this may be difficult for operators to achieve in the long-term, but it would make good sense if a criteria was added to DPPP Guidance so that accessible travel planning guides and tools were created under a national remit rather than being left for the separate rail operators to decide how this is made available. Not only would it reduce the complexity of information shared between operators, it will significantly help people with sight loss to plan an accessible train journey without spending a load of time visiting numerous company websites or stations for a single resource. If this long-term goal was to be achieved. The reliability of accessible information can only get better and allow more visually impaired people the chance to travel by train.

Answers to consultation questions:

5. NEAT wishes to express its reservations regarding the 5-category step-free access classification as proposed by the ORR’s Draft Guidance. At first glance, it is a good idea to have categories in this way, however we believe that from a visually impaired person’s point-of-view it may be too complex to understand. The use of wording such as “useable step free access” and “suboptimal step free access” makes it difficult for some of our members to determine how accessible a station could be, nor does it help if they are only classed as the second and third categories (B and C). Instead we believe the second option of having three categories as the most sensible and practical option. NEAT does see the ORR’s argument of the difficulty of keeping the information consistent across the network. To overcome this, we recommend the DPPP Draft Guidance include requirements for all operators to update access information on stations at given regular intervals (perhaps every 12-18 months) so that the database and classifications can remain accurate. It may also help if operators undergo an assessment of all the stations it manages to help them accurately measure how accessible their stations are and to be clear as to which

category each station would be classed under. This may be something that the ORR may wish to support operators with. If there is to be a category marked as “some step-free access”. The Guidance should make requirements to ensure operators display accurate information as to what level of “step-free” or what other barriers passengers may encounter. This information will also require regular updates by operators.

6. NEAT is very much in support of the ORR’s intention to introduce requirements to make mandatory checks on accessibility information, regardless of when and how passenger assistance is booked. If passengers with a visual impairment receive a lack of information as to the accessibility of stations and how much help is available, it can be very difficult for staff to deliver the assistance on the day - let alone for the passenger to make the journey. We agree with the three main criteria that must be checked at the assistance booking process as well as for any station alerts that may affect accessibility at the station, which we feel should be communicated to the passenger when the alert arises and - where humanly possible - before they arrive at the station.

7. NEAT believes that the proposal of a “best practice guidance” on passenger assistance is a good idea for disabled travellers to have. In order for this to work, we believe there needs to be clarity within the guidance and include sections based on the different stages of the journey. From informing the passenger what to do when arriving at the station; who is responsible for delivering the assistance; providing live information on the train the passenger is travelling on (i.e. if the train is on time and what platform it is expected at) and the procedure to board or alight the train (with a consideration of how many steps will they need to take and how wide the platform gap is). Additionally if the guidance is going to be made available to disabled passengers, then there must be a consideration from all rail operators to make this available in a variety of accessible formats and should include braille, large print and audio for those with a visual impairment.

8. While we are in support of a proposed “Handover Protocol” to help staff communicate the assistance requirements of a passenger between stations and operators, we are concerned with some of the areas of information which they may or may not need to call ahead for. Several members of NEAT have commented that even when they book passenger assistance to make a rail journey, they often request their handlers at departing stations to call ahead to the arrival station simply for peace of mind. If the protocol was to be altered so that certain information was passed on when a passenger has booked assistance, it would give confidence to the passenger that somebody will be there to meet and assist them when they reach their destination. We feel that - whether assistance is booked or not - only essential information about the passenger should be provided when called ahead, for instance, name of passenger, their disability and the assistance they requested. Information such as the train they are travelling on could be used at the discretion of staff at the departing station if assistance was not booked or otherwise deemed necessary.

9. NEAT feels that a passenger assistance phone line would be of great benefit to station staff to ensure reliability of service and provision of information between stations and operators is kept at a high level. We agree that a mobile form of the phone would be a worthwhile and cost-effective option for operators. It allows flexibility for the need for staff to be at stations, while at local or unstaffed stations it will still allow passenger assistance to be provided to disabled passengers who are in most need of it. This would mean that they would have the opportunity of improved access to rail travel from a more local location as opposed to travelling to a mainline station.

4. Staff Training

Summary of key findings:

In our report in response to the previous ORR consultation on Assisted Rail Travel, NEAT was very vocal in the importance of training and how it needed to require a heavy focus on disabilities as well as requiring all those involved in the rail industry - from station staff to train guards and managers of rail networks - to undergo the training for their benefit as well as the passengers. So it is very encouraging to see that the ORR is still considering this as a high priority and something which must be outlined in the draft guidance for the Disabled Passenger Protection Policy. Evidence displayed within the consultation clearly shows that a lot more needs to be done in this field. One example is to make better use of relevant legislation such as the "Equality Act" to help operators understand that it is there to ensure support is given so that those from disadvantaged or minority backgrounds - including disabled people - have equal access to services, not to just assume from legislation that disabled people "will never be of an equal position" as others.

Like the other factors and areas around Assisted Rail Travel, we wish to remind operators that training provided to staff should be reliable and relevant to disability. It would be useless to use materials and resources that are of entirely different subject matter, or are made outside of the UK - because it is likely to follow legislation not in force in our country.

If staff training is to be implemented into DPPP Guidance, NEAT believes that this should be a pan-industry initiative - i.e. a single disability training framework could be proposed so that all operators and staff have a duty to the training and won't miss out on useful knowledge they will need when it comes to supporting passengers on trains and at stations. Of course, we see no issue in operators taking individual responsibility in running the training for their staff. We additionally feel that this proposed framework should include a need to engage with organisations that deal with people who have disabilities and involve these people in training sessions, providing a chance to have first hand sources of knowledge and experience which can be shared between rail users and staff.

Again, we cannot express enough how important it is that any training given must include awareness around visual impairment and how best to help those with the condition. Because of past mis-conceptions of the condition or the term “blindness” and how people with sight loss have often been overlooked, There has to be better understanding of different sight conditions, how it affects people in different ways and how they can still be able to lead an independent life with support or equipment. Without this knowledge, operators cannot hope to make significant improvements to the way they provide passenger assistance, nor reliably change policy guidance which govern them, ultimately meaning that more people with sight loss will face barriers to rail travel.

Answers to consultation questions:

10. The ten proposed elements around disability and rail travel should make for a good training framework. It will mean all aspects of rail passenger assistance will be covered and how the elements can be used by staff in delivering the service, from the beginning when the disabled passenger books tickets and assistance, to helping them around the station and onto the train, to the very end of the journey when they arrive at their destination. The element of involving disabled people within the training will be most significant if rail operators are encouraged to invite disabled passengers and organisations to workshops and to help deliver the training. This in turn will help to enhance the training provided and the knowledge staff obtain from it.

11. NEAT agrees with the need for operators to review current training policies and deliver refresher training for staff which will ensure they maintain a thorough understanding of people with various disabilities and how best to deliver good services to them. Although the proposed time period of two years to revise training packages is fair for operators, NEAT feels that it is vital that staff should undergo disability training as soon as humanly possible in order to maintain a high level of service for disabled passengers and to ensure it follows up to date policies and regulations. We believe a deadline of 12 months to undergo training is still fair and considerate to operators while ensuring training is relevant and reliable.

NEAT is in agreement that refresher training around disability awareness is provided to all staff. As we have recommended above that any training framework should be a single form for use across the rail industry, we feel that the same approach would be best suited when it comes to refresher training so as to avoid inconsistency within the provision of Assisted Rail Travel. It may be beneficial if operators were to conduct their own refresher training packages to better suit company and passenger needs, but we are concerned that vital training elements around disability may be omitted if this approach was taken, affecting the relevance and consistency of training delivered.

5. Passenger Awareness of Assisted Travel

Summary of key findings:

While there is encouraging evidence of proposals being made to improve Assisted Rail Travel, it is just as important for the ORR to let visually impaired passengers know that it exists in the first place. It is surprising to find that a large number of blind and partially sighted people are not aware that support is available to allow them to make a rail journey. With the advancement of technology and changing social trends, there are numerous ways in which those with disabilities - especially with a visual impairment - can learn about Assisted Rail Travel. We feel the ORR should encourage operators to use as many resources such as local press and media, marketing and advertising materials, websites and forums to promote Assisted Rail Travel to potential users. This will in turn help operators economically by investing in the "Purple Pound" (the amount of money which disabled people spend on goods and services annually) encouraging improved mobility and travel for the disabled (by buying train tickets) and using that expenditure to improve facilities that will allow for more accessible rail travel. A win-win scenario.

NEAT is hopeful that the proposals set out by the ORR will encourage better use of resources to advertise passenger assistance to more visually impaired people than before. If proposals and adaptations to policy guidance were made on a national scale, it would allow all operators to contribute and support each other in promoting passenger assistance to their customers, share good practices and potentially reach out to disabled people in secluded areas.

Answers to consultation questions:

12. We are pleased to see that the Rail Delivery Group is taking steps to publicise passenger assistance as well as using materials such as mobile apps to allow disabled passengers - including those with a visual impairment - to view information and book the assistance they need for a train journey. We hope that the RDG continues to use a variety of resources to widely promote rail passenger assistance and recommend that they may wish to seek advice from organisations and groups that support disabled people as to how best to reach people of varying conditions - something which NEAT would be very willing to support.

NEAT fully supports the idea to better promote passenger assistance through the ticket booking process whenever a Disabled Persons Railcard is used. Even if a passenger requires little or no assistance to make a rail journey, the large number of people who do use Disabled Persons Railcards are the ideal target market to promote passenger assistance to. Requirements in policy guidance may be needed to ensure that awareness of Assisted Rail Travel is made whether a passenger books tickets at a station, through a call centre or online. However if it works, it will give disabled passengers the choice as to what they require to make the train journey. The promotion of the Disabled Persons Railcard could also work in this way. For instance if a passenger, without a railcard, requests assistance, staff could briefly explain the benefit of a railcard to them - that being a discount on rail fares - so that they can benefit from this in the future.

13. NEAT is very happy to support the requirement for operators to communicate and work with different disability groups and external authorities to be included in the DPPP Guidance. By using this wide network, the promotion of Assisted Rail Travel will stand out more to potential disabled passengers. For example, information about a service could be shared with a public library or local surgery - establishments which disabled people may use regularly. As a result, potential users - particularly those with sight loss - will be able to access the facilities as they normally would and find information through posters, leaflets, and other material waiting for them to view. These establishments may also have their own database of resources or information on their own webpages which potential users can access as long as those establishments make them aware of this. We also believe that it is beneficial to promote passenger assistance through organisations and groups dealing with disabled people as another means of promotion and a way to retrieve advice of how best to promote the information to the groups in question.

Additionally, this will encourage co-working between operators and organisations with the aim to develop Assisted Rail Travel. By doing so it will actively promote to the rest of the industry the need to involve disabled people and groups within the development of policies and services around passenger assistance for rail journeys. It also means that opportunities will be given to disabled passengers to have their say and input into the way services around assisted travel are provided for them.

14. Thanks to the advancement of technology, the internet is an important tool for people with a visual impairment to access information and conduct tasks like booking passenger assistance for a train journey. So it makes sense to ensure policy guidance includes measures to have information about this on web-pages which can be easily accessed by the user. The proposals made by the ORR are good ones but could be made more effective if these measures were consistent across all operator's websites and any other relevant organisations such as "Trainline". NEAT is in support of the ORR's proposal to actively and regularly monitor the information displayed and to ensure that it can be easily accessed by users within one click from a homepage. This shows a positive intention to actively promote passenger assistance and improved mobility for disabled people - including those with a visual impairment - simply by the fact that they are more aware that the service is available to them.

6. New Requirements and Updates to the DPPP Guidance

Summary of key findings:

NEAT is hopeful that the proposed additions and adjustments to the guidance on the "Disabled Passenger Protection Policy" will greatly enhance the quality of which passenger support services are delivered; promote better understanding of disability among operators and cover all aspects of the planning, booking and travelling stages of a passenger assisted rail journey. All new proposals set out in the guidance will need to be effectively communicated to all operators and allow the ORR to monitor

progress and take appropriate action if problems arise or if operators need to make necessary reviews to procedures.

Answers to consultation questions:

15 & 16. NEAT is in agreement that the notice period needed to book assistance for a rail journey should be reduced in order to bring peace of mind for passengers with a disability such as a visual impairment. After careful consideration of all three options, we believe the shortest period possible would work best for the likes of people with sight loss. The benefit of having a shorter booking notice of two hours is that it gives greater flexibility on the trains visually impaired people can take, not to mention that it will save time and the pressure for a traveller to plan their journey in advance. We also believe that a shorter booking notice of two hours will greatly benefit visually impaired passengers who may regularly travel on more rural and shorter railway lines or those who travel to and from smaller or unstaffed stations. This is because factors such as seat reservations and advance rail tickets are rarely used, allowing for greater flexibility of travel and more direct journeys passengers will be able to take.

NEAT does indeed empathise that such a proposal for the notice needed to book passenger assistance will bring significant burden and challenges for operators, not to mention that changes to policies will need to be made sooner rather than later to meet the demand. Therefore we agree that it would be better to phase in the reduction of the notice period in stages to relieve the pressure on operators. Perhaps it would be ideal to start with a notice period of booking at least the night before, allowing plenty of time for operators to obtain information of the passenger and the support needed and prepare facilities at the station for when the passenger arrives the following day. After a certain period such as a year, when operators and passengers alike are familiar with the changes and resources needed to carry out passenger assistance, the booking notice period could be reduced again to six hours, allowing passengers with a visual impairment to arrange assistance virtually on the day of travel. This will then help operators to make adjustments to be ready for a smooth transition to a two hour notice period for booking passenger assistance.

17. While NEAT feels that it is important to have staff on trains as much as in stations to support passengers with a visual impairment, we understand that the current nature of the rail industry simply cannot allow to have this implemented everywhere. If “train guards” or “door operators” are present, then they should be included in the disability awareness training so that they are aware of how to support a visually impaired passenger on board and can call ahead for assistance if needed. If an operator uses “driver only trains”, the ORR must then consider requirements for operators to effectively communicate with visually impaired passengers as to how they can access assistance at the station as well as vital information during the journey (e.g. next station stops and connecting information through audio visual displays). If a station is unstaffed, the ORR should then consider requirements to have “help points” installed at stations in a single standard location where passengers with sight loss can easily find and access to obtain information and

support. If a situation arises during a journey such as delay, or if a facility like an out of order lift which may hinder a passenger's access to the platform or train, that information must then be communicated between station and train staff - regardless of the journey or if assistance has been booked - to ensure that the passenger is made aware and that appropriate changes to the assistance can be prepared in good time.

18. If the provision of passenger assistance does not meet a visually impaired person's expectations or requirements, the implications can be severe. So it is important that the level of service is high and is carried out at each stage of the rail journey. If requirements are not met, then there is a case for passengers to claim compensation from operators through redress. As a whole, we are in favour of the ORR's recommendation to adapt the guidance to ensure all operators are answerable for any inadequate assistance provided and that they must mandatorily provide compensation to visually impaired passengers as a result. Having said this, a compensation scheme will not help to rectify the negative experience a visually impaired passenger may have or help staff to learn from previous errors. So it is just as important to have regulations within DPPP Guidance to have stronger disciplinary measures in place for when passenger assistance does not meet expectations and that staff must undergo refresher training in order to understand the importance of their need to be present to support passengers with a visual impairment to make a rail journey.

19. Travelling by rail with a visual impairment can be a challenge on its own, but that is greater if someone has difficulty in hearing in order to interpret information or effectively communicate with others. We completely empathise with the challenges faced by those with hearing loss when it comes to communicating with rail operators to book rail travel and passenger assistance and agree with the recommendations for operators to use latest technological methods to support and communicate with hard of hearing and deaf passengers. We suggest operators include a focus on hearing impairments and effective communication within staff training and involve the likes of organisations such as "Action for Hearing Loss" (the national charity for the disability) for background knowledge and expertise and operators of "Next Generation Text" Relay service to allow staff and managers to learn how the system works. Operators will need to ensure that they have staff that are willing and prepared to utilise these systems when necessary to communicate with passenger with hearing loss.

20. NEAT believes that the use of rail replacement buses and taxis should only come as a last resort option for incidents when there are planned engineering works on a line or when there is significant delay or closure to a line. This is because, for visually impaired travellers, this is regularly a challenging and arduous part of a train journey if replacement transport is inaccessible for their needs. NEAT agrees that more needs to be done when it comes to the training of bus and taxi drivers around disability awareness and that they should be trained to be aware of how they can support passengers of differing needs to access their vehicles. The example of good practice in the consultation by "Arriva Rail North" and "Blackpool Transport" shows

that working in partnership to support the needs of disabled travellers who require onward travel can be implemented effectively across the rail industry. Having access and good connections to local transport operators who have accessible vehicles will ensure that they can prepare alternative transport for planned line closures or quickly respond to unexpected incidents to support disabled passengers to reach their final destination or an interconnecting station where they can continue their journey. The provision of accessible taxis and private hire vehicles is another challenge altogether. Over the last few years, NEAT have worked closely with "Guide Dogs" on their petition for better access to taxis for blind and partially sighted travellers, especially those who travel with an assistance (guide) dog as part of the campaign "Access All Areas". The campaign has focused on urging local authorities to make driver training around awareness of visual impairment a mandatory requirement and eliminating discriminatory practices of drivers refusing travel to a passenger over the carriage of a guide dog - especially when drivers have not been exempted from doing so. Therefore, to ensure that accessible taxis and private hire vehicles can be provided as a rail replacement service, we believe there is cause for the ORR and rail operators to get behind this petition, not only to ensure that visually impaired passengers are able to carry on with their journey but to emphasise to drivers of their collective duty by law to assist assistance dog users to access transport when unexpected incidents to their journeys occur.

21. When passengers with a visual impairment arrive at a station, they will often seek help to find and board their train, buy tickets, get times of trains and information about their journey. So it is imperative that assistance is made available at every station, whether it be a small unstaffed station in a secluded area or a mainline terminal in London. NEAT feels that updated policy requirements are very much needed, not only to make sure assistance can indeed be provided but that all rail operators have a duty to allow visually impaired travellers access to support to be able to make a rail journey. If stations are unstaffed and support can only be provided through a help point or a free phone line, then the requirements must be for all unstaffed stations to have these facilities in place and appropriately and regularly advertise this to make visually impaired travellers aware of what is available to them. NEAT recommends that the ORR be responsible for ensuring that all operators have facilities in place for all of their stations where staff are not present and monitor this on a regular basis.

22. NEAT is aware that for some people with a visual impairment, they may have an additional physical condition affecting their mobility and so they use aids such as scooters to help them travel from A to B. We do agree that there is a need to have revised guidance made available to travellers as to what scooters and other mobility aids can be carried on trains and that operators should work collaboratively to produce guidance that can be used across the entire rail network. As our work deals mainly with issues around visual impairment, NEAT recommends that the ORR and rail operators actively contact organisations around physical disabilities and mobility who will be able to have an input in the carriage guidance and provide practical and theoretical support to operators when needed.

23. Rail operators must be encouraged to support travellers with a disability to be able to make a rail journey from the very beginning of the service when they enquire and book train tickets. So it would be ideal to have measures and requirements in place to ensure that inappropriate tickets and seat reservations are kept to a minimum. If there is insufficient space for a visually impaired person with a guide dog or a wheelchair user, then a free upgrade to the corresponding disability space in first class accommodation could be provided. If the situation was reversed (insufficient space in first class), then a partial refund could be given to the customer. If on board facilities like toilets are out of order or inaccessible, or if a wheelchair user cannot board a train (some rolling stock like "Pacers" still use stairs with a dividing handrail at doors) then a transfer to the next available train, without the need to purchase a new ticket, should be made a mandatory requirement. Any information about inaccessible facilities are probably best given when a disabled passenger arrives at the station to receive assistance to make their journey, something which should become a mandatory requirement. It would also be beneficial if there was a requirement for stations staff to immediately report inaccessible or out of order facilities for repair in order to avoid any repeated setbacks for disabled passengers.

7. Additional Good Practice

Answer to question 24:

While the Office for Road and Rail have made several valuable proposals to policy guidance to help improve the provision of Assisted Rail Travel, lets not forget - as we have already pointed out in our report - that there is significant evidence that rail operators are already conducting good practices to supporting disabled people to undertake train journeys, simply because of the willingness to do so and the increasing acceptance of disability in our society. More has been done to provide information at stations and on websites to help passengers prepare for journeys. Advancements in technology and equipment allows more passengers of varying disabilities - including visual impairment - to find information about their journey and to know where they are on that journey. Staff are being more open to assisting disabled people around trains and stations instead of thinking of disability as being a barrier for the passenger to travel.

The consultation paper provides plenty of evidence of how operators deliver good practice to supporting its disabled passengers. We believe that the inclusion of some of these examples in policy guidance will bring great benefit to the ORR and rail operators alike for various reasons: Examples of good practice would help operators to learn how they can rectify mistakes made to passenger assistance in the past and how they can improve the services they provide. The examples will provide excellent sources of information for operators to use in the delivery of disability awareness training to its staff. It will encourage operators to share information and knowledge with others so that they can collaboratively provide a better passenger assistance experience in situations where a disabled passenger may have to use train routes

from more than one operator. Furthermore it will show other industries and areas of society of how inclusive the rail industry can be of disabilities and the part it is playing to strive for an highly inclusive society for all, encouraging other organisations to follow suit.

NEAT is in agreement with the ORR for the case to include examples of good practice of the provision of Assisted Rail Travel within the revised policy guidance. The examples indicated below are ones which we particularly like and believe to be highly useful within the guidance:

- **Operators such as “Southeastern” offering “Assistance Cards” to disabled passengers** - these are designed to help staff and other people identify passengers who may need support and what kind of assistance they require.
- **Operators such as “ScotRail” appointing dedicated assistance staff** - this practice means that disabled passengers can have easier access to support from a trained member of staff who understands their needs and that they know they can get this from a specific point in a station, saving time and stress.
- **The provision of dedicated spaces for assistance dogs** - this practice, as used by “Transport for Wales”, allows greater opportunity to travel independently, without fear of discrimination, for passengers who travel with assistance or guide dogs and ensure that there is sufficient space on the train for both passenger and dog.
- **Supporting passengers with station navigation** - many operators now use technological devices or equipment to help passengers independently find their way around the station. We particularly like how some mainline stations now have tactile maps for blind and partially sighted people to view a layout of the station and to easily find facilities such as ticket counters, toilets and lifts.

8. Key Points & Summary:

Below is a summary of the main comments and suggestions NEAT have raised which we wish the Office for Road and Rail to consider as they continue with the consultation:

- **Availability of documents and information to passengers** - While policies and guidance documents are primarily for the use of operators to deliver a vital passenger support service, the industry cannot forget that passengers with disabilities - especially with a visual impairment - should be able to freely access useful and important information through passenger facing DPPP documents and increased publicity in passenger assistance. Updates to policy will need to ensure that operators have a duty to promote relevant information

at stations, online and in alternative formats which disabled passengers can access easily at a time that suits them.

- **Improved communication and co-working between staff and teams to provide passenger assistance** - All operators must understand that a passenger could require assistance from the moment they book a train journey and that any assistance needed must be arranged and passed on to all relevant staff that may deal with a passenger at each stage of the journey. Policy guidance must have requirements to ensure all staff are trained to communicate effectively between teams and to help each other to ensure a disabled passenger can undertake a journey without incident or confusion. This also means monitoring progress of the assistance provided to outline any mistakes or problems encountered in the process.
- **Delivery of training to staff** - We cannot express further the importance of the need for improved training processes for all operators for them to be to have the resources and knowledge required to be able to support a passenger to make a rail journey. It is also essential that staff learn from disabled passengers themselves for a more enhanced training experience.
- **Increased involvement of disabled passengers and groups in policy developments** - If policy is targeted around supporting disabled people to make a train journey, then it makes perfect sense for the industry to have more involvement with groups and individuals of varying disabilities and conditions. It will allow them to have their input on any improvements on the provision of assisted travel and helps operators to learn about disability and how best to meet their needs in a practical setting.
- **Ensuring support is available at all times** - Disabled passengers could require some form of assistance at any time and will be especially important when there is a lack of staff at a station or when an unexpected incident occurs. Policy guidance should include the need to have a form of support or contact available such as help points and phone numbers which disabled passengers can access at all stations. All operators will need to be encouraged to work together to achieve this and to support passengers to get to their final destination with minimum disruption.

The Disabled Passenger Protection Policy has been an important document for the rail industry for a number of years. It has ensured that passengers with disabilities - such as visual impairment - can access support to undertake rail journeys where they may not be able to without it. As the rail industry gradually modernises and grows accustomed to the ever changing trends of people with sight loss in today's society, it is a welcome time to adapt policy so that it coincides with relevant and up to date legislation and allow the industry to be more inclusive of visually impaired people than before. Meaningful, relevant and modern changes to its policies will mean operators will have more willingness to support blind and partially sighted passengers, are better prepared to provide support and challenge its partners and competitors alike to work together for a greater cause. Furthermore for the first time,

in a long while, many visually impaired people in the UK will finally have a sense of purpose: not only for the fact that they can have improved access to train travel, but to be involved in the development and changes to services and support that matter to them. North East Action on Transport is hopeful that the suggestions and opinions raised for this consultation will help the Office for Road and Rail and rail operators to achieve goals that they can reach together. The provision of Assisted Rail Travel, and the way in which operators can improve it, cannot truly function without meaningful policies to regulate it. The adaptations made to the guidance will determine how Assisted Rail Travel will be delivered going forward and how it will affect the access of rail travel to many passengers with disabilities in the foreseeable future.

**NORTH EAST ACTION ON TRANSPORT
LED BY CO-CHAIRS:
[redacted]**

**Based at Newcastle Vision Support
3rd Floor, MEA House
Ellison Place, Newcastle-Upon-Tyne
TYNE & WEAR
NE1 8XS**

13th January 2019

[Redacted]
Head of Consumer Policy
Consumer Policy Team
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

5th Floor
Northern House
9 Rougier Street
York
YO1 6HZ

[Redacted]

By Email

18 January 2019

Dear [Redacted]

Northern response to Disabled Persons Protection Policy Consultation

Thank you for your email dated 14 November 2018 in respect of the above. We appreciate the opportunity given to review and feedback on the proposed content and are keen to work alongside you to ensure that the information published adds value to all parties concerned.

In terms of the consultation documents provided, please see below our response on behalf of Northern to each question raised;

1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

We believe that moving to an 'Inclusive Travel Policy' or 'Accessible Travel Policy' is a positive move as it uses customer focused language that is reflective of changes to legislation, recognising that disabilities are wide ranging. We have assumed that the above amends the terminology of the collective reference to the passenger leaflet and policy document noting that Appendix A states that the title of the customer facing document is to be determined following consultation. Consideration should be given to how this may affect passenger awareness of a well-established name if "Making Rail accessible...." is no longer used. There would also be additional print costs incurred to operators in updating references to this document from material such as Passenger's Charters and posters, if these required any amendment at the same time to reflect the change in title; otherwise there would be inconsistent terminology in use for a period of time.

Alternatively, to provide further clarity for customers, the documents could be renamed to 'Accessible Travel: Customer Guide' and 'Accessible Travel: Policy' which would replace the Making Rail Accessible and DPPP respectively. This would clearly signpost the purpose of each document, under a common banner.

2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

www.northernrailway.co.uk

Northern is supportive of making the current passenger-facing document more user friendly and agree that including all the current material, in print, is a barrier to customers using it and operators maintaining an up-to-date and accurate source of information. We do not believe there is any required content missing from your proposal.

However, the information that will be removed remains important and should be readily accessible for customers and rail staff. We therefore suggest the document signposts readers to the relevant section of the operator's website (or advice to another appropriate way of obtaining further information), as a means to achieving this and creating standardisation across the industry.

The requirements within the draft guidance document that Crystal Mark accreditation for plain English is obtained is a positive step in ensuring the content is written in a passenger focused way, and this approach is already adopted elsewhere within the Arriva Group.

We are supportive in maintaining the existing title of the passenger-facing document as it is both effective in describing its purpose and audience and is familiar to existing rail users, though we note the possibility of an alternative, Accessible Travel: Customer Guide as outlined in point 1.

3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We are supportive of this change to ensure the passenger-facing document remains user friendly and information up-to-date providing that adequate signposting is provided to where this information can be located. It is worth noting that information about trains and stations can change frequently and so we should consider that this information should be provided via online links only as printed material can quickly become obsolete. The online location of this (and all other accessibility information) must be consistent across operators to ensure ease of access.

4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We are supportive of any improvements that streamline the process of maintaining up-to-date DPPPs and welcome the inclusion that minor and immaterial changes to the existing document will not require approval. However further clarification of the components of the approval and review process would be welcome; for example, who decides if it is not possible to incorporate feedback from local groups? Greater clarity of each stage of the approval and review process would assist operators in ensuring sufficient time is afforded when updating their documents and there is transparency of the pathway to approval.

5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The terms included within the classifications are generally accepted within the industry and it is therefore sensible to adopt this approach. However, it is important to make the distinction that whilst access to some platforms from the street may be step-free, access between the platform and train may not be accessible, even with a ramp, if the gradient is too steep. We would therefore welcome clarification within the classifications that where step-free-access between the platform and train interface cannot be achieved that those platforms or stations are categorised as D or E with an appropriate explanation in knowledgebase. If there are plans in the future to amend the classification terms for step-free access, then there must be an approval process in place for agreeing those changes.

6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

The proposed changes need to be delivered via a systematic process of improvement and the accuracy of NRE Knowledgebase, including agreed processes for inputting short notice updates to station accessibility, should be the priority before approaching what and how mandatory checks are carried out during the booking process. Once there is certainty of the accuracy of available information then trigger points during the booking process would be a sensible approach to ensuring that booking agents check accessibility information whilst maintaining a personalised conversation with the customer. Ideally the booking system should alert an agent to any accessibility restrictions during the booking process based on the requirements of that individual customer and we would welcome development of the new Passenger Assist system to include such checks.

7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

A pragmatic approach to guidance should be taken to reflect the variances in the station and on-board experience across the UK and it should be recognised that best practice in this context may not apply in every scenario and may even cause the passenger confusion and therefore, we believe 'good practice' would be a more appropriate description of this guidance. As the proposal includes adding guidance to the booking confirmation a link to tailored information that is relevant to the operators delivering the assistance for the booked journey would enable advice that is appropriate to that journey to be provided.

8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

In principle we support the idea of introducing an assistance handover protocol to ensure robust delivery of passenger assistance, particularly for un-booked assistance and confirming the passenger's location on the train when there is no booked seat. As part of the Arriva UK owning Group, we are to be trialling this process and providing feedback to ensure the system is deliverable before any industry wide adoption.

There are several practicalities to test, such as how the process would operate at unstaffed stations where the handover is carried out to on-board staff. The input of front-line staff regarding deliverability is essential to this being successful. A pragmatic approach to the protocol has been taken with handover calls the exception rather than the rule in every case; however greater clarification regarding the process at times of disruption or the passenger travelling on a different train to that booked requires further exploration and testing.

9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

The trial of the assistance handover process should highlight whether a dedicated assistance line is necessary and for which categories of station this is required. Clarification is also needed on what stations are classed as Mainline. As the delivery of assistance across UK rail is not a one fits all solution the mandating of a dedicated assistance number as a one fits all approach may not be appropriate in these circumstances. The practicalities, in particular of providing a dedicated number for unstaffed stations, requires further consideration, as in many cases the on-board staff will be responsible for meeting the customer's needs and therefore the handover protocol can be achieved by staff communicating in person. Situations where a station is part-time staffed needs further consideration as it would appear impractical to some degree to provide two numbers (a direct line to the station during staffing hours and an alternative number outside of those hours). Further clarification of the actions required by staff managing this number are required, particularly in the event that the receiver of the call may not be located at the station.

10. What are your views on our training proposals? Do you agree with the proposed outline content?

We understand the intent towards proposing training elements as it is important that customers are assured of a base standard of service and assistance irrespective of the operator whose services they use. Each train operator does however provide variances in its service delivery based on the market they serve, the trains they operate, stations they manage/call at and the unique needs of those customers. We therefore believe that in the event that elements of training are mandated this should be output based rather than prescriptive content to enable each operator to tailor their training package to their customers and operations.

Whilst it is important to keep staff appropriately re-briefed on changes in legislation or customer needs, mandating classroom-based refresher training every two years will create challenges. This includes ensuring that all staff can be released from duty for an additional training session whilst also ensuring the timely delivery of that training. Technology can play a key role in refreshing staff competencies and knowledge and we believe that in many cases e-learning, and the use of innovation e.g. Virtual Reality, could provide an efficient, timely and measurable record of that training. Appropriate consideration should also be given to how refresher training can be delivered on the job through manager and employee one-to-ones.

11. Do you agree that:

- **Operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **The refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

We note that in other areas e.g. training for traincrew and station staff on manual handling (such as ramps), license holders are typically required to ensure that staff are competent in the duties they are employed to undertake. This is achieved by training and reinforced via competency management systems rather than specific training or retraining intervals being mandated by the regulator.

The proposed two-year timescale for training to be revised and subsequently approved by ORR and delivered to all staff is likely to be challenging for operators to achieve and detailed analysis of existing training commitments will need to be undertaken to determine whether this is achievable within each company's existing resource plan, without negatively impacting service delivery. The long-term impact of staff being released from duty for training will also require analysis on the basis of the

current proposal that all refresher training is classroom based every two years. We suggest that ORR discusses the impact and likely timescales on an individual basis with each operator.

The focus of training should be a combination of priority areas for improvement, to ensure consistent industry standards, with the ability for tailored local priorities to be included. Standardised training outputs should focus on ensuring the delivery of a consistent experience for customers who need extra support across the industry, with refresher training focusing on legislative updates and local initiative developments, which could be efficiently cascaded during existing briefing cycles.

12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We support increasing customer awareness of the Passenger Assist service operators can provide as outlined in the consultation and RDG leading the promotion at a national level to deliver a UK wide media campaign. We believe increased awareness will ultimately lead to an improved and safer service for customers who need extra help. An option to prompt staff to enquire if assistance is needed for a Disabled Railcard holder could be achieved through an opt-in check box on the railcard where the customer can indicate that they may require assistance all or sometimes when travelling. This would act as a prompt to staff whilst also avoiding asking customers when it may not be welcome.

The approach to promoting passenger assistance should be taken in co-ordination with the other areas for improvement the industry will be working towards. For example, it is important to prioritise improvements to the reliability and delivery of assistance to customers already using the service before targeting more customers and risking failure to meet those needs.

13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We are supportive of the proposal to require operators to work with local authorities, service providers and disabled access groups; however, it is unclear why this needs to be mandated. Across Arriva train operators many activities of this nature already occur, and Northern plan to strengthen and expand our activities in this area. We believe that engaging disabled people in the design of our service and testing ideas with them can only ensure that we deliver a better and more reliable service that adds value to our customers' journeys. Operating businesses may need time to review their organisational capabilities to ensure that they are resourced and structured in a way that enables the ongoing engagement activity outlined in the consultation document.

14. What are your views on the proposal for more prescriptive website requirements?

In principle we are supportive of the proposals outlined in the draft guidance document and in ensuring that all operator websites comply with W3C standards to ensure that customers with disabilities have easy access to the information they may need to plan their journeys. Operators will need time to review the content of their websites and accessibility standards with their web developers to identify any steps they may need to take to meet the requirements of the guidance document.

15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

As an aspiration we are supportive of reducing industry timescales for pre-booked passenger assistance as this will lead to customers having greater flexibility and opportunity to travel in the certainty that the industry can meet their needs. There is a need to ensure that the current technology underpinning this system is updated before any changes can be made, such as the introduction of a new passenger assist booking system, and also ensuring that the National Reservation System can support seat and wheelchair spaces being booked within the same timeframe and honoured on board the train.

The ability for each operators passenger assist booking team to meet any of the timescales proposed is currently very limited and, if as the consultation suggests, the aspiration is to reach a point where each operator's team is open for those hours then the practicalities of eventually reaching a 2 hour booking window would mean that each booking team may need to operate 24 hours a day. Our own insight indicates that very few calls are made past 2000hrs each night, and even less following 2200hrs. A more pragmatic approach may therefore be for calls after a certain time to divert to a centralised call centre or one of the operators whose existing contact hours meet those needs. In the event that the aspiration is for each operator to be able provide a passenger assist team beyond their currently resourced hours then taking the opportunity to build this into future franchising requirements would be the most appropriate route.

16. How do you consider any reduction might be phased in? If so, how might this be implemented?

As outlined above the first steps needs to ensure that systems and technology underpinning the passenger assist service are aligned to meeting any reduction in timescales. Following this, dependent upon the booking timeframe to be delivered, we will need to undertake an assessment of its existing resource capabilities to ensure it can meet the needs of customers' booking assistance, particularly at locations where assistance is delivered by mobile staff. With technology and the right level of resource in place then an aspiration to reduce the booking window will be deliverable. We are supportive of a common standard for pre-booked assistance to support promotion and awareness to customers of the service the industry can provide.

17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

Northern's trains will continue to have a second person on board trains who will be there to help customers who need assistance.

Northern has a commitment, through our franchise agreement, to introduce Driver Controlled Operation (DCO), which means that the driver has full operational control of the train, including opening and closing the doors. How we choose to staff the train with a second person and exactly what responsibilities that person has are what we want to discuss with the unions. Recently, both Transport for the North and the Department for Transport have confirmed the retention of a second member of staff (in addition to the driver) on board Northern trains. This means that there will continue to be a suitably trained and competent member of staff on our trains to look after all our customers' needs. Any customer who needs help with access, personal security, information, ticketing and so on will have a member of staff (in addition to the driver) on board trains to help them.

18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We prefer to treat each customer as an individual and therefore by mandating any redress scheme, we lose our ability to do this with the customer-service focus which is intended. By stipulating that customers must be compensated for an assistance failure (once determined what failure means to each customer and the impact this has had on the individual), it then gives the impression that we are issuing redress because we have to rather than something we have chosen to do in recognition of the experience received.

The vast majority of other operators already compensate customers where it is felt it is appropriate as this is the 'right thing to do' from a customer service perspective and so if there is an issue identified where an operator has not demonstrated good levels of customer service then this should be raised directly with that operator or owning group as part of the ORR quality monitoring and regulatory processes.

In proposing mandatory redress for assistance failures there are a number of factors to consider:

- 1) **Doing the right thing:** The focus of managing an assistance failure complaint must be to ensure the customer has confidence to continue to use rail in the future. Compensation can be a means to supporting an apology but in isolation it will not restore confidence and trust and should therefore not be prioritised above taking action to reduce the failure reoccurring.
- 2) **Responsibility:** The vast majority of customers want assurances that if there is a failure in the delivery of passenger assistance that an appropriate investigation is carried out to identify the cause and mitigate it from occurring again. The failure of passenger assistance can be caused by the operator booking the assistance, the operator delivering the assistance, the operator responsible for keeping accessibility information up to date, by third parties (such as a failure of a taxi company) or a combination of the above. Northern's focus first and foremost is to always ensure that the cause of failure is addressed, working with any third party to address this where appropriate.
- 3) **Managing Expectations:** The severity of a passenger assistance failure will inevitably differ according to the passenger's needs. For example, at time of disruption or peak demand assisting staff will prioritise the assistance needs of a customer using a wheelchair or a customer with a hearing or visual impairment above a customer with luggage assistance, who may be asked to wait. Managing expectations around what comprises a failure and to what degree requires further clarification.
- 4) **Level of redress:** You have highlighted within your consultation that a customer may already have a right to compensation under the Consumer Rights Act for a passenger assistance failure which sets out the route to redress and potentially a full or partial refund. A customer may also have rights under the Equality Act. Agreeing what an appropriate level of compensation is, should be determined by the operator, in discussion with the passenger, following an investigation being completed, based on how that customer has been affected and the particular facts of that case. In our experience passenger assistance failures are very context and fact specific which may present challenges in setting prescribed limits. Further the establishment of the Rail Ombudsman now allows for a customer to escalate a complaint if they are not satisfied without having to resort to court proceedings.

- 5) Consistency: For any compensation process to operate fairly all operators identified in point 1 above would need to agree to accept liability for compensating the customer if they caused the failure in assistance delivery.

19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We support the proposal to move towards accepting calls via Next Generation Text Service as a step forwards from the current text phone system. Consideration must be given to existing technology arrangements and the impact this may have on implementation timescales when evaluating when this may be effective from.

20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

In principle the proposal to increase the availability of accessible alternative transport, particularly accessible buses and coaches is a positive step as it both reduces disruption and inconvenience to customers with mobility impairments and manages costs to the operator. The reality however is that the industry is dependent upon the vehicles approved operators have available at that time, which when procured for unplanned disruption may be more limited than when planned in advance for improvement work. The ability to provide a consistent customer experience is also important as it may not be possible to ensure that all vehicles are accessible on a particular date. This can lead to uncertainty for customers regarding the services they can use and those requiring alternative accessible transport to be ordered for them. If this is not known in advance it could lead to unexpected delays at the station for the customer whilst this is arranged.

The availability of accessible vehicles (including taxis), particularly in rural areas, is often extremely limited and we work hard to procure transport as quickly as possible when required. In reality, our powers are limited to increase the availability of accessible transport beyond actively working with existing operators to provide a service as quickly as possible to those customers when it is needed. Our priority is and always shall be to ensure that no customer is stranded, even if that means arranging separate transport for that individual.

The ability to require drivers of rail replacement buses, coaches and taxis to be trained to provide appropriate assistance could be included where contracts are renegotiated where this is not already in place.

21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

As highlighted in your consultation document help points are available at almost three-quarters of stations. In addition, a number of these help points may only currently provide automated information and help points may not be installed on every platform. Therefore, there may be a sizable gap filling process to achieve a consistent approach across the rail network.

With regards to a Freephone number, on a practical level this would need to be available from first until last train service, and currently most operators contact centres do not provide an aligned service. Advertising a Freephone number for the operator's team who answer help point calls may be an alternative route but there could be issues regarding this number being used inappropriately. A more suitable alternative could be to promote the availability of the National Rail Freephone passenger assistance line or National Rail Enquiries.

22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Focusing initially on the capability to carry scooters there currently remain restrictions to rolling stock (due to there not being a sufficient turning circle or space on board) and stations (due to the ramp gradient between platform and some rolling stock) that prevent a consistent approach being adopted and it would be pragmatic to enable rolling stock changes to first be completed before moving to a presumption of carriage across the industry.

Secondly, we would support an education campaign focused on how customers should safely use their scooters across the rail network and what to expect on-board; for example, to transfer to a seat and not occupy the wheelchair space.

We would be supportive of an RDG led collaboration with scooter manufacturers to introduce a 'safe for rail' accreditation sticker on scooters that can be transported on all accessibility compliant rolling stock. This would enable a consistent, industry wide approach to be adopted, where restrictions on carriage would be limited to the combined weight of the passenger and scooter and ramp gradients.

23. What are your views on our proposals to clarify the guidance to ensure:

- a) **Passengers do not unknowingly purchase tickets they cannot make full use of;**
and
- b) **Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

Our ability within the industry to mitigate passengers from purchasing a ticket they cannot make full use of is constrained by the ticket type, purchase channel (including third parties) and variances in rolling stock. To deliver this information changes in how customer information is captured during the ticket buying process may be required (i.e. a prompt regarding whether an accessible toilet may be required during the journey) along with integration of systems and information as they are digitalised.

We would welcome a collaborative industry wide approach to exploring how better information of this nature can be provided to customers when buying tickets from a wide range of operators and third parties.

With regards to informing customers when a toilet is out of order on-board the train, until all trains are digitalised to automatically report faults to other industry systems, we are reliant on staff becoming aware of the fault and reporting it to enable online information and station customer information screens providing an appropriate message. This means that it will not always be possible to alert customers before travel and this could lead to delays in alternative routes and transport being provided. It is also worth considering the current range of information sources at stations across the UK rail network where not every station has a real time customer information screen or public-address system. Whilst this will inevitably be addressed over time the guidance document should reflect that these information systems will not be in place in the short term.

24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?

We welcome the examples of good practice you have identified and are pleased to report that many of these areas are already adopted by Arriva operating companies or are currently being explored. Where 'may' has been used examples of when you view adoption not being a reasonable adjustment for an operator would be helpful. Some examples provided are achieved through digital enablers and operators may not have the infrastructure in place within their existing franchise to support those outputs.

The example of best practice provided regarding Video Relay services is interesting and looking for innovation outside of rail should be encouraged. Whilst it should not be a barrier to offering this service further consideration of the possible operational hours should be explored as it may not be possible to access a BSL interpreter for the same timeframe as other contact channels.

Thank you again for this opportunity to provide consultation feedback and we look forward to working with you in improving assisted travel.

Yours sincerely

[Redacted]

Rail Delivery Group

Response to The Office of Rail and Road

Improving Assisted Travel Consultation:
Changes to guidance for train and station
operators on Disabled People's Protection Policy
(DPPP)

Date: 18.01.2019

Rail Delivery Group response to consultation: Changes to Guidance for Train and Station Operators on the Disabled People's Protection Policy (DPPP)

Organisation: Rail Delivery Group

Address: 200 Aldersgate Street, London EC1A 4HD

Business representative organisation

Introduction: The Rail Delivery Group (RDG) brings together passenger train operators, freight train operators, as well as Network Rail; and together with the rail supply industry, the rail industry – a partnership of the public and private sectors - is working with a plan *In Partnership for Britain's Prosperity*¹ to change, improve and secure prosperity in Britain now and in the future. The RDG provides services to enable its members to succeed in transforming and delivering a successful railway to the benefit of customers, the taxpayer and the UK's economy. In addition, the RDG provides support and gives a voice to passenger and freight operators, as well as delivering important national ticketing, information and reservation services for passengers and staff. taxpayers and the economy. We aim to meet the needs of:

- Our Members, by enabling them to deliver better outcomes for customers and the country;
- Government and regulators, by developing strategy, informing policy and confronting difficult decisions on choices, and
- Rail and non-rail users, by improving customer experience and building public trust

For enquiries regarding this consultation response, please contact:

[redacted]

Rail Delivery Group

2nd Floor, 200 Aldersgate Street

London EC1A 4HD

¹ *In Partnership for Britain's Prosperity*, RDG (October 2017):
<http://www.britainrunsonrail.co.uk/files/docs/one-plan.pdf>

Overview

The Rail Delivery Group (RDG) welcomes the opportunity to contribute to the Office of Rail and Road Improving Assisted Travel Consultation: Changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP). The key points of the RDG's response are as follows:

Q1. What are your views on replacing Disabled People's Protection Policy with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

The RDG are supportive of such a change as it is aligned with our commitment to ensure the Rail Industry works to become more transparent in the language we use and sets policy in a clear and easy to understand way for customers. For example, we have seen work carried out recently throughout the industry to improve the language on tickets leading to the removal of over one million examples of jargon. This should follow the same lead so that customers with visible and non-visible disabilities have the information they need to travel with confidence.

Customers should have the right to be able to understand a train operators policy and a name change to either '*Inclusive Travel Policy*' or '*Accessible Travel Policy*' would be a step in the right direction. However, we would suggest that '*Accessible Travel Policy*' may be the better choice as it clearly identifies the purpose of this policy for customers at both Train Operating company (TOC) stations and onboard train services. Further, we believe that this policy should be clear, straight forward and easy for customers to locate when seeking this information. RDG will look to issue guidance to operators on where and how to display this policy information and then audit operators to ensure compliance.

The RDG believes customers should choose rail travel because it is safe, reliable and easy. For those that need additional support to travel by rail, a name change to '*Accessible Travel Policy*' would confirm that this support is available and provide confidence that disabled people have the ability to travel in the same safe manner as all other customers

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance? Is there anything you consider is missing from the required content? Is this still a meaningful title for this leaflet?

The RDG supports an easy-read passenger-facing document that is clear and simple for customers to understand. We also appreciate that a condensed version would allow operators to update these more frequently to reflect up-to-date information.

However, while the 'Improving Assisted Travel' consultation demonstrated that a leaflet/booklet is still the preferred method of receiving information about assisted travel, the RDG would recommend that this be regularly reviewed to ensure if a more innovative way to make this information available in an accessible and easy-read digital format is determined, that this is taken into consideration. Additionally, in our desire to ensure the information that is provided to customers is easy to understand and transparent in nature, we would recommend that operators are involved in discussions about what should be included in this leaflets and look to provide information through clear wording that provides information that is important to customers rather than looking to remove important information in an effort based purely on the objective of creating a reduced version.

Further, we would also propose an additional section for when customers look to transfer between operators. Changing from one operator to another can often be confusing for customers so providing information in this area would be welcomed to ensure we reflect the current model of the industry.

The RDG would also recommend that accessing this information online be easy to locate following the current Complaints Handling Process (CHP) format which mandates that customers be able to access information within a 2-click maximum from the operator's homepage.

Additionally, we would suggest that the ORR support having Network Rail (NR) provide some form of summary document of the main terminals that NR operate that covers all the Toc's operating from that station, rather than just having all the TOC's DPPP's on display as this may be confusing to customers. NR could signpost to the dedicated TOC leaflet but providing a document summarising key details about stations such as where the assisted travel point is, the accessible toilet, taxi or kiss and ride would be beneficial to the customer experience.

We also support the provision of these documents in all formats so that this information is available to all customers according to their individual needs. However, based on the low level of demand of many of these formats, we would suggest that these are made available upon request as opposed to mandating that they are available at all stations at all times leading to a surplus of supply and expenditure that could be better directed to other customer services.

Additionally, the RDG would suggest that the title of this document is aligned with any new name change for the DPPP so that there is consistency for customers.

Q3. What are your views on our proposed requirement that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

The RDG agrees that this information should be readily accessible and supports this being provided as part of a policy document rather than the passenger leaflet. However, we would also like to highlight that any specifics with regards to rolling stock and stations should be placed in the policy document and key headiness should be contained in all policy documentation. The RDG also agree that it is imperative that this information is kept up to date and would suggest that the amount of locations this information is held should be minimized. We also believe that in the best interest of customers that a standard template should be developed in cooperation with the ORR that can be used to create a standard national table of all stations so that every operator displays the same information which can then be housed on the NRE using Knowledgebase to ensure that every operator have the

same information available.

The RDG would like to highlight in specific railway terms that 'guidance' sets out best practice and not used for minimum standards. Minimum standards should be set out within an appropriate ACOP (appropriate code of practice).

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

The RDG welcomes the proposed changes to the approval and review process and believe that a shorter timescale for review of existing policies is a positive outcome. However, we would suggest that the two-week implementation timeline being proposed may be a little too tight considering the need for operators to produce these documents and brand them once approved and provide printed version in all stations in a timely manner. We would however suggest an agreed timeline between the ORR and the operator that outlines the process in its entirety including agreement on how long an operator could expect between presenting a draft to the ORR and the expected timeline for reply as well as an agreed timeline for other stakeholders such as Disabled Transport Advisory Select Committee (DPTAC), the Department for Transport (DfT), Transport Focus (TF) etc. to agree the proposal so that these could be delivered in an agreed, organised and timely fashion through an agreed implementation timeline.

Further, the RDG agrees that non-material changes should not require approval and that a revised DPPP would only require approval if there was a significant change in what an operator was proposing or indeed a change in franchise.

We would also like to further suggest that a panel be established, chaired by the ORR, and consisting of key Disability Advocacy groups such as Disabled Transport Advisory Select Committee (DPTAC), Built Environment Accessibility Panel (BEAP) and Mobility Access Committee for Scotland (MACs). This panel could ensure that an operator DPPP meet the standards at submission and confirm that language and terminology is clear. Further, this panel could make recommendations towards greater synergy among operators to enable customers to travel more efficiently when transferring between operators during their journey.

Q.5 What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The RDG agrees that consistency in how we communicate accessibility at stations to customers is important and an agreed common terminology among operators is required. However, the five categories being suggested may be more complex than required with terminology included that is not necessarily customer friendly. We would suggest that the first step to improving customer information on station access should be to agree a common phraseology for what is defined as step-free and to agree customer friendly language to express this. We would also suggest that we need to look beyond the definition of step-free as the only definition of accessibility at stations. In this regard the RDG has the aspiration to create a more comprehensive station information platform that provides both customers and staff with all the relevant accessibility information for each station including whether they are step-free, partial step-free or not accessible along with information on other facilities such as accessible toilets and staffing hours as this information can be vital for some when determining when and where to travel. We would also point out that 'accessibility' in this context seems to relate only to those with a physical disability, and we feel we have to raise

the point that not all disabilities are physical and that what is 'accessible' for one person, might not be accessible for another. Step-free access and lifts are integral to accessibility, but we also have to consider those who require additional support. With this in mind we feel that it is best for the time being to define access as step-free, partial step-free or not step-free, with directions to customers on how to find further information for each station through a central source such as the NRE or TOC websites and assistance booking agents staff having access to more detailed station information to advise passengers as required.

Q6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

The RDG supports the requirement for mandatory checks as set out in this consultation and agrees that information available to booking agents must be accurate on the NRE website to improve the reliability of passenger assist.

To provide customers with confidence when they travel, we would also propose some further actions to enhance the booking process and the accuracy of the NRE website.

One of the key areas of weakness in the booking process is the dependence on booking agents actually checking station accessibility information prior to confirming a customer's travel arrangements. While many agents do complete this process, there are occasions when this process is not followed and the ability to ensure that this is step is being followed is currently unable to be verified. The RDG will explore system integration between the current PA booking system and the NRE station pages. This integration would only allow the booking of assistance to proceed if the station pages had been checked and logged. A solution as to how this would work would need to be designed. However, this could support the actions set out in the consultations proposal and the RDG are happy to work alongside the ORR to design and implement this solution if it is agreed to be a worthwhile endeavor.

In terms of the NRE station pages, we accept that there are inaccuracies caused by issues within the backend system. We are working to resolve these inaccuracies and exploring how automation can make the process more efficient. In the short term, while these issues are being addressed, we are looking at providing an access database with each station's accessibility information housed. Each TOCs currently holds a master spreadsheet with all the information that is 100% accurate. This information feeds the NRE station pages. Rather than feed the NRE station pages it could feed the access database and this could be used as a short-term measure. A central person in RDG can be assigned to updating the database and distributing it on a weekly basis to the contact centres.

Q7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

One of the outcomes of the ORR research into the customer satisfaction of Passenger Assist was that there was work to be done in the actual awareness of the service. Best practice guidance would go a long way in supporting this.

We agree that a link in the booking confirmation to the NRE website would be an effective way to provide key information to customers. The RDG would also like this guidance information to be contained in the NRE APP and are looking to make this the case as the application is being developed. Additionally, the RDG are planning to issue guidance to operators regarding what information should be shown upfront on a landing screen (Tier 1

information) and this will include information relating to accessibility. The RDG also plan to audit operator and Third-Party Retail sites to confirm compliance

Further, the RDG has the aspiration as part of the introduction of phase two of the Passenger Assist application, to create the ability for customers and staff to communicate with each other so that not only can staff be alerted to where a customer is on a train or in a station in real-time, but also to be able to provide support during periods of unforeseen delays or disruption.

Q8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

The RDG supports this proposal and believes it may minimise the risk of information not being passed on. However, we also believe the new Passenger Assist solution, due to be rolled out in 2019/20, will play a key part in improving the issues around handover and may resolve this issue through this method. The first phase of this new solution will have a staff app equipped with a profile of the person who has booked assistance, so they are aware of the support the customer needs and can be viewed by staff at both the departure and arrival stations to ensure a smooth travelling experience for customers. The second phase, which RDG is looking to have endorsed by the Industry, will also have the ability to communicate with passengers directly as well as other staff to ensure handover protocols are managed effectively as well as allowing for communication with the customer during any unforeseen delays or disruptions to provide reassurance that a staff member is aware of their travel and can assist in any adjustments required if the need arises.

In addition to the above, and to improve station to station communication, the RDG has already introduced our newly developed and released 'Stations Connect' which will also support improved handover protocol between boarding and alighting stations. (Please see Q9)

However, if the Passenger Assist solution is not deemed to resolve the risk of information not being passed on effectively, we would agree that this proposal should be put in place keeping in mind that smaller stations on the network might find this difficult to implement so we suggest that the industry should work together and agree a protocol that would allow for this proposal to be executed successfully. This protocol should then be backed up with a robust training plan that is imbedded in all TOCs, with refresher training as required.

Q9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

The RDG supports this proposal and have begun the implementation of this with the introduction of 'Stations Connect'. This new system allows staff members to contact all UK rail station ticket offices using speech automation through one dedicated number. 'Station Connect' was rolled out in November 2018 and has already delivered well over 1000 calls and has received very positive feedback from Train Operating Companies.

'Stations Connect' phase 2 is being developed to meet the ORRs proposal for a dedicated assistance number. The RDG therefore would like to work with the ORR on setting the requirements for this implementation taking into consideration that each operator will need some flexibility in how this is incorporated into each station so that it can be successfully executed. The RDG does not believe a one-size fits all approach would be the right solution

as each operator, and station, may have different requirements and therefore should be allowed to determine how this is best implemented.

Q10. What are your views on our training proposals? Do you agree with the proposed outline content?

The RDG feels that the ten proposed areas set out in this consultation address the key areas that will improve the industry's approach to staff training. Further, we support the belief that this training should be designed in cooperation with subject matter experts that have real-life experience in disability issues including non-visible disabilities, we would also suggest that this learning is interactive as opposed to formal didactic training so that it is engaging which would lead to a more memorable learning experience for staff members.

The RDG has the aspiration to create a level of service across all TOCs that will ensure disabled passengers travelling on any route, and with any number of TOCs, will receive a consistent and seamless journey experience. To this end it is our ambition to develop an industry-wide training module that would complement individual TOC training materials and would be developed in cooperation with several UK disability groups and endorsed by them. The initial training should be classroom based with an ongoing online methodology available for refresher training. This would allow for effective training to be completed while also taking into consideration resource availability and the need to ensure the proper level of customer experience staff available to assist customers across an operator network.

The RDG also supports the idea that training should be undertaken by all staff, however some guidance in this area may be required as to what this means. For example, would this requirement be for all customer facing staff or all employees within the company? Would this be a requirement for temporary staff or would a condensed version be appropriate? More clarity in this area would be beneficial to ensure that all operators have a clear understanding of the expectations and to ensure the successful delivery of this proposal.

Additionally, the RDG would also recommend that the industry adopts a mandatory 'Equality Diversity Impact Assessment' (EDIA) like the public sector. This will ensure any project that is undertaken by the industry must carry out an EDIA so that accessibility requirements are identified right at the beginning of projects and when implemented will meet accessibility requirements. By implementing a mandatory EDIA this will ensure that accessibility is not seen as an afterthought and could achieve commercial savings in the long run.

Q11. Do you agree that operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff? In the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

The RDG accepts that it may be the train operator's preference to develop their own training material and customise it to their operation and the service they offer their customers. Two years seems a suitable amount of time to update training materials, however if this training has just recently been completed, we would suggest that the two-year time frame should start from the end date of the last training or refresher period as the expectation of two years to develop and deliver training to all staff within two years may be too time restrictive. Likewise, if a change in legislation is to occur, for example the '2010 Equality Act' then the modules would obviously be required in parallel to be updated.

Additionally, the RDG believes a hybrid approach should be taken with a blend of customisation as well as a standard module for all operators (Industry module). A single

entity would own the industry training syllabus and be responsible for:

- Designing the syllabus,
- Updating the syllabus,
- Distribution to the industry
- Assessing qualitative standards

It would be desirable for this syllabus to be endorsed by an external body to ensure it meets recognised standards. The train operators can then have a separate module that is customised to their requirements and as above be responsible for the four areas.

The Industry syllabus should have a minimum benchmark for each operator to achieve and this would be assessed by an independent body.

The RDG would also recommend refresher training focuses on areas where the industry needs to improve as a whole as well as targeted training where an operator has identified areas in need of improvement within the organisation. Further, we believe that the Industry should seek to work together to identify areas of best practice and share learning to ensure the overall improvement of the customer experience. An online e-learning approach for refresher training should also be considered to ensure that resourcing requirements do not have a negative impact on customer service.

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

The RDG recognises and agrees that more needs to be done to promote the Passenger Assist service to increase overall awareness levels.

Passenger Assist plays a vital role in enabling a more accessible railway. However, it is important to recognise that to be truly effective in its promotion a 'one size fits all' marketing approach will not work in the long term. Marketing and communication needs to be delivered across a multitude of channels, and across various formats to be truly accessible to its target audience and on a national level. However, to achieve this requires significant funding. In recognising this the RDG have prepared a national marketing proposal bid for funding that would promote Passenger Assist on a national scale with the aim to raise awareness.

In addition, a review of the Disabled Persons Railcard (DPRC) scheme is underway which will include reviewing the eligibility criteria to extend it to a wider audience.

In the interim the RDG have recently attained access to a shared marketing resource who is focusing on maximising promotional opportunity through National Rail owned channels. As part of this work Passenger Assist will activity be promoted across the National Rail Enquiries website homepage within the carousel feature, across National Rail's and the DPRC monthly newsletters and across social media. The estimated reach across these channels will be in the millions and will serve as great exposure.

Further, the RDG have also considered testing the provision of a short piece of literature distributed with newly issued DPRC's along with other useful customer information. This would explain what assistance is available and how it can be accessed to a core target audience group.

We are also keen to follow up the success of the in-station campaign that promoted Passenger Assist at national stations on a face-to-face basis and resulted in a 241% uptake

in bookings. It is hoped this activity can be run again in the near term.

Further, the RDG have taken on board the recommendation of working more widely with third-parties outside of the rail industry. There is agreement that there is potential to leverage audience reach through this approach to capture potential new-rail users. However, this will need to be explored thoroughly to determine the full requirements, practicalities and funding commitment.

In the interim it is hoped that the RDG can work more closely with charities and campaign groups to leverage opportunity to access their audiences via email and social media to promote Passenger Assist to capture a new non-rail audience.

Moreover, information on Passenger Assist is available on the National Rail website and clearly outlines what it is, how it works, provides freephone contact numbers (phone & SMS) along with direct links to individual Train Operating Companies. This content is currently being reviewed with the aim to make information more customer friendly and easier to understand. It will make better use of headings and quick links to enable users to easily locate information. It is hoped these changes can be published in the very near future.

Another consideration is to raise the profile of Passenger Assist amongst the DPRC audience through an inspiring and engaging and blog post hosted on DPRC website.

Aside from this, there is numerous pieces of work being initiated within the RDG that will promote the launch of the new Passenger Assist customer facing application in 2019. As part of the work the following is being considered:

- a new landing page > a route to update customers on the progress of the application, for more information and to capture email address to keep users informed of progress and timelines
- use of National Rail owned channels to promote the application (email, at stations, social, website)
- leveraging third-party databases to activity promote
- Public Relations experientials at stations
- Press articles both nationally and regionally

As the project develops we will gain a better understanding of what exactly will be possible. It is important to consider the promotion being done before, during and after the launch of the new application throughout 2019. It will be on a larger, national scale and with the support of funding, it is expected that this promotion will do a lot towards raising the profile of Passenger Assist amongst both existing and potential rail-users.

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

The RDG supports this proposal and believes that working with local authorities, service providers and disabled access groups is fundamental to ensure the success of all strategies and products being developed to support a better experience for customers.

Moreover, the RDG believes that more work across the industry has involved local authorities and disabled access groups than ever before. This is based not only on the engagement that RDG has had in the development of the new Passenger Assist service, but also through our regular Industry forums. In these Industry forums we see first-hand how much train operators are engaging with local authorities and disabled access groups,

whether it's to run strategies past them, gain valuable insight or actively involve them in the development of new products.

Disabled access groups have been heavily involved in the development of the new Passenger Assist App, right from the original draft plans through to the design, look and feel. For example, the colour contrast of the App was advised by the RNIB to ensure it meets the requirements of those customers with visual impairments, other Disability groups advised on making the user screens suitable for customers who have disabilities such as dyslexia and autism. The new Passenger Assist App will be rolled out in a series of phases and the same approach will be undertaken for all future phases of the Apps release.

The RDG have also consulted with a number of key advisor groups such as Disabled Transport Advisory Select Committee (DPTAC), Built Environment Accessibility Panel (BEAP) and Mobility Access Committee for Scotland to source their advice to support the role out. To support this further engagement was carried with a number of high profile and influential individuals within the disabled community.

Another approach that is being evaluated is to follow on from the success of the first Accessibility Industry day held in Feb 2018 with another similar event, or events, nationally and regionally, perhaps on an annual basis. This would be a fantastic opportunity to once again gain valuable input and feedback as well as help drive the awareness of passenger assist. We would suggest that if this was to go forward that at both a national and regional level we are aligned, and the scope is well defined, so stakeholders are focused on rail and not allow scope creep into niche areas. This would ensure targeted feedback for the industry on what is important for rail customers and how this can be delivered.

Q14. What are your views on the proposal for more prescriptive website requirements?

The RDG supports this proposal as we believe that having an accessible website is fundamental towards ensuring that disabled customers have the same access to information as others. We therefore agree that Industry website requirement meet the W3C standards and are aligned as much as possible, keeping in mind that different operators will want to distinguish themselves through branding. However, we would also suggest that the ORR work with operators to determine an agreed timeframe for this so that operators are clear on expectations and are properly set up to deliver this successfully.

Additionally, the RDG are planning to write best practice guidelines outlining requirements for tiered level of information which will include accessibility information that must be visible on the landing page or within one-click.

We would also suggest the following made mandatory either on the home page or within this one-click format from the homepage links to the following:

- An accessibility Hub housing all key accessibility information rather than information being spread across websites.
- Accessibility tools, for example page splitters, zoom in/out functions, colour contrast for the visually impaired and screen readers where appropriate
- Easy read library so that customers view key information in easy read format

As well, the RDG supports the term Passenger Assist being the only descriptor for 'Assisted travel' as this will go a long way to align the industry and give customers consistency.

Q15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

The RDG agrees that the industry needs to look to reduce the advanced booking times that are currently in place and, as an industry, we recognise that there is work to be done in this area to provide a better overall customer experience for disabled customers. RDG will look to lead the industry in this area as we believe that customers deserve shorter lead times applied consistently across the network. However, we also believe the most prudent strategy is to wait until the new Passenger Assist solution is rolled out before making any determination as to which of these options is most viable. This will allow us to determine the volume of take up on the customer App and gauge the change in the volumes via this booking channel. Once rolled out we would recommend a series of pilots once we identify the operators that are ready to trial. If the trials are successful, then the operators will then move towards either the options listed in this consultation or a reduced booking time that the operator is comfortable with and most importantly able to deliver to. We recognise that it is not ideal to have a myriad of different booking times, however, we must get this right and any short-term proposal before the passenger assist system is rolled out may not give us the insight/behavioral trends we need and could in fact work against the successful delivery of this application if we are trying to focus on introducing too many new protocols at the same time. Once we have a firmer understanding of the volumes and trends with the introduction of this new service we can look to agree a standard advance booking time that is consistent and can be delivered across the industry.

Additionally, moving to one of these proposals at this time would create a risk with regard to contact centre opening times as this proposal could force traffic to contact centres that currently operate until 22:00. This would have a potential commercial impact and risk of a poor customer experience as this could be potentially increase call volumes that are not within third-party supplier's forecasts. If instead we look to bring overall booking times down as part of the successful implementation of the Passenger Assist system, operators could then look to adjusting contact centre hours to meet agreed commitments when franchises elapse or when contracts with the 3rd party service providers are due for renewal.

Q16. Do you consider that any reduction should be phased in? If so, how might this be implemented?

The RDG supports a phased in approach with regard to any reduced booking time that may be recommended by the ORR in line with the successful introduction of the Passenger Assist system and the insights and behavioral trends that are gained from this. As well, realising that there will be commercial and staffing requirements that will need to be addressed for any reduction in booking times, a phased in approach will allow for operators to make the required adjustments to ensure the successful delivery of this proposal and we should recognise operators that are leading in this area.

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

The RDG recognises that there is a fundamental requirement to strengthen how operators consider assistance provision across different modes of train operation.

A key part of this, as mentioned within the ORR proposal, is how front-line industry staff communicate with customers. To address this concern the RDG has been developing an

enhancement to the future release of the new Passenger Assist application which would provide the ability for both staff and customers to communicate with each other during the customer journey which would go a long way in improving reliability. One of the weakness with the current system is that once the customer leaves the departure station there is no further communication until the customer reaches their destination. Therefore, the current practice can leave the customer feeling anxious and unsure of whether they are still being supported through their journey if the train experiences any unforeseen delays or is cancelled short of its destination. The ability for this two-way communication to be provided through the Passenger Assist application should alleviate this concern and provide assurance that the customer is being supported throughout their journey.

The RDG also recognise that the NRE website is often seen as the gateway to the industry and the one single source of information, therefore the information contained on the website is paramount to customers and therefore essential that it is accurate. The RDG will be looking at more improved ways in keeping the station information pages and stations made easy accurate in the future.

As well, in terms of providing assistance and having appropriate mitigations in place for DCO/DOO is critical for customer experience. The RDG ran a working group with the task of firming up an industry wide mitigation if DCO/DOO becomes more widespread across the industry. The working group used the mitigation strategy that Govia Thameslink Railway (GTR) deployed as a basis for a blueprint that would cover typical scenarios across the end to end journey. A draft blueprint was produced and shared with the Department for Transport (DfT) the Office of Rail and Road (ORRO and the Train Operating Companies (TOCs). This blueprint was encouraged to be used as a guide for train operators to model their mitigation approaches around and can be modified as required to suit the operator and customer needs.

The RDG supports references to suitable mitigations during scenarios such as DCO/DOO being made clearly visible within each operators DPPP

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

RDG supports this proposal and the Industry is committed to the new Ombudsman scheme that was introduced in November 2018. However, we also believe that in instances where something goes wrong during a customer's journey, the first point of contact to seek resolution or redress should be with the operator that was responsible for delivering the service. Further, we would suggest that a standardised approach to redress should be agreed in line with the NRCOT so that all operators and customers have a clear understanding of obligations and commitments.

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Text relay has been around for a significant amount of time. National Rail Enquires has received text relay calls for over twenty years, no process or procedure is required. When an operator at the TOC Customer Relations receives a call from a Text Relay Service Provider the operator introduces themselves and explains what the service is. The advisor only needs to keep in mind two aspects;

- a) Take their time when providing the information as the person they are speaking to is typing the information back to the customer
- b) To say 'go-ahead' to the operator when they have provided all of the information

The RDG does not believe a process needs to be implemented other than a briefing to staff and providing a number customers can call to make use of the service. The RDG understanding is that customers are aware of the service and can use it for any company customer team regardless of the industry.

Additionally, the RDG have been looking at a future enhancement in this area and have met with a supplier which works very much like the text relay service but includes the 'signing' element which some customers prefer. The customer would have an app with a list of Train Operating Companies who have signed up to the service. When the customer makes a call, it connects with the operator's contact centre team and a remote person via video who does the signing. The remote signer speaks to the operator's customer service agent and provides the information back to the customer through sign language via the application support team. There is a cost associated to this as the train operation company would be accountable for the call charges and subscription.

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

The RDG supports this proposal. The Industry relies on substitute or alternative transport providers during planned engineering works as well as during periods of unplanned disruption. As such, it is important that operators work towards ensuring that these providers have the ability to meet the needs of disabled customers so that they are well looked after during these times. The RDG recommends that operators endeavor to find these service providers and address this area both during the procurement process and throughout any contract period to ensure accessible vehicles are available and that those responsible for driving these vehicles have received accessibility training. We also recognise that there are areas within the UK where these services are not necessarily available, but operators should meet this requirement to the best of their ability and look to secure suppliers that can deliver on this expectation keeping in mind that operators may not have the ability to influence taxi or coach companies to the same level as the Department for Transport which may be a better source of influence to mandate change in this area. For many operators it would be difficult to refuse taxi permits to taxis that are not accessible as they would simply not have taxis at all on some stations.

Moreover, we would propose that the ORR work with the Department for Transport to influence changes within the taxi and coach market to increase the availability of accessible vehicles. Until this market moves to using accessible vehicles, TOCs remain unable to specify this requirement.

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

The RDG supports this proposal as customers who may require support rely on this information to be able to travel with confidence. Many operators already ensure this information is provided either through the booking process or within stations at ticket offices or information counters. Unstaffed stations may be an area where this is more of an issue. The RDG suggests that posters, help points, or information points could be used to ensure that all customers, no matter the location, are provided information on how to contact

assistance staff.

Q22: What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

The RDG would recommend a website functionally for each TOC labelled something similar to '*can I use my scooter?*' which could clearly show which of the three categories of scooters are available to be used on each TOC's rolling stock. This could then be linked to the timetable and show the appropriate rolling stock which would allow customers to know which type of scooter can be carried on board for a particular service. This webpage could also provide key advice a customer would need before travelling, current rules for travelling with a scooter, dimensions and any other pertinent advice the operator believes a customer should be aware of before travelling. Obviously, there is a risk that rolling stock can change during a 'set change', however this would need to be clearly labelled as a caveat. By carrying out this approach the Industry would clearly allow customers to make an informed decision on their travel plans before arriving at the station.

Presumption of carriage in an assembled state would allow for significant safety risks and would weaken scooter permit schemes which work to ensure safe travel for customers.

Unfortunately, mobility scooters are not built to acknowledged common standards in the same manner as wheelchairs. For presumption of carriage to be accepted, these same common standards would need to be developed and form part of PRM-TSI guidance to allow rolling stock to be built accordingly.

Q23. What are your views on our proposals to clarify the guidance to ensure:
(a) passengers do not unknowingly purchase tickets they cannot make full use of; and

The RDG agrees that clear directives and transparency of information is critical when customers are purchasing tickets that require passenger assistance.

To support this proposal the RDG suggests the following two approaches:

1. Whilst short term 'set changes' to rolling stock make it extremely difficult for Train Operators to confidentially advise that accessible space is available in their first-class services, there is an opportunity of implementing a further 'checking later' in the actual booking process. Whether by phone or through the website, the booking team could be instructed to check that the rolling stock that has been firmed up in the agreed timetable has the appropriate accessible facilities. In order for this to work the team would require access to the train plans so they know exactly what rolling stock has been planned to be used within the scheduled timetable. In order to further strengthen this the Contact Centre database could be configured with a section that must be completed that relates to this before the booking advisor can continue fulfilling the booking. However, it must be stated that this would increase the overall transaction time and would not solve the issue if, for example, a toilet goes out of service just prior to departure, nor would it account for purchases from a ticket vending machine as the interface is not linked to rail information systems that monitor facilities,

2. A second strategy is for the RDG to revisit the RARS 2 project (Rail and Availability Replacement Service) this would determine if the planned functionality would be able support the proposal set out by the ORR.

(b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

The RDG supports this approach as it ensures customers can make an informed choice on which service to travel. To be able to provide this information and allow customers to have the information they need to travel with confidence, the RDG have carried out work on the Industry information system, known as DARWIN. Through this work the Industry will be able to have the capability to display toilet information on Customer Information Screens (CIS). This will allow for Train Operating Companies to display up to date information on the status of available accessible toilets and alert customers when a train toilet becomes unavailable. This capability however is not currently available in real-time but instead all toilet status information would be provided into the CIS manually at the beginning of the rail day, any changes to the operational status beyond this manual input, cannot be updated into the CIS. However, work continues in this area and we aspire to make this information available in real-time during the second phase of the workstream.

This second workstream would involve working with the Train Operators to ensure the reporting feature filters through DARWIN and onto the CIS screens for real time display. Work has begun on this phase and we expect that some operators will begin displaying this information on their CIS in the near future.

As well, to compliment the above strategies, a future release of the new Passenger Assist application may well be able to provide customers with push notifications through the customer facing platform. These push notifications would provide key real time information about facilities at stations and onboard toilet or station information to further strengthen transparency and information customers with accessibility requirements need in order to receive a positive journey experience.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Railfuture
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

We support the need to change the policy title but would prefer ‘Assisted Travel Policy’. ‘Accessible Travel Policy’ seems to be too strongly linked only to the needs of disabled persons and ‘Inclusive Travel Policy’ seems too broad in its scope. But nevertheless, if we had to choose between two alternatives offered, we would prefer ‘Accessible Travel Policy’.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- a) The content seems comprehensive and commendably shorter than the existing leaflet; it would be difficult to say more without going into specific station details. The leaflet should also be on the operator's website and have links to it from the National Rail Enquiries, Network Rail and Passenger Focus websites.
- b) It does seem a bit too long-winded. How about 'Getting Help with Your Journey'? (should the term 'Passenger Assist' also appear in the leaflet to make it clear that this is a term that operators' staff will immediately understand?)

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

This seems a sensible step, which will also help to shorten the length of the passenger leaflet. The web version of the leaflet should have a link to this information in the web version of the policy document. **Accessibility at major stations should be shown prominently or highlighted.**

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We fully support the proposed changes, which will ensure that the operators' policy documents are more relevant to passengers' needs and kept up to date. In order to ensure feedback from user groups has been taken into account, we suggest that operators are asked to **demonstrate** that they have consulted such groups, rather than simply **confirming** they have consulted them. We would be happy to take part in any broader consultations, or in more detailed ones via our Branch network or our affiliated Rail User Groups.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

There is clearly a need for a form of classification, but there is a risk that making it too complicated could cause confusion to staff who have to use it. There may also be particular stations which do not fall neatly into the proposed categories. **The requirement to ensure that the National Rail Enquiries station pages contain the up-to-date information on accessibility is paramount (Section 4 A1 k refers).**

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

We fully support these checks, but it is not clear how they will be carried out or at what frequency.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

This is an important requirement and essential for first time users. Good communication about how their journey will be handled is very important. This information should be on the NRE website and each operator's website and provided as part of the booking confirmation. It should be offered in printed form to first time users who book in person at stations and don't have internet access.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

We welcome the introduction of this protocol, which should improve assistance failures.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This seems a very helpful improvement. The definition of 'GB mainline stations' needs to be clear and agreed with the Rail Delivery Group, NRE and operators.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

Yes and agreed it is important to include temporary and contract staff.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

a) Yes

b) Given the large variation between operator's stations and their rolling stock, it should be tailored to the priority areas for each individual operator.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We fully support these recommendations. We also suggest that Passenger Assist information is included when issuing Senior Railcards and on the Senior Railcard homepage.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We fully support this proposal, which should also help to encourage greater use of rail services. We would be happy to take part in any broader consultations, or in more detailed ones via our Branch network or our affiliated Rail User Groups.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

An excellent step forward to improve website accessibility and avoid confusion over terminology.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

Option 1 – unless linked to extension of contact centres' opening hours – could cause confusion to those booking assistance. Whilst Option 2 or 3 would be a great step forward, it is clear that it would be impracticable for operators to implement either of these in the short term. A phased approach is clearly needed – see answer to Question 16.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Given the planned implementation timetable for the revised guidance (expected to be issued by end of 2019), a phased approach on the following lines (subject to consultation with the Rail Delivery Group and/or operators) could be the best way forward:

Option 1 - 2020; Option 2 – 2021; Option 3 – 2022 or possibly later. It might be worth having a short trial next year of Option 3 with an operator who currently requires a minimum of 24 hours.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We welcome these proposals. Risk assessments should be carried out as a minimum at all stations which are unstaffed or staffed only at certain times and at all stations where DCO or DOO is currently used or planned. Such assessments could be incorporated into the operators' regular risk assessments in order to save staff time. ORR should seek evidence that all these assessments (which should be repeated at regular intervals) have been completed.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We agree that mandatory redress should be offered in all cases where failures occur and that the form of redress should be left to the operator. It is also essential that ORR monitor the rates of failure and redress offered. The requirement for operators to provide redress should be promoted as proposed, including the option of contacting the Rail Ombudsman if the passenger is unhappy with the redress offered.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

It is important the deaf or speech-impaired passengers can contact operators by text relay. Action on Hearing Loss should be consulted on any technical issues.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We fully support these proposals, including the need to work with third parties. Local authorities' transport teams and taxi licensing departments should be able to offer useful information. Regular monitoring by ORR of operators' practices - especially the frequent use of non-accessible coaches on rail replacement work – will be needed.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

This is essential to avoid passengers being “abandoned” - especially at destination stations or when changing trains or to another travel mode (eg London Underground). A freephone number should be provided in **all** cases and a help point or must be offered at all unstaffed or partially staffed stations.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

These proposals seem comprehensive, although we are not experts in this topic. The key issue seems to be to avoid different practices by different operators and these proposals seem to address this issue, as well as the importance of making clear to scooter users what the rules are.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

(a) We fully support this requirement., which is very important where passengers are alighting or changing at an unstaffed or partially staffed station or planning a journey which involved rolling stock which does not have an accessible toilet. All operators and ticket agents need to be made aware of this requirement , with real-time links provided to ensure the information can be obtained by them, irrespective of the journey routeing or operators' service involved.

(b) We fully support this proposal, with similar publicity and IT links as at (a).

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Good practices should be highlighted to operators as part of the issue of the revised Guidance.

Q25. Do you have any other comments or views on improving Assisted Travel?

Your proposals do seem pretty comprehensive. We like the plans to consulting operators, users groups and local authorities on major changes whilst recognising the importance of mandatory checks and ongoing monitoring.

Thank you for taking the time to respond.

Final Draft: RNIB response to the Office of Road and Rail's Consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)

January 2019

1. Introduction

Royal National Institute of Blind People (RNIB), is one of the UK's leading sight loss charities. We recognise everyone's unique experience of sight loss and offer help and support for blind and partially sighted people – this can be anything from practical and emotional support, campaigning for change, reading services and the products we offer in our online shop. We're a catalyst for change – inspiring people with sight loss to transform their own personal experience, their community and, ultimately, society as a whole.

There are currently estimated to be more than 2 million people living in the UK with sight loss. This figure is set to double by 2050. Of the current 2 million, 360,000 are registered as either severely sight impaired or sight impaired (blind or partially sighted.) [1]

Access to transport is consistently cited as a top concern for blind and partially sighted people; forty percent of those we surveyed through our 'My Voice' survey in 2015 told us they were unable to make all of the journeys they wanted to. Over half told us that they needed support to get out of the house. [2]

RNIB are delighted to respond to this consultation, which in the main, we are broadly supportive of. We feel the updated Disabled People's Protection Policy Guidance should further progress disabled people's

rights to travel by train independently and with confidence and have made recommendations, informed by blind and partially sighted people, to further this, within our consultation response.

In this response you will find:

- Information about how we gathered our evidence
- A list of our key recommendations
- Key areas missing from the consultation questions
- Our response to your questions

2. Our evidence

To inform our response to this consultation we have supplemented our existing knowledge gained through many years of transport policy and campaigns work by holding a number of specific focus groups and an online survey with blind and partially sighted people about the changes to the Disabled People's Protection Policy.

Where we do not provide source material as footnotes or state the source within the text, the statistics we quote, anonymous examples and quotes will be from this evidence gathering.

Survey and Focus Groups

We ran a short survey on your proposals from 2- 18 January, which 202 blind and partially sighted people completed from across the UK (94 per cent of whom are based in England).

We also held seven qualitative evidence gathering sessions, in the format of small focus groups throughout January with 46 blind and partially sighted people working in partnership with North East Action on Transport, Newcastle Vision Support, Sight Support Surrey, London Vision Forum and Thomas Pocklington Trust. We have also engaged with Guide Dogs and Vision UK as part of our response.

Additional Evidence

We have included relevant evidence from the research we undertook as part of our response to the Department for Transport Accessibility Action Plan consultation which resulted in the Inclusive Transport Strategy. This included a short survey for three weeks in October and November 2017 which 636 blind and partially sighted people completed from across the UK and five workshops in England with over 80 blind and partially sighted people in attendance. This is clearly referenced, when used.

3. What we want to see

Turn up and Go

- The Office of Rail and Road (ORR) should revise the Guidance to provide clarity to operators that they have an anticipatory duty to provide un-booked assistance, as per the Equality Act 2010
- ORR should revise the Guidance so that un-booked assistance is protected in the future
- ORR should make targeted recommendations for operators on improvements to increase un-booked assistance
- ORR should work with the Rail Delivery Group (RDG) and the Department for Transport (DfT) to ensure that more stations offer 'turn-up-and-go', and that adequate staffing levels are provided

Enforcement

- ORR should confirm what enforcement action it will undertake when operators fail to follow Guidance or meet UK and EU accessibility standards

Disabled People's Protection Policy name change

- To rename Disabled People's Protection Policy Guidance to 'Accessible Travel Policy'
- ORR to raise awareness of the Guidance with disabled people and their organisations

Revising the passenger-facing document

- The document should explicitly mention passenger rights to both booked and un-booked assistance, accessible station infrastructure ('At the station') and websites ('Before travelling')
- ORR should issue guidance on a standard layout for operators to follow so the content is accessible for blind and partially sighted people in all formats
- The document should be co-produced with disabled people and their organisations, including those representing blind and partially sighted people.

Removing the station and rolling stock accessibility information from the passenger document to the policy document

- ORR should ensure operators have information on station and rolling stock accessibility in a number of formats for passengers on request, as well as online

- Key accessibility information relating to blind and partially sighted people's access needs is provided in the updated information

Approval of Disabled People's Protection Policy:

- ORR should include requirements for operators to provide evidence that they have meaningfully engaged with disabled people on the development or revision of their DPPP. We advise that this is carried out by an independent disability consultant and the ORR has processes to assess if the engagement was meaningful and included a wide range of disabled people, including blind and partially sighted people.
- ORR to require operators to have alternative formats of their policies available from day one of operation

Classification of accessible station infrastructure:

- ORR should require station operators to audit the warning tactile at platform edges and make plans to rectify this
- Details of platforms with and without warning tactile should be included as part of the proposed station categorisation exercise
- Details of stations with missing audio announcements should be included as part of the proposed station categorisation exercise
- ORR to include complaints about audio announcements as part of their monitoring
- ORR should require rail operators to undertake spot checks and commission mystery shopping of audio announcements to ensure they're switched on and at a good level
- ORR to take enforcement action against station providers who fail to meet current EU and UK accessibility standards

Mandatory checks on station accessibility information at the assistance booking stage

- Alternative transport should be arranged for blind and partially sighted people if a station is not accessible due to infrastructure or staffing

Passenger best practice guidance

- All Guidance should be developed with disabled people and be advisory in nature only

Handover protocol and dedicated assistance line

- The ORR should require standardisation of training by different operators on this protocol

Revised training modules

- ORR must monitor the training package and ensure the delivery of training is to a satisfactory standard
- The training should be required to be delivered by paid specialist consultants who have lived experience of disability and be informed by the social model of disability
- Practical training outside of the classroom in a busy station for the sighted guiding module is needed, with a paid professional with lived experience of sight loss
- Temporary and agency staff to undertake sighted guiding training module
- Training for all assistance staff is needed on providing the ramp for blind and partially sighted people that request it
- Training should include information on invisible impairments, treating people with respect and upholding their autonomy
- Meaningful engagement of disabled people and their organisations is needed in the development and delivery of training, including blind and partially sighted people
- Measures should be put in place so that staff are easier to identify for blind and partially sighted people at stations, particularly at ticket barriers

Website requirements

- Change section A.25 from "Operators must commit to working towards achieving the industry-recognised W3C standards" to "Operators must commit to achieving the industry-recognised W3C standards."
- ORR should develop a monitoring framework which includes carrying out an audit of train operating company websites and apply penalties where they are not accessible

Reducing the notice period for booked assistance

- ORR should progress with option three: booking two hours before travel
- ORR should progress option three, as soon as possible rather than a phased approach
- ORR should tightly regulate the industry so they deliver the two hour notice period as proposed

Driver Only and Driver Controlled Trains

- Guards should remain on trains that stop at unmanned stations
- ORR should require operators to provide detailed plans which address the impact of moving to Driver Only Operation (DOO) and

Driver Controlled Operation (DCO) trains for blind and partially sighted people

Mandatory redress arrangements for assistance failure:

- Redress should include when someone has not been treated with respect or guided correctly
- Redress to include failure of working audio announcements on the train and on the platform, if they significantly affect someone's journey
- The system for claiming redress should be accessible for blind and partially sighted people
- The online system for claiming compensation for failed assistance should be subject to extensive user testing
- When operators provide redress for failed assistance this should be monitored and if warranted operators should undertake a review to change both policy and practice

Substitute and alternative transport

- ORR should ensure the industry sets out plans so that blind and partially sighted people are supported when rail disruption occurs
- There should be a named person who supports people during rail disruption
- Operators should ensure their procurement of alternative transport providers can meet disabled people's access needs, including provision of sighted guiding training for bus providers, audio announcements (or alternatives) and disability equality training for private hire drivers

Rail Ombudsman

- ORR should proceed with the statutory notice process to modify licences so membership to the Rail Ombudsman becomes mandatory for all operators

4. Key areas missing from the consultation questions

Turn Up and Go

We are disappointed that given this is the first review of the Disabled People's Protection Policy Guidance for train and station operators for almost ten years, and the first post-Equality Act 2010, that as a regulator,

the opportunity has not been taken to press the rail industry to go beyond their minimum regulatory duties with un-booked assistance.

We welcome the expanded summary of relevant legislation for operators in your proposed draft Guidance, including "meeting the requirements of persons with reduced mobility to be reflected Operators in policies, practices and procedures in accordance with Part 3 of the EA 10."

However we are concerned that by not expressly acknowledging Operators obligations under the Equality Act 2010 when referring to spontaneous travel throughout the document or including requirements for Operators to commit to being adequately staffed and prepared for un-booked assistance, it may indicate that Operators are not required to anticipate un-booked assistance requests, and thus weaken their understanding of their obligations under the Equality Act.

In your Equality Impact Assessment it is clear you recognise the disadvantage disabled people experience when being required to book assistance in order to travel by train. It is also clear that the Department for Transport's Inclusive Transport Strategy aims for spontaneous travel to be a reality for disabled people by 2030, however without sufficient steps and safeguards in place to ensure the rail industry deliver Turn Up and Go assistance, this is unlikely to be the case.

In fact, the evidence we gathered to inform our response to what is now the Inclusive Transport Strategy, found 79 per cent of blind and partially sighted people cannot travel whenever and wherever they like. [3]

At seven out of eight focus groups held for this consultation, when we discussed the positive move toward reducing the notice period for booked assistance, unprompted, all attendees expressed their desire to carry on or in the future travel using un-booked assistance.

Whilst we agree that the substantial reduction in notice period for booked assistance signals a move towards a more equal experience of train travel for blind and partially sighted people, one focus group attendee and guide dog owner, summed up how having to book assistance in the first place, leaves her feeling less equal to non-disabled people:

"I am a mum of two children. Unlike the other mums I currently feel I am not able to jump on a train to see family or take my children on an impromptu trip. Booking assistance is one more thing in my life that other people don't have to plan for...I should be able to just get on a train like everyone else - it's the flexibility of opportunity, that's what it is".

Another added:

"Last weekend a family member was ill, I really want to go and see them and whilst I think moving to a two hours notice period for booked assistance would help me do that, I don't want the extra stress of having to go through booking with someone in those kinds of situations. I just want to, well, turn up and go where I need to".

Since the last Guidance was issued ten years ago there has been a cultural shift towards inclusion of disabled people in society, including the Government's aim for one million more disabled people to be in employment by 2027. A working transport system is vital to achieving this aim, so we expect that to be reflected in the revised Guidance and provisions made to further disabled people's inclusion in the future.

We also note that, as we prepare to exit the European Union, we are in a time of both political and economic uncertainty which could lead to a challenging operating environment for the rail industry. Due regard must be given to ensure that Guidance such as this, which is intended to protect disabled people's interests when travelling by train for the foreseeable future, takes this into account.

The concern regarding reduced resources is particularly pertinent when we consider the example of Southern Trains who in 2017 withdrew its' Turn up and Go service, despite opposition to this decision.

The ORR should use this Guidance to put in place a stronger framework to protect and enhance disabled people's rights to un-booked assistance so they can travel spontaneously.

Recommendations:

- ORR should revise the Guidance to provide clarity to operators that they have an anticipatory duty to provide un-booked assistance, as per the Equality Act 2010
- ORR should revise Guidance so that un-booked assistance is protected in the future
- ORR should make targeted recommendations for operators on improvements to increase un-booked assistance
- ORR should work with the Rail Delivery Group (RDG) and DfT to ensure that more stations offer 'turn-up-and-go', and that adequate staffing levels are provided.

Office of Road and Rail increasing enforcement action

RNIB welcomes the increased commitment by the ORR to monitor operators' obligations to provide information on assistance as well as the proposal of mystery shopping of websites, contact centers and help points.

We would like to have seen in this consultation an explicit commitment to enforcement by the ORR when operators fail to meet current EU and UK accessibility standards.

We would welcome the revised Guidance to include details on the enforcement action that will be undertaken against operators who have, for example, failed to install warning tactile paving on platforms edges as required by Code of Practice and Guidance [4]

We would also welcome further details on how the Office of Road and Rail aims to monitor and enforce how operators provide:

- Audio announcements at stations and on rolling stock that are timely, easy to hear, and understand.
- Staffing levels
- Accessibility of ticket machines
- Accessibility of toilets (including audio description)

We discuss in detail our preferred approach to enforcement of audio announcements and warning tactile paving in question five.

Recommendations:

- ORR needs to confirm the enforcement action it will undertake when operators fail to follow Guidance or meet UK and EU accessibility standards

Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

We are in favour of updating the name of the DPPP's to reflect the aim that disabled people are able to travel by train independently and with confidence.

At our focus groups, despite those attending clearly having an interest in sharing their experiences as blind and partially sighted people who travel

by train, a clear majority had not heard of the Disabled People's Protection Policy.

The minority that had heard of the Disabled People's Protection Policy were either volunteers with RNIB or specifically campaign on transport related issues.

It was surprising the majority of focus group attendees had either not heard of or accessed the passenger facing document 'Making Rail Accessible for Disabled and Older people' by any operator.

Many remarked they were not aware of any particular policies to protect disabled people's interests when travelling by train, let alone operators being obliged to produce such a policy. Clearly blind and partially sighted people, being unaware of the obligations operators are required to undertake is interlinked with disabled people's overall confidence in asserting their rights when travelling by train.

We support the recommendation to raise awareness of, both booked and un-booked assisted travel, however this must also include information on the level of service disabled people can expect and what steps to take when this fails.

The move to either Inclusive or Accessible Travel Policy are both clearly in the spirit of the social model of disability, which we support as we advocate for a world without barriers for blind and partially sighted people.

Whilst instinctively 'Inclusive Travel Policy' reflects the values we wish to see operators commit to - ensuring disabled people's rights when travelling by train being upheld in an anticipatory manner – and also reflects the Department for Transport Inclusive Transport Strategy, however when we asked our focus groups participants, there was a strong preference for the term accessible.

Accessible was preferred over inclusive because whilst 'inclusive' is a more holistic term reflecting disabled people's rights to a society without barriers, participants felt that before becoming involved with sight loss or disability organisations, they would not have understood that the term 'inclusive' was pertaining to their rights as disabled people.

Recommendations:

- To rename Disabled People's Protection Policy Guidance to 'Accessible Travel Policy'

- ORR to raise awareness of the Guidance with disabled people and their organisations

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

a) Is there anything you consider is missing from the required content?

b) Is this still a meaningful title for this leaflet?

- a) We endorse a more concise passenger friendly document and agree with the proposed content in the revised passenger leaflet, however as noted in section 4, we would like to see explicit mention of disabled people's right to un-booked assistance
1. RNIB also would like to see explicit mention of passenger's rights to both accessible station infrastructure ('At the station') and websites ('Before travelling') in this document
 2. We advise ORR create a standard layout for operators to follow for this document, with a standardised layout incorporating individual operators branding but with key design elements, so the content is accessible for blind and partially sighted people in all formats
 3. We would advise that when re-designing the leaflet it is co-produced with disabled people and their organisations, including those representing blind and partially sighted people.

b) As referenced in our answer to question one, the majority of participants at our focus groups were unaware this document existed and therefore by association, the information on operators policies and practices which protect their interests when travelling by train.

We would suggest a change in title which reflects that assistance must be provided for disabled people by operators. Again, this is an area where consultation of a wide demographic of disabled people on a meaningful title would be advised.

Recommendations:

- The document to be revised to be more concise and passenger focused
- The document should include an explicit mention of passenger's rights to both booked and un-booked assistance, accessible station infrastructure ('At the station') and websites ('Before travelling')

- ORR should issue guidance on a standard layout for operators to follow with key design elements, so the content is accessible for blind and partially sighted people in all formats.
- The document should be co-produced with disabled people and their organisations, including those representing blind and partially sighted people.

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We agree that by placing this information in the policy document it would create a more succinct and easily accessible passenger leaflet.

At our focus groups it was noted that information on station and rolling stock accessibility was key to having the confidence to travel independently.

Therefore, we recommend, that this information should be readily available, not just online, but copies are frequently refreshed in alternative formats at train station information points and ticket offices, alongside being able to request this via phone.

Inclusion of this information should also be in the Passenger Assist app, in a format which is easy to understand for blind and partially sighted people.

Many focus group participants noted that if they had accurate information on station, staffing and rolling stock accessibility sufficient to meet their access needs, that they would not always need to book assisted travel. It is therefore vitally important that this information remains easily accessible and is promoted by operators.

When updating the policy document, we recommend that you update information on rolling stock accessibility including colour and contrast of carriages, accessibility of ticket machines, and accessibility of toilets (including their audio description).

Please refer to our response to question five regarding station infrastructure and how blind and partially sighted people require advance notice of it in order to travel by train independently and with confidence.

As previously addressed, we would urge that the proposed Guidance instructs operators that their passenger and policy documents must

include information on the provision of audio announcements. We would welcome a clear framework by which ORR will adequately enforce the use of audio announcements on trains and at stations.

Recommendations:

- To ensure that information on station and rolling stock accessibility is widely available in a number of formats with ease
- To include key accessibility information relating to blind and partially sighted people's access needs in the updated information

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We support the requirement for operators to confirm that they have sought feedback from disabled people and their organisations, including local access panels and their own accessibility panels, when developing or revising their DPPP's.

The ORR must ensure that this engagement with disabled people is meaningful. We advise that the ORR produce guidance for operators on how they must work with an independent disability consultant to undertake this type of engagement work. The consultant must also produce a short document for approval to show how the operator has engaged with a wide range of disabled people, including blind and partially sighted people, as part of the development or revision process.

We support the new requirement for operators to make their documents available to the public from the start of their operations. We note that the deadline refers only to the documents being available online and recommend that the same deadline be applied to alternative format leaflets such as braille, audio and large print, so that blind and partially sighted people who do not or cannot use the internet have the same opportunity to access these documents at the same time as they are published online.

We also support the current annual review process of the DPPP's and advise that the ORR carry on with this process and take into account feedback it has received via monitoring activity and from disabled people and their organisations.

Recommendations:

- ORR should include requirements for operators to provide evidence that they have meaningfully engaged with disabled

people on the development or revision of their DPPP. We advise that this is best carried out by an independent disability consultant and that the ORR assesses whether the engagement was meaningful and included a wide range of disabled people, including blind and partially sighted people

- ORR should require operators to have alternative formats of their policies available from day one

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

We support the classifications of stations relating to their accessibility.

67 per cent of the blind and partially sighted people who responded to our survey on this consultation agreed that information on step free access at a train station, as well as the proposals on the station categorisation would help them travelling by train.

At RNIB's focus groups, step free access was viewed as favourable for blind and partially sighted people mainly because the Code of Practice [4] was not being followed. Examples given included inadequate colour contrast to enable independent travel around stations.

A number of people told us of the 'fear' they have when trying to use stairs at stations where there are gaps between each step, steps that aren't sufficiently wide enough, or where handrails weren't present. Often this meant blind and partially sighted people would use a lift when they otherwise wouldn't require one.

A Guide Dog owner shared how her new dog was due to be escalator trained, so she required use of a lift at a station. On one occasion she was left waiting alone for upwards of 40 minutes by assistance staff, whilst they arranged for an escalator to be switched off for her to use because a lift was not available.

Station accessibility for blind and partially sighted people

Whilst we welcome the classification of step-free stations, we recommend that the ORR require operators to provide information on key station infrastructure to enable blind and partially sighted people to use train stations independently and with confidence.

When we asked blind and partially sighted people via our survey for this consultation, what physical infrastructure enables them to travel by train with independence and confidence we found:

- 96 per cent of respondents said good quality platform audio announcements were very important;
- 89 per cent of respondents said warning tactile paving at platform edges were either important or very important; and,
- 88 per cent of respondents said that a static passenger assistance point to meet staff was important or very important.

Given the review and standardisation of Knowledge Base we would recommend that the ORR requires *as a minimum* that information on platform edges with and without warning tactile is included in any station accessibility classification, so to ensure parity of blind and partially sighted people's safety and independence when travelling by train.

Below we briefly expand on the reasons why certain infrastructure was prioritised by the blind and partially sighted people we spoke to:

Tactile paving on station platforms

Blind and partially sighted people rely on tactile markings to indicate danger, whether that's a flight of stairs or the edge of a platform. This means that when tactile markers are missing from platform edges it can cause real danger for blind and partially sighted people. Many told us - both in our evidence gathering for the Inclusive Transport Strategy consultation and in response to this consultation - that they feel nervous whilst waiting on platforms generally.

The Code of Practice [4] advises tactile strips on platform edges as well as the yellow line, but there clearly are still many platforms without tactile strips across the country.

At our focus groups we were told of blind and partially sighted people who had fallen onto the tracks due to missing tactile at platform edges, echoing the information we collected in 2017 to inform our response to The Inclusive Transport Strategy [3].

Station audio announcements

In response to our evidence gathering for the Inclusive Transport Strategy, 46 per cent said that the lack of audio announcements on station platforms was a problem.

“There are a lot of unmanned stations, or stations only manned for a certain time period, navigating these is near impossible. Some of these stations also do not have audio announcements, which leaves me completely stranded; train travel is often not an option.” - Inclusive Transport survey respondent [3]

At the workshops we held to gather evidence for the consultation on the Inclusive Transport Strategy [3] attendees told us that they currently book assistance for help with problems in the station, which could be easily corrected. For example, one workshop participant told us:

“At one station I always have to book assistance because their platform audio announcements come so late I don’t have a chance to get to the platform in time. If the announcements were made earlier or there was a more accessible way for me to get that information accurately I wouldn’t need assistance.”

Some used apps that provide platform numbers which meant that they didn't have to book assistance at familiar stations. Many don't have smart phones though so this is not a solution which will help everyone.

We were also told about the stress blind and partially sighted people experienced when audio announcements on platforms were either unclear or difficult to hear leading to people missing trains.

The gap between the platform and the train

“I haven’t used the train after a really bad experience, where the gap between the train and the platform was so HUGE that my dog ended up falling between the platform and the train, it was terrifying.” - Inclusive Transport survey respondent [3]

The survey we carried out in response to the Inclusive Transport Strategy found that nearly half (48 per cent) of respondents found the gap between the platform and train was a problem when travelling. This was also noted by most people attending our focus groups.

We are also aware of several blind and partially sighted people who have been injured by falling down the gap between the platform and train, as well as a number of guide dogs who have been injured.

Some rail companies provide ramps for passengers to use to board the train, but not at unmanned stations. Where there is no guard on the train,

this does not happen. Not all operators provide ramps for passengers with sight loss. Research carried out by DfT in 2005 contains the following passage regarding injuries on the rail network:

“Incidents involving visually impaired passengers were significant; representing 2.6% of all incidents. Statistics provided by the Association of Train Operating Companies indicate that less than 1% of journeys are made by visually impaired people. Therefore, it would appear that they are at greater risk of having an accident.” [5]

In the focus groups we held for this consultation we heard the same worrying comments, with one participant noting:

“I have fell down [sic] the gap at Foster Square three times you know, it made me feel very scared and embarrassed.”

Whilst the platform gap is difficult and costly to amend with the variation of rolling stock in any one station, we have expanded further in our answer to question ten, how good quality passenger assistance along with installing tactile warning strips at the edges of platforms can alleviate this issue to some extent. The ORR, as a regulator, should be requiring operators to take these duties seriously and undertake enforcement action when needed.

Recommendations

- ORR should require station operators to audit tactile warnings and include details of platforms without it as part of the proposed station categorisation
- ORR should take enforcement action against station providers who fail to meet current EU and UK accessibility standards
- ORR should include complaints about audio announcements as part of their monitoring
- ORR to require that rail operators undertake spot checks and mystery shopping of audio announcements to ensure they're switched on and at a good level
- Static assistance points and call buttons should be installed at all stations where it is reasonable and they are adequately staffed

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

We agree with the introduction of mandatory checks on station accessibility. If a station is not accessible for a blind or partially sighted

person due to staffing or inaccessible infrastructure, alternative accessible transport should be arranged when assistance is booked to mitigate the stressful experience of having to arrange this when a passenger arrives for their journey.

As addressed in question five, if there is not sufficient information on accessibility relating to infrastructure to support blind and partially sighted people to travel by train independently and with confidence, or where staff are not easy to locate then mandatory checks at the booking stage may still result in failed passenger assistance.

Recommendations:

- We agree that mandatory checks should be undertaken at the booking stage and alternative transport arranged for blind and partially sighted people if a station is not accessible due to infrastructure or staffing

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We support greater guidance for passengers about what to expect at stations and when receiving passenger assistance. We would support information on how to contact assistance staff should there be an issue, including blind and partially sighted people being unable to locate assistance staff or an assistance point in a station they are unfamiliar with.

All Guidance should be developed with disabled people and be advisory in nature only.

We are cautious that the onus on providing good quality assistance must fall to the staff employed to provide it and not the individual disabled person.

Please see our answer to question ten, regarding the importance of assistance staff respecting disabled people's autonomy when travelling by train.

Recommendations:

- We support information on how blind and partially sighted people can contact assistance staff
- All Guidance should be developed with disabled people and be advisory in nature only

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

We fully support the introduction of the assistance handover protocol and believe this will deliver real change for disabled people when travelling by train.

It is important that this process is also followed if the assistance is un-booked.

This proposal would require the standardisation of training by different operators so that the correct information regarding the type of assistance required by people with different types of impairments is relayed correctly.

Q9. What are your views on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

We support this and believe that without the dedicated assistance line the proposals for the handover protocol would not be realistic.

We welcome this method to address providing un-booked assistance at unmanned stations, however this is dependent on operators' staff resources being adequate to meet disabled people's needs.

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We strongly welcome the proposed, significantly strengthened, mandatory training modules required for operators.

We agree both senior and frontline staff should partake in this training. We believe it is important that senior staff undertake the training so they

are aware of how to resolve any systemic issues disabled people experience.

We would advise that key union representatives, especially those with an equalities remit, are also offered this training on an optional basis if they are not already one of the mandatory attendees.

The two-year refresher for permanent staff is agreeable. The training should be reviewed if there is concern identified by ORR's monitoring efforts. RNIB endorses proposals for increased mystery shopping by disabled people and their organisations, including blind and partially sighted people, at regular intervals to inform this monitoring.

The condensed version of training for agency staff should include sighted guiding training, as a number of focus group participants noted how temporary staff had been detrimental to their confidence.

One focus group participant shared how a temporary member of assistance staff refused to provide sighted guiding because he was under the impression he was not allowed to touch anyone, so she missed her train, whilst the confusion was resolved. We recommend that sighted guiding training be undertaken in a station with a paid professional with lived experience of sight loss and for this to be provided for temporary and agency staff to avoid this.

RNIB have been calling on the rail industry to include disability equality training and sighted guiding training for many years. We have detailed key issues blind and partially people experience when using assisted travel below.

The proposed modules address the main areas RNIB would suggest, however these sessions should be delivered in the spirit of the social model of disability and social model theory included as an element of any training. This will support staff to understand that the reason assistance is provided for blind and partially sighted people is because of societal conditions rather than someone's sight loss being an inherent detriment of their personhood.

When we asked focus group participants about their opinions on the proposed training modules there was consensus around the following amendments:

- The training be delivered by paid specialist consultants who have lived experience of disability

- The training to include a practical session in a busy station, particularly the sighted guiding element of the training, as this element of the training cannot be experienced in the classroom
- The visual impairment awareness session (including the sighted guiding training) to be delivered by a paid blind or partially sighted person, who has expertise in this area, and engages a wide range of blind and partially sighted people who have differing levels of vision, mobility aids and confidence when travelling by train
- Temporary and agency staff to undertake sighted guiding training

We agree with colleagues at Guide Dogs that the training should also include a section on assistance dogs, their roles and their legal status.

Given that there is not one operator covering more than 80% of the proposed training modules, it is important that the ORR to approve the content of training to be delivered prior to it going ahead.

Failed Assistance

Our survey found that only 13 per cent of respondents reported their booked assistance arriving as planned.

Most of the failed assistance occurs when assistance staff do not turn up to meet people off a train when it arrives into the destination, (36 per cent) but there were also issues with being able to locate staff at the start of a journey (21 per cent) and staff not supporting people to change trains (13 per cent).

These findings echo what we heard via our survey for the Inclusive Transport Strategy [3] in 2017 where:

- 64 per cent of respondents said that because they can't rely on assistance being available they have to book assistance in advance.
- A third said that a reason they couldn't travel when they wanted to was because passenger assistance they booked didn't turn up.
- 21 per cent of those surveyed said that staff who were available weren't helpful.

We welcome the handover protocol, improved training and redress to address failed assistance.

Whilst we welcome advice for passengers on how best to receive their assistance, we are concerned with the proposal to reduce failed assistance rates by suggesting people remain in their booked seat.

People may need to move seats for many reasons, including those related to their impairment, such as glare from the window, or simply wanting to move because they are not comfortable with the person they are sat next to. We therefore recommend that all messaging is revised to be advisory, suggesting passengers may wish to remain in the same seat as it may make it easier for assistance staff to locate them but they are free to move.

In our focus groups RNIB learnt of an issue which we had not heard reports of previously, namely, assistance staff preventing blind and partially sighted people from boarding trains they wish to because the staff perceive them to be too dangerous.

One participant said:

"I was using a long cane and they [assistance staff] refused to put me on a busy train without a seat despite telling them I was fine. As I tried to get on the fourth train I could use, she [assistance staff] pulled me back by yanking my arm so I ended up half on the train and half off, She [the assistance staff] said it was because the station at the other end hadn't confirmed they would meet me, despite me saying if I was guided to the back of the train my mother in law would meet me off it."

Another London workshop participant told us how she was stopped from getting on a busy train with standing room only by assistance staff, which resulted in her sitting on the floor, to make an 'embarrassing point', as she needed to get that particular train otherwise her plans would be disrupted.

We recommend that training should include valuing blind and partially sighted people's autonomy and ability to make decisions about their own safety alongside the health and safety responsibilities of station staff.

We also strongly believe that failed assistance should encompass when assistance staff do not treat blind and partially sighted people with dignity and respect, which we cover further in question 18.

Whilst many people in our focus groups described their experience of assisted travel staff as a 'pleasure' and 'consistently good' RNIB also had reports of blind and partially sighted people being made to feel 'embarrassed' or a 'burden', which is why we thoroughly support the ORR's revision to the mandatory training.

Assisted travel and the platform gap

In our response to question five we addressed the importance of tactile warning strips on platform edges, however a huge difference can be made by correctly guiding blind and partially sighted people and providing ramps when they are requested.

A survey respondent to our evidence-gathering for the Inclusive Transport Strategy [3] added:

"...on many occasions, ramps have not been available, or staff not trained to use them, resulting in the constant need to explain why I need the ramp. There is a lack of awareness amongst many rail staff who, in the absence of their provision of a ramp, have insisted that I get off the train without it which is unsafe for me and other passengers who offer to help." [3]

We welcome the amendment to section A1(g) so that the ramp is now available for all disabled people, not just wheelchair users. We reiterate that the ORR should ensure that revised training includes the requirement of providing the ramp to bridge the platform gap when requested by blind and partially sighted people.

At RNIB's focus groups we also heard about how blind and partially sighted people had fallen down the platform gap or had friends with sight loss that had fallen down the gap because they were guided incorrectly.

Therefore, we recommend that training must explicitly cover how to guide blind and partially sighted people with dignity, alongside specific on-site training with staff and people with sight loss on how to guide between a platform and different types of rolling stock.

Navigating stations and being offered assistance with an invisible disability

A frequent theme at our focus groups was the experience of blind and partially sighted people who do not wish to use assisted travel but when they request assistance, for example at ticket barriers, are met with a lack of understanding by frontline staff. This is especially true for those who rely on residual vision and do not use mobility aids such as a cane or a guide dog.

The assumption that all people with sight loss use a white cane or a guide dog is incorrect, and many people don't use any aid or use a symbol cane only in certain circumstances, like when in an unfamiliar place.

More people are also using smart phones and navigation apps to get around, which are not obvious to others. In our survey for the Inclusive Transport Strategy [3] found that:

- Around 20 per cent of blind and partially sighted people who responded do not use a sight related mobility aid.
- 16 per cent said they do not use any aids at all.
- A further 6 per cent said they used another form of mobility aid, such as walking stick or wheelchair, which did not make their sight loss immediately obvious.
- The experiences of people with sight loss who do not use mobility aids can be different to those who use a guide dog or cane
- 25 per cent of those who don't use any aids identified as being blind (rather than partially sighted). The lack of a mobility aid is not necessarily an indicator of the level of sight a person has.

It is clear from these experiences that raising staff awareness of people with hidden impairments is a priority also.

Being Treated with Respect

Those who use white canes or are guide dog owners reported at RNIB's focus groups that this did not necessarily prevent ignorant behaviour from staff including:

- Staff just nodding or gesturing and not speaking, leading to other passengers stepping in to explain
- When asking for support to read the departure board being told to look up despite informing the staff member they have sight loss

In the evidence we gathered for the Inclusive Transport Strategy [3] we were told about the following situations:

“I was guided completely inappropriately by a member of station staff. They just grabbed hold of the bottom of my cane whilst I had hold of the top and proceeded to pull me around by it!” – Survey respondent

“I was at a station using my cane when a guard yelled “Make way for the blind person!” at the other passengers. I won't use my cane any more at stations because of this.” – Survey respondent

A common theme from our focus groups was about support given when approaching a ticket barrier in a familiar station.

One participant described his experience:

"In Leeds at the barriers, there is a sea of people, often six or seven people deep all shoving and fro-ing. Even with my residual vision I can't see where to put my pass or spot a member of staff as their coats don't stand out, so I have to wave my assistance card, it's embarrassing, I feel a lack of dignity...for me it would be great if someone wore a hi-vis vest so I could locate them."

We would recommend that staff at ticket barriers are trained to look out for people who may need assistance and to offer it. RNIB also recommend that operators are urged to look at ways of making staff easier to identify in their stations for people with sight loss.

RNIB recommend that measures are put in place so that staff are easier to identify at stations. This should include staff being at static information or mobility points and ticket offices, something which 88 per cent of respondents to our survey noted as important or very important to their experience of travelling independently and with confidence.

We are concerned at the industry's move toward a more fluid customer service model which does not rely on static points. RNIB often hear of difficulties faced by working age blind and partially sighted people being unable to find staff to assist them early in the morning or after working late, especially when the station doesn't have an assistance call button.

We believe any major move away from staffing from static mobility points and ticket offices would be seriously detrimental for blind and partially sighted people's ability to travel independently and with confidence.

Recommendations:

- ORR must monitor the delivery of training to a satisfactory standard and take action if it is not
- Training should be delivered by paid specialist consultants who have lived experience of disability and be informed by the social model of disability
- Practical training in a busy station for the sighted guiding module, with a paid professional with lived experience of sight loss.
- Temporary and agency staff to undertake sighted guiding training
- Training for all assistance staff on providing the ramp for blind and partially sighted people that wish to use it
- Training should include information on invisible sight loss conditions, treating people with respect and upholding their autonomy

- Meaningful engagement of disabled people and their organisations in the development and delivery of a consultants training, including blind and partially sighted people.
- Measures should be put in place so staff are easier to identify for blind and partially sighted people at stations, particularly at ticket barriers

11. Do you agree that: operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff? the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

We support the training to be implemented as soon as is reasonably practicable.

The refresher training should take place no more than two years apart and be repeated if monitoring identifies a cause for concern.

We support industry-specific priority areas to address systemic concerns, however individual operators may need to focus on specific areas which have been identified via monitoring. Therefore, RNIB recommend the refresher training package should incorporate both elements.

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We agree with these proposals.

In 2017, as part of our evidence gathering for the Inclusive Transport Strategy [3] our survey revealed:

- 35 per cent of respondents did not have a Disabled Person's Railcard
- Over a quarter of those who didn't have a Disabled Person's Railcard were not aware of what it was.
- A further 10 per cent said they did not know how to apply for one.

For those who are partially sighted, the percentage of those who do not have a Disabled Person's Railcard was 45 per cent, and over a third were not aware of the card. [3]

RNIB were surprised by these figures, and believe it demonstrates that much more can be done to promote the card. It is vital that any promotional materials are accessible to blind and partially sighted people, and we are keen to work with ORR to ensure that as many blind and partially sighted people know about the Disabled Person's Railcard as possible.

Recommendation:

- RDG and ORR work with RNIB to reach more blind and partially sighted people in regard to Passenger Assist schemes and the Disabled Person's Railcard.
- Ensure any promotional materials are accessible to people with sight loss

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We agree with these proposals and would be happy to work with operators to reach our community of blind and partially people to improve the passenger assistance service.

We have a network structure including nine Regional Campaigns Officers across England who would be able to support this work.

It is vital that any engagement with disabled people is meaningful and led by disabled people's views and opinions on the scheme, rather than simple consultation exercises.

Q14. What are your views on the proposal for more prescriptive website requirements?

We agree with using the term Passenger Assist and all information regarding assisted travel being provided on a linked page on the homepage.

As part of our 2017 evidence gathering for the Inclusive Transport Strategy [3] we found that the pay and repay website were inaccessible

to those who use screen readers. This inaccessibility seems to apply to all rail operators as they use the same web template, so therefore we would urge that any online system for claiming compensation for failed assistance undergo extensive user testing.

At our focus groups participants reported mixed experiences with operator's websites and apps.

The difference between operators of a similar size demonstrates that whilst some take their responsibility to provide accessible web content seriously, others do not prioritise this.

People using screen reader technology had the greatest number of difficulties accessing websites, but at our focus groups the National Rail Enquires website was praised as easy to use by all that used it, regardless of how they accessed it.

It has been more than two decades since the Disability Discrimination Act 1995 (DDA) came into force which obliged website owners to ensure that they had accessible websites for disabled people.

When the DDA was merged into the Equality Act it was clarified that not providing a service (such as a website for both public and commercial services) for someone with a protected characteristic, such as disability, was likely to be unlawful discrimination.

Sections 20 and 29(7) of the Equality Act make clear that web providers must make "reasonable adjustments" to enable disabled people to access their services, with section 20(6) clarifying that a service provider must take steps to ensure that information is provided in accessible format.

It is also noted by the Equality and Human Rights Commission's Code of Practice that this is an anticipatory duty, and service providers should not wait for disabled people to request adjustments before making their websites accessible.

Following the W3C Guidelines are likely to be a good parameter on what would be expected from an Operator in terms of creating an accessible website, however we also recommend extensive user testing for usability of websites as well.

RNIB also note an ongoing concern raised in focus groups regarding operator's websites (alongside others) and the need to verify one's

identity using 'Captcha' software. This is reported to be inaccessible for many people who use screen readers and should be monitored.

When taking into account the anticipatory duty for websites to be accessible in line with the Equality Act, we do not believe that **'working toward W3C'** standards is sufficient and advise that this should be revised to **'must be compliant with W3C standards'**.

Furthermore, given that the EU Directive on the accessibility of public sector websites is being brought into UK law, coupled with the fact that the rail industry receives central government funding, operators should keep pace with the public sector in terms of the expected level of website accessibility.

RNIB believe that without appropriate enforcement by ORR the rail industry will not meet the W3C standards, so whilst we welcome the monitoring of operator's websites we would urge the creation of a framework for enforcement if operators do not meet this standard.

Recommendations:

- Change section A.25 from "Operators must commit to working towards achieving the industry-recognised W3C standards" to "Operators must commit to achieving the industry-recognised W3C standards."
- ORR should develop a monitoring framework which includes carrying out an audit of train operating company websites. Penalties should be imposed where they are not accessible
- The online system for claiming compensation for failed assistance is subject to extensive user-testing

Q15. What are your views on the three options for reducing the notice period for booked assistance?

As explained in section 4, RNIB is in favour of ORR expanding operator obligations to provide Turn up and Go assistance, as we believe that blind and partially sighted people should be able to travel whenever and wherever they like independently and with confidence.

We do welcome the reduction in notice period as a move toward offering disabled people an opportunity to travel with more flexibility.

Our survey found that 61 per cent of blind and partially sighted people preferred Option 3 - booking 2 hours prior to travel.

RNIB expanded on this in focus groups, and whilst some people were happy with booking the evening before travel, the majority preferred un-booked assistance, but accepted that this reduction in notice period would enable them to travel more spontaneously. Some noted that booked assistance can be less stressful because there is an assumption it will arrive, however that is not always the case.

"This type of booking system, which whilst not perfect, would mean I can do the simple things that little bit easier, not worry if my work meeting has overran, decide to stay out later than planned with friends or just see how I feel on the day about when and where I need to travel - it's not a lot to ask when you are paying for a service really" - focus group attendee

A small number of operators already commit to delivering either Turn Up and Go or a voluntary two-hour booking period. To RNIB this shows that it is feasible for the rail industry to deliver this, if their resources are allocated to do so.

RNIB believe that for the rail industry to properly deliver a reduction in notice period, the ORR will need to tightly regulate it and act where an operator is not meeting the minimum booking period.

Recommendations:

- ORR to progress with option three: booking two hours before travel
- ORR to tightly regulate the industry so they can deliver the two-hour notice period as planned

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

We believe that the reduction in notice period should come into practice as soon as possible.

The ORR have already recognised that Option 1: 10pm the day before travel would not require a huge shift for most operators' practices, apart from amending their call centre hours and booking sheet protocol, therefore this should certainly be delivered in 2019.

Whilst we are sympathetic to the pressure same-day assistance bookings will place on the industry, we believe that it is entirely reasonable for operators to provide the resources, policies and practices to deliver a same day notice period for assisted travel.

One attendee at our focus group noted:

"I have previously worked at a senior level in the corporate world and I believe we've let people off hook for too many years [on assisted travel]...two years is a long time in this world and companies need to be challenged to change that, so I think the two-hour notice period should come in as soon as. It should be people before profits and if the businesses are not putting people first, there should be some kind of penalty, until they do"

RNIB believes that initially there will need to be sanctions of some kind for operators that do not meet the agreed notice period for booked assistance.

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

At our focus groups, blind and partially sighted people consistently raised concerns about Driver Only Operation (DOO) and Driver Controlled Operation (DCO) trains, especially those that travel to unmanned stations.

At one focus group we heard:

"I travel from Menston, which is an unmanned station. Without the train staff spotting me I wouldn't be able to find the doors, as they don't automatically open and I can't locate the button from the beeping. I would miss my train. When I was a Magistrate it had a big impact on my travel to and from work. The stress of not knowing if I will get my train, the nature of my job meant I couldn't book assistance. I am someone who travels frequently and confidently but without guards I wouldn't feel happy about travelling independently any longer."

RNIB recommends that guards remain on any trains that stop at unmanned stations.

RNIB also recommends that operators produce detailed plans addressing the impact of moving to DOO and DCO trains for blind and partially sighted people.

The national freephone number to contact assistance staff is a potential safeguard, however RNIB feel that this does not go far enough as mobile phones are not always reliable and assistance points are not consistently easy to find for blind and partially sighted people.

Recommendations:

- Guards remain on trains that stop at unmanned stations
- ORR require operators to provide detailed plans which address the impact of moving to DOO and DCO for blind and partially sighted people

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

RNIB support the proposal for mandatory redress arrangements for assistance failures.

RNIB would recommend that the assistance failures also include when someone has not been treated with respect or guided correctly, as well as assistance not being delivered.

Further, the redress should also include failure of working audio announcements on the train and on the platform when they significantly affect someone's journey.

It is vital that the process for claiming redress is accessible for blind and partially sighted people, as RNIB routinely hear that the Delay and Repay website is not accessible for people who use screen readers.

Any system to report failed assistance must not rely on visual cues, such as the number or name of a staff member from their badge or descriptions of rolling stock.

At RNIB's focus groups we found that many people were either not sure about their rights or did not complain despite having good reason to do so, including someone falling onto the tracks because they had been guided incorrectly. An accessible and easy way to complain, developed with the involvement of blind and partially sighted people and then well-publicised is recommended.

One clear message from our focus groups was that blind and partially sighted people would prefer a consistently good service as opposed to compensation and that operators paying redress should not detract from these changes being made.

Recommendations:

- Mandatory redress for assistance should be brought forward
- Redress should include when audio announcements have not been used on the platform or train, when they have proved detrimental to a passenger's journey.
- Any complaints procedure should be accessible and developed with input from blind and partially sighted people.
- The complaint procedure should be well publicised.

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

RNIB support this.

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

RNIB welcome all efforts to support disabled people to travel with more confidence should planned or unplanned disruptions occur.

Blind and partially sighted people are adversely affected by disruption to rail services. While passengers in general may be inconvenienced in these situations, for a disabled person this disruption can make travelling impossible or unreasonably difficult.

A common theme in our focus groups was the lack of support for blind and partially sighted people to locate rail replacement bus services.

RNIB were frequently told of blind and partially sighted people not being offered assistance to locate a bus some distance from the train station from either the assisted travel staff or the bus company. RNIB heard reports of people being told to 'go over there' and a member of staff pointing to a place in the distance, despite being told the person had sight loss.

RNIB were also told about rail replacement bus staff not being aware of how to guide blind and partially sighted people onto a coach, or the bus not having working audio announcements or being offered alternative arrangements.

Focus group members all agreed these can be addressed in a number of ways by operators:

- Rail operators identify a member of staff responsible for ensuring people are supported during disruption, and this member of staff undertakes the mandatory training, including about visual awareness
- A static meeting point announced to passengers who may wish to locate assistance during disruption
- Operators procurement processes to include that their rail replacement buses have working audio announcements or an alternative is provided to enable blind and partially sighted people to travel independently and with confidence
- Rail replacement bus staff should be required to have a high level of disability equality and visual impairment awareness training

Where taxis are used, it is vital that operator's procurement processes ensure companies contracted are aware that it is a criminal offence to refuse Guide Dog owners, and also that their drivers have undertaken disability equality training (either as a stand-alone module or as part of their ongoing training such as the BTEC on Introduction to the Role of the Professional Taxi and Private Hire Driver).

Recommendation:

- ORR should ensure the industry sets out plans so that blind and partially sighted people are supported when rail disruption occurs
- There should be a named person who supports people during rail disruption
- Operators ensure their procurement of alternative transport providers can meet disabled people's access needs, including provision of sighted guiding training for bus providers, audio announcements (or alternatives) and disability equality training for private hire drivers

Q21. What are your views on our proposal to ensure that at every station, passengers are informed how to contact a member of staff that is able to provide assistance and service information?

RNIB support passengers being informed on how to contact a member of staff for assistance and service information.

Due care should be taken so that this number is accessible for blind and partially sighted people, as many people with sight loss may struggle to read a poster or find an unfamiliar help point.

RNIB would encourage this information to be provided by audio announcements, online information, via staff and the Passenger Assist app.

Q23. What are your views on our proposals to clarify the guidance to ensure:

a) passengers do not purchase tickets they cannot make use of; and

b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

RNIB support this and urge the ORR to include information for passengers with sight loss when audio announcements at stations and on trains are not working.

RNIB would advise highlighting to industry the easy win of installing audio description in toilets, which is common in many European countries, to enhance blind and partially sighted people's dignity when travelling by train.

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Birmingham New Street Redevelopment Case Study

Although it is located in Birmingham, New Street Station receives thousands of passengers from around the country every day, including many who are blind and partially sighted. The RNIB office for the West Midlands is based in Birmingham, as well as a large college for people with sight loss, a local society and several other organisations for blind and partially sighted people.

RNIB worked with the Gateway Team at Network Rail to try and ensure the change over from the old to the new train station was as smooth as possible for blind and partially sighted passengers and users of the station. This was a large-scale project, incorporating several facets of accessibility.

RNIB's Regional Campaigns Officer worked with the communications department of the Gateway Team to ensure that information about the changeover was accessible to blind and partially sighted people. As the public information leaflet about the changeover contained very visual information such as maps and diagrams, our Regional Campaigns Officer worked to transcribe this information into text which could then be provided in alternative formats. These were then available at the exhibitions for the general public about the redevelopment and at the Customer Service reception at the train station.

The Gateway Team also commissioned the production of a tactile map of the new station by RNIB, which is still available to the general public in the station concourse.

A major part of the project involved the organisation and execution of guided orientation tours of the new station for blind and partially sighted people, prior to its opening to the general public. These tours were carried out by Network Rail staff on an individual basis with blind and partially sighted people and advertised through various channels, including through RNIB networks and at the train station. The demand for the tours was so high that Network Rail deployed staff from London to assist in the implementation. During a three-week period, over 95 blind and partially sighted people from the West Midlands region and beyond, received an individual guided tour of the new station prior to opening. Availability of the orientation tours also continued after station opening on an ad-hoc basis based on requests from blind and partially sighted individuals and staff availability.

Feedback from people with a sight loss who completed a tour was overwhelmingly positive, stating that it gave them a greater sense of the layout of the new station and an opportunity to ask questions and allay any anxieties they may have had. Individuals said that they felt more confident overall about using the new station and that they knew how and where to ask for assistance if they needed it.

A significant additional benefit of the tours was the positive learning experience that they provided for station staff. Staff members said that the opportunity to physically guide a person with sight loss around the

station and the informal conversation with them during and afterwards meant they received first-hand information about life as a blind or partially sighted person, particularly in relation to using public transport. It provided an invaluable learning experience and contributes significantly to the overall positive experience that people with sight loss have when using New Street Station.

Further to this engagement work with Network Rail, an access panel for New Street Station has been established, including individuals with sight loss and organisations representing them. The forum is organised and facilitated by Network Rail and addresses issues of accessibility for blind and partially sighted people in relation to the station and station staff.

Q25. Do you have any other comments or views on improving Assisted Travel?

RNIB have outlined areas missing from this consultation in section 4.

Rail Ombudsman

Whilst RNIB welcome the Department for Transport's introduction of a "dispute resolution ombudsman" to investigate and resolve complaints by rail passengers, including those by disabled people, we are extremely concerned that this will essentially be a membership organisation effectively regulating itself. We welcome ORR proceeding with the statutory notice process to modify licences so membership to the Rail Ombudsman becomes mandatory for all operators, and feel is important to ORR's proposals for people to seek redress for failed assistance.

Ticketing

Whilst outside of this consultation, in our focus groups the issue of accessible ticketing was consistently raised. RNIB urge the ORR to work with the industry and disabled people's organisations to address the problems of inaccessible ticketing. Below we have included a summary of the main findings from our 2017 research to inform the Inclusive Transport Strategy:

RNIB's survey showed that:

- Only 3 per cent can use a ticket vending machine without problems.
- 56 per cent say it is impossible for them to use a ticket machine, with 30 per cent finding it difficult.

Unsurprisingly, only 4 per cent said they'd chose to buy a ticket from a vending machine if they were having to travel at short notice. 76 per cent would prefer to buy a ticket from a person in a ticket office and 20 per cent would prefer to buy the ticket onboard the train.

Clearly, buying tickets in person is the preferred method at short notice for blind and partially sighted people; yet, two thirds say they cannot rely on ticket offices being open and this prevents them from travelling when they want to.

Smart tickets on mobile phones can be accessible or made more accessible for people with sight loss, but not everyone has a smart phone. At our workshops many liked the idea of a top-up "Oyster"-type ticket which they can be in control of "topping up", but many were worried this would not work with our current complicated rail ticketing system.

Those at our workshops who had used ticket machines with difficulty, said that there were other problems with the machines such as:

- The types of tickets available are limited to the most expensive
- It is hard to add a rail card, extra passengers or select different ticket types on the machines
- Many of the chip and pin devices on the machines do not have the accessible bump on the number 5

By far the biggest problem cited about ticket machines after accessibility was that they are so frequently broken and out of service.

RNIB also received regular complaints about the accessibility of rail operator and ticket buying websites. The inaccessibility of these websites limits blind and partially sighted people's ticket buying choices even further.

Overwhelmingly, blind and partially sighted people want reassurance from a person when buying a ticket to make sure that they are buying the best ticket for their needs. There is a real fear that as new ticket technology is introduced, and ticket offices and staff are reduced, many people with sight loss will be excluded even further from rail travel and become less independent and more isolated.

Recommendations:

- ORR, DfT and Rail Delivery Group should explore a fully accessible and consistent national system for ticketing
- DfT needs to develop accessible vending machines

- The ORR needs to carry out an audit of train operating company websites and penalise those companies which are not making them accessible

6. Conclusion and contact information

RNIB are supportive of your proposals and believe they will significantly improve assisted travel for blind and partially sighted people. However, RNIB do feel there are areas, as a regulator, you can apply further pressure on the rail industry to meet their obligations and go further to create train travel without barriers for disabled people.

RNIB would be happy to discuss our response with you and provide support with your endeavors to improve travelling by train for blind and partially sighted people.

Please contact:
RNIB Policy and Campaigns Team
105 Judd Street
London
WC1H 9NE
campaign@rnib.org.uk
0207 391 2123

Endnotes

1. <https://help.rnib.org.uk/help/newly-diagnosed-registration/registering-sight-loss/statistics>
2. <http://www.rnib.org.uk/knowledge-and-research-hub-research-reports-general-research/my-voice>
3. <https://www.rnib.org.uk/rnib-responds-department-transport-accessibility-action-plan-consultation>
4. <https://www.gov.uk/government/publications/accessible-railway-stations-design-standards>
5. <http://webarchive.nationalarchives.gov.uk/20120925163540/http://www.dft.gov.uk/publications/rvar-significant-steps/>

Document ends

Improving Assisted Travel – DPPP Guidance

Scope Response

January 2019

Summary

For many disabled people, the rail network is still not accessible, with assistance and access provision inconsistent or completely absent. The steps outlined in this consultation would represent a significant improvement to disabled people's experience of using the rail network.

Disabled People's Protection Policy (DPPP) guidance is in urgent need of updating to bring fully in line with the Equality Act 2010, and Scope hopes to see measures implemented as quickly as possible.

Scope welcome the majority of the proposals in this consultation, and so below are our recommendations for how to improve or amend proposals from the consultation document. A full summary of our response to all consultation questions can be found at the end of this submission.

Recommendations

- *Question 1* – Rename the Disabled People's Protection Policy the 'Inclusive Travel Policy'.
- *Question 3* – The DPPP passenger-facing document should contain information on step-free access and staffing levels at stations operated by the Train Operating Company (TOC) in question.
- *Question 4* - TOCs should be required to consult with disabled people when making changes to their DPPPs.
- *Question 10* – Key elements of staff training should be designed and delivered with the involvement of disabled people
- *Question 10* – The ORR identify an independent body to evaluate and quality assure the disability awareness training delivered by TOCs.
- *Questions 15 & 16* – The notice period for booking assistance be reduced to 2 hours. This should happen in a single step, rather than implementing a phased change.
- *Questions 15 & 16* – The ORR work with the Rail Delivery Group (RDG) and TOCs to promote the existing 'turn up and go' schemes, and any expansions of these schemes.
- *Question 17* – Where operators propose changes to their operating system, their DPPP should be updated, reviewed and approved by the ORR prior to the change taking place.

- *Question 24* – Future franchise tenders be amended to recognise the value of TOCs following best practice, with bidders who commit to doing so having an improved chance of winning the contract.

Introduction

For many disabled people, public transport is crucial to being able to live the life they choose¹. However, the rail network still presents a number of barriers that mean it is not inclusive for disabled people. Recent polling by Scope found that 20 per cent of disabled people are unable to access train stations because of accessibility difficulties². This leads to disabled people making significantly fewer journeys by rail than non-disabled people³.

The proposals outlined in this consultation would represent a step forwards for disabled people's ability to access the rail network, and encourage TOCs to provide a better service. To ensure that the benefits they could bring are fully realised, it is important that train operating companies (TOCs) do not delay or diminish the extent of what is being proposed ahead of implementation.

We have ordered our response along the same lines as the consultation document, with 6 sections:

- 1 Updating Disabled People's Protection Policy guidance
- 2 Reliability
- 3 Staff training
- 4 Passenger awareness
- 5 New requirements
- 6 Best practice

In writing this response, we have developed on our work with disabled people to better understand their experiences of public transport, and how it could be changed to better meet their needs. Where appropriate, quotes from these individuals have been included in this document in an anonymised form.

1. Updating Disabled People's Protection Policy guidance

1.1 Documentation

¹ Scope (2018) Independent. Confident. Connected.

<https://www.scope.org.uk/Scope/media/Documents/Publication%20Directory/Independent-Confident-Connected.pdf?ext=.pdf>

² Ibid.

³ Department for Transport (2018) Travel by mobility status and main mode or modes: England.

<https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access>

Question 1

- 1.1.1 The term ‘Disabled People’s Protection Policy’ is neither clear nor widely known.
- 1.1.2 As such, we agree with the proposal to rename the DPPP. Of the proposed options, ‘Inclusive Travel Policy’ best captures the diversity of barriers that disabled people may face, as there is a danger that ‘Accessible Travel Policy’ could be seen as relating purely to physical accessibility.

Recommendation: Rename the Disabled People’s Protection Policy the ‘Inclusive Travel Policy’.

Question 2

- 1.1.3 We agree that the passenger facing document needs to be made more concise and passenger friendly. The approach outlined is an appropriate one for this document.
- 1.1.4 It is important that, alongside providing sources of further information, the document should make clear how passengers can escalate complaints they feel have not been adequately dealt with. Given the establishment of the new Railway Ombudsman, the details of this office should be given a high level of prominence.
- 1.1.5 Given the change in name to the DPPP, a more appropriate name for this document is ‘Making Rail Inclusive’, as this makes it clear to uninformed observers that it is related to the Inclusive Travel Policy. However, any name for this document should be tested with disabled people to ensure that they find the title of the document intuitive.

Question 3

- 1.1.6 We do not agree that information on the accessibility of stations and rolling stock should be entirely removed from the passenger-facing document. Disabled people have told us that this information is crucial to enabling them to plan journeys, and they often do not know where to access it.

“What I would find helpful is if there was more information available about train stations, in terms of what assistance is available, but also what access is available.”

- 1.1.7 While disabled people we spoke to ahead of this submission did not mention DPPP leaflets specifically, they did identify the value of having information on station accessibility available in a hard format from stations. As such, at least basic information on station accessibility should be retained in the passenger facing document. We also know that disabled people are less likely to have access to the internet than non-disabled people⁴. Therefore, we would like to see station accessibility information in a physical document that can

⁴ Ofcom (2017) Internet Use and Attitudes 2017.

https://www.ofcom.org.uk/_data/assets/pdf_file/0018/105507/internet-use-attitudes-bulletin-2017.pdf

be spontaneously obtained at stations will ensure that all disabled people are able to easily access it.

- 1.1.8 Nonetheless, the current format that this information is provided in is excessively cumbersome and discourages its use. With the upcoming implementation of the Rail Vehicle Accessibility Regulations 2010 (RVAR), it will no longer be necessary to provide detailed information on the accessibility of rolling stock, as all rolling stock will meet minimum standards of accessibility.
- 1.1.9 However, the passenger facing document should retain information on step-free access and staffing levels at stations. This would represent a significant reduction in the amount of information to be communicated, while still meeting the key needs of many disabled people. Further information could be found online, or in the detailed DPPP policy document.

Recommendation: The DPPP passenger-facing document should contain information on step-free access to, and staffing levels of, stations operated by the TOC in question.

1.2 Involving disabled people

Question 4

- 1.2.1 While we welcome a new duty for TOCs to consult with local groups while writing their DPPPs, we recommend it be strengthened so that they have a duty to consult directly with a range of disabled people. Where they have not incorporated the feedback of these stakeholders, they should set out, alongside the submission of their DPPP, why they have not done so.

“I find a lot of these organisations say they will be consulting, they say they’ll take your comments on board and feedback. When it comes to the nitty-gritty, nothings actually done.”

- 1.2.2 This would ensure that a wide range of disabled people are involved in the consultation process, including those who might have less exposure to the railway system. The requirement to justify not including the recommendations that emerge from this consultation would also ensure that this is not simply a box-ticking exercise, but instead a meaningful process of refinement.

Recommendation: TOCs should be required to consult with disabled people when making changes to their DPPPs.

2. Reliability

2.1 Provision of information

- 2.1.1 Disabled people have told us that, too often, the information provided on the transport system is either too complex for them to understand, or turns out to be incorrect. While regular users of the rail network normally already have the information they need about those specific routes, there are significant difficulties when using unfamiliar routes.

“[You need to know the] accessibility of the stations – step free access and so on. Not just for planning journeys, you need to know on the day whether the lifts are working.”

Question 5

- 2.1.2 The use of 5 clearly delineated categories to classify stations by their accessibility is a positive one. This would remove much of the uncertainty that currently surrounds the accessibility of stations, with no consistency between different TOCs. It is also preferable to adopting a 3-banded approach. In cases such as these, it is important that passengers are given all the detail appropriate. The 3-band system discussed leaves a large degree of variability within each band, meaning that disabled passengers may still have to seek additional information. By contrast, the 5 banded system proposed minimises the number of occasions where this will be necessary.
- 2.1.3 The guidance provided in Appendix B is broadly appropriate. However, to ensure consistency across different aspects of the rail network, the maximum gradient for access ramps in Category B stations should be 1:12. This is consistent with the gradient set out in RVAR Part 1 Paragraph 1.5(i), whereby staff are obliged to provide support to wheelchair users where the ramp to board a train is above 8%⁵. This adjustment would make it clear that a Category B station is one in which all wheelchair users can expect to be able to access the platform independently.

Question 6 & 7

- 2.1.4 We agree that, at the point of booking assistance, station accessibility should be confirmed and communicated to the passenger. Passengers should also be told what action they can take, and what the provider will offer, should the accessibility of the station change between booking and the journey happening.
- 2.1.5 When developing best practice guidance, it is important that it does not solely focus on what the passenger can do to support rail staff. While this information is important, passengers need to be told exactly what the rail staff are expected to do at each stage, so that they are able to receive the service they are entitled to.

⁵ [Rail Vehicle Accessibility \(Non-Interoperable Rail System\) Regulations 2010](#)

2.2 Provision of assistance

Question 8

2.2.1 Failures of staff to communicate between different stations have been identified by disabled people as a key driver behind the failures of assistance on the rail network. Failure rates for assistance are notably higher at destination stations than departure stations, suggesting that the primary failure occurs in communication between stations⁶.

“I only travel by train if it is a really long journey or I have deadlines, because I have to expect not getting picked up by the support staff at either end so leave lots of extra time, usually about an hour.”

2.2.2 A new assistance handover protocol has the potential to improve this situation, provided that staff are properly trained to follow it. Without this, there is no guarantee that there will be a substantial improvement in the experience of disabled people.

2.2.3 It is also important that this protocol emphasises the need to call ahead as a default, with no action being taken only where staff are completely sure that it is not necessary. If the default is to not call ahead, then there is a chance that requests for assistance will continue to be miscommunicated.

Question 9

2.2.4 The proposal to have a dedicated line at all mainline stations for managing accessibility requirements is a welcome one. The provision of a single, accountable point of contact at each station should reduce the number of incomplete assistance bookings.

2.2.5 The development of a new app to facilitate passenger assistance is also welcome. However, it is important that the promotion of digital solutions does not lead to those disabled people without access to smartphones or the internet being disadvantaged. With only 1 in 3 disabled people using their mobile phones to access the internet⁷, it is important that a phone helpline for passenger assistance is maintained.

2.2.6 As well as providing assistance with bookings, this helpline could provide assistance to disabled passengers in the event of assistance not being booked. With the new contact line for each station, it should be possible for the central booking and help line to coordinate assistance where the new communications systems have not worked as intended.

⁶ Rail Delivery Group (2015a) On track for 2020? <https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469772981>

⁷ Ofcom (2017) Op. Cit.

3. Staff Training

- 3.1 We have been told that staff behaviour across the rail network is inconsistent and, in some cases, fails to meet the standards that are expected. This has been identified by disabled people that we have spoken to as a key area where they want to see improvements made.
- 3.2 Disabled people have also told us that there is often an unacceptable level of variation in staff behaviour between different operating companies. Customers should expect, and receive, the same high levels of service no matter where they are in the country. As such, customer service standards for disabled passengers and associated training need to be consistent across the system.

Question 10

- 3.3 We agree with the outlined areas for training of railway staff. In particular, it is positive that the proposed training will go beyond the legal duties on staff, and additionally cover the ways that staff can informally improve disabled passengers' experiences.
- 3.4 It is also positive that the proposed outline content recognises the crucial role that those with lived experience can play in delivering this training.
- 3.5 We recommend that the guidance be amended to make clear that disabled people should be involved in the development and design of training covered by this guidance. This will ensure that their lived experience is central to the training, and not be seen as an additional component, distinct from the bulk of the training. The priority for operators must be ensuring that disabled people are involved in designing and delivering training around interactions between staff and passengers, including communicating with disabled passengers and providing safe assistance.

Recommendation: Key elements of staff training should be designed and delivered with the involvement of disabled people.

- 3.6 For the benefits of the new training framework to be realised, it is important that it is being delivered consistently and to a high standard. This role remains important. We recommend that the ORR identify a body independent of the TOCs that can evaluate the training being delivered and, where necessary, make changes to the content or delivery to ensure it meets the standards outlined in the DPPP guidance. As an example, we have previously recommended that DPTAC should have a role in quality-assuring the training delivered by TOCs.

Recommendation: The ORR identify an independent body to evaluate and quality assure the disability equality training delivered by TOCs.

Question 11

- 3.7 Two years is sufficient time to fully roll out new programmes of staff training. However, TOCs should be encouraged to carry out new training programmes as soon as possible.
- 3.8 Refresher training within this two-year window should ideally cover all the elements discussed in the training framework. As no TOCs currently cover all of these, and staff may have received different training programmes that are no longer delivered, refresher courses between now and the rollout date of the updated DPPP guidance should be moving towards the new standard. This will minimise the gap between newly trained or refreshed staff and those who are awaiting refreshed training over the first two years of the new programme.

4. Passenger Awareness

- 4.1 Unprompted awareness of Disabled People's Protection Policies (DPPP's) is low among disabled people⁸, with many of those we spoke to unaware of not only the existence of these documents, but also many of the conditions contained within them. This led to disabled people either under-utilising the rail network, or feeling that it was less inclusive than it might be in reality.

Question 12

- 4.2 The proposals for the Rail Delivery Group (RDG) RDG would improve awareness of the Passenger Assist system, and should be implemented. We would also like to see individual TOCs take the lead in promoting the service.
- 4.3 TOCs should go further than suggested, and adopt a booking form that actively prompts all passengers to input whether or not they require assistance to travel. This would ensure that disabled people who are either not eligible for a Disabled Person's Railcard, or travel too infrequently to justify the purchase of one, are still reminded of available assistance at the point of booking.

Question 13

- 4.4 We welcome the requirement for TOCs to work with local groups to promote assistance services.
- 4.5 In particular, the requirement to engage with local service providers and charities presents an opportunity to engage with disabled people who may currently not

⁸ Office for Rail and Road (2017a) Research into passenger awareness of assisted travel services. http://orr.gov.uk/_data/assets/pdf_file/0008/25982/research-into-passenger-awareness-of-assisted-travel-services-april-2017.pdf

consider the railway network at all. This group should be considered a key target for any such outreach, as they are the group who potentially have the most to gain from understanding that assistance is available to them on the rail network.

Question 14

- 4.6 We welcome the proposals for more prescriptive website requirements, especially for meeting W3C standards.
- 4.7 On nomenclature, the current variability between TOCs when referring to Passenger Assist is a potential source of confusion. We support mandating a single phrase to be used across the industry. However, the ORR should work with RDG to test a number of potential names, before settling on what single term be used. While Passenger Assist is the formal name at the moment, it may be that there is another phrase – such as Travel Assistance – that better communicated the service on offer. By testing different names with disabled people, the most appropriate result can be reached.

5. New Requirements

5.1 Booking assistance

Questions 15 & 16

- 5.1.1 Disabled people have told us that the requirement to book assistance in advance represents a major obstacle to using the rail network as much as they would like. The current system requires individuals to set plans well in advance if they are to guarantee assistance, meaning that often other forms of transport are preferable where possible. As such, reducing this window of pre-booking assistance is a key improvement that must be made to make the rail network more inclusive.
- 5.1.2 Of the three proposed options, our preference would be to see a 2-hour notice period for booking assistance. While any of the proposals would be an improvement on the current system, this is the only one that would allow near-spontaneous travel for people who require assistance.
- 5.1.3 While phasing in improvements over time is understandable from the industry's perspective, it risks creating confusion for both passengers and staff over the amount of required notice. Instead, we would prefer to see the change implemented in a single step, which would also give time to clearly communicate the new process to staff and passengers in advance.

Recommendation: The notice period for booking assistance be reduced to 2 hours. This should happen in a single step, rather than implementing a phased change.

5.1.4 While a 2-hour window is a significant improvement over the current situation, it still does not represent an opportunity for disabled people to travel completely spontaneously. This is particularly the case on suburban or commuter lines, where the frequency of services mean that most non-disabled passengers don't need to decide precisely which service to use in advance.

“Sometimes you can plan in advance, but most of us don't know when we'll be finished at work or the cinema or whatever. It would be nice to have the option of living like everyone else and just turning up and going.”

5.1.5 It is welcome that this consultation proposes to maintain the current obligation on TOCs to provide turn-up-and-go assistance where reasonably practicable. However, disabled people we spoke to have limited knowledge of this, and feel that – without booking in advance – assistance is unlikely to be provided.

5.1.6 While this is largely not the case, there is a clear distinction between mainline trains and schemes such as that run by TfL, whereby all stations guarantee assistance without prior booking⁹. In the long term, we feel that this level of assistance should be the aim of the entire rail network.

5.1.7 We have previously recommended that the RDG work with TOCs to introduce trials of TfL-style 'turn up and go' schemes to other major transport corridors, with a view to expanding this to a nationwide scheme¹⁰.

5.1.8 Alongside this, a public awareness campaign will be needed to instil confidence amongst disabled passengers about the availability and consistency of support. Many disabled people know from experience that travelling spontaneously is often difficult on certain routes where it is meant to be offered, and as such will not attempt it without significant guarantees that the turn up and go system will work. This awareness raising should be supported by the ORR.

Recommendation: The ORR work with the RDG and TOCs to promote the existing 'turn up and go' schemes, and any expansions of these schemes to work towards expansion of these schemes across the whole network.

Question 17

5.1.9 Disabled people have told us that they are concerned about changes to operating models that reduce the number of staff working on train services. This is still true of disabled people who do not use booked assistance, as they feel that staff play

⁹ TfL. Help from staff. [Web page] <https://tfl.gov.uk/transport-accessibility/help-from-staff>

¹⁰ Scope (2017) ORR Improving Assisted Travel consultation response

an important role should their journey not go to plan. Improvements to protocols around staff communication and information provision can play an important role in reducing this concern.

- 5.1.10 Given this concern, it is welcome that TOCs will be required to consider the impact that any changes that they make to their operating model will have on disabled passengers. It is important that as part of this they engage with disabled people and their representative groups, to fully understand the impact that changes may have on a diverse range of disabled people.
- 5.1.11 Any substantial change in operating system will require an operator's DPPP to be updated to reflect these changes. As such, the process for confirming that they have mitigated the impact of the change should be the same as that for a revised DPPP. Given the nature of the changes, any change to operating system should trigger a full review and approval process.
- 5.1.12 This process should be completed prior to the implementation of any new system, to ensure that disabled passengers are not disadvantaged.

Recommendation: Where operators propose changes to their operating system, their DPPP should be updated, reviewed and approved by the ORR prior to the change taking place.

5.2 Redress mechanisms

Question 18

- 5.2.1 We support the proposals for mandatory redress arrangements where assistance is not provided.
- 5.2.2 Failure rates for pre-booked assistance remain high¹¹. While the steps outlined in this consultation should go some way to reducing the incidence of assistance not being provided, it cannot expect to eliminate it entirely. As such, redress mechanisms are key to ensuring that disabled people are not excessively disadvantaged.

¹¹ Office of Rail and Road (2017b) Research into passenger experiences of Passenger Assist http://orr.gov.uk/_data/assets/pdf_file/0009/25983/research-into-passenger-experiences-of-passenger-assist-november-2017.pdf

5.2.3 In addition to failures of pre-booked assistance, there are significant issues with the non-provision of spontaneous – or turn-up-and-go – assistance¹². This primarily occurs when assistance is provided at the departure station, but not at the destination. For these redress mechanisms to be effective, they must cover instances such as these, despite the lack of pre-booked assistance.

5.2.4 In addition to the routes outlined, the redress mechanism should be made clear along with the information sent to passengers as part of their confirmation. Where this is not done (for example, when assistance is booked over the phone) then passengers should be informed where to go for information at the point of booking.

“A lot of people don’t know how to get compensation. If a train’s late by so many minutes, there’s supposed to be a refund, but it’s hard to find the place you get compensation.”

5.2.5 Our view is that redress schemes should be as made as easy as possible for disabled passengers to navigate, and given the greater automation of Delay Repay, we would ultimately like to see redress and compensation for failed assistance made automatic.

5.3 Contacting TOC staff

Question 19

5.3.1 We support the proposal for all operators to accept calls made via text relay. Given the technology in this area is already available and widely used, there is no reason why this could not be implemented as soon as possible.

Question 21

5.3.2 All disabled passengers must have the ability to contact a member of staff to request assistance. However, a number of issues have been identified by disabled people, with help points often not being answered, or hold times being too long. If these proposals are to make a meaningful difference, then they must be accompanied by firm commitments from TOCs to reduce the time that disabled people are made to wait to get through to a member of staff who can provide assistance.

“A helpline would be brilliant, if it was manned.”

5.3.3 In addition to contact details being provided at stations, they should also be provided onboard trains. This would mean that disabled passengers can contact

¹² Office of Rail and Road (2017c) A mystery shop of turn-up-and-go services.

http://orr.gov.uk/_data/assets/pdf_file/0006/25980/a-mystery-shop-of-turn-up-and-go-services-report-november-2017.pdf

staff while on a service – for example, to ensure assistance is present at their destination station.

Question 22

5.3.4 We support this proposal.

5.3.5 Additionally, some users of mobility scooters have told us that they find it frustrating that each TOC issues their own scooter identification cards. A national, uniform system should be rolled out, whereby the same card can be used on all train services. This may require the card to contain more information, but would simplify the process from the point of view of the disabled passenger.

6. Good Practice

Question 24

6.1 The discussed examples of good practice all represent valuable innovations. In order to ensure that TOCs work to implement these and similar schemes, future franchise tenders should be amended to recognise the value of going above the ORR required levels of service for disabled passengers. This would mean that prospective TOCs have a clear incentive to committing to follow and implement best practice across their network.

Recommendation: Future franchise tenders be amended to recognise the value of TOCs following best practice, with bidders who commit to doing so having an improved chance of winning the contract.

7. Summary of consultation questions

Section	Question	Response
Updating the DPPP Guidance for Operators	<u>1</u>	Agree, with further recommendation
	<u>2</u>	Agree, with further recommendation
	<u>3</u>	Proposed modifications
	<u>4</u>	Agree, with further recommendation
Reliability	<u>5</u>	Agree, with further comments made
	<u>6</u>	Agree
	<u>7</u>	Agree
	<u>8</u>	Agree, with further comments made
	<u>9</u>	Agree, with further comments made
Staff training	<u>10</u>	Agree, with further recommendation
	<u>11</u>	Agree, with further comments made
Passenger awareness of assisted travel	<u>12</u>	Agree
	<u>13</u>	Agree
	<u>14</u>	Agree, further comments made
New requirements and updates in DPPP guidance	<u>15</u>	Agree, with further recommendation
	<u>16</u>	Agree, with further recommendation
	<u>17</u>	Agree, with further recommendation
	<u>18</u>	Agree
	<u>19</u>	Agree
	<u>20</u>	No response
	<u>21</u>	Agree, with further comments made
	<u>22</u>	Agree
	<u>23</u>	No response
Good practice	<u>24</u>	Comments made

For further information

[Redacted]

Policy and Campaigns Manager

[Redacted]

About Scope

We're Scope, the disability equality charity. We won't stop until we achieve a society where all disabled people enjoy equality and fairness. At home. At school. At work. In our communities.

We're a strong community of disabled and non-disabled people. We provide practical and emotional information and support when it's needed most. We use our collective power to change attitudes and end injustice.

We campaign relentlessly to create a fairer society. And we won't stop until we achieve a society where all disabled people enjoy equality and fairness.

Consumer Policy Team
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

18 January 2019

By Email

Response to The Office of Rail and Road Improving Assisted Travel – a consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP) dated 14 November 2018

ScotRail welcomes the opportunity to contribute to the Office of Rail and Road Improving Assisted Travel Consultation that was issued on 14 November 2018.

As part of our commitment to helping make Scotland more accessible for all and ensure everyone who travels with us has a secure, comfortable and enjoyable journey, we are focusing effort on the below areas as part of our plan for this year:

- Raising Passenger Awareness;
- The reliability of Assisted Travel provision; and
- Staff Training.

Our key to raising passenger awareness is the refreshing of our DPPP to enable a wide marketing and communication strategy involving issuing copies to a broader range of stakeholders including local councils, hospitals, universities, colleges, Citizen Advice Bureau, and tourist information offices.

Our response to the key areas of the consultation are as follows:

Question 1:

What are your views on replacing Disabled Person's Protection Policy with Inclusive Travel Policy or Accessible Travel Policy?

ScotRail are supportive of this change. It aligns with our customer and stakeholder feedback and our work on rewriting our DPPP in an easy to read, jargon free style. We believe that the use of the term Accessible Travel Policy would clearly identify the purpose of this policy and that this is a more appropriate term than Inclusive Travel Policy.

Question 2:

What are your views on our proposal to replace the current passenger-facing document Making Rail Accessible: helping older and disabled people with a more concise, passenger-friendly document as set out in the draft revised guidance?

- A) Is there anything you consider is missing from the required content?
B) Is this still a meaningful title for this leaflet?***

ScotRail are supportive of this move and this aligns with our customer and stakeholder feedback. It is important that a concise leaflet be issued to enable easy marketing of services to potential customers and direct them to where more detailed information is available. ScotRail customer and stakeholder feedback suggests that the station accessibility and train traction details should be contained in an easy to read table available on the website, with hard copies available for those who request it, as this data can change regularly.

ScotRail are currently working on producing such tables with an easy link direct to the further details available on the ScotRail and National Rail Enquiries websites.

A) Many of ScotRail's customers transfer between other services and it would be helpful for customers to have some guidance on this.

B) ScotRail believes that the title should be aligned to the proposed title of the DPPP ensuring consistency.

Question 3:

What are your views on requiring that stations and rolling stock accessibility information form part of the policy document rather than the passenger leaflet?

ScotRail is committed to providing customers with all information that they require to plan and make their journeys.

ScotRail manages over 350 stations across Scotland and as such accessibility information can regularly change. Producing data as part of the policy document and passenger leaflet is not we believe appropriate as it means that documents are regularly out of date and a customer may not realise that the version they have has been updated. We believe that it is more appropriate to have this information online in an easy to read tabular format and that links to the data available via both the ScotRail and National Rail Enquiries websites. If the data is online it is easy to update and direct customers to the newest version from social media and other forms of communication.

Question 4:

What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

ScotRail welcomes the proposed changes to the approval and review process and believe that the shorter timescale for the review process is a positive outcome. However, we believe that it would be more helpful if a timeline was produced showing the commitments on both the side of the operator and ORR.

ScotRail supports the approach that non-material changes should not require approval.

Question 5:

What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

ScotRail believes that consistency amongst all Train Operating Companies is essential in ensuring customers understand if they can travel without requiring assistance. Stakeholder feedback indicates that the proposed five categories are still more complex than they need to be.

It is essential to agree standard terminology for the UK rail industry for step free access. ScotRail's stakeholder feedback indicates that the classification should be kept as simple as possible to enable customers to understand easily if they can travel unassisted. This would mean a classification of say 3 categories: step free (to station and platform to platform), not step free (please book assistance) or partially step free (please speak with our assisted travel team to check your journey).

Station accessibility goes beyond just step free and should also cover the needs of all customers not just wheelchair users.

Question 6:

What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

The provision of accurate data on station accessibility is crucial in enabling customers to plan and make their journeys with confidence. As such, the priority must be to ensure that the information available to customers is accurate and easily obtainable. The current National Rail Enquiries system requires improvements to be made to it to ensure that the system is reliable. These changes must be made as a matter of priority to ensure that Train Operating Companies can easily update information for customers.

ScotRail supports the requirement for mandatory checks as set out in this consultation and agrees that the information available to booking agents must be accurate on the NRE website. This should coincide with the classification of stations above.

ScotRail believe that the new passenger assistance booking system being developed by the RDG should be created with the ability to check accessibility data as an integral part of the booking process.

Question 7:

What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

ScotRail support the suggestion that good practice guidance be provided about what to expect at stations and during journeys and the actions that customers can take to support rail staff who are delivering assistance.

Question 8:

What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

ScotRail supports the importance of the consistency and quality information however believes that the new passenger assistance system will address this issue.

Development of the new industry assistance system due to be rolled out in 2019 should address this issue without the need to develop an additional process.

Question 9:

What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

ScotRail supports the principal for communication between stations but believe that this should be reviewed in the light of the recent station telephone numbers issued by the Rail Delivery Group. In addition the development of the new passenger assistance system should be investigated to see if it can provide the solution rather than placing additional resourcing requirements for an assistance line.

Question 10:

What are your views on our training proposals? Do you agree with the proposed outline content?

ScotRail supports the key areas identified and that training should be designed in collaboration with subject matter experts. ScotRail currently employs this approach when developing and delivering its training.

Question 11:

Do you agree that

A) Operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?

B) The refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator.

A. Whilst ScotRail supports ensuring that training is always timely and up to date, any time restrictions should also take note of say changes in legislation. It is important that a variety of training methods are used to ensure that bite size modules are available so as and when updates are required that the training can be made available to all staff quickly.

Refresher training is important to ensure that staff maintain their skills and knowledge, however it is also important that this refresher training is integrated into the programme of other refresher training such as safety, first aid etc.

Consideration should be given to industry wide training being developed such as e-learning material that covers standard areas for the whole rail industry.

B. The immediate priority must be areas for each individual operator and any areas identified through customer feedback. ScotRail undertake annual mystery shopping for passenger assistance and use the findings from this to determine training needs.

Question 12:

What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

ScotRail supports the industry raising the profile of assisted travel to those customers who are not currently using the service but could do. It is important that passenger assistance marketing takes a new approach to ensure that we reach those customers who currently do not travel on the railway or do not visit rail websites. For instance marketing to GP surgeries, Citizens Advice Bureau, local and national radio.

ScotRail supports the proposals to promote assistance when issuing a Disabled Persons Railcard.

Question 13:

What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

ScotRail has a Stakeholder Equality Group which currently consists of representatives from 16 national disability groups. We believe strongly in engaging with our local communities and support the proposals within this consultation. ScotRail uses its stakeholder engagement to help inform and develop its services and processes for assisted travel.

Question 14:

What are your views on the proposal for more prescriptive website requirements?

ScotRail supports having accessible websites as a fundamental part of enabling customers to plan and make their journeys.

Question 15:

What are your views on the three options we have identified for reducing the notice period for booked assistance?

ScotRail supports the view that advanced notice period should be kept to a minimum and currently operates a 3 hour advance booking window for all ScotRail services. From 1st April 2019 this will reduce to 2 hours and then 1 hour by 1 April 2021.

Question 16:

Do you consider that any reduction should be phased in? If so, how might this be implemented?

Please see above.

Question 17:

What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

ScotRail have recently carried out an extensive review of passenger assistance on ScotRail operated services and are using this review to inform the business across services such as those that are operated with a ticket examiner and those operated with a conductor.

ScotRail believes that the new industry passenger assistance system should strengthen the reliability of assistance together with any enhancements to the data on National Rail Enquiries website.

Question 18:

What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

ScotRail believes that a fair and transparent system already exists. We handle all complaints on a case-by-case basis and this includes failed assistance complaints. Our current process involves investigation and potential compensation if appropriate.

ScotRail is committed to the new Ombudsman scheme introduced in 2018. We believe that any approach to redress should be agreed in line with the conditions of travel so that all operators and customers have clarity of obligations and commitments.

Question 19:

What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

ScotRail understands that Text Relay has been operating for many years and that there is no requirement to enforce this provision. ScotRail is now in the process of providing a signing service rather than just a text service to reflect up to date technology and customer expectations.

Question 20:

What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

ScotRail supports the concept behind this and strives to do all that it can do to influence replacement rail services. Consideration needs to be given though to the ability to ensure an accessible alternative provision in remote areas of the country.

There should be an industry approach with local authorities and those responsible for licensing taxis, private coach hire etc.

Question 21:

What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

ScotRail supports this proposal.

Question 22:

What are your views on our proposals for the carriage of scooters contained in the draft revised guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

ScotRail is committed to transporting customers using wheelchairs, scooters or mobility aids providing that they fall within the maximum sizes specified on our website and in our DPPP. We are unable to accept mobility aids that fall outwith these specifications as they cannot be safely transported on all routes. ScotRail therefore is unable to support the proposal to include a presumption of carriage. Scooters can already be carried on our services provided that they are within the specified size restrictions – for safety reasons.

ScotRail does not apply a scooter permit scheme. Full information on what the scooter constraints are is contained on ScotRail's website and also provided by our passenger assistance team.

The UK rail industry, via the RDG should communicate widely with scooter and other mobility aid manufactures and retailers to ensure that they are aware of size constraints.

Implementing a scooter card scheme requires further consideration in view of any resource implication for the train operators and to ensure consistency across the UK. ScotRail is open to working with the ORR on this matter.

Question 23:

What are your views on our proposals to clarify the guidance to ensure:

A) Passengers do not unknowingly purchase tickets they cannot make full use of; and

B) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required

A. ScotRail fully supports this proposal.

B. ScotRail supports the proposal to enable customers to have a choice before they travel where practicable.

Please contact me should you require any further information.

Yours sincerely,



Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]	
Job title*	[Redacted]	
Organisation	Scottish Accessible Transport Alliance (SCIO)	
Email*	[Redacted]	

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

Disabled Person’s Protection Policy is not easily understood and implies ‘fencing in’ or ‘keeping away from danger’.

It is also limited (and outdated given the ageing population) because it sounds relevant only to those individuals who self-identify as ‘disabled’, which many people who require assistance or support do not.

‘Inclusive Travel Policy’ is good, but ‘Accessible Travel Policy’ is clearer and is a more commonly used term (although it could imply that it is the policy document itself that is accessible rather than the end result of what the policy is there to do!).

The word ‘inclusive’ implies that the needs of everyone have been considered from the beginning, whereas ‘accessible’ implies that special considerations are made for those who need them.

In an ideal world it would be a **Policy for Inclusive & Accessible Travel**. .

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

50 pages is not a leaflet. It needs to be concise but indicate where more detail can be found. If it is aimed at those who did not know of the service or have not used it the 4 headings you propose are good.

The title 'making rail accessible' could become 'making rail travel accessible'.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Rolling stock information is of limited use to passengers in many cases. On many routes there are several classes of train sets in use, and station and booking staff don't know whether any particular train will be, for example, a 158 or a 170. On the other hand, station accessibility changes slowly. Even so, it's detail too complicated for a DL leaflet. Keep these to the policy document but make them available in an accessible and meaningful form for the end-user.

Proposals 2.30 & 2.31 meet requirements.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

The problem is not so much the length of time for consultation, but getting the information that consultation is to take place out to the relevant people. How do you propose to do this?

It is essential that the passenger document is ready and on display to the public in stations before the start of the franchise.

Point 2.33 – holding of accessibility information online and ensuring that it is always up-to-date. If being removed from the passenger leaflet then this information should be clearly available and signposted so it can be found by passengers without requiring a huge, time-consuming hunt. It should also be presented/displayed in a consistent way so passengers can become familiar with the layout.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

A 1:10 ramp is quite steep, especially if unlimited in length. Would suggest 1:12 should replace it.

Number of categories: A & E are clear and unambiguous. All in B-D need detailed amplification, so giving them different classifications doesn’t provide useful information.

The clearest classification is to have three categories only –

- (a) step free to all platforms,
- (b) some step free access and
- (c) no step free access.

However, step free access does not solve all accessibility problems. Step-free access is essential for those who use a chair full-time and for some with walking difficulties, but there are many other disabilities which affect access, in particular for those with visual impairments.

Also, in general, if the area around the station is inaccessible passengers may not be able to get to the station. Therefore, Network Rail needs to do whatever it can to make the areas leading to the station accessible, although this may involve seeking cooperation from third parties such as local councils.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Should be done, even when PA booking staff are familiar with the station.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

The suggestions made in 3.53 are obvious, but people don't always recognise them. Having a phone number to contact is good, especially if contact is not made at a large and busy station (or one run by a single person).

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Not sure I understand Fig 3.10. the reasons for handover failure are understandable, but the problem is a communication or human failure. The usual problem is a call failure.

Reliability (Chapter 3)

Q9. What is your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

A good proposal. In theory a dedicated assistance line is a good idea but not clear whether the public will be able to telephone this line or is it simply an internal telephone line for use by railway staff. Presumably the latter is intended?

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

There needs to be work done to make best practice into normal practice, and to make it universal.

It is desirable or maybe essential that disabled people are involved in the delivery of disability awareness training to assistance staff. Groups such as local Access Panels can have a role to play here.

Staff Training (Chapter 4)

Q11. Do you agree that:

- operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?
- the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

- a. Yes
- b. Either or both as circumstances dictate

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Given the large number of passengers who say they have never heard of these services, any means of spreading information about PA is welcome. Linking it with the Railcard seems obvious.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

ScotRail has been using 'Try-a-train' sessions for some time, but it is limited to stations with a spare platform for a few hours. Working with other groups and agencies is necessary.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

Despite the fact that not all have access to the web or can use it, it is the most widespread source of information. The point in 5.26 about consistent terminology is well-made. Navigation on the site needs to be simple, intuitive and as direct as possible.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

What needs to be considered is the SIZE of the stations involved. A medium-sized station can frequently offer assistance with no pre-booking. An unstaffed station or one with one-person operation where that person is also selling tickets cannot. Neither can a main-line station with hundreds of requests a day – where bookings have to be scheduled as well as the trains are. Option 2 would be one to aim for. 2-hour is never going to be practicable for all journeys.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Apps may be developed which could manage bookings more effectively.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

DOO should be deprecated. There should always be another member of staff on board.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Agree with plans. All passengers should in principle be entitled to compensation where an assistance failure has caused loss and inconvenience.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

You need to adapt to the technology - but not to get too far ahead of that used by your customers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

'Reasonable provision' will never be enough but may be the best we can expect. Bus substitution tends to use coaches because they can be easily available to hire, but service buses are more disabled-friendly. Outside big cities WAVs are difficult to find.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Satisfactory. But bear in mind that because many stations are unstaffed that the member of staff may be miles away from the passenger.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Keep weight/dimensions limits. Do not allow remaining on scooter while travelling – stability issues.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

Reasonable.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Thistle cards and similar are useful for giving "validity" to hidden disabilities.

Try to make train travel as stress free as possible for disabled passengers to encourage more disabled people to travel.

Q25. Do you have any other comments or views on improving Assisted Travel?

Thank you for taking the time to respond.

Improving Assisted Travel

January 2019

A response from the national disability charity Sense

About Sense

Sense is a national disability charity that supports people with complex disabilities to be understood, connected and valued. Sense supports children, young people and adults in their home and in the community. Sense campaigns passionately for the rights of the people it serves, and offers practical help and support to families and carers, including information and advice, short breaks and family events.

Introduction

Sense welcomes the opportunity to respond to this consultation. The rail network plays a crucial role in enabling many disabled people to participate fully in society. However, many people with complex disabilities face barriers to using the rail network. These can range from lack of information about the accessibility of a train station to unreliable assistance which can reduce confidence in the system. These barriers can have a seriously detrimental effect on a person's quality of life and, in some cases, can lead to social isolation and loneliness.

As a founder member of the Jo Cox Commission on Loneliness, Sense brought together a number of charities to collectively highlight the issue of loneliness amongst disabled people. In our report 'Someone Cares if I'm not there'¹ we found that many of the barriers

¹ <https://www.sense.org.uk/support-us/campaign/loneliness/>



to disabled people forming social connections were practical ones, for example, the need for accessible transport and buildings.

We are pleased that the Office for Rail and Road are conducting this consultation looking in to improvements which can be made to the guidance issued to station operators when producing their Disabled People's Protection Policy (DPPP).

Updating the Disabled People's Protection Policy (DPPP) guidance for operators

Sense agrees that the guidance for rail operators DPPPs needs updating to reflect the many changes in legislation, passenger expectations and technology since the last guidance was issued in 2009.

From 'Protection' to 'Accessible and Inclusive'

Sense supports the ORR's proposal to amend the licence condition for operators so that policies focus more on 'inclusive travel' to better align with the UK government's recent Inclusive Transport Strategy, as well as acknowledging the changes to language and principles since the previous guidance was issued.

Restructuring and revising the DPPP guidance

The proposal to split the guidance in to two documents, the passenger facing leaflet and the more detailed policy document, is one which Sense would support.

Passenger Leaflet

It is vital that disabled travellers can book the assistance they need with an expectation that it will be delivered. Giving passengers clear information about what is available and how to book it is key. We would support a more concise, customer friendly and accessible



leaflet. The proposed structure and content outlined in the consultation should deliver this. It is important that the leaflet is available in as many accessible formats as possible including Braille, large print, British Sign Language (BSL), and easy read formats, as well as online for people using assistive technologies such as screen readers. This leaflet can help strengthen consistency of the passenger experience across the network, alongside other changes proposed.

Policy Document

Sense agrees with ORR's proposal that information about station and rolling stock accessibility should form part of the policy document rather than the customer facing leaflet. However, it is important that this information is well sign-posted so that customers wishing to access this specific information are able to do so quickly and in their preferred format.

Approvals and Review Process

Involving disabled people and the organisations which support them is vital when developing and producing services. We would therefore strongly support the ORR's proposal to require licence operators to demonstrate how they have engaged with disabled people when producing their plans. This engagement needs to be with as wide a range of disabled people and groups as possible, including those with hidden disabilities, to ensure as wide a range of different views and experiences inform production of operators' plans.

Reliability

Sense agrees with the ORR that more needs to be done to improve overall reliability of the assistance offered to passengers requiring additional support when making their journeys. The three key areas of the customer experience that have been identified where immediate improvements to reliability can be made are well thought through.



Accessible journey planning

Sense agree with concerns that information around the accessibility of stations and assistance held online by National Rail Enquiries (NRE) is often inaccurate and inconsistent across the network. This can lead to assistance being booked that cannot be delivered. These mistakes are frustrating and distressing for passengers and can undermine confidence in the Passenger Assist service.

Step-free access is important for many of the people Sense supports. ORR has identified issues with the information about step-free access that is uploaded to the NRE website and we would agree that a more consistent approach to how this information is recorded is urgently necessary. Having considered both proposals offered in the consultation for how stations will be expected to categorise their level of step-free access, Sense does not have a definitive view on which of these proposals would be most suitable. Whichever option is chosen however, it is vital that this information is kept up-to-date. For people to have confidence in such a system, it is important that how stations are recording this information is reviewed to ensure adherence to the categories—these reviews should involve disabled people and the organisations that support them. Similarly, where a passenger feels that the information that has been recorded is inaccurate, there needs to be a clear and accessible way of reporting this so that it can be investigated.

Booking assistance

Sense agrees with the consultation proposal that it should be mandatory for booking agents to check the accessibility fields on the NRE website. This should help to provide peace of mind to passengers when making a booking that measures are in place to ensure their journey runs smoothly. However, this is based on the assumption that stations and rail operators keep such information up-to-date and accurate as outlined above. The accessibility information available to booking agents will only be as accurate as the information posted by stations on the NRE website.



Sense also welcomes the proposed development of best practice guidance to inform passengers of what to expect during their journeys, and actions that they can take to help staff who are delivering the assistance. We also agree that this guidance should be added to the train operator's DPPP. We would also recommend having the assistance guidance as a separate document that can be requested by passengers in alternative formats, for example, at the time of booking or copies made available at stations which could be provided upon request.

At the station

Ensuring that assistance provided runs smoothly and in a consistent manner is of vital importance to passengers. The variations in practices outlined in this consultation are worrying and we would therefore support the proposal to develop an assistance handover protocol for use across all stations. This will not only improve the reliability of information communicated between stations but will provide reassurance to passengers that there are robust systems in place. We also welcome the introduction of a dedicated assistance line to ensure that staff can always communicate quickly and efficiently with other stations to inform them of passengers heading their way who require assistance. Having an accountable individual responsible for the assistance line at each station should help to ensure that messages about a passenger's assistance needs are quickly and efficiently passed on and will offer increased transparency. It is vital that, where a booking has not run as it should, the passenger is updated as to what went wrong and what lessons will be learnt.

Staff training

As with any public facing role, staff training is key to ensuring the customer gets the best possible service. Where specific and often specialised assistance is required, such as that provided to passengers needing assistance to travel by rail, appropriate training is all the more important. Sense is very concerned at the evidence presented in this chapter as to



the current inconsistencies in the amount of disability awareness training provided to staff. Sense agrees with the proposal to develop a consistent approach to the delivery of staff training, focusing on 10 key areas that must be covered. However, we would recommend that more emphasis is placed on practical knowledge such as how to guide a visually impaired person as our anecdotal evidence suggests that not all staff appear to be confident in doing this. This is an area where disabled people themselves can, and should, support the delivery of training. We therefore welcome the ORR proposal that disabled people should be involved in the delivery of staff training. Sense agrees that allowing rail operators no more than 2 years to update and revise their training packages and deliver refresher training to all staff is a reasonable timeframe. It is important that ORR rigorously monitor adherence to this to ensure full compliance.

Passenger Awareness of Assisted Travel

Ensuring that people know about the passenger assist scheme is crucial, and Sense fully endorses ORR's view that more should be done to promote the service, particularly to potential passengers who rarely use the railways. With increased demand put on to the Passenger Assist scheme, it is important that rail operators also provide adequate resources to ensure that demand can be met. It is likely that an increase in awareness will lead to an increase in uptake of the scheme and so we agree with the ORR's acknowledgement that this needs to run alongside the improvements to reliability and staff training discussed earlier.

The Rail Delivery Group (RDG) is developing a Passenger Assist app and, while we fully support the development of this app and believe it will help to raise awareness of what assistance is available and make it easier for many people to arrange it, it is vital that the app doesn't replace existing methods of booking assistance to ensure that those who are unable, or choose not to use technology, can still benefit fully from Passenger Assist.



The Disabled Persons Railcard scheme can also offer an opportunity to promote Passenger Assist and we agree this avenue should be utilised more than it currently is. The suggestion of including a leaflet promoting Passenger Assist when a Railcard is issued is a good starting point but we feel that this leaflet needs to be available in alternative formats. We therefore recommend that, when ordering a Disabled Persons Railcard, customers should be asked which format the customer would like such a leaflet in. This feeds in to a wider view that communication with the customer should be improved across the board. The proposed Passenger Assist app will help with this but, as previously noted, the app will not be suitable for all passengers.

We also agree that operators need to engage with local authorities and local access groups to promote the passenger assist scheme. The requirement that operators will need to work with groups of people who use Passenger Assist to receive feedback is also welcome.

Finally, Sense supports the ORR's suggested recommendation to ensure uniformity of language across Operators websites when describing the Passenger Assist scheme. The current variations across the sector are confusing and unhelpful. We also support the proposals for monitoring of operators websites to ensure that they are meeting Web Content Accessibility guidelines (WCAG).² We think that, as a minimum, rail operators should be expected to meet level AA conformance to these standards.

² Web Content Accessibility Guidelines (WCAG) are a series of guidelines for improving web accessibility. Produced by the World Wide Web Consortium (W3C), the WCAG offer an internationally recognised set of standards for making a website accessible.

<http://www.w3.org/WAI/standards-guidelines/wcag/#intro>



New requirements and updates in DPPP Guidance

Reducing the notice period for booking assistance

The ability to travel as spontaneously as possible is something many people take for granted, but the current need to book assistance in advance for passengers needing additional support, often up to 24 hours before travel, can take this choice away from disabled people. Sense are pleased that the ORR have put forward proposals to reduce the notice period needed for someone booking assistance. The current system where rail operators have a range of different notice periods in place adds an additional and unhelpful layer of complexity to the process and making any changes uniform across the network is welcome.

Sense has considered the 3 options for reducing the notice period proposed by the ORR. In the long-term, Sense would like to get to a position where as little notice period as possible is needed and so we would support option 3 wherein a 2 hour notice period is required. We have seen however how operators like Transport for London have put in place a 'Turn Up and Go' service and so other operators should be working hard to reduce notice periods even beyond the 2 hours proposed. Given the substantial changes needed to staffing and infrastructure to deliver the reductions, ORR's suggestion of a phased in approach starting with option 1 (booking by 10 PM the night before travel) leading to the 2 hours' notice period proposed in option 3 represents a sensible course of action. That said it is important that such a phased approach has clear timelines in place to ensure that operators are working towards meeting their obligations and rigorous monitoring of their progress towards this is essential. Another benefit of having a clear timeline in place is that it will provide clarity for passengers as to what they can expect from the service.



Providing Redress

Where assistance booked is not fully delivered, it is important that the passenger concerned can seek redress. Sense welcomes ORR's proposal to make it mandatory for train operators to offer financial redress in instances where assistance booked is not provided. While we understand ORR's wish to offer train operators flexibility in setting the levels of redress, there is a concern that operators may seek to use this flexibility to limit what is offered to passengers. It is vital that ORR monitors this requirement to ensure it is being used in the way intended. Wider promotion of the provision of redress to passengers and how to claim it is welcome. As previously stated, it is important that when a passenger fails to receive the assistance booked, lessons are learnt from this failure and, where possible, the passenger is provided with information as to why this happened and how steps will be taken to ensure such a situation does not occur again.

Text Relay

With advances in technology, it is right to amend the guidance to ensure that people using the Next Generation Text Relay (NGT) service can contact rail operators as proposed in the consultation. We would also recommend investigating other forms of digital communications, such as online live text chat as the NGT system is not fully accessible to people with certain disabilities, for example a deafblind person.

Accessible substitute transport and alternative accessible transport

In situations where someone is unable to undertake all or part of their journey by rail it is vital that alternatives used are accessible and that drivers have undergone the relevant disability awareness training. While we accept that, in rural areas, the provision of accessible taxis can be challenging in terms of their availability, we welcome ORR's proposal to expect train operators to work with third parties to improve the accessibility of alternative transport. For example, in situations where it is known in advance that there will be disruption caused to rail travel due to engineering works or similar, it is not



unreasonable to expect rail operators to have factored in the need for any rail replacement service to be accessible. The good practice example cited in this chapter demonstrates that this is possible and should be the norm across the network.

Providing passengers with confidence to travel

Ability for passengers to contact staff

Sense would welcome the proposal to ensure that, at every station, information is provided detailing how passengers can contact a member of staff to obtain assistance. However, the proposal does not make any mention of providing this information online which will mean that many visually impaired people will be unlikely to be able to access it. A list of stations and contact information could easily be provided on the operator's website.

Providing train accessibility information in advance

Providing passengers with timely and accurate information about on-board accessibility and issues such as disabled toilets being out of order is important to enable disabled people to travel with confidence and dignity. Sense agrees with the ORR that rail operators should be required to consider how they will inform passengers of a reduction in the accessibility of train facilities such as disabled toilets so that, if they choose, passengers can make alternative travel arrangements. Technology, such as the RDG Passenger Assist app should help in this regard, but, as previously mentioned, not all disabled people will use the app and so consideration needs to be given to alternative forms of communicating this information.

Similarly, we agree that steps should be taken to ensure that passengers are unable to purchase advanced tickets which they will not be able to use due to lack of accessibility of the train they wish to travel on.



Conclusions

Sense welcomes the proposals set out in this consultation and look forward to seeing clear and tangible improvements to the experience of disabled people using the Passenger Assist service.

For more information, please contact Steven Morris (Policy and Campaigns Officer)
[Redacted]

Shaw Trust Response to ORR Consultation on Assisted Rail Travel

25 January 2019

About Shaw Trust

Shaw Trust is a charity with the ambition to transform the lives of one million young people and adults each year. Our 4,000 staff and 1,000 volunteers work across the UK and internationally, supporting people to develop their potential and live independently. Our specialist services help people gain an education, enter work, develop their career, improve their wellbeing or rebuild their lives. As a charity we add value to every service we deliver by investing back into the people and communities we support. Shaw Trust is one of the largest charities in the UK. Comprising Shaw Trust, Prospects, Ixion and Shaw Education Trust, we use our 75 years' combined experience to support people to achieve their goals.

In 2014 Shaw Trust merged with the Disabled Living Foundation (DLF) which provides impartial advice, equipment and training on assistive technology to enable which enables people to live independently. DLF also runs the Youreable website, supporting 60,000 disabled service users a year with advice on benefits, travel and health. In this submission we have included results from a survey completed by users of the DLF's *Youreable* forum.

Summary and recommendations

- We very much **welcome this latest set of proposals** set out by the ORR, clearly showing they are carefully listening to feedback. It is vital that these latest set of proposals are delivered in a joined up way throughout the rail industry. This requires effective implementation and monitoring processes and good communication;
- The case study (experienced by a Shaw Trust employee who has fed in extensively into this consultation process) set out in this response, and our survey feedback, suggest that these **effective implementation and monitoring processes and good communication channels are not currently in place meaning that current passenger assistance requirements are not being met**;
- **Passenger information** must use language (e.g. by using 'Crystal Clear' plain language standard), and a range, structure, design, formats (e.g. BSL) and delivery platforms (e.g. hard copy as well as digital) to **clearly and effectively provide all passengers that require assistance with the best possible chance of finding, understanding and using accessibility provisions and Assisted Travel information, contacts and services** they need to travel in the same way as all other passengers on the rail network. **A number of survey respondents emphasised the need for fully accessible real time travel information** (e.g. audio and text announcements for those with sensory impairments) for passengers (e.g. for delays, cancellations, service changes and platform alterations);
- Shaw Trust has **concerns about ORR's definition of 'Useable' under Category B-D stations**. We would suggest that whether access is usable or not depends on a passenger's disability/access needs, and **not all passengers will be able to use what is categorised as step free access at category B-D stations**. We would suggest to the ORR that **detailed information will need to be provided**. A number of respondents **challenged the concept of categorisation of stations, saying they**

should all be fully accessible. Step free access between platforms and trains and the use of **symbols on passenger information** were also emphasised by our survey respondents;

- The inclusion of accessible toilets within the ORR's proposed station specification is welcome. We are calling for this information to include an **indication of where *Changing Places* toilets are available at stations** (offering enhanced accessibility and changing facilities for disabled children);
- We welcome the commitment to staff training, and we are calling for it to be based on the social model of disability. Our survey responses show that **disabled passengers often experience poor attitudes and discrimination** when travelling on the rail network. Very worryingly, one survey respondent who is a wheelchair user observed that station staff **do not want to provide required assistance to trains; "I hate travelling"** they said;
- Shaw Trust is suggesting **stage by stage, time bound plans to deliver all the proposed assistance booking time frames**, from largest to smallest, of two hours before travel. It is vital to make sure that this standard is not introduced before it is deliverable;
- Shaw Trust supports the ORR's proposals for operators to promote existing redress policies, and introduce and promote a scheme to provide passengers appropriate redress when they do not receive the assistance that they have booked.

Compensation requirements on the rail industry should reflect the seriousness of consequences of travel disruption for disabled passengers.

Introduction

While a number of accessibility strategies have been developed for public transport, particularly rail, Shaw Trust's research shows that much more needs to be done to ensure the systems are accessible and inclusive for disabled people.

Over the past fifteen years, the Department for Transport (DfT) (via DPTAC) has produced several Accessibility Actions Plans. Both in 2002 and 2017, the DfT found that transport issues are the single most prominent concern for disabled people at local level. Despite this, in both 2002 and 2017, disabled people still made a third fewer journeys than non-disabled people.¹

We very much welcome the latest set of proposals set out by the ORR, which clearly shows that they are carefully listening to the feedback they have received from disabled passengers and their representative groups.

However, it is vital that this latest set of proposals are delivered in a joined up way throughout the rail industry. First and foremost, this requires effective implementation and monitoring processes and good communication, particularly between Network Rail and the train operating company staff and systems.

Poor co-ordination and communications too often means rail accessibility systems and staff completely fail to meet the needs of disabled passengers, and meet their obligations under the existing Passenger Assist and 'Turn Up and Go' schemes, and Disabled People Protections Policies. Below is just one case study of this; the severe journey disruption

¹ *Attitudes of Disabled People to Public Transport*, DPTAC, 2002

experienced by Shaw Trust's Disability Advocacy Adviser on a journey to a meeting in Parliament from Bristol.

Case study

Below is an account of the severe travel disruption faced by Shaw Trust's Disability Advocacy Adviser (who has fed in extensively into this and previous ORR and DfT consultation processes on accessible rail) on a rail journey from Bristol to London, in November last year. This was caused by an inaccessible platform, and was greatly

Arrived at Paddington yesterday to find the ramp to get me out of the carriage too close to a wall, leaving my wheelchair no room to get off the ramp on to the platform. Nowhere near an accessible and inclusive world yet! #Accessibility #WeNeedChange



exacerbated by poor procedures and communications between station and train staff.

“On 20th November, I boarded a train from Swindon to Paddington. When the train pulled in to Paddington at approximately 15:15 hours, the carriage I was in was situated opposite a wall. The assistance team had not arrived to alight me from the train and therefore the Train Manager assisted with the ramp. When he placed the ramp from the carriage onto the platform there was not

enough room for my wheelchair to turn off of the ramp. The train was due to go back to the depot and all passengers and the driver had left the train. A number of rail staff and a member from the assistance team arrived at this point and suggested that I try and alight from the train with the ramp in position adjacent to the wall. This was completely unsuccessful because the front wheels of my wheelchair were at the bottom of the ramp, with no room to manoeuvre to turn on to the platform. I then needed to reverse my wheelchair up the ramp to get back into the carriage. This then placed me in an extremely dangerous situation because the back wheels of my wheelchair went off the side of the ramp. It was only due to the quick thinking and awareness of my Personal Assistant that prevented me falling off the ramp and potentially ending up being stuck or falling between the train and the platform. The only option was to move the train forward so that the ramp was not up against the wall. As you can imagine at Paddington this was not an easy solution because they had to lock down the train with me and my personal assistant in it for the train to be moved. They also had to try and locate another driver to move the train. As a result of the above incident I was over half an hour late for a meeting that I was due to attend in Westminster”.

Responses to consultation questions

Question One: Views on proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

We know from our discussions with the ORR, and these consultation proposals, that they are well aware of, and committed to, the need to make their passenger information leaflet fully accessible to a range of audiences. This is achieved by using language, structure, design, formats and platforms to clearly and effectively provide all passengers that require assistance with the best possible chance of finding, understanding and using accessibility provisions and Assisted Travel information and the contacts and services they need to travel in the same way as other passengers on the rail network.

To ensure accessibility, it is vital that the leaflet’s design and content adheres to accessibility principles across all versions, such as the ‘Crystal Clear Mark’ accreditation for plain English, large print and clear colour contrast. The leaflet should also be made available in a range of formats, such as easy read, and it should be made sure that the content is available through a range of delivery platforms, such as digital and audio visual formats (e.g. to provide a British Sign language interpreted and audio described versions) and print, including extra-large print for those with visual impairments.

Survey responses

These issues were highlighted by respondents to our ‘*Youreable*’ survey with one respondent saying leaflet accessibility and availability was paramount, while two other respondents called for plain English and easy read versions for people with learning difficulties.

A number of respondents raised the accessibility of live travel information, particularly information on delays, cancellations, service changes and platform alterations, for those with sensory impairments; *“All information should be shown and heard all the time. For specific information, people should be able to access information intelligence screens.”*

Question Five: Views on the wording of the station classifications

Shaw Trust has concerns about ORR’s definition of ‘Useable’ under Category B-D stations. We would suggest that whether access is usable or not depends on a passenger’s disability/access needs, and not all passengers will be able to use what is categorised as step free access at category B-D stations. We would suggest to the ORR that detailed information will need to be provided for disabled passengers wanting to use category B-D stations. In particular, this should be enhanced to include the availability of communications for people with sensory impairments for example; induction loops and real-time information through both clear audio announcements (for those with visual impairments) and text information (for those who are deaf or hard of hearing), as well as good signage and lighting on access routes. Ramp and path gradient information should also be provided, for example, 1:12 for independent use.²

² This complies with UK current building regulations (Part M).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441786/BR_PDF_AD_M2_2015.pdf

Survey responses

One respondent said that station classifications beyond Category A make little sense to a wheelchair user. Also, passenger information does not set out which platforms trains are travelling to and from, and whether these platforms and the stations more generally, are accessible to wheelchairs and other disabled passengers.

This point about the need for station 'usability' and 'step free access' to cover multiple disabilities and needs was raised by one respondent to our 'Youreable' survey - *"Mobility isn't just about wheelchairs; supply useful info for people with a variety of mobility problems"*. They suggested other disabilities/health conditions that should be covered by station accessibility information, and the symbols for doing so;

"You could use symbols (which you'd have to explain, obviously): - A wheelchair; A person with chronic pain (there's a symbol out there on the web somewhere) or fatigue, or a cane (for people who can walk short distances, or do a few stairs, but would have trouble with longer distances or many stairs). Then you could just put: (Wheelchair symbol) Step free access to all platforms or (Wheelchair) Step free access to some platforms or (Person with pain symbol) Number of stairs to other platforms (I have chronic pain which gets worse with activity. On a good day, I can do a few stairs (6? 8?) and it only increases my pain a bit. If I were to try to climb/descend 60 stairs, however, there'd be a lot of tramadol involved. Knowing how many stairs there are would be really useful!)."

Other survey respondents also recommended the use of disability symbols to explain the disabilities and the level of station accessibility; *"I'm a wheelchair user. Words like Suboptimal mean nothing to me. Why don't they use a 'key' pictogram illustration like the symbol in disabled parking bays"*? Another reiterated this point about language and symbols, calling for plain, clear, understandable English rather than terms such as *"step free to new-build standards"*, *"usable"* and *"suboptimal"*, and the use of basic definitions of disability and conditions to be conveyed by recognised symbols in passenger station access information.

A number of respondents also asked what the extent of 'step-free access' is, particularly the vital need for step free access on and off trains; *"The train must be step free or the entire process is invalid"*. Another respondent said *"All train wagons must be more accessible than all laws and norms, all access must be at floor level, with colours that are helpful for vision impairment. All information must be simple to understand to all."*

One survey respondent asked whether step free access *"means a wheelchair can get around the station/to the exit independently, or would require help from staff; e.g. at one station near me you have to find a member of staff to access a freight lift and accompany you in it"*. Another respondent said *"It'd be very useful to know if a wheelchair/scooter could get on/off the train independently or would need a staff member to bring a ramp."*

Question Five (cont). Additional views on station accessibility information/classifications that should be contained within the guidance?

One of our survey respondents raised the issue of whether toilets are available at the station (see survey responses below). We note that the ORR is proposing to provide information on accessible toilets when these are known to be out of service. In this context, we note a recent DfT announcement about the introduction of *Changing Places* toilets at motorway

service stations. These toilets offer a much higher level of accessibility, and changing facilities for disabled children.

We would suggest that more *Changing Places* toilets should be introduced at rail stations, building on the DfT's very welcome investment of £2 million for Changing Places toilets in service stations.³ Station accessibility information should include information on whether accessible toilets are available, and they should be classified, according to their level of accessibility, including an indication of whether *Changing Places* toilets are available.

Survey responses

Two respondents challenged the whole concept of categorising stations, saying that all stations should be genuinely accessible to all disabled people.

One respondent raised the issue of station guidance covering whether toilets are available at stations, and if so, on which platform? Also, the respondent says accessibility information for stations should include whether cafes/waiting rooms are accessible to wheelchairs.

Another respondent set out a list of accessibility features that stations should have and which should be set out to passengers; *"Ramps, automatic doors, lifts with Braille buttons, induction loops at counter, lowered counters for wheelchair users. Accessible signage. Level access into train where possible. Contrasting colours on signs."*

Very worryingly, a wheelchair user highlighted the absence of passenger assistance (in complete violation of the requirements on the rail industry), and the paramount importance of willing, timely assistance accompanied by good passenger information and signage;

"Most stations leave you stranded, even if you've booked assistance and asked to be taken from the travel information centre (if they even have one) to the train they aren't willing. It's often of long distance, I am in a manual wheelchair and it's exhausting and they don't release the platform information in time and I panic and then no one is even there to meet you anyway! Made worse by its never clear where the lifts etc are, hardly any stations are accessible. I hate travelling"

Question Eight: Views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

To enable easy booking of assistance ahead of travel, it is vital that any Passenger Assist helpline is unified and joined up across train companies and Network Rail, and facilitates smooth handovers of passenger support between Network Rail and train company staff. We very much welcome the ORR's proposal to include text and video relay services on the helpline.

We also welcome the development of a Passenger Assist App. As with the passenger leaflet information, it is vital that it is fully accessible to disabled people, and usable on a range of ICT platforms and devices.

Question Ten: Views on our staff training proposals? Do you agree with the proposed content?

³ www.changing-places.org/news/%C2%A32_million_for_changing_places_toilets_.aspx

One respondent emphasised the need for wide ranging disability training for rail staff (see survey response section below). Shaw Trust welcomes the commitment to training and regular refresher courses. We call on the ORR to make sure this training is grounded in the social model of disability which is favoured by disabled people, the UK Government and their representative groups (i.e. 'what makes someone disabled is not their medical condition, but the attitudes and structures of society').

Survey responses

One respondent strongly emphasised the need to give all staff training on disability, covering the full range of disabilities and health conditions, including hidden disabilities and conditions such as mental health, and associated accessibility needs and adjustments. The respondent also particularly raises the need for the disability and equality awareness training to address and challenge prejudice and poor attitudes amongst staff.

Another respondent suggested the access specifications for the Tokyo Paralympics in 2020 as an example of best practice.

Question Fifteen: Views on reducing the notice that passengers need to give to book assistance?

Shaw Trust is suggesting that operators produce a stage by stage, time bound plan to deliver all the proposed assistance booking time frames, from largest (10pm the night before travel) to smallest, of two hours before travel.

We very much welcome the proposal to provide the maximum possible flexibility to passengers that require assistance by enabling them to book it two hours before travel. However, it is vital to make sure that this standard is not introduced before it is deliverable, so that passengers' service expectations are not raised before this level of service (and the systems and structures need to support it) is consistently deliverable to passengers.

Question Eighteen: Views on mandatory redress arrangements for assistance failure?

Shaw Trust supports the ORR's proposals for operators to promote existing redress policies, and introduce and promote a scheme to provide passengers with support when they do not receive the assistance that they have booked. This proposal is welcome if it takes into account the implications and consequences of disabled passenger journey disruption on cancelled plans and appointments and unmet commitments (these can often be very serious, for example, in relation to caring responsibilities, professional commitments and health related appointments). The compensation requirements on the rail industry should reflect the seriousness of the consequences of travel disruption.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People's Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	N/A
Organisation	Sheffield Transport 4 All
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

Accessible Travel/Transport policy is preferred by us as a group as it firmly focuses on the group aimed at for all of the adjustments made whilst making the necessary improvement to use enabling language.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

We are happy with the title suggested for this document to remain the same and the approach taken apart from any observations in the following questions.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Considering the two areas of information listed. An understanding of the rate of change of this information should impact this decision. Where operator have a simple rolling stock fleet the accessibility facilities can reasonably be included in the passenger leaflet. This can form key information for whether a journey is possible. Therefore, where it is reliable and consistent it should be easily available in the passenger booklet. This however might not be practical for some operators with complex fleets and guidance should give operators discretion in this area.

Station accessibility features are much more likely to change and can be vast for some operators. For this reason it should not be required as part of the passenger leaflet and the information is most appropriately included in the policy document.. Operators might choose to duplicate this information for principle stations which are used by a large number of passengers and where hours and facilities are unlikely to change. This can maximise the convenience to passengers for the document without needing a copy of the more detailed policy document..

All policy information must be provided electronically including in downloadable form for offline use. This must be available in other formats as requested. It should be possible for passengers to 'subscribe' to receive updates in their requested formats when major changes are made e.g. quarterly or annual updates.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We are pleased to see the inclusion of disabled people in more of this process.

It is important to note that certain larger operators may not be reaching out to enough local disability transport groups and missing out on getting pro-active input on issues and changes. In particular changes to CrossCounty accessibility impacts a vast network and our group has had no direct contact or consultation previously, yet decisions made can have a profound

impact on long distance connectivity for our members. We would like the guidance to reinforce the need for operators covering a larger network to acknowledge the wide impact they have on the ability of disabled people to travel.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The rating system seems reasonable but may need review after it's initial use. It would be helpful to clarify or emphasise how infrequently used platforms for engineering or disruption purposes. For example, consider Bletchley station where one platform is not accessible by lift but signallers may route the Bedford service to that platform. This should be marked as a low category station for this reason. This might not be appropriate for other stations such as Streatham where some platforms are locked out of use normally, and only used for engineering where a separate accessibility assessment and service alert might be more helpful for passengers and booking agents.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

We thoroughly support the mandatory checks. Many passengers might wish for a quick call-time however, and so the ability for these checks to be automated or carried out later would be helpful. It seems odd that service alerts are not a mandatory check. Additionally, the knowledge base needs to take account of planned facility unavailability e.g. lifts out for servicing and notify this according to the T-12 standard if booking checks are to be guaranteed as effective. This target should be explicitly stated in the guidance for planned facility unavailability. Where facilities are planned to be unavailable, or in the case of breakdown a process for checking all bookings for that station should be in place to notify and adjust the booking for passengers as required.

In order to facilitate an unobtrusive booking process for regular disabled travellers we feel that being able to book by e-mail with each operator to allow quick communication and Operators time to perform the checks without taking excessive passenger time.

The benefits of automation might highlight where staff will finish within an hour of the booked time (and so inform the passenger there is a risk of alterations being required on the day if

there is disruption). Manual checks to meet a passenger's physical access requirements should be required at the booking stage and are likely to be better done manually.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

An introduction booklet being e-mailed or posted would be the most helpful solution. The current e-mails are very verbose for regular travellers and a better summary is required ideally which shows in a single screen shows Stations, times, and the custom assistance details field. Ideally it would be possible to select from several e-mail options when setting up a Passenger Assist account linked to an e-mail address to suit a users experience level. Regular travellers currently would disengage with checking because of the overwhelming amount of information.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

This is essential to see a greater accountability when things go wrong, and hopefully reduce failures. We have annotated some concerns in the attached Annex A as there appear to be gaps or clarifications required to help make this really clear to passengers and staff in the areas of "no shows" and "disruption". This will be good preparation for App introduction assuming that it is possible to change the headcode in a booking when disruption occurs etc.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This is essential to ensure that calls are taken. It is important that it is clear to passengers what the most effective way of contacting a station directly in the case of delay either on or off the rail network. Explanation of any automation which removes concerns for the passenger in new technology will be an important area to communicate to passengers.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

As a group we are pleased with the proposals made on training and this should make a big difference to the quality of assistance provided. The refresher training every two years is vital as part of this. We also agree that a classroom element is vital so that it maximises the opportunity to absorb the information given. However, it might be that there is a benefit to carrying out the practical element of training in local locations both for accurate examples and challenges and as this might provide secondary benefits including:

- ⑩ Ensuring that experience and variations across a network are engaged with.
- ⑩ Engaging local disability groups in having a good connection with their local station(s)
- ⑩ Providing an additional promotional opportunity for the Assisted Travel service by including local disabled people who can invite new people to try out what to expect with new and old hands.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

As a group we feel that training for the new GB wide assistance protocol should be targetted for complete training provision within 12 months. Other aspects within two years is reasonable. Priority should be given to national protocols and consistency across GB. However, some local issues might require focus but only if the impact of such local issues is high.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We agree with these plans but also please see our response in the second half of Q10 for an additional publicity avenue as part of training. Also see the response in the next question for RDG to better facilitate access to local groups.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

This is vital for both promotion, and good relationships with Operators should there be issues, and communicating how it is being resolved so future customers can have confidence.

To best facilitate this we would like to see RDG maintain a list of local disability groups which might engage at each station. This can help with secondary operators at a station and consulting when changing long distance routes and service changes and get input from passengers.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

When specifying home page and reference to the wider system it would seem that the home page might refer to "Passenger Assistance" unless it is specifically a booking button rather than a link to the main information page? This should be accompanied with a standard multi-disability graphic which is standardised. Clearly, the booking is made with/in to "Passenger Assist" and is the name/brand generally and we thoroughly support this.

Inclusion of a home page link to “Passenger Assistance” would be welcomed to make this easily accessible and raise awareness of the support available and the system to use. Similarly, asking if a passenger wishes to book assistance when declaring the Disabled Railcard is thoroughly supported.

When considering online booking systems we need to be careful not to overwhelm people unnecessarily with warnings. A tick box preference such as “Travelling with a wheelchair, let us know.” would be preferable to warning the whole world. Similarly using the Disabled railcard box to trigger warnings will be most unwelcome and incorrectly re-enforce that disability is only mobility impairment.

It is vital that monitoring of W3C accessibility standards is carried out. We would like to encourage ORR to also ensure that monitoring of accessibility on Android and iOS apps is included in this area where Operators provide them.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

It is vital that once new technology is introduced that the benefits are leveraged for disabled passengers who need to use it. In particular we are keen that the guidance documents emphasise the role that Operators play in enabling Disabled people to access employment and operate as business professionals where meetings will often not conform with pre-booking etc. Being able to book up to 10pm enabled the days business to be completed and then a booking made etc. When working the current conceptual 6pm deadline for most operators interfered with the working day.

Encouraging operators to acknowledge in their policy that they understand return travel might vary from any booking and that staff will be constructive with this. We thoroughly support the goal of moving to a 2-hour booking but 6-hours is acceptable for a nearer term goal.

Option 3, the 2-hour goal is vital in the long term as even longer distance journey would be reliably covered. The shorter the notice however the more likely it is that communication of a Confirmed booking is required (e.g. guaranteed for anything earlier than 24-hours is automatically confirmed) and which improves over time. For shorter time scale bookings using the app or via a call centre with SMS text confirmation should be a goal. It is likely that for robustness for short term bookings there would need to be a confirmation process. This should allow engagement with any wheelchair zone reservations which must continue to take priority. Confirmation once all points have confirmed is necessary, however knowing what parts have confirmed a passenger might be willing to depart if they know all connection stations have confirmed. It is likely that this requires a passenger to have an account to facilitate this service efficiently for both parties.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

As well as the preceding answer please consider the following:

- ⑩ It is better to have two windows for “bookings” the maximum, and the lower one that operators offer e.g. 6 hours as a starting point. Operators providing even shorter notice might need to refer to this as TUAG in terms of industry wide terminology.
- ⑩ These named timescales can then be reduced over time as systems, franchises and networks are ready but with a clear method for communicating this. If base simplicity is required in certain circumstances for certain disabilities then for example the Easy read document can specify only the network wide maximum (I assume for example the international 48-hours would be omitted?)

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

In 6.34 we feel that there are some key requirements that ORR must consider in the area of DCO:

- ⑩ Different procedures for passengers in different areas will be confusing and increase the burden on disabled passengers in knowing what to expect. Therefore, an effort to achieve consistency is required and ORR should work with RDG to facilitate this.
- ⑩ Consideration of whether it is practical to communicate a meeting point on each platform to aid OBS at unmanned stations should be considered particularly where long trains stop. This should include a tactile paving suitably defined to guide from entrances to such a meeting point (or assistance desk at manned stations).
- ⑩ Clarification of what if anything in terms of assistance can be expected from the driver is an important part of public policy information for DOO and DCO.

It is also essential for passengers who want to know to be able to precisely identify which services are DCO and which are DOO from a public source such as a timetable booklet or journey planning tool. Information from brtimes.com indicates only DOO and this is also not an official source providing no accountability as to whether AAT is being offered unreasonably and reducing the opportunity to travel by rail and being disadvantaged with slower journey times.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

As a group we strongly support the requirement of redress where assistance failure takes place and the need to publicise this. The following points are important in this requirement:

- ⑩ An explanation of where things went wrong and what action will be taken to avoid this issue in the future. Continual issues which are only financially compensated neglect the fundamental and equal access to a service, repeated issues might require doubling of compensation.
- ⑩ A maximum reporting, investigation and payment of compensation timescale should be specified and this should be enforceable by ORR. Consider the greater impact on Disabled passengers if they incur additional costs to get to their destination after failed assistance. This is particularly important considering the greater financial vulnerability for some in this group. Clearly recent incidents with slow payment by Hull Trains and other operators illustrate the necessity of considering this area.
- ⑩ Redress should apply to booked journeys which are disrupted for whatever reason and would like to see this explicitly mandated.
- ⑩ We would like ORR to indicate that redress should be on top of Delay-repay compensation due. Promotion of the delay-repay scheme being another important part of ensuring disabled passengers are included in getting this information.
- ⑩ We are willing to provisionally accept the ORR redress level policy as long as it is clearly detailed when the review of failures and compensation paid will take place. Availability of this information on request to the public is vital and is on the proviso that ORR can update this guidance in a reasonably prudent timescale.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We are curious about and suggest that ORR considers if there are any implications for waiting on hold for a long time which wastes the time of text relay operators? Is a priority line required? If not already done so please can you consult OFCOM for advice on this as this page suggests that it takes more time and costs anyway and the suggested reasonable adjustments are implied <https://www.ofcom.org.uk/phones-telecoms-and-internet/advice-for-consumers/accessibility/text-relay-guide>

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We thoroughly support the increased weighting on operators need to consider their AAT provision and plans to ensure they are fit for the needs of disabled people wherever possible. We would like to see operators explicitly disclose areas of their network where it is difficult or impossible to provide Accessible transport and detail timescale implications such as taxis sent from the nearest major town/city. This should also include contract renewal dates where in place for replacement road transport. Publication of this information can help improve understanding of which areas of the country are either risky or no-go areas for people with disabilities.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Visual display of this information should be displayed at a suitable height for both wheelchair users and others to access without too much difficulty. Font typefaces and sizes should be reasonably legible for the Visually Impaired.

Ensuring a free contact number which works for mobile phones and is for the entire UK is vital for Visually impaired people so it is easier to make contact when in unfamiliar stations. It would be helpful to emphasise this in the guidance. Particularly as the "if you cannot find staff" option when travelling on a disrupted service.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

The scooter users in our group are very pleased at the more constructive policy. In considering carriage Operators should also understand whether AATs can accommodate scooters and advise passengers if not so that passengers understand any limitation in the event of disruption.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

It is important that declaring a disabled persons railcard does not form the trigger for lots of warnings on websites etc. as this could be detrimental to other disabled users experience who are not mobility impaired. However, we do support call centre's pro-actively asking if any assistance booking is required.

Care must be taken to not generate unnecessary warning text on websites. However, the general goal is supported. For online sales a box to tick if a wheelchair space is required can enable a simpler and less intrusive approach for other users whilst highlighting if rolling stock is not compatible. This may not piratically work for other operators services of course. Therefore, ORR guidance should highlight the refund of price difference as specified in NRCoT where a passenger has to travel in Standard accommodation.

Where an alternative service needs to be taken, or an unapproved route or TOC it would be useful to know how Endorsements are implemented on mobile or electronic tickets in this instance as a Passenger Assist bookings will not provide such easements or endorsements and certainly does not cover TUAG.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Good practise for assistance dogs is important, however, we feel that ORR needs to consider when mandatory requirements might be necessary for dog welfare. We have highlighted areas where this applies in the attached draft guidance.

Secondly, note the statement that “c2c offers season tickets to blind or visually-impaired people that allow a companion to travel with the passenger at no extra cost. “is actually a mandatory requirement for all season tickets not just one operator. Therefore this is misplaced in the good practise guidance as it is mandatory across TOCs (see <https://www.disabledpersons-railcard.co.uk/using-your-railcard/other-discounts/>).

Q25. Do you have any other comments or views on improving Assisted Travel?

We feel that there is a key areas still missing from the management aspect of the Guidance. With the introduction of delay-repay 15 on some operators we are concerned that it becomes less and less likely that passengers will receive assistance to their seat where this is needed for VIPs. Further other performance matters will generate staff being instructed to not provide assistance unreasonably. Commitment to ensuring such decisions do not occur is important as part of management arrangements and ensure no backward steps are taken. This must include making better use of staff at larger stations such that dispatch staff can at least assist passengers in alighting rather than being “jobs worth”. As an example Southern staff do not see the safety aspect if a passenger struggles to disembark but they won’t help because of poor attitude or role description.

We are keen to see a requirement on all TOCs to facilitate reservations on operators which offer them even if they do not have reserveable services. We would like ORR to encourage RDG to work on this issue as it seems unfair on the operators who do have reservations having to perform other companies assistance booking duties just because of having no ability to make reservations. It is common for passengers to be lied to if a TOC doesn’t do reservations, being instead told that there are none. This may put some off travelling where a seat is essential (This illustration covers SWR). Upon pushing they revealed a list of other TOCs to do the work for them.

Regarding areas for monitoring by ORR. We feel it is vital that a yearly summary of changes to assistance hours at stations is provided and that there on not stations which loose access which had it a decade ago for people with varying disabilities from VIPs to ramp users. Any reduction of staffing on station impacts the probability of travelling by rail and it will aid the industry and the public greatly to see what if any changes are happening and allow ORR to fulfil their duty to ensure maintaining of access for TAUG particularly in urban areas.

Thank you for taking the time to respond.

From: dppp
Sent: Monday, January 28, 2019 8:05 AM
To: [Redacted]
Subject: FW: Response: Assisted Travel Consultation
Importance: High

From: [Redacted]
Sent: 26 January 2019 12:47 PM
To: dppp <DPPP@orr.gov.uk>
Subject: Fw: Response: Assisted Travel Consultation
Importance: High

Resubmitted. Thank You.

From: [Redacted]
Sent: Monday, January 07, 2019 2:59 PM
To: DPPP@orr.gov.uk
Subject: Response: Assisted Travel Consultation

Dear Sirs, we are writing in our capacity as the local voluntary rail improvement user group, St Leonards & Hastings Rail Improvement ('SHRIMP'). We do not consider ourselves to have an encyclopaedic knowledge of the finer details of this complex issue – there are official organisations far better placed in that context – so are responding in the context of local issues.

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We have four stations within our catchment ie Ore, Hastings, St Leonards Warrior Square and West St Leonards. All of these stations present issues for disabled travellers:

ORE Official ORR footfall data shows this station as gaining a consistent year-on-year increase of usage. It serves an expanding local residential community and an advanced educational facility. But it has NO step-free access to the west-bound platform for services to Hastings, Eastbourne, Brighton, Gatwick Airport, London Victoria. The station is permanently unmanned, has no ticket office and no public address system.

As such, for anyone with a disability - be it physical or sensory – it is not fit for purpose.

HASTINGS This central town station, which was totally rebuilt in 2004, is serviced by two rail franchises, Southern (p/o GTR) and SouthEastern. As a general operating criteria Southern services utilise platforms 1 & 2 which have level access from the main station concourse, with SouthEastern operating out of 'island' platforms 3 & 4 which are reached by either 2 x stairways or 2 x lifts at both ends of an overhead bridge, which is satisfactory unless there either of the lifts is out of service.

When either of the lifts is out of use then there is no alternative means of accessing SouthEastern services for passengers with mobility restraints, unless passengers use the next station ie St Leonards Warrior Square.

ST LEONARDS WARRIOR SQUARE This is another significant central town station, with two platforms. It is an important inter-operator interchange, with passengers from across a wide area moving between platforms in order to switch between Southern (Coastway) services and SouthEastern services to London via Battle and Tunbridge Wells. This switch is made by passengers moving uni-directionally over a connecting overhead bridge which has two sets of steps, no ramps, no lifts.

For anyone with a physical disability this presents a major challenge.

WEST ST LEONARDS The station has two platforms, neither of which offer step-free access. In addition this station is serviced only by SouthEastern so passengers within its catchment who require trains towards Bexhill, Eastbourne, Brighton, Gatwick etc are required to travel via St Leonards Warrior Square – **see above**.

SUMMARY

Any project or consultation to improve access for disabled passengers within the rail system is overdue and receives our full support. But there is clearly an issue about getting passengers into the system to start with.

Many stations present difficulties for passengers with either sensory or physical challenges, irrespective of background systems designed to assist journeys within the network.

Remedying these difficulties is not easy, with the design of many of these stations a hindrance within Access for All calculations and requirements. In addition some stations have local planning restrictions imposed on them which, albeit with fine intentions, are inconsistent with meaningful upgrades.

As reaction to the consultation progresses, thought might be given as to whether overriding these restrictions would be useful.

We hope our submission is useful.

Yours faithfully,

[Redacted]

SHRIMP - St Leonards and Hastings Rail Improvement, p.o East Sussex Rail Alliance

c/o 6 Silverstone Court
St Leonards on Sea
TN37 6PB



South Western Railway

*Response to ORR's **Improving Assisted Travel: a consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)***

Date: 18th January 2019

South Western Railway response to consultation: Improving Assisted Travel November 2018

Organisation: South Western Railway

Address: 6th Floor, Friars Bridge Court, 41-45 Blackfriars Road, London SE1 8NZ

Train Operating Company

Introduction: South Western Railway operates commuter services from our Central London Terminus at London Waterloo to south west London. SWR has some of the busiest routes in the country, operating nearly 1,700 services each weekday. We provide commuter, inter-urban, regional and long-distance services to customers in South West London and southern counties of England, as well as providing connectivity to the ports and airports in the region. As well as commuters and business travellers, SWR transports leisure travellers across the region, to many tourist and heritage sites, and the numerous major sporting and social events that take place along the route every year. We recognise the important role that SWR plays in this region, with so many people and businesses relying on the services that we provide.

For enquiries regarding this consultation response, please contact:

[Redacted]

Accessibility and Inclusion Manager

[Redacted]

[Redacted]

South Western Railway

6th Floor, Friars Bridge Court, 41-45 Blackfriars Road

London SE1 8NZ

The consultation response

South Western Railway welcomes the opportunity to respond to the ORR's consultation on Improving Assisted Travel. We are fully committed to improving services to our customers and have already made, some significant improvements in the field of accessibility.

In January 2018, we appointed a dedicated Accessibility and Inclusion Manager and in June 2018 we reduced our booking notice period to 12 hours, as well as reducing this to 4 hours' notice from our main stations. For those customers who may struggle with communication, in July we introduced a Travel Assistance Card in July 2018.

Looking forwards, in Spring 2019, we will be introducing an Assistance Dog Seat Reservation card which will allow customers who are Assistance Dog owners to reserve the seat next to them for their dog, free of charge.

We look forward to working with the ORR and other operators in the industry in improving the customer experience of older and disabled customers. Where we have disagreed with the ORR's proposals, we would welcome the opportunity to work with the ORR in finding suitable alternatives that meet the same outcome.

[Redacted]

South Western Railway

Response to Specific Consultation Questions

Section 2 Updating the Disabled People's Protection Policy (DPPP) Guidance for Operators

Question 1: What are your views on replacing Disabled People's Protection Policy with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

SWR agrees with the ORR that the current title of "Disabled People's Protection Policy (DPPP)" is no longer appropriate and would support the ORR in changing the name to either of those suggested above. As the current and proposed policies look after the interests of disabled and older customers but not those with other protected characteristics under the Equality Act 2010, such as gender or ethnicity, we would suggest that "Accessible Travel Policy" is a more appropriate title.

We note from the draft Guidance at Section A2.5 that ORR's aim is "*To help achieve consistency*", for example, by mandating consistent use of terminology and the same Assisted Travel icon or hyperlink on TOC homepages. With consistency in mind, we suggest ORR consider whether it will propose that operators to phase-in this replacement terminology by a certain date or whether there will be a 'go-live' date when this will change for all operators. The former would have the advantage of allowing new printed material to be rolled out to different locations in a more managed way. The latter would have the advantage of reducing potential customer confusion during a phase-in period, particularly as the existing terminology is well understood by those who use it.

Sufficient time should be allowed to update various documents including signage (including the new signage that would be required), posters, apps, and staff training materials.

Question 2: What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- ***Is there anything you consider is missing from the required content?***
- ***Is this still a meaningful title for this leaflet?***

The proposal to have a leaflet rather than the booklet in its current form is a welcome change. SWR believes that the suggested content is sufficient to cover what customers would need to know about what we, as a TOC, would do to assist them.

It is important to remember that this new leaflet should be there to reassure customers about what help is available at our stations, on board or through other channels, to sell the product of passenger assistance, and what to expect when travelling with us. We think that the passenger leaflet should not need to display items such as how to get involved with the operator's work in improving accessibility. This could make the passenger or customer leaflet

unnecessarily long and detract from its proposed purpose of being a guide to travel. SWR would welcome the opportunity to work with the ORR and other operators in helping to finalise a design that would be consistent across operators.

As all operators must provide assistance to older and disabled customers when requested, it is important to ensure that this document be as standardised as possible across all TOCs. This standardisation should include language used, such as 'Passenger Assistance' being labelled consistently throughout the industry as currently, there are multiple names which include 'Journey Care' and 'Assisted Travel'. However, it should still have sufficient flexibility to allow different Operators to use their own Tone of Voice. The language used should be in as plain English as possible, removing jargon and complicated sentences. Although Easy-Read versions could be produced, SWR believes that all customers could benefit from its language being as simplified as possible, without losing its meaning and nuances.

If the documents were needed to be approved by an external body, such as Crystal Mark, the suggested timescales for printing would not be sufficient, especially to apply branding to the document.

The current review process has shown how having many different stakeholders, though undoubtedly with good intentions, can significantly hinder the creation process of the document and stretch the time resources available to TOC staff responsible for its creation. Any additional accessible formats should be available upon request for printing rather than being a pre-requisite of any hard copy published at stations. SWR believes that if a version is uploaded to a website in word format, given the different software packages available for screen reading and screen-editing, many customers with access to a computer would be able to tailor the document to suit their needs.

SWR believes that the title of the leaflet is no longer meaningful. A better suggestion for the title could be 'Assisted Travel: a customer guide'

Although SWR appreciates and values the focus groups and research that has been conducted by the ORR since its consultation on the same topic a year ago entitled "*Improving Assisted Travel: a consultation*" SWR believes that there is merit in utilising more digital materials. Although the above leaflet must be made available at staffed stations as well as TOC websites, having the document available at stations can often be too late in promoting the assistance available, as customers need to be made aware before travel and at the time of booking that Passenger Assistance is available.

Many TOCs produce a small card or leaflet with the details of Passenger Assistance as promotional material. We are now living in a digital age, and although there will still be a need for printed material, it is more environmentally friendly and more convenient for customers to have access to digital materials. Digital materials can also be more readily updated whereas updating printing material requires changing the entire document. SWR would support a drive towards this kind of media, especially as this material would be available at the time of booking and research for the journey. Although much unused printed literature from stations is recycled, it is still hugely wasteful because of the need for it to be printed and transported beforehand and we believe that more focus should be given to digital media.

SWR's dedicated Accessibility and Inclusion Manager is aware that the current assistance material on the website is still relatively hidden and will be working with our website team to improve its visibility and will also work with our Accessibility and Inclusion Forum to ensure that its content is appropriate.

Question 3: What are your views on our proposed requirement that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

SWR believes that station and rolling stock information should not form part of the customer facing leaflet and would go further to argue that the policy document is not the right place either. We welcome the fact that the ORR has recognised that larger TOCs with many stations, such as SWR (with 184 managed stations, calling at 214 stations in total) would have passenger leaflets that appear cluttered and will consist of many pages. ORR has also recognised the industry's challenges in maintaining up-to-date information for station information, especially with the current pressures of needing to re-print every document which can involve significant cost, as well as logistical challenges.

SWR would argue that it is better to improve the current online provisions with National Rail Enquiries (NRE) station pages. The ORR is aware of the challenges that operators face in maintaining these pages and greater focus should be given to ensuring that the industry has a suitable operating system for maintaining these pages, as well as ensuring that customers can access up to date information. For stations that we call at but do not operate, it can be difficult to ensure that the information that we provide is up-to-date. We acknowledge that the ORR appreciate this and we would urge the ORR to consider the station page and other pages on the NRE as sufficient rather than requesting Stations Made Easy (SME) as the go-to page as we know that there are inconsistencies with the feed to SME from the NRE station page. By using the NRE site, there will be a single source of truth for customers and staff alike, helping to ensure that both parties have access to up-to-date information.

All front-line staff at SWR have been issued with company smartphones which have access to the internet. Permitting that there is a mobile phone signal, or station WiFi, our staff will be able to search for station accessibility information on our website, app, the NRE website and/or app, ensuring that customers are given the information that they require, should they ask for it.

If ORR is minded to mandate that stations and rolling stock accessibility information form part of the policy document, then we note that the draft Guidance at Section 2.1 states that the policy document "*must be produced as an A4-sized document in both Word and PDF format.*" Given the objective of ensuring accessibility information concerning individual stations and rolling stock types is up to date, we suggest a better option for both passengers and operators, would be to require that stations and rolling stock accessibility information is made available on the operator's website within '1-click' from the Policy document and that it is a format which will be capable of being printed or made available in A-4 size.

Question 4: What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

SWR supports the proposal for the inclusion of disabled and older people, or disability groups, in the development and review process of a new Inclusive/Accessible Travel Policy (I/ATP). SWR, as a minimum, would be able to consult with its own Accessibility and Inclusion Forum.

SWR would like to draw caution to how much value local groups would have on the production of an effective I/ATP. In this respect, we have some concern about the two references in the draft Guidance to a new requirement that operators “*must confirm that they have sought and incorporated feedback from local groups*”. Such groups are often very well informed and will have read the ORR’s Guidance. The risk is that with the knowledge operators are required to show that their suggestions have not just been considered, but have been incorporated, they may make unreasonable or unsuitable suggestions which cannot be accommodated. We suggest instead that operators “*must confirm that they have sought and given all due regard to feedback from local groups*”.

SWR would support a national panel to approve all future I/ATPs, therefore ensuring consistency across the industry. The panel should be independent and appointed by a body other than an operator, such as the ORR or the Rail Delivery Group (RDG). SWR would support RDG being involved in the suitability of candidates as all of those on the panel should have an awareness of what is reasonable for an operator to do (taking into account the specific circumstances of its franchise, including stations and rolling stock) in regard to reasonable adjustments and commitments for disabled and older people.

SWR welcomes the new stream-lined process for changes and looks forward to being able to publish changes in a timely manner. SWR notes that lots of the onus in the current proposals is placed on the operator to have the I/ATP ready in a certain timescale and we believe that the ORR and other external parties must adhere to an agreed timescale for all parties involved in order to create and publish these documents successfully. SWR notes that care must be given when involving outside bodies once the new I/ATP is passed to the ORR for approval. In SWR’s experience, a lot of back and forth can take place, leading to many confusing exchanges which take time to come to a consensus.

Further, SWR agrees that non-material changes should not require approval and that a revised DPPP would only require approval if there was a significant change in what an operator was proposing or indeed a change in franchise.

Section 3 Reliability

Question 5: What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

SWR welcomes the wording provided to allow greater understanding of step-free access at stations. Providing five categories to members of the public could be confusing so a simplified system may be preferable when advising customers of station step-free access. SWR's current DPPP does advertise our stations as "full", "partial" and "no" step-free access. Using the Category system, A-E as advised in Appendix B of Annex A could be best used as an internal system.

Step-free access can not only be affected by the built environment but also by the staffing levels at stations. At some SWR stations, for example, step-free access is only achieved via the use of a barrow crossing which can only be used under staff supervision, or a particular entrance to a station is only open when staff are present. Care should be taken on the current nuances of step-free access. The Rail Delivery Group's (RDG) proposed Accessibility Map which shows other useful information to make a station more inclusive, such as accessible toilets or customer information screens, is, we believe, a much better tool in determining overall accessibility rather than step-free access by itself.

SWR would like to express its view that a national standard needs to be identified for how we as operators should advertise station step-free access. For example, although SWR advertises "full", "partial" and "no" step-free access in its current DPPP for stations, those stations that are advertised as "full" step-free access may not have step-free interchange between platforms. This might be achieved via the public highway, with some interchanges being very short, and others being quite long in their duration.

Question 6: What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

Checking station accessibility information at the booking stage is what we expect of our staff. SWR does not know how the ORR would intend on monitoring this activity. If the ORR wishes to seek a way in enforcing this, SWR would urge the ORR to consult with us, and all other operators in finding a workable solution for this. If these checks are mandated and records are to be kept, it is important to note that we, as an operator, would only be held accountable at the time of the check and that if anything were to change which would affect the booking, such as a lift becoming out of order, then we as an operator would not be held accountable for any disruption to the journey as a result of the original booking.

We do have concerns about how this system may work where the journey fails (or is different from that expected at time of booking) as a result of changes to station accessibility information, particularly where that station is operated by another operator, or where another

Operator performs the booking checks inaccurately. For example, if Operator B provides a Passenger Assist booking and inaccurately checks the information provided by Operator A about its station(s) and there is then problem with the journey, we question how Operator A is expected to deal with the resulting customer complaint. The customer will (understandably) be likely to see this as Operator A's fault (since it experienced the problem at its station, rather than at the point of booking) and may not have an appreciation of Operator B's involvement and responsibility for the booking. The passenger is still likely to want to claim from Operator A (and potentially bring a claim for breach of the Equality Act) and any argument from Operator A that this only occurred because Operator A's failed to follow the mandatory booking checks is not likely to be warmly received.

There may also be a similar issue where booking has failed because of incorrect information (e.g. on knowledgebase) provided by another operator.

The proposed draft wording of Section 4 paragraph A1(c) of the draft Guidance is unclear. It currently states that: "*When bookings are made via a contact centre and the journey involves a station with an accessibility classification A B, C or D (see Appendix B) the operator must ensure that relevant accessibility information on the National Rail Enquiries station web pages) (see commitment j. below) is checked and communicated to the passenger to ensure assistance can be provided at every stage of the journey.*" [emphasis added]. Taking this in sections:

- It is not clear what "*relevant accessibility information*" should be provided at the point of booking. If ORR's proposal is that detailed accessibility information should be made available and kept up-to-date on the NRE website then should the operator at the contact centre simply communicate the accessibility category of the departure and arrival station platforms, or provide the fuller details available on the NRE website, or will an operator have flexibility as to how much information to provide at this stage?
- We presume the reference to "*commitment j*" should be to "*commitment k*".
- We think that the word "*checked*" should be changed to "*consulted*" or "*viewed*" (or a similar word). This is so that it is clear that the operator is not required validated (which is the other meaning of "*check*") that the accessibility information provided at third party stations is actually accurate or something for which it is responsible.
- It is not clear what "*communicated to the passenger*" means in context. Is the contact centre required to communicate accessibility information to the passenger whilst they are on the phone (so that, for example, the passenger can make a decision about whether to use a different station with a different accessibility classification), or should this information follow with confirmation of the booking, or will an operator have flexibility as to how and when this information should be provided, and in what detail?

We strongly suggest that the words "*to ensure assistance can be provided at every stage of the journey*" should be amended or removed. As an operator, it is reasonable to expect that we will check the accessibility information of the departure and arrival stations at the time of booking. However, that accessibility information could be out-of-date for reasons over which we have no control (e.g. the station is operated by another operator or Network Rail and they have not updated the information), or may have become out-of-date by the time of travel

(e.g. a lift becomes out of order), or the staff at that third party station may fail to provide assistance. In these cases, we (as the operator handling the booking) cannot “*ensure assistance can be provided at every stage of the journey*”. We suggest this is removed (or changed to state: “...*to ensure that the information indicates that the journey can be completed by the customer*”). This would still meet the ORR’s concern to avoid allowing “Bookings designed to fail from the outset”.

Question 7: What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions that they can take to support rail staff in the delivery of assistance?

SWR is supportive of producing general practice guidance for Passenger Assist users as outlined in the consultation document. We are committed to improving our own assisted travel provision, and to improving the service across the GB Rail network. We appreciate that some practices may be different between different TOCs, SWR would be happy to take part in and support a working group to create the above document. We know that when assistance does fail, this can be because customers were unaware of where to meet with the staff that would assist them. We would hope that such general guidance would assist them.

We think that ORR’s proposal that such general guidance could be attached to booking confirmations and provided as a link on the NRE webpage is a good one. We think it may defeat the objective of the Passenger Leaflet to include such detail in it, if that is what ORR is suggesting where it says that “*this information could also be added to each train and station operators DPPP*”.

Question 8: What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

SWR is happy to support a handover protocol for station staff. It is important for staff to communicate to stations ahead not just to ensure that there are staff available to help, but also that all of the necessary facilities to enable the customer to alight at that particular station are functional, such as lifts. From the Autumn of 2019 this procedure should be easier for staff to facilitate as the new passenger assistance system will be ready and SWR station staff will have access to its App to help ensure that the necessary information has been passed onto the destination station.

Question 9: What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

SWR agrees that communication channels need to remain reliable. SWR would support the introduction of a dedicated assistance number for each station as one solution, however, it should be permissible to use this number for other functions if desired. For example, if a ticket office were the only focal point for staff activity on the station, then the ticket office number could also be the assistance number, if desired by the operator. With the introduction of the new passenger assistance system in Autumn 2019, each operator must be given the flexibility to use this system how they see fit to enable assistance reliability to be improved. We believe that the outcome rather than the method should be prescribed here.

Section 4 Staff Training

Question 10: What are your views on our training proposals? Do you agree with the proposed outline content?

SWR is supportive of the principal of refreshing colleagues' knowledge of Disability and Equality Training. SWR believes that it is important to have consistency in training across all operators. SWR has already committed to having its current Disability and Equality Training being approved by at least one disability organisation/charity. The previous franchise holder had used the services of a disability organisation in the delivery of its Disability and Equality Training. This was successful. However, our experience suggests that the impact and value of including disabled people in the training depends on the spectrum of disabilities considered during the training. There is a clear benefit to include 'real life' training with input from disabled people. However, this should not be at the expense of making the training effective in considering a full spectrum of disabilities. If the ORR wishes for the training to be as consistent as possible across the industry, SWR would suggest that the Rail Delivery Group (RDG) is best placed in developing and sharing this. Please see response to Question 11 for further information.

Question 11: Do you agree that:

- **Operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

SWR is supportive of refresher training and would be comfortable in committing to a two-year timescale to update its training packages and to provide refresher to training to all staff. The two-year timescale should start from the last date that the member of staff received their initial training. SWR would not support the traditional approach of classroom training where frontline staff would need to be released from their duties as this would be an impractical burden. We would see greater benefits if staff were to have their training refreshed via modes such as e-learning and briefing on specific areas. Benefits of e-learning could be:

- it enables TOCs to more easily keep track of who received what training and when
- by making it modular, it enables modules to be taken at different times and also it decreases the chances of information overload or a dip in engagement during the day
- online tools can have built-in assessment after each module to ensure comprehension
- FirstGroup can leverage an economy of scale in providing similar modules for all of its Operators (but also allowing for tailoring for specific Operator needs).

The proposed training should be tailored to the staff member's duties, as staff who carry out assistance as part of their work duties will need to receive a potentially very different training and awareness programme to that of managers and office staff. The ORR proposes that agency staff should also receive this training, however, we believe it to be impractical to provide training by the SWR training team to agency staff who may only work with us on an ad-hoc basis. More thought should be given to how Agencies can train and deliver this to their members.

SWR would be happy to work with the other FirstGroup operators, especially with Great Western Railway. Considering our two networks provide the majority of passenger services west of the capital, south of the M4 corridor, having consistency between our two companies would be beneficial to providing the consistent customer experience that customers expect.

We believe that the priority areas should be targeted to each TOC in the first instance, with the wider industry as a secondary output.

SWR would like to question the methodology of the ORR in conducting their initial TOC training research. SWR provided the ORR with its training materials, however, no

representative from the ORR attended any SWR Disability and Equality Training course and we would be keen to understand how the ORR assessed our training materials. In order to help facilitate the above, SWR would be very interested in receiving feedback from the ORR in regard to its research of SWR's current training content in order to prioritise areas for improvement.

Section 5 Passenger Awareness of Assisted Travel

Question 12: What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

SWR supports the view that RDG should lead the national campaign for Passenger Assistance awareness. With the introduction of a new Passenger Assist system in Autumn 2019, there is a great opportunity within the industry to utilise the campaign of awareness around this new system for what help is available to disabled and older people. With any future campaign and advertising, it is important to set expectations with customers so that they know what assistance they are entitled to and that with any unbooked assistance request, our staff may not be able to help immediately as they may have to perform other safety critical duties as part of their normal working before assisting a customer. It is also important to make customers aware that not every station is staffed and that if alternative transport is required, there may be a wait for this to be organised and in place.

Whilst operators recognise that the policy of the Equality Act 2010 is to ensure that disabled people receive a standard of service as close as it is reasonably possible to get to the standard normally offered to the public at large, what amounts to a reasonable adjustment to services must be considered in all the circumstances, including legitimate organisational constraints, and the proportionality (including time and cost) of measures to address these constraints.

For example, many services may only have two wheelchair spaces. This will address wheelchair users' needs in the majority of circumstances. However, it is not currently clear how operators are required to address the cases in which this is insufficient, such as during peak periods where wheelchair space demand may outstrip availability. There is a related point of balancing the committing of sufficient resources to meet the duty to make reasonable adjustments, but not taking this so far as to require operators to make adjustments which are not reasonable (e.g. for reasons of time, cost and resourcing, balanced against the benefits that would be delivered).

Should operators and ORR be having an active conversation within the industry about the message it should be giving disabled passengers in such cases? Notwithstanding the objective to promote accessible transport, it is important that passenger expectations align with legitimate organisational constraints and the boundaries on the requirement to make reasonable adjustments.

Question 13: What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

SWR is well placed to work with third parties in promoting and improving assisted travel. SWR has been conducting “Try the Train Day” events since June 2018 with its own Community Ambassadors, many of whom are frontline staff who will be helping customers to travel. Our Stakeholder team also works very closely with local authorities on our network and our dedicated Accessibility and Inclusion Manager liaises with Disability Organisations, access groups and SWR’s own Accessibility and Inclusion Forum.

Question 14: What are your views on the proposal for more prescriptive website requirements?

SWR agrees that information to all customers should be as easy to access as possible. We understand that it is important for all customers to understand how to travel with us, where to book tickets and what support they can receive, should they require it. Our Accessibility and Inclusion Manager is working with our web team to improve the layout and content of our information on our website for customers with other accessibility requirements. SWR also understands that all customers should be able to access this content with minimal fuss and is always working with its website developers to improve the overall accessibility of the website. There are tools for improving website accessibility and our Digital Manager and Accessibility and Inclusion Manager are working together to look at how we could potentially incorporate these tools into the website. SWR would seek to have an implementation period for any Accessibility improvements and requirements so that activities such as coding, debugging and user testing may be carried out.

Section 6 New Requirements and Updates in DPPP Guidance

Question 15: What are your views on the three options we have identified for reducing the notice period for booked assistance?

SWR would support a reduction in the booking notice period to “10pm the day before travel.” As you have mentioned in your consultation, SWR has already reduced its booking notice period to 12 hours from June 2018, and additionally at 23 stations to only 4 hours’ notice. The reduction in booking notice period is a franchise commitment of SWR. SWR could not support the other two options of “6 hours before travel” and “2 hours before travel” as this would most likely result in a change to our staffing proposals which would conflict with our franchise obligations. The ORR must consult with the DfT regarding any proposed changes which may affect our contractual obligations as an operator. If the ORR were to introduce either of the other two options listed, this would significantly impact on us as an operator as these options differ significantly from what we have signed up to in our franchise agreement

with the DfT. Other operators may also be heavily impacted by such a sharp reduction in the proposed booking notice period. TOCs that offer seat reservations but do not have electronic displays on all train units, such as Great Western Railway (GWR), and would require 24 hours' notice currently, may be heavily impacted by the 2 and 6-hour notice periods, with customers expecting a seat potentially being unable to acquire one. In turn, at SWR managed stations where GWR services call at, for example, Salisbury, this could lead to greater confrontation between our staff and GWR customers who may be asked to give up a seat that they have fairly booked because a customer who has booked passenger assistance under the proposed heavily reduced notice period now requires one. Although many customers would be willing to vacate their seat for somebody who may need it more than they do, this could still lead to potential conflict. Therefore, SWR could not support a reduction to 2 or 6-hours' notice.

Question 16: Do you consider that any reduction should be phased in? If so, how might this be implemented?

As mentioned in our answer to Question 15, SWR could support an immediate reduction to 10pm the night before travel. However, if either of the other two options were to be implemented, these must be introduced in a phased fashion in order for us to assess implications on us as a business, including any role changes and additional staff that we may need. SWR would suggest that the introduction of the new Passenger Assist system in Autumn 2019 would be a starting point for any phased introductions.

Question 17: What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

SWR believes that adequate provisions should be made for older and disabled customers, irrespective of the mode of operation. We will always work with government, and the Regulator in ensuring that our operational structure is adequate in ensuring consistency in the customer experience of disabled and older customers' travel. We suggest that the Regulator also work with government regarding different modes of train operation.

Question 18: What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

SWR already commits to refunding customers for the single leg and/or return portion of a customer's journey should their booked assistance fail. SWR also reviews each of these on a case-by-case basis so that we have the flexibility to find the right solution for each customer and their circumstances. When assistance has not been booked and this has failed, we of course look at these on a case by case basis but we, as an operator, should be left the flexibility to determine what, if any redress, should be due. Many customers

would prefer to have solutions to any of the problems that have occurred rather than to gain financially from it, so the ORR should consider redress in a way that might not necessarily have a monetary value.

Given the above we would suggest this wording is amended to state that “*operators must including a statement in the passenger leaflet [and ‘policy document’] that when assistance has been booked but has not been provided then compensation will be provided and that the form and value of this compensation will be determined on a case-by-case basis to allow operators to consider the circumstances of the case*”.

Question 19: What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

SWR welcomes the ORR’s acceptance of the changing nature of communication, especially for those who are deaf, hard of hearing, or living with hearing loss. SWR would be happy to look into a text relay service. Additional cost could be a barrier, although we will need to consult with our telephony service supplier if this would be possible. SWR would also like to highlight that customers with hearing loss may prefer to contact us via our live chat service and that such other methods of communication should be considered by the ORR.

Ultimately, it should be about specifying the outcome, rather than, the method when communicating between customer and staff.

Question 20: What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

SWR staff will always work with our customers to find the best solution for them when arranging alternative transport. During planned disruption, such as engineering work, SWR would be happy to work with its replacement bus service provider to source as many low-floor accessible buses/coaches as possible. During unplanned disruption, such as emergency engineering work or, as we have recently seen, strike action, the timescales left to us as an operator are small and we are very much at the mercy of the bus operators as to what remaining vehicles they have available for us.

When arranging wheelchair accessible taxis, SWR is reliant on local authorities to licence these vehicles. In larger, urban areas, sourcing a suitable taxi maybe easier than in more rural locations. SWR would welcome the DfT working with local authorities to help enable its *Accessibility Action Plan* and *Inclusive Transport Strategy* to succeed.

In regard to the Disability and Equality Training that taxi and bus/coach drivers receive, SWR believes that we, as an operator, cannot be held responsible for this. We believe that

this is the responsibility of the individual bus/coach or taxi company, and for taxi drivers, this should be the responsibility of the local authority to approve licences appropriately.

SWR agrees with the spirit and intent of this proposal. However, in practical terms, adherence to the proposed Guidance wording would be very difficult (and potentially impossible, for reasons outside of SWR's control) to implement throughout the whole SWR Network.

As an initial point, there is a discrepancy between the wording operators have been asked to consider as part of the Consultation, and the wording proposed in the draft revised Guidance. SWR can support the wording of the Consultation but, for reasons explained below, cannot support the wording of the draft revised Guidance (which is incapable of being complied with).

The wording of the Consultation proposes that operators will be required to:

1. Work with 3rd parties to explore how more accessible rail replacement services (buses and taxis) might be provided in cases of delay, disruptions and emergencies;
2. Work with third party taxi providers to explore how accessible taxis might be made more widely available to provide alternatives to rail travel where required by passengers;
3. Report to ORR on the accessibility of rail replacement bus services; and
4. "Make reasonable endeavours to ensure drivers of rail replacement bus services and taxis have been trained to provide appropriate assistance to rail passengers"

(Point 4 is stated at Consultation page 11, bullet 9, the other points are at Consultation page 94).

By contrast the draft revised Guidance includes obligations that:

- *"Where access by Private Hire Vehicles to stations is regulated under contract with the station operator, the terms of the contract must include, from the earliest opportunity, the requirement for the taxi operator to provide wheelchair-accessible vehicles and drivers trained in disability awareness."* (Guidance, paragraph A1(j)); and
- *"The accessibility requirements for buses and taxis is set out in separate legislation to that referenced in section 1.3 of this guidance [FN13: the PSVAR]; the accessibility of these services is neither monitored nor regulated by the ORR. However, in cases of delay, disruptions and emergencies, operators must consider how the rail replacement services and taxis provided are as accessible as possible. Operators must also make reasonable endeavours to ensure drivers of rail replacement bus services and taxis have received appropriate training to provide assistance to rail passengers."* (Guidance, paragraph A4)

Paragraph A1(j) is unnecessarily restrictive. What is required is that there are a suitable number of taxi operators to provide wheelchair-accessible vehicles and drivers trained in disability awareness. Creating an obligation that all taxi operators must comply will have the negative consequence of reducing service provision to all non-wheelchair using passengers as taxis that could previously access the rank would be prohibited from doing so. This may have severe consequences where non-wheelchair using passengers rely on an available flow of taxis to and from the station.

Based on the above, suitable alternative wording would be that "...the station operator may stipulate terms of the contract which include a requirement for the taxi operator to provide wheelchair-accessible vehicles and drivers trained in disability awareness in order to ensure suitable provision of wheelchair accessible vehicles at that station".

Similarly, with respect of paragraph A4, what is required is that there are a suitable number of taxis and/or replacement buses to serve the needs of disabled users, not that all such provision should be "as accessible as possible" (which would be a requirement above the legal duty imposed by the Equality Act 2010).

Further, just as ORR recognises in the suggested wording that it has no control over regulating buses and taxis, neither do rail operators. It is therefore unreasonable to mandate that Operators must also make "reasonable endeavours" to ensure drivers have received "appropriate training". Is it suggested that operators would have to review the training material provided or seek assurance for drivers about the level of training received? How far does reasonable endeavours go, and what amounts to appropriate training? Do all drivers have to receive such training, or just a suitable number to meet demand? If an operator can ensure suitable provision via wheelchair-accessible taxis, does it still need to make reasonable endeavours to ensure replacement bus drivers are trained? Is this realistic in cases of short term "delay, disruptions and emergencies"?

Our concern is that ORR may be mandating a level of compliance which is, in practical terms, uncertain in its terminology and impossible to attain. ORR's proposal appears to run contrary to the evidential basis for making the proposal (as set out in Consultation paragraphs 6.51 and 6.52, which notes, for example, that a stipulation that only wheelchair accessible taxis could apply for hire at stations, would mean that 42% of taxis would then be excluded, and that the problem would be more acute in rural areas where accessible taxis may be further afield). We believe that the ORR's proposal would have the effect of reducing supply to non-wheelchair users since not all taxis will meet this standard.

Question 21: What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

SWR's Assisted Travel line is open 24 hours a day. The ORR will be aware that the National Rail Enquiries (NRE) call centre is also open 24 hours a day so if some operators do not have a 24 hours helpline, or if there is a high volume of calls due to disruption, then the NRE will be able to provide information for customers. SWR also has help points at every station that we manage, as well as station welcome posters which contain the above information, so we can currently meet this requirement, so we have no issue with the above proposal.

Question 22: What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the Guidance review?

SWR already operates a scooter permit scheme. This was designed from a series of safety tests that were conducted on our rolling stock and will continue with the introduction of class 442 and 701 trains onto our network in the coming months. By having a scooter permit scheme, SWR could not support the carriage of assembled scooters without permits as this undermines the notion of having a permit scheme. We appreciate that this may be frustrating for customers, however, the safety of all customers and staff must come first. The proposed presumption of carriage of these mobility aids is something that we cannot support. The risk of potential harm (and liability for potential harm e.g. under Sections 2 & 3 Health and Safety at Work Act, even where there is no actual harm) outweighs this proposal.

As a proposed alternative solution to meet ORR's aspiration, SWR would support a system where there is a "presumption of carriage" where the scooter user can provide industry-authorized / recognised evidence that the scooter complies with relevant safety and physical constraints to be safely transported. This is what SWR's "scooter permit scheme" aims to do. SWR would suggest this scheme continues in order to address the objective.

SWR would support the ORR and DfT in working with mobility aid manufacturers in ensuring that they meet PRM-TSI requirements for accessing trains but also that they make customers aware that they will be able to access most rolling stock with these aids.

Question 23: What are your views on our proposals to clarify the guidance to ensure:

(a) passengers do not unknowingly purchase tickets they cannot make full use of; and

(b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.
review?

Operating a mixed fleet on our medium and longer distance services is not without challenge. Contact Centre staff, station staff and other station staff and contact centre staff at other TOCs will need to be given accurate timetable information with the specific type of rolling stock being used on a particular service. SWR would like to seek clarification on what the procedure should be where a customer has booked an advance ticket and can then no longer access the service. With the introduction of a homogenous fleet on our suburban network later in 2019 and during 2020 with the Class 701, customers and staff informing them will be more confident that the journey they are making will be on a particular class of train.

It would be very difficult for SWR to prevent customers from purchasing tickets that they are not always able to use as many ticket office staff will not have access to other TOC rolling stock information, such as the ability to see if a particular TOC is able to accommodate a wheelchair user in First Class. Any transactions placed online would need to be address by Ticketing Issuing Suppliers (TIS) and it should be for them to address the issue of usability of a ticket rather than the above being placed in the I/ATP guidance.

Regarding point b) above, SWR is looking into a data dashboard to show us where toilets may be unusable currently. The new Class 701 will be able to auto report the functionality of the toilet, however, as with all technology, it will not be able to report on the cleanliness of the toilet, which, can have an effect on its usability. SWR would be happy to work with other operators and the RDG in being able to better get information of toilet availability to customers, including the use of CIS screens at stations. SWR would advise the ORR that it would be better to see how new innovations like the auto reporting functionality, CIS screens, Passenger Assist App and Transreport 'bed in' and whether they result in effective improvements before ORR decides whether and how to significantly shift the landscape of the Guidance.

Question 24: Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Travel Assistance Card – SWR introduced these in July 2018. It is designed to help customers who may struggle with communication. All our front-line staff are briefed and trained to recognise this card when shown to them. We would support a national scheme with the input of all TOCs.

Assistance Dog Seat Reservation Card – we will shortly be introducing a seat reservation card for assistance dog users to block the seat next to them (passenger loading dependent) in order for their dog to rest by or under the seat. We recognise that this can give the dog some much needed down-time from its working schedule.

Video Ticket Vending Machines (VTVM) – we recognise that ticket machines can be difficult for some customers to use. These VTVMs link to our Video Contact Centre in Basingstoke, allowing customers to be helped and talked through a ticket purchase at some of our stations that are unstaffed for all or part of the time.

Question 25: Do you have any other comments or views on improving Assisted Travel?

Section 1 of the Guidance: Statements of the law

SWR is concerned by some of the explanations of the law included in Section 1 of the draft revised Guidance. ORR should take specialist advice to ensure the absolute accuracy of the

statements of the law in this section as the Guidance may well be read (and relied on) by disabled passengers and others. Whilst we do not object to Section 1 providing some form of easily accessible guide to the law, this should not be at the expense of the accuracy of those statements (even where further explanation is needed to properly explain it).

For example:

- A non-legally trained person reading the statement that the “*duty to make reasonable adjustments...applies where a physical feature puts a disabled person at a substantial disadvantage*” might take that statement at face value. In fact, the application of this duty to railway is very limited in light of Schedule 2 paragraph 3, which states that “*It is never reasonable for [an operator] to have to take a step which would...involve the alteration or removal of a physical feature of a vehicle used in providing the service...[where it is] a vehicle built or adapted to carry passengers on a railway or tramway (within the meaning, in each case, of the Transport and Works Act 1992).*”
- It states that “*Operators need to be mindful of the requirements of the Regulation when developing policy and practice. In particular, Articles 19 to 25 inclusive...*”. However, only Articles 9, 11, 12, 19, 20(1) and 26 of the Regulation are in force in the UK (and the remainder may never come into force as a result of Brexit).
- there are references to “persons with reduced mobility” which should be references to “disabled persons” under EA10.

The particular relevance of this point is that SWR is aware of disabled passengers that keep themselves very well informed, including by reading statements produced by Regulators. Such statements therefore need to be legally and factually accurate because it is operators who otherwise have the burden of explaining to passengers why their understanding having read such statements may nevertheless be inaccurate.

Section 4, Paragraph A2.5: Websites

It is not clear that it would actually be useful to users to make it mandatory that all of the types of information list in this section must be provided “*on one page*”. Proposed content includes (amongst many other items) “*information of on-board facilities and station information, including accessibility information, staff availability, contact centre opening hours, disabled parking spaces*”. This risks creating a large inaccessible document that is difficult to read and takes a long time to load. Would it not be better for that one page to contain all the links in one place, rather than all of the underlying information?

Section 4, Paragraph A3: Ticketing

ORR recommends changes to the ticket booking section of Operators’ websites at the first available opportunity and, where necessary, their contact centre call handling procedures, so that when passengers indicate they have a Disabled Persons Railcard (DPRC) this acts as a trigger for the website or call centre staff to ask whether they require assistance with any aspect of their journey. It is not clear what the time will be allowed for implementing compliant practices. This will require amendment to call centre training and script documents.

SWR would like to express that not all disabled and older customers require assistance, and some DPRC holders may find it patronising to be asked if they require assistance. For instance, many people with epilepsy would qualify for a DRPC, however, many of those who are younger or middle-aged would most likely not require any assistance and would, in our opinion, be offended by the suggestion that they could not managed to travel without physical assistance from staff. We appreciate that customers who may require assistance should be made aware of it, we believe that this would not be the most appropriate way of doing so.

If the above were to become mandatory, ORR must allow testing and, if testing confirms it is possible, a sufficient implementation period for operators to instructing coding, sandbox testing, and confirm the functionality of (in particular) its website to meet the proposed mandatory requirement that *“the operator must ensure that passengers are unable to, or warned against, purchasing tickets they cannot make use of on the operator’s services e.g. due to the accessibility of rolling stock (e.g. when purchasing first class tickets, passengers should be warned if there is no wheelchair space in first class).”* ORR should only introduce this mandatory requirement once it is confirmed that key back-office functionality used by all or most TOCs can actually support such a trigger. How does ORR intend to regulate third party ticket sellers (such as TrainLine.com and ‘Ticket Splitting’ websites) to ensure they provide equivalent functionality?

Section 4, Paragraph A7.3: Third party provided facilities (in stations)

The draft Guidance states: *“Operators must set out how they will ensure that services and facilities provided by third parties are as accessible as possible.”* Operators can *“seek to ensure”* compliance, they can make stipulations in sub-leases and contract, and they can even take action against those that do not comply. However, operators cannot guarantee that they *“will ensure”* compliance. That is a matter for the third party. The proposed wording might also give the (presumably unintentional) suggestion that operators are required to fund third parties so that it can ensure the services and facilities are as accessible as possible.

Terminology used for Assisted Travel

South Western Railway (SWR) acknowledges that the ORR has conducted extensive research on Passenger Assistance provision and SWR has been involved in focus groups regarding this. SWR would like to highlight terminology used for Passenger Assistance, as it is currently known in the industry, is a national system, signed up to by all Train Operating Companies (TOCs) and Network Rail, the terminology used should be consistent across the industry as a whole. There are many variants of the service used by different TOCs such as “Assisted Travel”, “Journey Care”, “Travel Assistance” etc, leading to potential confusion amongst customers as to what each means and potentially having a different meaning and comprehension depending on the words used. SWR would like to propose that whatever name is chosen is consistent throughout the industry.

Terminology used for “Spontaneous Travel”

In regard to “Spontaneous Travel”, informally known as “Turn Up and Go” SWR would prefer to refer to this as “Unbooked Assistance” as the term “Turn Up and Go” could be misleading due to practicalities of ensuring that staff are available at every part of the journey in order for our staff to help and assist customers. As part of its licencing conditions with the ORR, SWR provides data of Unbooked Assistance requests on a railway period basis (4 weeks) and provides the details of the number requested, the number successfully completed, the number unsuccessfully completed and the reasons for failure. Through this data collection, SWR is aware that the percentage of Unbooked Assistance vs Booked Assistance varies in location because of the nature of our operations. SWR acknowledges that customers do not need to book assistance prior to travel, however, SWR would like to impress on the ORR the need for expectations to be set appropriately to customers and for customers to understand that pre-booking assistance can be advantageous, depending upon the journey being undertaken.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Southeastern Railway
Email*	[Redacted]

*This information will not be published on our website.

Southeastern Railway welcomes the opportunity to comment on the proposals to update the DPPP guidance document, we hope that you find our comments useful and will take on board the points we have made.

Please get in touch if you need clarification with anything.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

As Inclusive is a wider term, generally used to describe those protected characteristics covered under the Equality Act, it would probably be better to use Accessible as this does cover mobility issues like parents with pushchairs or those with luggage or indeed elderly people but is mainly focussed on disability which is what this policy is mainly about.

If companies were required to issue a policy document for passengers that covers all Protected characteristics then Inclusive would be the appropriate name for that document, which may talk about adjustments for people on religious grounds e.g. multi faith prayer rooms etc.

When you look up these two terms in the dictionary, only Accessible mentions disability and Inclusive is about including everyone – which this document is not aimed at.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

a) Is there anything you consider is missing from the required content?

There still seems to be a lot that will be put into the passenger facing document. This is an opportunity to produce something very simple, no more than 4-6 sides of a DL size leaflet, that would give all the relevant information to people about our services and assistance available for disabled and elderly people, without bombarding them with far too much information that simply puts them off picking up the leaflet in the first place. Obviously, there is a need to explain in some detail some elements but for most it should be about sign posting people to where they can find more information, whether through staff at stations, through our Call centre or via links on our website.

For instance, it could list the basic dimensions of our Scooter/wheelchair policy but then signpost the person to our more detail scooter/wheelchair guide on our website where they can get more information. Or, it could include a couple of sentences around Priority seating and cards but then direct people where they can find more information or pick up a separate leaflet about this.

In this way it makes the leaflet an attractive proposition to pick up and look through but then it contains a guide to where all the further and more detailed information can be found.

Also having the document available at all stations that our services call at, will not make it clear for passengers, who may well be unaware who runs the particular service they are getting. Also at some main terminal stations where there are several different Toc's operating, this could lead to several different leaflets all lined up in the leaflet rack which will cause confusion for the passenger – particularly at these stations why not insist that Network Rail produces a document that gives the basic information applicable to all operators and then signposts people to where they can find further information?

b) Is this still a meaningful title for this leaflet?

As this is the target audience we feel that this is the appropriate name for the document.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Rather than listing this information as part of this document, there should be a commitment to have rolling stock information (and pictures) on our website.

There should also be the commitment to have Station information up to date on the NRE website but that the website should be both made easier to use and update and that the current system will be replaced with something more reliable.

Then this is where passengers should be directed to find this information – having another data set on line, buried with in the policy document, but only reviewed every year, means it will be out of date very quickly and just becomes another onerous data set that needs to be updated. It also doesn't match the information shown on the NRE website in its content which makes it both more difficult to update and for people to use it.

It is also unclear from the consultation document whether it is expected that alternative versions of both documents, i.e. the passenger document and the on-line policy document, will have to be available, on

demand at stations. This will mean printing out many copies of these leaflets, in the different alternatives versions that are being proposed, so that they can sit on a shelf and not be used. Especially with the policy document that now contains all the station and train information, this will need to be done every year. Currently we keep these ready prepared copies on our website, available as downloads direct for passengers and we currently get no demand for these at all. Having these ready done versions at every staffed station is both expensive and unwarranted by current demand.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

- Although it is suggested that we should not send an initial DPPP for approval that has been fully designed and ready for publication, because we only have a month from when they send the document back to us, to get a fully printed version available as a hard copy at stations this seems very unrealistic. Not only has the document going to have to be branded (which includes the wording and tone used for a passenger document) but it also needs to go through the additional hoop of being 'crystal marked'. It only gives two weeks for a customer version to be displayed on our website, then a further month to have a printed version available in stations. This only means 6 weeks (30 working days!) from final approval to a printed version. Before it was three months which was a much more realistic proposal and there is no real justification in here as to how they believe this can be halved but also what need is driving these timescales.
- Some clarification is needed when it comes to the consultation process that the Toc is supposed to undertake. There are no timescales on this yet as most of the organisations we deal with are either voluntary or not funded for this kind of activity, it can take several weeks to get a response from these organisations or even attend what can be very sporadic and ad hoc meetings.
- There is also the issue on what happens if a particular consultee decides we are being unreasonable on not delivering a particular service that the Cop doesn't impose on us but they believe we should do. Is it that we note their concerns when we send in our policy for approval and state that we intend to not do whatever it is, however does this then make yourselves believe we are ignoring a demand from our passengers and actually tell us we have to do something which we are not obliged to or likely to be funded to do? Do you need to see the responses we had to our consultation or are you content if we can prove that we undertook a consultation, received so many responses, and that where we agreed with the consultees have made the necessary changes and where we haven't, have at least noted the concerns for future consideration?

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The new step free classification, although no doubt this provides clarification for those in the industry and are familiar with the issues around accessibility, they will not be clear to passengers and the language used is not clear and logical. E.g. PRM, 1:10, 1:7 etc.

Although providing granularity on the step free status does have merit, these classifications are not likely to give people a simple guide to the status and are likely to cause further confusion for people. Maintaining a simple 3 step approach with a clear explanation, as we do now, appears to work for passengers and staff. It might be that agreement is reached on what is included in the description and how this is set out, so there is some level of uniformity across Toc's, making it easier to understand for passengers. This should be Full step free access, partial step free access (check details and will include anything that is only step free via steep ramps etc.) and No step free access. It will then be better to reach a standard on how the access is described and in what order, as this will make it easier for people to understand who are crossing different Toc's.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

With all that call centre staff need to check it looks like this will make calls even longer so will increase Average Handling Time for calls.

We already ask the question in our script to passengers when booking if they need to know what facilities are provided at the stations. Most don't want to know as they are familiar but if they do need lots of information about other Toc's stations this can add a lot of time to the calls.

We need a fully supported new system that is live for every station which then pulls across the relevant and live information into the Passenger Assist system so that operators do not then need to have multiple screens open to find this information. But importantly this information needs to be both correct and live and currently we do not have that comfort.

However, if the person is say booking a journey for two days' time and we tell them that the lift isn't currently working at the station and may by there isn't any ETA for when it will be working, but it would probably be ok by the time they travel, this will only cause the passenger to be uncertain about their journey as we will have put the uncertainty in their mind as we are not able to guarantee that the facility will be available.

What may work better, for essential facilities like lifts or toilets, is that an automatic email is sent to them on the day, generated from the new PA system, which will confirm the current status of the lift and toilet – if all is ok they just get reassurance , if it isn't then this email would trigger a response from the Toc operator to make alternative arrangements or get in touch with the person as required.

If calls are extended this could lead to changes in our contract terms with our supplier and mean, we need to increase the headcount – which will increase the costs

If the person books online how would these passengers know about these facilities – would we be expected to phone them, even though they clearly prefer to deal with us on line?

There needs to be a way of being able to provide detailed information on other TOC's stations and trains that ensures the information is reliable and up to date and is easily accessible.

Even though it may be proved that the fault for a booking failure lay with the operator who made the booking, it will be a weak defence for the operator that actually delivered the booking if they are just to point the finger at the operator who made the booking. If this protocol was implemented who does the ORR believe will need to take responsibility for the failure of the booking? At the moment it will be whoever delivers the booking, not whoever booked it in the first place.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Believe this is a good idea to make sure we set our expectation on what we need the passenger to help us with and we would need to provide examples of why it is important eg why staying where you were boarded is important (so that the destination know what coach to go to)

With all that call centre staff need to check it looks like this will make calls even longer so will increase Average Handling Time for calls which will increase cost.

How would this effect the passenger charter, Consumer Rights Act and rights under National Rail Conditions of Travel in terms of a best practice guidance – i.e. if they don't stick to the rules we apply to them receiving the assistance does that mean none of the above apply?

This would help in setting the passenger expectations, but the reality is this is different, not only between different Toc's, but at different times of the day and the service on the same Toc.

This may mean there needs to be a general approach that applies to all Toc's and then more granular detail per TOC on what some stations can provide. However, would this then not lead to confusion to passengers on what they can expect at different Toc's and what they are expected to do for different Toc's, even when using the same station. E.g. the difference in the service provided by GA and Lorol at Stratford station.

It is important that it is considered when we would be relaying this information to people, especially as for some who may not be able to follow a link on a web page or even read normal text, they may need this information read out to them – thus leading to much longer calls! What about people who book on line or by text?

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

The handover procedure seems that it will be hard to ensure happens, any more than it does now. After all we expect that this information is passed on now and believe that in most cases it is, it is just that staff forget or get side tracked by other assistance or passenger events that they need to respond to.

What will really make this a failsafe operation is when all staff are using the new Passenger Assist app with their own personal equipment (i.e. phone or tablet). This way the delivery of the assistance can be tracked by both the passenger and the member of staff and should it fail to be delivered it can be pinpointed to exactly who was responsible for doing it.

It is only by having this level of certainty, that the assistance wasn't delivered and who it was that was supposed to deliver it that we will be able to ensure all such failures are followed through with the right person. It is also a way to ensure that the passenger themselves did not disrupt the assistance by moving carriages or catching an earlier train etc.

Also, as this is not a 'proved' concept yet, that is it being tested, and this won't happen until after the consultation has closed, it is difficult to see how we can provide comment on the proposal now without seeing the outcome of this 'proofing'.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Obviously not every station has a phone line as quite a few are unstaffed. Many more are only staffed for part of the day and part of the week. This means that the person who would be available 24/7 for all these stations would need to be remote from the stations. This then means putting this onus onto a person who is no doubt located at a station remote from the station the person needs to travel from yet has many responsibilities already at this main station – they may be the Supervisor or local train service controller. As it is unlikely they will be able to get to the station or even have staff to send there, they will most likely need to organise a taxi – this is usually done by our Call centre so in reality is this not the best place for dealing with calls for out of staffing hours assistance?

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We believe the areas highlighted as needing to be taught are reasonable and we believe our training course delivers much of this already.

However, there is a lot in here that would involve didactic learning and to quote Benjamin Franklin

“Tell me and I forget, teach me and I may remember, involve me and I learn.” so understanding how it is intended to put this across to the attendees in a way that will ensure they take away the learning points would be essential.

However, there is no clarification as to who is designated a frontline colleague, so requires this full training, or if there is a shorter or more defined curriculum for someone who is perhaps a manager or admin or say works as an engineer in a depot and has no direct interaction with passengers?

We believe all training is useful, especially in this subject, but it does need to be tailored to the individual's role and an appropriate amount of time devoted to it, depending on what exposure or interaction they are likely to have with disabled people.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Two years is reasonable to bring our course completely into line with this proposal, but we would want to know who will decide whether our training course does meet these 10 elements? We had asked for the outcome of the evaluation done of our training package but that has not been forthcoming yet, so it is difficult to say how much we must do in your opinion to bring our training up to this standard. Plus we have a new franchise starting soon and we suspect there will be new training included for staff in this – has any work been done by the ORR and DfT to expect some synergy here about what we will be obligated to deliver as part of our new franchise and ensuring that any changes brought about via this consultation are included with these franchise obligations?

The refresher training is something that we would support, however we do strongly believe that this should be based on local issues that have been identified and not just national issues. All Toc's have different business models, with different on train and station facilities as well as many differing levels of staffing on trains and at stations. This means that the challenges our disabled passengers face can be different and so the skills needed by our staff will be different and we should be able to react locally to this change by having refresher training that reflects these different needs.

However there does need to be a clarification on what frontline staff this is aimed at – for instance is it expected that all drivers go through this refresher training or is it aimed more at station-based staff?

It also isn't defined whether all management and admin staff should go through this training, both initial and refresher?

It would be useful to know if it is expected that these groups of Management and admin staff would be expected to go through the full training session or if some staff, especially those with a much more back office role, are either excused from training entirely, or could perhaps undertake an on line training

module, or if indeed the Equality and diversity training that is offered to employees would suffice as this is aimed more at working directly with colleagues from different backgrounds and of course with disabilities?

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Although it is a good starting point to give people information about assistance who have applied for a DPRC, it is wrong to assume that everyone with a DPRC needs assistance. Although it is a while since ATOC surveyed DPRC users, when they did in 2008, 77% were aware of assisted travel but of these 70% chose not to use it!

And although it would be good to see national promotion of the assistance available this should be done alongside promoting the features of modern rail travel that will mean many disabled people are able to independently travel on our trains without the need to have direct assistance. The emphasis should be on making people aware that travel on trains is available to them across a wide range of disabilities and that if needed, assistance is available. We do believe that nationally is the right approach to this kind of promotion as this is more likely to present better value for money across the industry.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We do engage with disability groups and local charities and use the opportunity to discuss how our service could be improved or made better by making changes that would assist people with the particularly disability that the group or charity represents as we talk about our service.

However, we do not find from a promotion point of view, that this works particularly well, at least beyond the immediate reach of the people we are seeing. This is because as much as these groups are used by the people who have the particularly impairment or disability, this is often in small numbers and not because the disability isn't widespread but simply people are not engaging with these types of organisations even though they claim to represent their interests. This means that the trickling down of information from the charity or group, to their grass roots is not very extensive and even though we make our information available and are willing to supply it direct, there is very little uptake of this from these groups.

Over the last few years many local groups that often had some small support from the local council because they represented disabled peoples view in the area but have lost this council support and many have simply disbanded as they have lost secretarial support or a meeting location.

Many Operators already engage in these processes on a voluntary basis. If this process become mandatory and regularly monitored, then it is possible that some third parties might seek to use this requirement as leverage for change. If that change is merited, then the process has worked. But it is possible to envisage situations where the capability and resource of the Operator, and the aspirations of user groups for a better system, are in conflict and who then would be the arbiter?

However there is also the danger that the process will become just another tick box exercise where the main reason for the engagement is just to go and talk at the various organisations just so you can say

you have been 'working' with them when in reality there is little working with and more just a talking at so that the number of organisations 'engaged with' in this way is just so the annual returns to the ORR look impressive.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

These seem reasonable on one hand but then the WC3 guidance doesn't test usability just accessibility, as there is no measure for this and not understanding this will not necessarily lead to easy to use websites for anyone.

It doesn't say whether we will be expected to provide 'proof' that the website has been certified as W3C compliant, or on what frequency we will be expected to have had it tested.

Both above would involve increased cost, especially as routine maintenance and upgrading of any of the website pages may make it difficult to comply with the W3C standards as this would need constant rechecking. Perhaps if there were some number attached to how often this would need to be done and who would we be expected to certify it as such. The working towards is also a bit vague as that hasn't changed since the last Cop yet we do not know of a Toc or many other businesses that could certify their website as W3C compliant.

We note the ambition to have all the information for disabled people on one page, at least that listed in the guidance, but this would seem a lot of information to have available on one page, not making it particularly easy to navigate. This would also be difficult when it appears that information needs to be displayed that is live, such as the requirement to list any delays or disruptions to facilities or services. Surely it would be better to commit to having a link from this page direct to various places where this information could be found, which especially when talking about different types of information, like station facility availability and train running information, which would be found in different parts of our website anyway.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

What insight is driving those three options and what are the benefits of each of them? We believe that this question has not been asked of regular travellers who we know are happy to book several days in advance and we certainly don't get this type of request at the moment, even though we offer a 12 hour service so people could in theory phone the same day – this rarely happens, but of course when it does it creates far more work for our call centre as they have to phone stations direct, which is much harder when the station isn't one of ours.

- up to 10pm the day before travel;

This would provide uniformity across Toc's and would be a logical step because if they didn't want to plan ahead they could just turn up as we do a turn up and go service and do not require a reservation. However, it should be noted that many Toc's call centres close at 10pm so if they phone up at 2159 they may not actually have time to complete their booking. We would suggest 9pm or 930pm would be a better cut off and would not mean most Toc's would not have to change their contracts with their call

centre suppliers. However, does this mean we could roll back our current 12-hour provision back to 10pm the night before?

- a minimum of 6 hours before travel;

When this is the only notice period, it means the threshold moves across the day e.g. 10am for a booking at 4 pm, then 12pm for a booking after 6 pm etc. which could be hard to plan for as mentioned above this will then generate additional work with the booking to make the necessary phone calls. And although for a phone booking this would at least mean we would immediately know of the request, for a web form booking it might take longer to pick up on this request which could reduce drastically the time available to make the necessary arrangements. To make changes to how the current webforms are processed would mean additional cost and possible resource.

- a minimum of 2 hours before travel.

The level of staffing required to meet this expectation would increase costs considerably, because if someone could then phone up just two hours before arriving at the station it may take 30 + minutes to actually record all their requirements for the booking and confirm back all necessary information, including live information about the status of facilities both on the stations and on the trains.

Any changes beyond 10pm the night before should really wait until the new Assistance App from RDG is available and working/bedded in so that as much as possible this can be automated, plus anything for a journey the same day remains as a request and is not confirmed or guaranteed as this could create problems for Toc's in guaranteeing delivery especially for cross Toc journey's.

It is better to ensure that the system works and then start to reduce or even eliminate the booking horizon gradually so that there is uniformity for the passenger, the chance for the operators to ensure the reliability of the system as the booking horizon is reduced.

So for the output of this consultation we believe the best course is to commit to the night before (but 9pm rather than 10pm as this will not impact current call centre opening times) but then only commit to a regular review of this Toc wide every 6 months or so, so that when a further reduction is made , it is done so in an ordered manner when we know the technology is able to cope with it , as well as understanding the impact of changes introduced by new franchises, especially our own.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

- up to 10pm the day before travel;

If this was 9 or 930pm we believe no particular phasing is required. If it was to be 10pm we would need to understand what the implication would be if someone phoned at say 2155 and we had to cut the call off at 2200?

- a minimum of 6 hours before travel; and

To amend the passengers being able to book would require 3-4 periods notice, but this would require a change in contract and extra cost. We would still have the same issue below as well for 6 hours ahead as we would for 2 hours ahead and that is how we would communicate the booking through to the frontline.

- a minimum of 2 hours before travel.

Approx. - 6 periods as a minimum and this would require a full change in structure and large cost! Would also need to consider how the station teams would deliver this and how we would have to communicate the bookings to them – the current system delivers these overnight, as that wouldn't be possible, it may mean we had to phone every late booking through. There is no guarantee that the new passenger assist app, from the staff side of things, will be delivered in the next year. It depends on each different Toc's ability to deliver the staff passenger assist app because they may well be at different stages when it comes to the availability of the necessary equipment that staff need (e.g. up to date and personal issue mobile phones and/or tablets). If our frontline staff do not have the capability to receive bookings through the app then we would have to resort to phoning them through which would be a costly addition.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

This seems to be saying that if a passenger does not want a taxi then we will have to supply a member of staff to assist at a station where either the staff have finished for the day or there are never staff at the station. If it is just assistance off or on the train then we will usually expect the onboard staff to provide this assistance and where this is requested from a station that has staffed trains calling at them, this is what we would normally do. But obviously if the person needs assistance around the station as well, or indeed it is a station which only has DOO services calling at them, then we would normally provide a taxi. There are some occasions where 'spare' staff can be utilised from nearby stations, but this is on a very ad hoc basis as we do not have the luxury of staff to assist on a roaming basis at our stations. To implement this, would mean a significant uplift in resources at stations, including needing to make them more mobile/agile so they are able to get to the station in time to provide the assistance before the train arrives.

This is the model that GTR have temporarily adopted on the south coast for a small select number of stations, but this is both expensive and even then, cannot adapt or cope with multiple requests at different stations at the same time.

We obviously do supply accessible taxis where we are not able to supply a member of staff or guarantee level access, but at least this means we only pay for the service they provide when they provide it and do not have to pay them to sit around and do nothing in between demand – this makes it more cost effective for us and ensures we concentrate on delivering the service when it is needed rather than having a very expensive on demand service, whether it is a roving team member or a standby accessible taxi, both of which are unlikely to be seen as reasonable adjustments under the act.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We already do this by refunding ticket cost for failed BOOKED Assist. We do not refund for non-booked assistance requests and do not think this should be introduced.

Although we support refunding a ticket we do **not** believe this should be an open-ended compensation – as a risk of a mandatory redress obligation without redress levels is that different Operators may well

offer different redress leading either to a race to the top, or to users making excess claims since there is no specificity as to what they can claim.

We do not offer compensation unless the person has actually bought a ticket so, for instance, we do not refund Freedom pass holders anything because they have not actually paid out for the ticket – we believe this is fair as buying a ticket is the actual contract created between the operator and the passenger and we think without this basic contract there should not be an obligation on us to provide financial redress.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

This is a reasonable request but then we should be able to remove the Textphone number and equipment at the same time as this is archaic and underutilised by passengers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

The DfT has chosen not to introduce compulsory obligations on taxi companies and private hire buses to make their vehicles all wheelchair accessible and ensure their staff are all trained in disability awareness. Through this new obligation, this is putting the onus on train companies to make this happen through commercial pressure where they (the DfT) have not taken the opportunity to do through legislation which is clearly a more effective route. Most taxis are renewed every 3 years or so, so if on renewal all taxi and PHV owners had to have accessible vehicles on their next renewal, this would both create a level playing field for all owners but would do so in a short period of time.

It appears with this proposal, that it is concentrating on wheelchair accessible taxis over all others, which doesn't reflect the demand for these taxis, and in fact many disabled people do not have the need for a wheelchair taxi and in fact those with mobility problems can often find these hard to get in and out of as they are higher off the ground.

There are simply too few PHV (only 2% are accessible) and private buses that are accessible and if we refuse to engage with taxi companies that do not have accessible vehicles we will simply be left with no taxis at all on our forecourts, available for any passenger, which is clearly counterproductive. Or we had the scenario that the only taxi available was one that we had refused to have on our forecourt because they did not meet the criteria for accessibility but the person needing assistance was visually impaired and wasn't concerned about the persons training!

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

It is not clear who this member of staff needs to be (e.g. a call centre- NRE or our staff direct?). If it is meant to be a local member of staff this would be very difficult to achieve as staff at stations are expected to be mobile much of the time and although contactable, they are not generally meant to answer calls for multiple stations.

If it is ok for this to go through to a call centre, especially if initially this can be National Rail Enquiries, as they redirect these calls to our call centre directly, however these calls are only 1 or 2 % of the calls they receive, where as they can deal with the 98-99% of calls that comes through stations from local Help Points as they are usually about train running information rather than assistance requests, so it is sensible that they are the first response so they can filter out the vast majority of calls that are simply about train running information.

If the latter is what is being asked for here then we already comply with this now at all of our stations whether fully staffed or completely unstaffed, have Help points with the ability to go through to our Call Centre via NRE or may be answered directly by local staff if the station is staffed 24/7.

However, if it is meant to be a 'local' member of staff this would be almost impossible to deliver at our unstaffed and partly staffed stations.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

The RVAR and PRMTSI compliant trains that nearly all operators now have or will have in the next year (to comply with the 2020 deadline for only using compliant stock) were only designed to carry a 1200mm x 700mm reference wheelchair. Wheelchairs are usually much more manoeuvrable than scooters by design (generally having larger rear wheels and smaller front wheels which are closer together and practically allow a wheelchair to turn on the same spot) and even though we allow scooters up to this size on our trains they can still be found to not be able to get into the wheelchair space usually because of the lack of competence in manoeuvring the scooters exhibited by some of the owners both due to their inexperience but also to the massive difference in handling characteristics of scooters when compared to wheelchairs.

So, we not only have the issue that even scooters within the 'footprint' are not able to fit into the space but this proposal is not clear if we will be expected to take scooters larger than the 'footprint' this unless we can 'prove' they are not compliant or cannot fit into the space.

The onus should not be on us to 'prove' they won't, but rather on the scooter users to prove that they can and do fit with our policy. We have introduced floor mats at many of our main stations that contain the standard 'footprint' for a scooter user and these are portable and allow the scooter to be accurately measured, anywhere around the station, discreetly if needed, but at least then gives reassurance to both passengers and staff that the vehicle is of a size we can accommodate.

It should also be clear that as the trains were not designed to take bigger vehicles than the proscribed 1200x700 then we should be able to ban those scooters above this size automatically!

In fact, although we do have issues with scooters even up to this size, the main issues we have with scooters is those that are designated Class 3 vehicles, which are made so they can go at 8mph and travel on the road, and they are mainly above (way above in some cases at 1300,1400 even 1550mm+ length!) this footprint size, especially in length so they are not designed to use in another vehicle and on

that basis should all be banned from train use – it is not practical to make more space on trains for bigger scooter users as there is simply a practical limit to what size can be accommodated and in fact this is already set with the current size into which most Class 2 scooters could be fitted.

Keeping it to this size will then make it a standard policy across all Toc's once the 2020 deadline comes into force for RVAR/PRM TSI compliance which will make it easier for people to understand and comply with.

Forcing all Toc's to carry out individual assessments both with different vehicles and of course users (who will all have different abilities) is not only impractical and costly but will then potentially give false assurances to these users that they are safe with using their vehicle on trains and at the stations. We are not 'qualified' to give this guarantee and in fact as there is no licence obligation on scooter users, so no one is signing off scooter users as safe anywhere. So, where we are all able to say someone or some vehicle isn't safe with no real knowledge or qualifications in this area, we are not competent or qualified to say either a vehicle or a user is Safe, especially if we are expected to allow vehicles on our trains that are larger than the current accepted footprint which we currently allow.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

- a) Operational systems used by train planning and control for carriage workings are not currently made available to retail systems. Therefore, it is not possible for ticket sales outlets to give passengers precise details of the makeup of the rolling stock provided by individual trains to customers when they purchase tickets. Although the National Reservations Service allows train inventories and seat composition to be returned by retail systems, this is a very basic interface which does not currently provide the sort of functionality that would be required for such a service to be provided.

Furthermore, it would be difficult to impossible to make TVMs give this information, at least in the granularity needed for someone to plan their accessible journey. Linking this information from the website could be possible but as Accessibility is such a subjective measurement, not just based on someone's disability but on how they deal with their disability, that it is impossible to say someone has bought a ticket which they cannot use unless that need is very specific i.e. there must be step free access via a lift and there must be staff on hand to assist around the station.

If you apply for a refund on an unused Anytime or Off-peak ticket before the ticket is valid for travel, or on the day, at the ticket office where the ticket was bought, within an hour of purchase, we will give you a refund and won't charge you any administration fee.

There is also the question of how this would be done where the sellers are a third party and we have no control over what they have said to the passenger when selling the ticket.

In the future we would hope that operational systems and retail systems will be able to share data so that a customer may see the type of train that is working their service and the facilities on board prior to purchasing a ticket. However, we are unable to put a precise timescale on when this will be available. Our view therefore is that it is premature to update the guidance with this requirement currently.

b) It is very unclear what alternative arrangements we could make for someone if the accessible toilet wasn't working on a train – perhaps providing easement re their ticket validity could be done so they could get the next train where the toilet is working but for which their ticket isn't valid (although we would do this anyway). However providing alternative transport e.g. a taxi or a bus, would hardly seem appropriate for this as this alternative do not have accessible toilets for them to use and there is no more guarantee that the taxi/bus would be able to find an accessible toilet when needed enroute any more than the train being able to stop at stations enroute to use the accessible toilet. This 'alternative travel arrangement' needs to be illustrated more as to what the ORR expects us to provide especially when the next train may come in 15 or 30 minutes with a working toilet.

Also, at the minute it is very difficult when trains are in service to check whether their on-board toilet is working. They automatically lock themselves out of use when the tank reaches a certain level and this can happen anytime, until this can be automatically signalled out and this isn't possible at this time, it will be difficult to know whether the train has a working toilet even before the person gets on , but it can then lock itself out of use after they have boarded but before they wish to use it? Although we can stop at a station enroute for them to use the toilet it will depend on the time of day and frequency of service as to whether they will be able to re board the same train.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

We feel that what you are listing here is 'Best' practice here rather than 'Good' practice. Although that may feel like semantics it is an important distinction as Good sounds like something we all should be doing where 'Best' makes it a bit more specific to the Toc and exemplary rather than run of the mill. Some of the 'good' practice mentioned is ok but is not applicable to all Toc's, because our various businesses differ in the service we provide and how we provide it. However as one Toc does this, will this 'good practice' start to be seen as the minimum provision that everyone starts to have to do? Will this indeed be seen as a minimum adjustment that everyone must make otherwise they are failing to provide a service e.g. Like a Toc with a non reservable service being expected to reserve priority seats for disabled people because a Toc with reservable seats is, very easily, able to do this?

Q25. Do you have any other comments or views on improving Assisted Travel?

As above why is it all about Assisted Travel when it should be about All disabled people, the majority of whom don't necessarily need assistance with all the other improvements we have made on the railway e.g. A4A, Tactile surfaces, handrails, signage, CIS on stations, audio and visual as well as PIS on trains, priority seating and cards/badges, Accessible toilets, wide aisle ticket gates, Blue badge spaces, Automatic doors, accessible heating, on line station/train information and train running etc. etc.

It seems we are to be measured on the service that we give only around 5% of disabled people that travel, as all these new obligations and particularly measurement of such, are aimed at disabled people who require assistance. Although a couple of the proposals do apply to any disabled person who is travelling, it seems the focus is mainly on those whom require assistance , and although of course we support that we feel the ORR is missing an opportunity here to spread a much clearer and in effect

better message about how many disabled people are travelling, independently and confidently on the railway.

Maybe they should be looking at how they measure this 'silent majority' of disabled people who travel successfully every day on the country's railways without needing assistance because of the many billions of pounds that have been spent on making stations and trains accessible to them. By helping to spread this positive message it will encourage more disabled people to try the service and help offset some of the negative press often around when assistance fails which has the impact of putting disabled people off even trying the railway.

Additional comments

Although welcome to see that the language has been tightened up so that we can see what we must do in comparison with what the ORR would like us to do, there is still some ambiguity around the phrase 'where reasonably practical' as that seems open to interpretation on both sides and in particular seems that one Toc may be expected to undertake a particular action where another isn't, yet there is no clarification as to what aspects of the business may be taken into account when considering what is reasonable. Perhaps where this phrase is used, some explanation of what circumstances would need to occur before this action is expected by the ORR.

Assisted Travel Consultation
Submission by [redacted] – Founder of Speedy Sticks Consulting
22 January 2019

Q1:

I prefer '*Inclusive Travel Policy*' as it sounds like it covers a whole range of disabilities.

Q2:

I like the title of the document, however, one of the main things I want to see stand out from the leaflet, (I'm unsure if this document would be tailor made for or by the train company or from the ORR?) is the contact information (including their social media contact information of the accessibility Manager(s).

Q3:

I am of a view that there should at least be two accessibility Managers, one for stations and one for rolling stock. I suggest that if passengers have complaints about the stations, (environment, ticket machines, staffing), they could get hold of the stations accessibility Manager through the train companies switchboard or through the website.

The same is true for the rolling stock accessibility manager, (train crew, toilets, interior fittings etc).

I would like to see one of their main duties is for them to regularly tour stations (if it is the stations accessibility manager so they can check that the staff's accessibility training is up to scratch, make sure things like accessibility leaflets, disabled toilets and other things relating to a wide range of the disabilities like hearing loops are working etc.)

The same for the Rolling stock accessibility Manager, (to make sure they regularly go on trains to monitor the Guard/OBS/etc, check the accessible toilet is working, making sure the PIS is working etc).

Q4:

Maybe at the start of a new franchise, there should be a mailing list of

disabled passengers in the area, who should either get the leaflet sent electronically or via snail mail as soon as available, but then making it an automatic opt out on the snail mail version unless the passenger requests any updated copies to save costs.

Q5:

I think I like the A to E category solution, but with the advent of trains that don't need a wheelchair ramp to get on or off a train, I would like to see a gap range given at each station so a wheelchair or an electric user knows if their chair can bridge the gap from the train to the platform or will need to ask for a wheelchair ramp. I realise that it is a bit more complicated for stations that have a curvature, due to varying gap sizes, where the wheelchair carriage of the train stops at, etc.

It may be helpful to identify where best to find a member of staff or to summon them by a bell or phone number etc (if you can access the stations building in the first place!) for further help and information about the station or the destination station if the map seems to be complicated or confusing.

Q6:

I think the train company's Stations accessibility Manager should have the responsibility of maintaining the station accessibility information and any wrong information should be that person's responsibility.

Q7:

As an electric chair user I think you should be given the option of either asking station staff what platform their train is on or where it may be and then go to the ticket barriers and ask them to pass the message on to platform staff that you need a wheelchair ramp, then it would be easier for the platform member to meet you at the ticket gate to get you to the train, but I personally don't mind going up to the platform to meet them, but I can understand if others would prefer the platform staff to meet them at the ticket barrier. Even if the train hasn't arrived and/or had its platform allocated to it, I just wait for them to call me once it is available.

I find that better than having to go to an assistance reception where it is far

from the platform and may take longer to be attended too. But the option should be given, not dictated to the disabled passenger as to what to do.

As for getting assistance once your train pulls into the platform, I'm of the very strong opinion that the train Guard/OBS should be the main person to get you off, whether you are in a wheelchair or require other assistance, then if the passenger requires a seat, find them a seat, then they should then find the nearest member of platform staff to offer you onward and/or further assistance like a wheelchair or a member of station assist staff. All guards/OBS/etc should be allowed to use a wheelchair ramp to get you off the train and on to the platform, whether the wheelchair ramp is on the train or the platform, this will save both stress for the passenger being worried that they have been forgotten about and not delay the service leaving the station. Virgin West Coast at Euston is one of the worst for this as they wait for a person on a mobility buggy to get the wheelchair user off the train with a wheelchair ramp. There should be absolutely no excuse for leaving a wheelchair or anybody else seeking assistance if none turn up in max of a 1 minute wait of when the train stops at a station. But I'm seeing increasing use at stations like Redhill, Gatwick Airport etc where they rely on "Remote" assistance staff which go all around the station and maybe on the concourse etc, which rely on boards and being "told" the train that the assistance job is on is late when it visually isn't, getting folks off the train should be primarily the on board staff, or platform staff (especially if there isn't any 2nd person on the train,) who can actually "see" the train coming into the platform, meaning the person needing assistance won't be left on the train or the train being delayed leaving the station.

But all train company best practice guidance should be as identical as possible so for disabled passenger and staff harmony. If platform staff fail assistance job, the passenger should report it to the train company's station accessibility Manager of which the assistance failed, the same for if train staff fail to offer the required assistance, they should report it to that train company's rolling stock accessibility manager.

I also recommend that all Train company's accessibility Managers should

meet at least once a year to spread best practice and also identify and act on any hotspots where assist failures are common.

I also think the increasing use of agency staff isn't helping with assist service reliability due to agency staff most of the time being constantly moved around and maybe not being familiar with the different layouts of the different stations they are sent to. I'm very concerned that around my area and maybe other areas that ticket gate agency staff aren't qualified to use the wheelchair ramp, so can't offer additional help if more than one assistance job comes up on different platforms or either on the same train.

Q8:

I think the station and rolling stock accessibility Managers should be required to investigate assistance failure and investigate what went wrong, why and troubleshoot a solution, even working with other accessibility managers from other train companies if the assist fail has another train company involved in the journey.

Q9:

Having a 'Responsible Person' is a fabulous idea, but I do worry about the negative trend of poorly trained agency station staff. The 'Responsible Person' needs to be a paid member of the train company or be employed by Network Rail. The nature of agency staff is they get moved around regularly, so won't be at a station or stations for long enough to be familiar with the station layout. Agency staff tend not to stay in a job too long before moving on.

The 'Responsible Person' also needs to be able to keep the same number for their station(s). The agency staff at Crawley station either lost their mobile phone or had it nicked, so the number I had to phone them to advise that I was on an incoming train was not working. They gave me the new mobile number, but it is questionable if the other stations on the GTR network had the new number, or indeed knew the other number wasn't working any more due to the phone being nicked or stolen.

The accessibility Station Manager should be responsible for maintaining the

station phone number database.

I believe that if station to station communication is consistency bad at a particular station, it should be a badge of shame for that particular destination station to give their 'Responsible Person' number to any disabled passenger that uses that station. This is happening in Crawley where the all agency platform staff are pretty unreliable. In this situation the Stations accessibility Manager should be responsible for identifying and rectifying the reason why communication is so bad, is it the assist phone is too far away from the gate line, is it too quite, etc?

The Stations Accessibility Manager should be responsible for contacting the disabled passengers who use that station to tell them the phone number has changed due to it being nicked or stolen via the database.

Q10:

I have big concerns that agency staff should be required to do the same training at the required level. Train companies shouldn't be using agency staff as staffing 'on the cheap'.

I also strongly believe that all gatelingstaff, (agency and own TOC staff) should be trained to use the wheelchair ramp.

Q11:

I agree with the first point.

Training should be tailored to how many train companies use the station where the staff member should work, this may reduce training costs if that station(s) have only one operator.

The same for train crew staff.

Q12:

I think the giving as much info with the Railcard renewal pack is a good idea, could also be available on YouTube etc for viewing.

Maybe part of the TOC's Accessibility Manager's roll could be to help disabled passengers renew their railcard, as paperwork (at different venues as above) and process wise, it can be frustrating and confusing.

Q13:

My concern with the RDG is they are very 'closed door' when it comes to the roll out road map of their Passenger Assist app, this greatly troubles me, with the impending of guard removal schemes, the ones that are having their guards removed should be priority for having the app, even for use within just their network.

The TOC's accessibility Managers should be much more approachable via social media and the same is true for RDG.

The more personable the accessibility Managers are with their disabled passengers and those coming from out of the area, the more passengers will feel confidence in confining their issues and engaging with them to find solutions to problems.

The TOC's accessibility Managers should be suitably qualified in dealing personally with disabled people, not as GTR's accessibility Manager who's only qualification seems to be being a former station master. That is totally unacceptable, especially when dealing with such a large and diverse operating area.

I think the TOC's accessibility Managers should be able to go to shopping centers, coffee shops, stations, to both be able to advise on their TOC's accessibility products and services and also be able to assist with their local passenger's questions and issues they might have with the operator. The mix of venues should encourage different groups of passengers to best engage in an environment that suits their needs.

I have concerns on how the GTR disabled users group was made up, but generally it is a good idea. But it needs to be politics free when selection for the panel is made with a 'Can do' attitude.

When traveling in between train companies I don't view each company's website as I choose to be as spontaneous as possible. This is when a

consistent disability policy is essential with a little room for a train company to try new ideas.

Q14:

All train companies should have the same term for their assisted travel section and all should be in a similar location within each TOC website to save confusion for passengers who travel between TOC's.

Also there must be a way of booking your assistance at the same time as booking your tickets.

Q15:

Speaking from a crutches, wheelchair and an electric chair passenger point of view, on somewhere like Southern Rail I see absolutely no reason why I need to book at all as all their trains should have OBS staff on board who can get a wheelchair ramp if station staff don't turn up. The same is true for most journeys I have where staff are on the train, but not all train company's train crew use the wheelchair ramp in normal operation, if they did, it would free up platform staff to offer assistance to those who need it, this is why I fear the trend of destaffing trains a very worrying trend.

Most of the problems I encounter are mainly down to communication problems, which aren't followed up and acted on and the same failures just keep repeating.

I can understand that LNER may require 24 hours notice because of their old trains having a lot of unreliable toilets, but even this notice period isn't good enough if the required train's toilet is broken, but not reported.

Logically if you are doing a long journey, you may start by giving the first operator 2 hours notice, but because your journey is about 4 hours, the 2nd of a two train journey will logically get 4 hours notice if the train change is two hours into a 6 hour journey, if the passenger makes assist booking 2 hours before their trip.

Q16:

TOC's must give formal notice as to why they require a certain period of pre booking and why and how the staged improvement will take place. LNER could say since they have their new trains coming in on certain routes, the reduction of notice period would make sense due to working toilets, etc.

Q17:

This hasn't been addressed at all by the industry in relation to the guard removal schemes. All I have heard is utter nonsensical spin by able bodied management and faceless social media and PR teams.

A TOC's accessibility team has got to be at the forefront for ANY guard removal scheme and be involved as a major player and hold relevant muscle in terms of offering solutions to communications problems which may well result in guard removal.

The accessibility Manager must be publicly available to as possible to answer disabled passengers concerns and keep them fully involved at every stage.

DfT and RDG have got to let the TOC be as flexible as possible with the speed they need to carry out the change in regards to passenger concerns and they need to let them have the retentive staff and resources in place before the change. They MUST do a proof of concept to prove to disabled passengers that their journeys won't be affected by guards being removed, the proof of concept needs to be done on one line, (preferably a branch/local line) so the changes can be scaled up successfully.

I am again deeply concerned by GTR's reliance on poorly trained agency staff, any guard removal schemes need to use as many TOC employees as possible.

I also know for a fact that planning for disabled passengers once guards were removed wasn't asked for in the franchising documents, this needs to change immediately, doesn't matter if it is a Franchise, Open Access, etc. Planning must be made in the bidding documents.

Q18:

I'm not a real fan of financial redress as I feel it allows TOC's with big pockets a way of 'Paying off' complaints without doing anything about the route cause of the assist failure.

What needs to happen is a TOC's accessibility team should personally arrange to speak to the passenger about the assist failure by phone in the first instance, then arrange to meet them at their local station or near by that station to explain what went wrong and what they will do to address it, also ask the passenger if they have any ideas to stop the issue happening again. If the assist failure occurred outside the passenger's local train company area, obviously a meeting would be harder, but may not be impossible. Maybe just a VOIP chat may suffice.

Q19:

N/A

Q20:

As you say I'm hoping that you can let disabled passengers on wheels to use a taxi on a normal taxi rank where a bus replacement is being used without a wheelchair accessible bus/coach or if a train line or station isn't wheelchair accessible. Or if a TOC's preferred taxi company is known to take too long to arrive when called.

Some may prefer to use their local taxi company to use from their local station if it is a bus replacement.

Q21:

I know from my experience of using help points, if I had a direct way of contacting the accessibility manager through a phone number or social media, I would feel better than having to press the emergency button on the help point to talk to the control room, because most help point Info buttons connect to an off shore call center. I always thought that a station should have a reference code which you could quote the TOC call center so they know how to deal with an issue you may be having. For example, in 2014 I was stuck at Whittlesford in my electric chair, but couldn't get on the train because the station and all serving trains were unstaffed. When I pressed the

Emergency button, the control room didn't have a plan in place, which caused problems all around.

Q22:

This is why a disability Manager should have a disability background, so they can better understand the disabled passenger point of view and maybe offer advice on a different mobility product that would better suit their needs and be more compatible for train travel. They should also be involved in any new or refurbished rolling projects as should the members of that TOC's accessibility group so they can better design the train around their passengers needs.

I also wonder if a partnership with a local or national mobility company may help all around to help both their TOC's management and passengers to be more inclusive.

Q23:

A good idea

B A notification of a toilet being out of order should be the same as a TOC requires a disabled passenger to book their train.

Q24:

The spread of a dedicated travel assist teams at stations is a good idea in principle, but they shouldn't be involved in getting people off the train. This should be the tasks of the platform staff and on board train staff, all should be trained in using the wheelchair ramp. Leaving wheelchair passengers on the train must not be an option like it is at Euston for example with Virgin West Coast, the crew must use the wheelchair ramp within a minute if assistance doesn't turn up.

I do really think there should be a person or a body set up who disabled passengers can call upon to help with passenger complaints with train companies, somebody who can look over guard removal schemes to ensure disabled passengers needs aren't forgotten in the process, somebody who can address unfair assisted travel policies, Somebody who can look over new train or refurbished designs where they can use good old common sense to spot

design errors and have the powers to get them addressed, for example the new CAF trains for Northern Rail not having grab rails in the wheelchair area. There seems to be a lack of the personal touch for disabled passengers in the rail industry, we need a person or body to represent us.

St Leonards & Hastings Rail Improvement user group response

Dear Sirs, we are writing in our capacity as the local voluntary rail improvement user group, St Leonards & Hastings Rail Improvement ('SHRIMP'). We do not consider ourselves to have an encyclopaedic knowledge of the finer details of this complex issue – there are official organisations far better placed in that context – so are responding in the context of local issues.

=====

We have four stations within our catchment ie Ore, Hastings, St Leonards Warrior Square and West St Leonards. All of these stations present issues for disabled travellers:

ORE Official ORR footfall data shows this station as gaining a consistent year-on-year increase of usage. It serves an expanding local residential community and an advanced educational facility. But it has NO step-free access to the west-bound platform for services to Hastings, Eastbourne, Brighton, Gatwick Airport, London Victoria. The station is permanently unmanned, has no ticket office and no public address system. **As such, for anyone with a disability - be it physical or sensory – it is not fit for purpose.**

HASTINGS This central town station, which was totally rebuilt in 2004, is serviced by two rail franchises, Southern (p/o GTR) and SouthEastern. As a general operating criteria Southern services utilise platforms 1 & 2 which have level access from the main station concourse, with SouthEastern operating out of 'island' platforms 3 & 4 which are reached by either 2 x stairways or 2 x lifts at both ends of an overhead bridge, which is satisfactory unless there either of the lifts is out of service.

When either of the lifts is out of use then there is no alternative means of accessing SouthEastern services for passengers with mobility restraints, unless passengers use the next station ie St Leonards Warrior Square.

ST LEONARDS WARRIOR SQUARE This is another significant central town station, with two platforms. It is an important inter-operator interchange, with passengers from across a wide area moving between platforms in order to switch between Southern (Coastway) services and SouthEastern services to London via Battle and Tunbridge Wells. This switch is made by passengers moving uni-directionally over a connecting overhead bridge which has two sets of steps, no ramps, no lifts.

For anyone with a physical disability this presents a major challenge.

WEST ST LEONARDS The station has two platforms, neither of which offer step-free access. In addition this station is serviced only by SouthEastern so passengers within its catchment who require trains towards Bexhill, Eastbourne, Brighton, Gatwick etc are required to travel via St Leonards Warrior Square – **see above.**

SUMMARY

Any project or consultation to improve access for disabled passengers within the rail system is overdue and receives our full support. But there is clearly an issue about getting passengers into the system to start with.

Many stations present difficulties for passengers with either sensory or physical challenges, irrespective of background systems designed to assist journeys within the network.

Remedying these difficulties is not easy, with the design of many of these stations a hindrance within Access for All calculations and requirements. In addition some stations have local planning restrictions imposed on them which, albeit with fine intentions, are inconsistent with meaningful upgrades.

As reaction to the consultation progresses, thought might be given as to whether overriding these restrictions would be useful.

We hope our submission is useful.

Yours faithfully,

[Redacted]

SHRIMP - St Leonards and Hastings Rail Improvement, p.o East Sussex Rail Alliance

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	[Stagecoach Rail
Email*	[Redacted]

*This information will not be published on our website.

This is a joint response on behalf of East Midlands Trains and Stagecoach Rail.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

We agree that ‘Disabled Person’s Protection Policy’ is an outdated term which requires replacing with a title more appropriate to the wide variety of requirements passengers may have when considering rail travel as part of their journey. We would prefer Accessible Travel Policy, as consistent with Government strategy.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- a) We believe that there should be a separate section on 'How to Book Tickets' instead of this being part of the 'Before you travel' section as described in section 3.3a of Annex A. This is because we believe it is key to our customers' journey experience. We have encountered problems with customers booking assistance prior to purchasing a ticket (and vice versa). As the National Rail System (NRS) and Passenger Assist (PA) systems are yet to integrate, a customer can purchase a ticket without knowing if space for a mobility scooter/aid or priority seat on their preferred/booked service is available, or they can book assistance and the cheapest ticket is no longer available. Whilst we appreciate that this situation should be resolved in the longer term (with the new PA system); it would be useful to encourage customers to buy a ticket/book assistance from the outset.

There is concern that the draft passenger leaflet structure/content will still result in a quite lengthy document.

There needs to be consistency across TOCs/Network Rail regarding section 4.d of Annex A, to manage passenger expectations on when they will be met at their final destination.

We believe the wording used in the passenger-facing document; 'When things go wrong', may give an expectation to customers that their assistance may fail. We suggest rewording or renaming this section. However, we do support including redress arrangements within the passenger-facing document for all operators (both franchised and open access).

- b) The previous title seems restrictive and does not consider the wider issues that the Accessible/Inclusive Travel Policy addresses. We would prefer the title of the passenger-facing leaflet to be 'Making Rail Accessible for All'.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We agree that rolling stock accessibility information is moved to the policy document.

However, there is concern that there still needs to be reference within the Passenger Leaflet to highlight that some stations are inaccessible. This could be presented as a map, with keys to the type of assistance that is provided and where/how to obtain further information.

As many customers' journeys may be across multiple TOCs (including stations managed by Network Rail), there is a need for a national level map showing levels of accessibility, which each TOC can refer to in their documents. This should be led by RDG, at a national level in consultation with the wider industry.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We agree that unless significant material changes have occurred requiring a review/full approval by the ORR, then annual approval of the full DPPP documentation is not required.

The requirement for new operators to submit their Accessible/Inclusive Travel Policy at least 10 weeks before the start of operations is ambitious as new operators of franchises may (in some cases) only be announced by the Department for Transport up to 90 days before operations commence. The ORR recommend 90-120 days between franchise announcement and day one of new operations. In the case of a new operator being announced 90 days before operations commence this would provide a very limited window to draft, in consultation with relevant stakeholders, a new Accessible/Inclusive Travel Policy.

We believe that new operators should have the option to submit their draft Accessible/Inclusive Travel Policy after operations commence to allow time for the required consultations and drafting to occur, with an allowance for the previous operator's Accessible/Inclusive Travel Policy to be effective until the new operator's policy has been approved and published. We have no concerns about having to upload the documentation to the website within one week of approval and to distribute to stations within one month of approval.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

It is unclear if the proposed classifications have been through a consultation process that includes disability groups to better understand what information customers require.

The classification of stations requires consistency industry wide, where the language used in each classification is transparent to customers. In the case of the classifications in Appendix B of Annex A, the A-E titles for each classification would be unsuitable because a customer would not immediately understand what each classification means to their accessibility requirements. From the customer's perspective, how is a category 'B' station more appropriate for their needs than a category 'C' and how would customers define the difference between 'useable' and 'suboptimal' step-free access?

We believe describing to customers the step-free accessibility to platforms using the three-tier option (described in section 3.31 of the consultation document) would be more appropriate. There may be a use for the A-E classifications within the industry to ensure stations are evaluated consistently.

There needs to be clarity as to who would be responsible for conducting station inspections/surveys to classify each station according to the criteria described in Appendix B of Annex A, as this could potentially be an onerous task (incurring costs) for TOCs with a large number of stations. This, and the frequency that stations are expected to be re-inspected is not clear.

The classifications refer to station accessibility, but they do not consider the facilities and services (e.g. staffing, accessible toilets, provision of appropriate seating etc.) which passengers may consider to be key to determining if a station is truly accessible for their needs.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

We agree that the provision of mandatory checks during the assistance booking process would help to ensure that failures are reduced. However, it is therefore essential that Knowledgebase is kept up to date. There have been recent issues where TOCs have made changes to this information but this has not subsequently been updated within Knowledgebase. Updating the information on Knowledgebase is an onerous task for operators, and a review urgently needs to be undertaken to improve this process and the system's reliability.

As the introduction of mandatory checks will increase assistance processing time, it would be better if these are only required on stations which are flagged within the PA system as tier two or three (as tier one would be classified as fully step-free). To ensure that the provision of this information is then provided to the customer, mandatory tick boxes should be provided within the PA system, so the advisor has a clear process on the steps required to complete the booking. These can then be monitored/reported.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We agree that this would help to set passenger expectations. A list of frequently asked questions (to include this information) should be attached to the email confirmation sent to customers via PA and text alerts included in the development of the forthcoming customer app.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Further clarification is needed on ORR's mainline station definitions in this context.

We support the introduction of an assistance protocol and agree that this would ensure consistency across the industry when delivering assistance to passengers. A handover protocol should form an integral element of the training regime. Any handover protocol will also need to be integrated with the new PA app. In the short-term (prior to the introduction of new systems), further detail on how compliance with any handover protocol is to be monitored and reported would be beneficial.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This would require additional resources (and costs) to introduce. Our TOCs manage some stations that other TOCs operate from, who would fund this? Would it be the station operator, who would have to not only deal with their own passengers but other TOC passengers too – if so, this would be extremely resource heavy and at times of disruption, a very difficult task.

Could the RDG/ORR investigate the possibility of having an industry level centre for managing communications between stations and throughout a passenger's journey using Passenger Assist? The ORR has recognised in the consultation document that one of the key failure points in assisted travel is between the point of boarding and alighting. Mandating that station staff will have additional responsibilities and duties, presents potential industrial relations risks that will need mitigating.

Our preferred solution would be that communications between stations and staff during assistance handovers are integrated with the Passenger Assist app, as our experience suggests phone calls between stations can fail. Further information on the capabilities of the Passenger Assist app currently in development/trial would aid our understanding of the potential for the handover protocol to sit within the app, instead of using a separate system.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We agree that the content does cover all required training elements, however it needs to be appropriate for the roles of the staff being trained. Condensed versions should be provided for management volunteers/agency staff. Further clarity is required on the level of training required for non-customer facing members of staff.

It is our view that a consistent, industry wide training regime is created to ensure consistency throughout.

There is concern that the extent to which train operators can change their training regime could be restricted by any committed obligations, which could have an impact on the two-year training requirements.

Staff Training (Chapter 4)

Q11. Do you agree that:

- operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?
- the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

If online courses are permitted for delivering training and refresher courses, some of these mandatory training elements could be delivered within two years. However, the level of staff training to ensure proficiency in all the areas described in the draft revised guidance may require classroom training. At larger TOCs there are several thousand employees that this would apply to. For these operators, redesigning their training regimes, and retraining all employees within two years would be challenging and could have detrimental impacts on the customer experience during this time. We would be more comfortable with operators being permitted two years to provide refresher training to staff in line with the proposed mandatory elements once they have redesigned their training packages and these have been approved by the ORR.

Training elements should consist of key elements for the industry (to ensure consistency) with the allowance to also include any priority areas for each operator.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We are happy for RDG to promote Passenger Assist, but all operators must have reasonable time to review materials and the opportunity to feedback, prior to operators approving the final materials/promotions prior to release. This will also allow operators to manage any potential increase in assistance requests.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We agree that this would help to promote awareness. However, there needs to be an agreed definition of the engagement levels/frequency expected and reportable outputs.

It is not practical to commit to accompanied journeys due to the resource required. However, this could be feasible in the future with the new technology.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

Whilst we agree with the proposal in principal, this may be challenging/costly to implement for operators who use a third party white label website. This could also be difficult to implement on the 'ticket booking' area of the website where operators use third party integrations. Can the ORR confirm if it is the entire website that would be required to meet the W3C standard? Some TOCs use Trainline for their booking engine, and due to the nature of this part of the website, it could be costly for operators to make all the required changes. Further detail is required from the ORR on any proposed timescales for websites to be compliant with the W3C standard.

We would propose investigating at an industry level any accessibility systems that can be used to make website pages more accessible (i.e. web-readers).

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

We agree that the reduction in notice period would improve the experience for customers requiring booked assistance; however, with the current national PA system, which does not update in real-time, only option one (reducing the notice period to 10pm the night before travel) is currently feasible for operator bookings, although some operators would be required to make adjustments to contact centre opening hours.

The movement towards a shorter booking period is reliant on the new App/System and once introduced, the reduction in booking time should be rolled out in phases agreed with the industry.

Further research on the potential costs of reducing the booking window to six or two hours is required before we could support any reduction in the booking window from 10pm the night before travel.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

The movement towards a shorter booking period is reliant on the new App/System and once introduced, the reduction in booking time should be rolled out in phases agreed with operators. It may be more appropriate to phase in reductions with each operator individually as franchises are re-tendered (for operators with internal contact centres), or when contracts with third party providers of contact centre services are expected to be renewed/re-tendered.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

This question is relevant for operators with Driver Controlled Operation (DCO) / Driver Only Operation (DOO) where they also have unstaffed, yet accessible/step-free stations. The ORR has stated on section A1.h of Annex A that *“The ORR will not approve an Accessible / Inclusive Travel Policy that describes an inflexible policy of only providing alternative accessible transport to an unstaffed but otherwise accessible station; operators may wish to use onboard staff,*

station staff or mobile staff - where such working practices are routinely operated or can be accommodated - to provide the assistance required.”

Does this mean the ORR could mandate that operators are required to have all accessible stations or trains serving those stations staffed (or a mobile workforce)? This would be prohibitively impractical and expensive.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Redress for failed assistance should be consistent across the industry, one of our TOCs (East Midlands Trains) already commit to provide a full refund in these instances (as a minimum). However, it should be noted that complaints about assistance failure often include other elements of the customers experience; they therefore deal with all cases on their own merits.

For mandatory redress arrangements to be introduced across the industry for assistance failure, there must be the systems in place which can accurately attribute the point/flow where assistance has failed (and who owns that flow) to appropriately attribute responsibility for redress. Currently redress is primarily the responsibility of franchised operators. It is our understanding that Network Rail do not pay compensation. If mandatory redress arrangements are introduced, this should be mandated on all parties (including Network Rail, and open access operators) that are involved in passenger journeys.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We agree that all operators should adopt this service. One of our TOCs (East Midlands Trains) allows this already but are in the process of updating information to accept the Next Generation Text Service (BT's next generation text relay service).

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

Our TOCs already have reasonable related conditions within our service contracts with taxi and coach operators for substitute and alternative transport. We can work with our TOCs to strengthen the specific training required.

For operators who utilise DOO and DCO, some passengers may not require staff assistance if the station has step-free access to the platform. However, it is unclear whether the ORR will require that all alternative accessible transport must deliver passengers to a station where there will be a member of staff (i.e. onboard, station, or mobile staff). If this is the case, then additional cost to the operator (and inconvenience to the passenger) may be incurred in transporting the passenger further to an accessible step-free station with a staff presence available, even in the event that the passenger has explicitly stated they do not require staff assistance once the operator has arranged transport to a suitable step-free station. Further clarity is required from the ORR on these proposals.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We agree with the proposals to ensure that at all stations passengers can contact staff who can provide service information. As part of our customer quality assurance planning, we aspire for customers at all stations operated by our TOCs to have the ability to contact a member of staff. For instance, our TOC East Midlands Trains have invested to provide help-points at all stations operated by them which link into their 24-hour call centre.

For providing assistance, further clarity is required on how the ORR defines 'assistance'. The ORR has requested that in the Passenger Leaflet there are two forms of assistance offered: booking in advance (i.e. Passenger Assist), and spontaneous travel (Annex A, section 3.2). The current draft guidance does not clearly state if it is the intention of the ORR to transition to a state where spontaneous assisted travel is available from any station a passenger can access (even if it requires transporting a customer to an alternative station).

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

The carriage of scooters, due to increasing usage and restrictions to rolling stock and station design, is becoming increasingly difficult for our TOCs to manage; as operators cannot carry many scooters due to their size. The main concern of not precluding customers who do not hold a scooter card negates its purpose. Staff at our TOCs do not have the tools to be able to visually compare whether the scooter would fit within the permitted dimensions, and experience has shown that this can then cause safety issues (e.g. aisles and doors being blocked, and situations where mobility scooter users cannot safely negotiate the gradient between the train and platform causing the scooter to tip back).

All TOCs have different restrictions, so it can be difficult for customers making journeys using multiple TOCs to understand the different restrictions applicable along their journey. As this is an issue of national concern, a full review is required for all operator policies with an objective of producing a national policy.

We agree that policies should include information on other mobility aids.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

- a) This can only work once the Passenger Assist system is integrated into the National Rail Booking system, especially in relation to Advance tickets. It is currently not possible to book an Advance ticket online, request assistance and reserve the wheelchair space at the same time. The customer then has to book assistance/wheelchair space separately, which means that there may be occasions when the space may not be available on the train they are booked to travel on. This can also be seen on inter-TOC journeys where the space may only be available on part of the journey.
- b) We support these proposals and our TOCs will contact the customer by phone wherever possible. This should be feasible with the introduction of the customer app.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

National assistance cards should be introduced. Priority badges/hidden disability badges should also be introduced on a national level, potentially with a new national logo which is easily identifiable.

We could not commit to 'dedicated' assistance staff being mandated at larger stations due to additional resourcing costs and the restrictions this would place on staff flexibility and multi-skilling.

Where possible, we would support the option to also book a seat for an assistance dog, using a national 'dog under seat' card.

Our TOCs will already book a companion seat for passengers, including if the passenger has been upgraded to 1st class.

We are also happy to review other apps through our TOCs as they enter the market.

Q25. Do you have any other comments or views on improving Assisted Travel?

We thank you for the opportunity to provide comment on this consultation.

See Q7 – We understand that updating Knowledgebase forms part of the RDG Business Plan. Supplying accurate, clear and concise information to Knowledgebase (for customer and staff use) is key to ensuring that the industry can deliver (and improve) Assisted Travel. However, work is required to ensure that the Knowledgebase system and processes are fit for purpose. This should be at the top of the agenda.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Appointment by the Minister for Disabled People.
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

I feel that a change from DPPP to the ones suggested is a need. To take the ‘medical’ ‘protection’ out and replace it with a word reflecting the society in which we live is important so Disabled persons accessible travel policy is a good suggestion.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- a) There are some items missing from the required content.
- b) The title is fine.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

It is essential that the 'whole' picture is given particularly at a time over the next few years where new rolling stock and station replacement and upgrades is predominant. So details of train access and interior requirements and access facilities are detailed.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

I feel that if there is a significant change, the policy would continue to be reviewed and approved and publicly noted as such with any potential failure penalty detailed.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The genuine concerns about the consistency in approach across all operators is one which is not clarified. There has to be a uniform approach to all access matters.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Quite simply it is imperative this is built in as a minimum requirement.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

This can only be achieved by again a uniform set of minimum set of cross industry standards so that a passenger gets consistent information and support.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

This has to be efficient and with full knowledge to ensure a seamless journey. Currently such protocols are deeply flawed.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This is a timely long overdue development to allow staff to be prepared of any issues including possible failures of services. It would be the basis of the much needed plan B for assisted travel

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

I work with many companies on successful awareness raising. Disabled people provide are an essential element to demonstrate lived experience to staff. This must include involving disabled people in course delivery or provision of additional impairment-specific training. It must be updated and not done as a one off item.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

These two are important, but I feel that two years is too long. The revision should be within 6 months of a mandate to demonstrate a workable package.

Any refresh should demonstrate a cross industry minimum set of standards, with local demographic tweaks.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

There is a need to clarify and promote the benefits by clearly using all media and disability related avenues such as major charity news and websites.

There needs to be a consistency of service levels provision without setting an unachievable aspiration as the current system all too often does.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

The statement says it all. Nothing about us without us!

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

Websites must be user friendly and not full of pretty pictures which hide information and actually confuse the user. Timetable, ticketing and assistance aspects of a journey should be easy and unambiguous on the site and should not be vastly different between operators.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

2 hour notice is a great ideal, as is turn up and go, but the basic fact is it depends on a good and reliable timetable operation. It also depends on staff being trained as to what to do when things go wrong. It's no good taking a booking at short notice if we already know of problems, so staff efficiency is essential. We need to promote the best outcome by pre booking without being condescending.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

I feel that each operator looks at a mutually agreed 'start up' identified set of journeys which would demonstrate to passengers and to staff how reduced lead time can work and then wind it out across the network.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

I feel that the key indicators as highlighted at page 87 6.33 and 6.34 are a serious weakness in the policy in terms of supply of support by TOC's and station staff. Again a consistent set of standards across all companies needs to be exhibited to overcome gaps. The ORR needs to actively enforce a cross industry business standard.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

The Rail Ombudsman is an important development here. But again any mandatory system needs to be cross sector, and the full complaints apparatus implementation needs to be explained and operated in terms of time scales and key points.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

The full needs of a range of sensory impairments has been a gap needing filling, and so an inclusive technical system which works for both passenger and TOC staff has to be developed and uniformly operated.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

As has been achieved by Blackpool Transport and Northern Rail, a fully accessible and consistent bus replacement service is a requirement. It must not be a second class substitution of an inaccessible coach which is not fit for the purpose of carrying all passengers who would be on the train it replaces. The ORR must not allow companies to 'luxury' of being able to chop and change replacement services as the facility is an extension of the rail service. For this, the ORR have to take responsibility for such enforcement.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Even on unstaffed rural stations signage must be clear and unambiguous as to the assistance required and offered and time of its availability.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

We can and must have clear cross industry standards applied and not the 'some do some don't' mess currently in place. We need a wider acceptance of scooters on the railways who must ensure that scooters can be carried safely within the constraints of all the rolling stock they operate. Passengers should be more easily able to identify whether their scooter can be carried and ensure that full publicity and documentation clearly sets out the size, weight and types of scooters that may be carried. Staff awareness must be consistent so that passengers will be made aware of the operator's policy in this area.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

- a) It is imperative that all TOCs must warn passengers and prevent them from purchasing advance tickets for its services that they cannot make use of, for instance due to the accessibility of rolling stock. However, they must also advise when a service would be available for the journey, or an alternative way of undertaking the journey. It must not be a closed answer.
- b) Too many trains have failed or unusable toilets for whole or part of the journey. This impacts on ALL passengers, so on board staff **must be enforced to** make their control aware of equipment fails. Text messaging or scrolling information at stations could assist here.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

The use of case studies in the overall policy document could assist companies in their understanding of the aims of the policy.

Within the consultation paper is the 'hidden gem' of information which the ORR should more clearly demonstrate; that of its powers - *Where there is evidence to suggest operators are not complying with their obligations, we have powers to take enforcement action. Firstly, we will discuss this with the operator concerned. We may then carry out more regular monitoring of that operator. This might include requiring additional information or carrying out an audit. Under its licence, we can require an operator to conduct a review of its DPPP and report its findings, potentially leading to changes to existing DPPPs or practice.*

This should be more prominent as the arbiter and enforcer of good practice

Q25. Do you have any other comments or views on improving Assisted Travel?

- a) The involvement of a range of disabled people including those with sensory, mental health and other condition such as dementia are paramount to ensure true disability equality. Access is not just about wheelchairs and white sticks.
- b) Clear endorsement of the policy by DfT, DWP-ODI, and arrange of Disability Organisations should be an annex to the policy as presented to the TOC's partly to help in giving it strength of purpose and partly to be a back stop for action enforcement.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changes to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Thomas Pocklington Trust
Email*	[Redacted]

*This information will not be published on our website.

Thomas Pocklington Trust (TPT) is a national charity dedicated to delivering positive change for people with sight loss. Research is central to our work. The research we fund supports independent living and identifies barriers and opportunities in areas such as benefits, employment, housing and technology. We work in partnership and share our knowledge widely to enable change. We provide evidence, key information and guidance for policy makers, service planners, professionals and people with sight loss.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

We support this proposal. The change in title acknowledges the needs of other passengers who face difficulty when travelling, including older people, people with temporary injuries and those with less visible disabilities.

Thomas Pocklington Trust prefers the term ‘Inclusive Travel Policy’ as it conveys the need to design services and infrastructure that meet the needs of all passengers from the outset, rather than making additional adjustments to overcome barriers.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

In principle this is a good idea but there needs to be some additional action taken. Station ticket offices carry large amounts of printed materials and pressure regarding which items to 'rack' is high. Marketing materials often takes precedent over passenger information. We would therefore argue that the leaflet needs to be available upon request at all stations where there is a staffed ticket counter. At Category A stations the 'Inclusive Travel Policy' summary leaflet should be clearly available alongside other passenger information. In addition, easy read and alternative format versions should be available upon request. This should apply in respect of all operators serving that station, including sub-stations. For example, at Liverpool Lime Street the information should be available at the main station ticket office and at the Merseyrail ticket office at the lower level station.

The information should also be readily available electronically and on sites which are accessible (including to screen readers) and also downloadable content such as easy read versions.

There should be an obligation upon operators to ensure that leaflets, posters and information in electronic format are distributed to key stakeholder organisations including mobility centres, local citizens advice agencies and local advocacy organisations. Distribution needs to be monitored with operators having to report how information and posters have been distributed.

The missing element from the current leaflet includes

- How operators ensure co-ordination between other operators and stations managed by other operators served by, or that serve, their managed stations.
- The steps that are taken to ensure integration of support between transport mode. Rail travel is part of an inclusive transport chain and passenger confidence would be greatly enhanced if this information were provided.
- How passengers can become actively involved in supporting the operators to improve the quality of inclusive rail services (see later point) and
- Monitoring of online resources to ensure easy, efficient and accessible access

Thomas Pocklington Trust supports The Guide Dogs for the Blind suggestion that the document could be called "Making rail inclusive", to keep it in line with the broader principles of inclusivity.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

The proposals are sensible. A succinct passenger leaflet will enable passengers to locate the information they require more readily and will be easier to keep up-to-date. Passenger leaflets must always signpost how the wider policy document can be accessed.

Commitment to provide the policy document online, in hard copies and in alternative formats (upon request) is essential. Regular monitoring needs to be enshrined in the requirements to ensure information is correct when accessed.

Attention also needs to be paid to ensure that elements which support the needs of blind and partially sighted people are addressed. These include:

- audible announcements at stations and on rail vehicles
- tactile elements to flooring in and around stations
- the tonal and colour contrast of rail vehicles and doors
- information which will be useful to those passengers with little or no sight
- provide access to this information through the operator's app
- ensure that access to information is on the home page of the operator's website
- ensure that staff at stations have easy access to this information when supporting a passenger in person and have received the appropriate disability awareness training.

In terms of rolling stock, the 2020 Equality Act deadline should make this information unnecessary as there is a requirement that all rolling stock be accessible by January 2020. However, as with the station information, operators should detail planned replacement rolling stock or refurbishments over the lifetime of the franchise.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We support these changes and the timeframes suggested.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

Whilst step free access is an important feature of station accessibility, it is not the only consideration. The classifications do little to acknowledge the accessibility requirements of blind and partially sighted people and should be expanded to do so. For example, tactile elements to flooring in and around stations, audio announcements on platforms and the provision of guide dog spend areas.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Any additional steps to ensure that the assistance provided meets the needs of the passenger is welcomed. However, this proposal will have little impact if implemented in isolation, as the information available to the booking agent can be often be out of date or inaccurate. Equal importance must be placed on improving the quality of station accessibility information on the NRE station webpages.

This being said, there are operational factors that need to be considered. For example, lifts break down or staff fail to report for duty. There should be a second stage check that checks bookings 24 hours prior to travel. This can be flagged to call centre staff, who could then take appropriate action.

It would also be a good idea to make accessibility issues (both permanent and temporary) available online via website, social media and an app with push notifications.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We would welcome any initiative that helps passengers to travel with greater confidence. Any best practice guidance should encompass the needs of blind and partially sighted passengers. The guidance should be developed in partnership with disabled passengers and older people

as well as organisations advocating on their behalf. We would also suggest that publicity needs to be through operators and other third parties e.g. disability and age advocacy groups.

Guidance should incorporate the functionality of the Passenger Assist application, once it has been nationally implemented.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

This is a good idea, but in practice a number of dependencies would need to be addressed. Not least of these is the fact that services operate to stations managed by different entities. It is important that one single organisation take overall responsibility for this at a particular location. However, a more appropriate resolution would be for there to be one single organisation that delivers assistance across the entire network, either GB wide, or across England, Scotland and Wales individually. This could help to ensure a consistency of approach and protocols.

Reliability (Chapter 3)

Q9. What are your views on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This could be a positive development, if it were seen as a stepping stone to a single entity taking responsibility for the management and delivery of assistance across the whole rail network. There also needs to be an approach that integrates the service with other transport modes such as light rail, coach, bus and aviation services.

Accessibility for all disability groups must be considered when designing a dedicated assistance line.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We support the ORR taking steps to improve the quality and consistency of assisted travel across the network and particularly welcome the inclusion of 'involving disabled people in course development/delivery' within the proposed mandatory elements.

However, the proposed mandatory training elements should differentiate between different roles and functions. For example, it is likely that frontline staff will require more detailed and frequent training than senior management. We believe that all frontline staff should receive impairment-specific training.

The training itself needs to recognise that staff may be disabled so all materials and delivery must be fully accessible.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

A timeline of one year would be a better approach for revision of training packages and provision of refresher training, as content can quickly become outdated. Following this, content should be reviewed every 12 months to ensure it is in line with current legislation and trends.

Frontline staff should receive refresher training annually and all remaining staff every two years.

Refresher training should include a balance of national priorities and priority areas for individual operators. If the training is too specific towards individual operators, inconsistency of assisted travel could remain a prominent issue.

Follow up reviews should be undertaken into the effectiveness of the training. For example, is there an increase in customer satisfaction from disabled passengers, is there a reduction in disability related complaints, etc.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We support further promotion of assisted travel, in collaboration with increasing the reliability of the service. A leaflet or contact card may not always be appropriate for blind and partially sighted people, we would suggest that the information is also sent via email (with the individual's permission). Asking whether passengers require assistance when they have indicated ownership of a Disabled Railcard during the ticket purchasing process would be a positive step.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

This is an excellent proposal. It is important that blind and partially sighted people are well represented within disabled access groups, so that operators have a good understanding of their needs. Any consultations with disabled access groups should be followed up with appropriate action.

We would also suggest that operators promote the Passenger Assist service through providers of other modes of transport, particularly at key station interchanges (e.g. Heathrow Airport).

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

Ensuring that assistance services are commonly branded is crucially important to enable passengers to use the service appropriately and does not limit assistance to those who might be reluctant to use it because they do not see themselves as being disabled.

We would fully support the requirement that all websites aim to exceed W3C standards. Notably if websites are not accessible, people with a vision impairment may have problems accessing content with a screen reader or screen magnifier.

There is a further complication which needs to be addressed. A high proportion of passengers access rail travel information via third party websites such as National Rail Enquiries and the Trainline. As such we would argue that the W3C requirements must apply to third party retail licence holders and third-party information providers. Prior to hand-off passengers need to be given the option of booking assistance when making ticket purchases.

It also needs to be recognised that operators will also employ disabled staff and that any non-public facing parts of websites must also be fully accessible.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

Ideally, assisted travel would be offered on a 'turn up and go' basis, though we recognise that this may not always be practical (e.g. at smaller stations/at rush hour). Of the three options suggested, our preference is 'a minimum of two hours before travel'. This would enable blind and partially sighted people to have greater flexibility and spontaneity when making journeys. A

consistent notice period for assisted travel across the network should be implemented, to avoid confusion and reduce the risk of individuals missing the deadline to book.

We recognise the challenge that a two-hour notice period would present, however a number of franchised operators are already meeting this target or working towards it under the current system. The implementation of the Passenger Assist application should increase operators' ability to respond to requests for assisted travel at short notice.

We hope that the Passenger Assist app will increase the availability of 'turn up and go' travel.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Although we would welcome this change as soon as possible, we recognise that a two-hour notice period would be a major shift from current practice for most operators. The right systems and staffing must be in place to support the change, so as not to adversely affect passengers using the service. Operators would therefore be best placed to work with the ORR to agree how a reduction might be phased in.

The agreed option, process and timeline should be widely publicised to existing and potential users of assisted travel e.g. upon purchase of a railcard, upon purchase of train tickets, audio announcements at stations, social media campaigns, working with advocacy organisations.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We believe that this is an important exercise, given the increasing rate of passenger assist bookings and the risks that different modes of train operation present.

Driver Only Operated trains could considerably impact blind and partially sighted passengers wishing to board or alight at unmanned stations. With pre-booked assistance arrangements can be made to deploy staff either on the train or at the start and end point for a journey. When passengers decide not to pre-book, greater difficulties will arise.

Train and station operators should be seeking alternative options that do not require the passenger being carried over to the next staffed station, as this will inevitably cause delays or further problems reaching their destination.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We support the proposal to introduce mandatory redress arrangements for assistance failure. If assistance fails, a passenger may be unable to alight the train or stranded in an unknown location, both of which would be immensely distressing for somebody who is blind or partially sighted.

The ORR are proposing that operators provide 'appropriate' redress to passengers. The level of redress should not only reflect the cost of the original ticket, but any additional costs of reaching the intended destination or knock-on effects of the failed assistance, such as missed appointments. The recent establishment of a Rail Ombudsman should provide a means by which passengers can appeal the level of redress if they deem it to be inappropriate.

We welcome the proposal that all operators must promote the provision of redress to their passengers and how to claim it.

There is a risk that operators will choose to make redress payments rather than improve poor provision of assisted travel (where this is the case). The recent establishment of a Rail Ombudsman should disincentivise operators to do so. However, the ORR's proposal to monitor rates of assistance failure and redress is a welcome additional preventative measure. We would like to see this information broken down to particular routes and in the public domain.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We see no reason why this shouldn't be adopted. If adopted it should be done with guidance from key stakeholders, such as charities representing people with hearing loss.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We support the proposal to improve the accessibility of substitute and alternative transport provided by train and station operators. Although it is important that rail replacement bus drivers receive appropriate training, this is not the only aspect to consider. Information about rail replacement buses should be provided in formats that are accessible to blind and partially sighted people e.g. on the operator's app, audio announcements, members of staff to assist

passengers to the location of the bus. Ideally, audio visual announcements should be available on all rail replacement buses to reduce the risk of blind and partially sighted passengers alighting the bus at the wrong location (we recognise that the ORR does not regulate or monitor the accessibility of public vehicles).

Under the [Equality Act 2010](#), it is illegal for taxis and PHVs to refuse a passenger with an assistance dog.

The ORR should monitor and evaluate how passengers are adversely affected by the different modes of alternative transport and identify any action they can take to rectify this.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We support this proposal, however many blind or partially sighted people would experience difficulty locating a help point unaided. Where help points exist, we would recommend a standardised design that features colour contrast. There should also be information available online as to where the help point is located at the station.

Blind and partially sighted people may struggle to locate and read a freephone number. Where displayed at a station, the freephone number should also be widely available electronically e.g. on the operator's homepage and app, as well as the Passenger Assist app.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

N/A

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

We support these proposals.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

We support the good practice areas identified and believe that they will make a significant difference to many passengers. We would ask that the ORR actively encourages as many operators as possible to take up the initiatives, in order to facilitate consistency across the network. This will in turn increase the number of passengers who are confident to travel independently and to make long distance journeys (where the likelihood of travelling with multiple operators is greater).

The ORR should consider what measures can be put in place that enable operators to share good practice methods and results. We would suggest that the ORR monitors the implementation of good practice areas and, depending on their success, considers including them as requirements rather than recommendations in future updates to the guidance.

Other areas of good practice would include:

- Tactile flooring in and around the station (specifically, to alert passengers to the edge of each platform and the first and last step of all stairs)
- Colour contrast throughout the station (specifically, to alert passengers to the edge of each platform, handrails, help points etc.)
- Guide dog spend areas
- Audio announcements on all platforms and the main concourse of the station
- The installation of ticket machines that are accessible to blind and partially sighted people / giving passengers the option to download electronic tickets

These measures may enable more blind and partially sighted people to feel confident travelling without assistance, in turn giving them greater flexibility with their journeys.

Q25. Do you have any other comments or views on improving Assisted Travel?

In addition to the focus on disabled and older passengers, there should be a focus on how any changes impact on disabled staff working for the rail providers to ensure any changes in practice are inclusive of their needs and requirements.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Tonbridge Line Commuters
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

Accessible Travel - We think this is a positive step as the world has become increasingly non-binary. People requiring assistance could include parents with pushchairs, shoppers with trolleys, people with mobility issues, such as walking with a stick or being in a wheelchair. It is no longer possible to size up someone’s need or justification for assistance and so the systems in place to help people also need to reflect this.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

The content for the document seems complete however the title needs to improve.

The title reflects an outdated notion that it is only old people or those in wheelchairs or are worthy of this sort of assistance.

Something like “Assisted Travel: Getting you from A to B” would be better.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Intrinsically, we would argue that the station and rolling stock accessibility documents should be within the passenger leaflet, however, we take on board the logic for keeping them separate. The key to this is getting passengers the information they need in an efficient and helpful manner. The point should be made that this is not a marketing document and so boasts of investments should be kept from this document. Efforts should be made to keep the legalese to a minimum.

Larger stations should also provide posters and individual leaflets and smaller stations should be detailed in a line-by-line guide.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

The streamlined process seems logical and allows for an operating entity to react to changes and correct errors without a cumbersome approval process. We are very supportive of the reduced timescales for preparing and releasing documents and would see this as a starting point with further improvements targeted down the line. We strongly welcome the involvement of users for whom the policy is designed to protect as well as local groups. Our own involvement as a local passenger group across other areas has shown that local groups are often well placed to point out issues that the operator is unaware of, or deficiencies in the operator’s proposed plans that they are not aware of.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

Although harmonisation of the definition of step free access across all operators is welcome, the categories themselves are not intuitive at first glance. For example, "usable step free access" is a lower category than "step-free to new-build standards" and whilst that may be correct it is not at all obvious what that means and how it may impact a passenger's journey without then having to try and find out the definition which may not be in the same document/poster display.

The current "Step-free Tube guide" produced by Transport for London is perhaps a better, but not perfect, example of the information that needs to be included in each category – precisely defining in the category itself what the implication may be for a passenger's accessibility needs. For example, categories could be re-worded as "A – Fully Step free from Street to Train: Less than 50mm step from all Platforms to Train and less than 85mm gap between all Platforms and Train".

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Mandatory checks are essential to such a point 'knowledgebase' becomes accurate and reflective of the current state of affairs. Staff members need to have reliable information when taking a booking. If a journey is not possible due to aging infrastructure then this must be relayed to the passenger as soon as possible and definitely before the trip is made.

Station Operators must also be made to keep its system updated to keep any incidents of this nature to a minimum. Bookings being destined to fail must be consigned to history.

This information should be regularly audited and corrections made where required.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

The whole process needs to be made as simple as possible for the passenger. Staff need to be where they say they will be at the time stated. For most people with mobility issues, being let down is a common occurrence and if they receive poor information and someone isn't there to meet them it's not surprising that they will take matters into their own hands. The stories of people being left on trains or unable to board because staff fail to show up or don't have the equipment is enough to put some people off travelling and others to have very little faith in the service. Perhaps staff can carry signs showing their own name or making it clear that they are there for assisted travel so that people can make their way to them. I would encourage staff not to use their actual names in case they are called away and someone else steps in. Using the passengers name would not be advised for privacy and cases of mistaken identity.

The onus very much needs to be on the industry to provide a solution rather than shift the burden onto the passenger. For example, if a service is delayed, the company should be aware of this and proactively contact the passenger to reassure them that the service they've booked will be delivered.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Removing the call for as many incidents as possible is a hugely positive thing. If a staff member ends up standing around at platform b for a no-show, that is infinitely better than a passenger being stranded because a call didn't get through. We believe strongly in the principle that the booking stands until otherwise notified.

We welcome the introduction of a standardised assistance handover protocol for all mainline stations, however we are concerned that the protocol itself is still likely to fail passengers. Although standardising the protocol reduces the chance for errors to occur through the interactions of independent protocols, it does not address errors in applying the protocol itself (e.g. failure to call ahead) as evidenced by the experiences of passengers today. In order to resolve this, the protocol itself needs to be enhanced to reduce the chance of the protocol not being executed in full. This could include for example a strong recommendation that the handover process begins before the passenger has boarded the service – e.g. the member of assisting staff at the origin station records on the system that a passenger will be boarding a specific service before they have done so, and then confirms once they have done so. Staff at the destination station could then see that a passenger is expected to arrive at their station on a specific service and if staff at the origin station had not confirmed that a passenger had boarded the intended service, could contact the origin station to verify.

This information should also be easily accessible to the passenger themselves, e.g. via a standardised phone app or by calling an assistance line, and the passenger should be able to provide additional details if they wish. However, this should very much be for the passenger's peace of mind that information has been logged correctly and is correctable rather than placing an onus on the passenger to provide the information themselves.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Passengers should be able to call the station and speak to someone. Whether that person is actually at the station or a centrally controlled centre is irrelevant. The key issue is getting the communication to the relevant individual in an efficient manner. Our concern with relying on a telephone system is that messages can be misconstrued or prone to error. For example: "Ok, they're on the 4:31 from Charing" – is that Charing or Charing Cross?

Ideally this would be via an app that the passenger would have access to and the ability to challenge/correct data.

One concern with phone systems is that if the issue is that staff members do not have enough time to complete their tasks and make/receive calls, then having a dedicated hotline is not going to improve matters. We refer you back to our previous answer that staff must assume that bookings are going ahead unless they explicitly hear otherwise.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We agree with the proposed content and endorse the notion that not all disabilities are obvious. We would also welcome content that would train staff to respect the individual's perception of their independence and give the help that the individual requires. This means that the staff

member needs to use their judgement and communicate with the passenger to ascertain the best course of action. There is no one size fits all approach here.

It would make sense for the industry to centrally produce a training standard rather than have all the individual entities make up their own training scheme. This will help the handover process between firms as well.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

We feel that two years is more than enough time to allow for training materials to be updated and delivered. The repeated issues faced by those needing this service cannot wait longer than that.

The training should focus on areas facing the industry as a whole, but also consider where individual firms are failing. We heartily encourage progress towards a national standard and so the training must be consistent.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

For economies of scale, the promotions should be handled centrally and pushed out to the operating companies to be advertised.

There should be penalties for inaccurate, incomplete or poor visibility on promotions. Each TOC should be accountable for ensuring that localised information is correct, relevant and useful.

We support the disabled persons railcard and would like to see further integration of this into the system.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We wholeheartedly support these measures. Often people needing assistance will be engaged with one of these organisations and therefore there is a natural synergy to providing information in this way. Information should also be promoted via the internet to allow people outside of these circles to learn and engage.

We would also encourage the rail industry to engage with rail user groups (affiliated with Railfuture) such as ourselves as we are well placed to help shape policy and provide constructive feedback from the outside. We also have an active membership and can be useful conduits for information.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

We support this. There should be a nationwide scheme and all operators are required to call their service this. Websites should meet the Government's standards, which include the W3C standard as a bare minimum.

<https://www.gov.uk/service-manual/helping-people-to-use-your-service/making-your-service-accessible-an-introduction>

We support the proposed measures.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

The present system is cumbersome and reflects an age before digital communications. It should be possible to arrange quicker responses for passenger requests. One major failing of our railways is the fact that some people do not have the luxury of being able to plan their journey ahead. The notice period should reflect the staffing levels at each station and this information should be clearly available to those wanting to use assisted travel. This should be reiterated at booking stage so that the passenger is fully aware of the notice period offered on that service. A station that is often unmanned should have more time to ensure staff availability or report back to the passenger that the journey cannot happen as planned. Busy popular stations that are routinely manned should have shorter timeframes.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

If the reduction is more generous than the current system, then it can be introduced immediately and passengers can gain the benefit.

It must coincide with training and marketing materials to ensure that the system is ready for the reduced timescales. Too often in the industry, initiatives are rushed and performance suffers. This is an area that has to be got right for the sake of the passengers who require it.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

Operators need to take their operating model into account when accepting bookings. This needs to go hand in hand with ensuring that train companies and network rail keep up to date information on their stations.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We wholeheartedly agree with this. If an operator takes a booking and cannot fulfil it then compensation should be paid. We would encourage a regulated standard to ensure a base level of consistency across the network.

We would strengthen your proposals by requesting that the ORR should mandate the form of redress rather than leave it to the operators to decide.

We note for example that Southeastern's current policy is that in the event of a journey not being completed they will only offer half the price of a return ticket or the full price of a single ticket. This is not adequate as the passenger is significantly inconvenienced as a result of a failure outside of their control.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Text relay should be an option available to operators but this must go alongside training so that staff can reliably use the service. We do not feel that text relay is enough of a solution on its own and would urge it to form part of a comprehensive communication system.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

Your case study (Preston to Blackpool) demonstrates that a higher standard can be achieved. There is often a perception that rail replacement buses are hired on the cheap and therefore do not cater for anything other than an abled bodied person.

More should be done to compel the rail operators to either provide suitable buses or hire a taxi. Whilst a taxi is not a service that should be provided as a first port of call, there are circumstances where it is appropriate and reasonable for a passenger to use an operator funded taxi. In these circumstances, passengers should not have to feel like they are being trouble makers in order to get the operator to book one and they should not have to face unnecessary hurdles.

The replacement service should match the original service as much as possible. This includes toilet facilities, which are often lacking on buses. Buses would be preferable to taxies on the basis that a bus can have a low-level access option, which is not always available within a taxi.

If a passenger has booked assisted travel and then there is cause for a replacement service, the passenger should at least expect the level of service they have booked. This may result in a specific vehicle being needed for that passenger.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

These seem reasonable and we support these measures

Information might be placed in conjunction with level of support offered at that station, e.g. assistance will be provided within 1 hour.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

T these measures seem reasonable.

A national standard should be created so that a small scooter is the same definition whether in Scotland or Kent. The onus should be on the manufacturer to also clarify what category the scooter/chair fits.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

It is lamentable that this even needs to be considered. Under the Consumer Rights Act 2015, selling something that somebody cannot take advantage of is illegal.

Network Rail needs to improve its systems so information on lack of on-board toilets can be automatically displayed on departure boards at London termini. At the moment this process is far too manual and prone to error. It is a cause we are fighting vigorously for. This may also be happening elsewhere.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

We would encourage the good practice areas to specifically list those with mental health issues rather than limit to just physical ailments. We note that the disabled railcard would permit a helper travelling with the assisted passenger and would encourage more of this type of action through subsidised or free fares.

Q25. Do you have any other comments or views on improving Assisted Travel?

The rail industry needs to also consider people who may benefit from a greater level of consideration but not need full assisted travel. For example, train at Cannon Street are often announced just as they're arriving in the station which causes bottlenecks on the concourse and a mad dash for the correct platform. This is stressful enough for able bodied people but if you needed assistance or walked with a stick, it is a nightmare.

More care should also be considered when switching platforms. This is particularly acute in times of disruption. If a platform is changed and passengers need to change level in order to reach the new platform, enough time and sensible announcements need to be made to allow passengers to make that transition. That includes people in wheelchairs, people who walk with a stick and those with young children/buggies.

Assisted Travel needs also to empower the passenger and provide them with a greater sense of confidence. As illustrated in the consultation and by many cases that have been raised publicly, users of Assisted Travel are often forgotten or mishandled. Users of Assisted Travel should be able to access the information that has been recorded about them in real time both for the purposes of giving them confidence in that their needs are known and will be met, and to provide them with an opportunity to challenge or supplement incorrect or partial information to resolve an issue with the full provision of the Assisted Travel service before it arises. Care needs to be taken to ensure that the onus is not placed on the traveller to always check and correct the information, but being able to do so in what should be the rare occasion whereby incorrect or partial information has been recorded is still of tremendous benefit to users of the service and encourages greater confidence that the service shall be delivered and their needs met.

Thank you for taking the time to respond.

Passenger Assist Consultation – Office for Rail and Road

- Muscular Dystrophy UK is the charity for **70,000 children and adults living with muscle-wasting conditions**. We provide vital information, advice and support to help people live as independently as possible. We accelerate progress in research and drive the campaign for access to emerging treatments.
- Trailblazers is a group of young disabled campaigners from across the UK who **tackle the social issues affecting young disabled people, such as access to higher education, employment, and social and leisure opportunities**. We aim to fight these social injustices experienced by young disabled people and to ensure they can gain access to the services they require. We are part of Muscular Dystrophy UK, the leading UK charity fighting muscle-wasting conditions.
- We welcome the opportunity to submit written evidence to the consultation, and wish to draw particular attention to helping those who have muscle-wasting conditions to enjoy independent travel regardless of their disability.
- ‘Muscular dystrophy and related neuromuscular conditions’ is an umbrella term used to describe 60, mostly genetic conditions that cause the weakening and wasting of the muscles. All these conditions are serious and progressive, with effects that range from mild to severe disability and premature death, most typically in childhood or early adulthood. **Approximately 70,000 people in the UK are affected by one of these conditions.**
- The All Party Parliamentary Group (APPG) for Young Disabled People, for which the Muscular Dystrophy UK *Trailblazers* provides secretariat support, **released two reports, both called End of the Line in 2009 and 2016, which together summarised the issues faced by Trailblazers in using public transport networks.**

Background to the End of the Line campaign

- Nearly two thirds of survey respondents have experienced problems getting on a bus owing to the attitude or behaviours of the driver or fellow passengers.
- Half of respondents have been unable to get on a bus because the ramp was not working.
- More than half of respondents have been unable to travel on a bus because the wheelchair space was taken up by buggies.
- Over a quarter of respondents say they have been refused service by a taxi driver, purely because they are disabled.
- Over half of respondents have experienced difficulties in booking a wheelchair accessible taxi.

1. How can rail operators improve the availability and promotion of Assisted Travel information in stations?

We spoke to our Trailblazers regarding the leaflets which outline what services they could expect to receive from Assisted Travel. None that we spoke to were aware of these leaflets. We would suggest that this information should be available online so that disabled people can access it while booking assistance. Leaflets and posters will also be useful, but perhaps need to be more prominent in stations, including given out by assistance staff to those who have not received one or who are unaware of the services that can be provided.

2. Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?

We believe all information should be of high quality and reliable. So long as the lack of a Crystal Mark standard does not affect the quality, reliability and accuracy of the information provided, then it is not necessarily required.

3. What steps can be taken to increase website accessibility?

We feel it is important to understand that not all disabled people access websites in the same way, and make adjustments accordingly. Many disabled people may only access websites on their smartphone while others may use eye tracking technology integrated with dedicated hardware. Making accessibility information available at the forefront, but also ensuring that the website, and all the information available on it, is fully accessible on all platforms is essential. Use of screen readers for those with visual impairment is also an essential tool for many people with disabilities, and therefore all websites and images on websites should be compatible with screen reading software.

4. How can rail operators use social media to increase awareness of Assisted Travel?

We support many young disabled people at Trailblazers, but on a wider focus at Muscular Dystrophy UK we support adults and older individuals. A broad spectrum of these individuals use the rail network to get to and from work, hospital appointments and social outings with friends and family. With this in mind, it is important to remember that disabled people are a diverse community, and so not all of them will be able to access social media.

However, for the vast majority of young disabled people social media will be the place they turn to for both socialisation and information. Ensuring that local train stations regularly post links or videos on their social media channels explaining what can be offered through Assisted Travel, as well as ORR would be the best way to ensure that adequate reach is achieved.

5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

We believe that this is a sensible move in the right direction so that information is available at the point of purchase. While we do not have expertise in the running of such a programme, it does not sound like there should be any significant barriers. In addition, it should vastly improve the understanding of the Assisted Travel programme among disabled people who are actually planning to travel in the near future.

6. Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

We believe that this is the obvious next step to increasing uptake of Assisted Travel. However, we also strongly suggest that no time limit be put on how far in advance you must book. Some of the young disabled people we support are now not booking Assisted Travel as they feel that they get the same standard of service, regardless. In addition, some feel it impinges on their autonomy and ability to be spontaneous or change travel times. However, the majority of Trailblazers prefer to book their assistance. Most have told us that the ability to book tickets and assistance online at the same time is their current preferred option.

In terms of booking Assisted Travel for those who choose to do so, at the point of purchase is the best opportunity to do so. Whether this is online or in person at the station, the facility to book assistance should be available at all points of purchase and should be as simplified as possible.

7. How might the reliability of communications be improved?

Our Trailblazers have told us of many instances where communication breakdown caused issues with their journey. The most frequent of these was actually between stations where a wheelchair user requires a ramp to alight.

In airports dedicated teams of assistance staff are responsible for helping travellers get on and off the airplane. While this model still has issues, it is generally a successful option. Therefore, we would suggest the use of a dedicated team of staff at staffed stations is essential so that the communication is not being lost. We would also suggest that the use of app-based technology which a disabled traveller can use to alert staff that they are nearing their destination and need assistance in case of delay or changed travel plans would be the next step in improving communication.

In addition, some wheelchair users have suggested that train drivers be made aware that they are on board and the station they are getting off at so that if staff do not come with a ramp, they can stay at the station. It is hoped that this would result in preventing disabled people from ending up at the wrong place or in an inaccessible station.

8. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Yes. Assistance protocol should be standardised across all areas of public transport to ensure a smooth, inclusive journey for all disabled people. Trailblazers are happy to assist in the development of any such policies.

9. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes. Some stations and rail operators already operate this, and so there is some confusion as to when this is offered. It should also be offered if a normally

accessible station is not accessible on the day of travel due to a broken lift, for example. In addition to refund, they should also pay a taxi or bus for the remainder of the journey.

We'd also like to draw attention to the phrase 'was not provided as requested'. This phrase is quite ambiguous. If this was defined as assistance not happening at all, or not as planned or maybe left waiting on the train then the views of disabled people may be different. In our view, if travel is different than a non-disabled persons journey due to an assistance failure, then redress should be applied.

10. Are there any obstacles to individual rail operators introducing their own redress policy when the service for these passengers fails?

No, but any individual redress policy should be above the standard set. This is where an industry wide assistance protocol for disabled passengers can get a minimum standard which is acceptable, but other operators can increase this to a higher level if they feel the need to do so.

11. How can consistency in training for company staff across the industry on disabilities be achieved?

Firstly, it is important to make it clear that we believe all disability awareness training should be conducted by disabled people. This is another area where an industry wide assistance protocol should be utilised to ensure that a set minimum standard of training is always achieved.

12. How frequently should disabilities training take place and its content refreshed?

The semantics surrounding disability, and also the technology used to assist people with disabilities can change at a reasonably fast pace. Indeed, some Trailblazers told us that assistance staff did not understand that pushing their wheelchairs may be dangerous or impossible if they do not ask first. Training for personal assistants for disabled people is updated yearly, and we would recommend a similar schedule for all assistance staff.

13. Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

DPTAC are an important part of keeping the transport system accessible to disabled people, and overall improving that accessibility as time moves forward. We do believe that all guidance should be followed from DPTAC. However, the document itself is almost 10 years old, and due consideration should be given to this if it is not updated as part of the Accessibility Action Plan review.

14. Is there a role for an independent benchmarking exercise of the quality of existing training? If so, who could do this, e.g. ORR, DPTAC etc.?

Yes, all training should be audited. In addition, we believe assistance services itself should be audited. This encourages improvement, but if a report is released by the ORR it will also give disabled travellers an idea of the type of services they can expect in certain areas. This transparency is essential for disabled people, and provides a motive to improve for stations and rail operators.

15. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

We would like to refer you to our End of the Line campaign, which has released two reports on the state of accessible travel for disabled people using the public transport network across the UK. You can find the reports at:

<http://www.muscular dystrophy uk.org/campaign-for-independent-living/trailblazers/campaigns/what-we-campaign-about/public-transport/>

16. Beyond our current planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

At Trailblazers, we have carried out secret shopper exercises with our network of young disabled people as part of our End of the Line campaign. We believe direct, lived experience of disabled people travelling is the best way to understand the current situation. Disabled people themselves are often able to offer simple solutions to any problems they experienced. Trailblazers would be more than happy to assist with these efforts.

17. Are there any technological innovations, programmes or initiatives beyond those described above which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

We mentioned app-based technology as the next logical step to improving accessibility on the public transport network for disabled people. The use of this technology, if an industry wide standard is agreed, could feed back a rating of the journey and explain anything that went particularly well, what did not go well and how it could be improved next time. We cannot stress enough that other options must be open, but for many young disabled people this will both simplify the assistance process and also provide monitoring information and act as a 'digital comments box'.

18. Do you agree with our proposed approach to reviewing DPPPs?

Yes, but we would ask that reviewing and updating DPPPs is done in consultation with disabled people themselves. Trailblazers would be happy to assist with this.

If you have any queries about the contents of this evidence you can contact us:

[Redacted]

Trailblazers [Redacted]

[Redacted]

Improving Assisted Travel

**A consultation on changed to
guidance for train and station
operators on Disabled People's
Protection Policy (DPPP)**

TransPennine Express thank the Office of Rail and Road (ORR) for the opportunity to respond to this consultation which seeks to revise and update the guidance documentation available to train operating companies (TOCs) when writing their Disabled People's Protection Policy (DPPP).

In addition to the response provided by TransPennine Express, we have provided input to the response which is being put forward by Rail Delivery Group (RDG), and hope that the detail provided in both responses is of use when compiling the revised guidance.

We are in no doubt that the guidance needs to change to encompass the developments which have been achieved in the last decade to provide for disabled customers when travelling by train, and the significant advances which have can be seen in the use of technology and ensure the industry continues to progress, however, as is detailed in our responses, there are several areas of the consultation where we feel the ORR has not fully explored the impact of the proposed changes upon wider operations of the railway, or given sufficient consideration to the costs which would be involved in achieving some of the proposed changes.

We would welcome the opportunity to work closely with the ORR to explore alternatives to these areas where the desired outcomes could be achieved by other means.

If there are any elements of our response which you would like to discuss further, we would welcome the opportunity to do so.

Kind regards

[Redacted]
Strategy Director
TransPennine Express

Organisation: TransPennine Express

Address: 7th Floor, Bridgewater House, Whitworth Street, Manchester, M1 6LT

Overview: TransPennine Express is an intercity rail provider with a vision to Take the North Further. We will deliver an investment of over £500m in the next two years that will transform travel and customer experience across the North and into Scotland.

By 2020 we will have introduced 220 brand new state of the art carriages, will provide new routes and services and will increase capacity by over 80 per cent on a seven day a week timetable.

We are proud to be a FirstGroup plc company which provides easy and convenient mobility, improving quality of life by connecting people and communities.

Our network is:

- **North TransPennine**
Services between Manchester Airport / Liverpool and Newcastle, Middlesbrough, Scarborough and Hull via Manchester Stations, Huddersfield, Leeds and York.
- **South TransPennine**
Services between Manchester Airport and Cleethorpes via Manchester Piccadilly, Stockport, Sheffield, Doncaster, Scunthorpe and Grimsby Town.
- **North West and Scotland**
Services between Manchester Airport and Edinburgh / Glasgow via Manchester Piccadilly, Preston, Lancaster, Oxenholme, Penrith and Carlisle.

Contact: For enquiries regarding this consultation response, please contact:

[Redacted]

Accessibility and Integration Manager
TransPennine Express

[Redacted]

[Redacted]

7th Floor, Bridgewater House, Whitworth Street, Manchester, M1 6LT

Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

TransPennine Express are supportive of a move away from the term 'Disabled Person's Protection Policy' and would welcome the introduction of a more appropriate title. The current terminology sends out the wrong message and is no longer representative of the attitudes within society.

Whilst change is welcomed, we would propose alternative replacements to those set out within this consultation.

It would be our proposal that the two documents are renamed under the banner of 'Accessible Travel' with the customer facing document being the 'Customer Guide' and the more formal policy document being the 'Policy'.

- Accessible Travel: Customer Guide
- Accessible Travel: Policy

This simplistic approach would differentiate the two documents, with customers able to quickly determine which document they need depending on whether they want advice for travel, or more detailed policy information.

The change of name of the document should be phased in as each operator transitions from the former guidance to the new guidance so that customers are aware of the requirements being applied to each TOC, with a clear timeline for when each TOC will transition, agreed in advance with the ORR, recognising the refranchising timeline and ease with which each TOC can make the required changes to meet the requirements of the new guidance.

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

a) Is there anything you consider is missing from the required content?

b) Is this still a meaningful title for this leaflet?

TransPennine Express welcome the proposal to reduce the quantity of information presented within the customer facing document to focus on providing easily digestible and meaningful advice for disabled customers accessing the railway.

This would address the long-standing issue with the current document whereby significant levels of detail are provided which are irrelevant or constantly changing, therefore quickly becoming outdated. A prime example of this is station accessibility information, or operated fleet information. By removing this additional detail from the document and placing it online, it can be displayed more effectively and maintained, therefore providing greater accuracy for customers when planning their journey. An expectation would be that the accessibility of this information online meets W3 standards.

Upon review of the proposed guidance, we agree with the majority of the changes which have been proposed, however we do feel that there is some content which the ORR have set out as a requirement which could be transferred to the Policy document, including details of **'how to get involved with the operator's work with disabled people to improve accessibility'**.

A suggestion would be that to further reduce the size of the document, a consistent set of terminology and icons are agreed upon to be utilised across the industry. We appreciate the intent to introduce the requirement to gain Crystal Mark standard for plain English, however we feel that by taking this approach within the guidance, the requirement for review and accreditation diminishes, reducing the number of steps required to update and approve the document.

As set out in our response to Question 1, the name of the documents should be changed recognising the proposed change to the overall name, with the customer facing leaflet titled 'Assisted Travel: Customer Guide'

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Rolling stock and station information changes frequently, and therefore any reference within a printed or art worked document can soon become out of date, leading to inconsistencies between various sources of information which are fed by different industry systems. This is of particular importance for TransPennine Express during a period of significant investment in station facilities delivering a vast array of customer focused improvements and the imminent introduction of three brand new fleets of intercity trains to our network.

With consideration of our position, which is not unique within the industry, we believe there is a strong case for a 'core' document (the leaflet) containing information which is more likely to remain permanent and accurate. However, we do not necessarily think it must follow that all other accessibility information must go in a single separate document (the 'policy document'). We would propose that neither the customer or policy documents contain tabled information about station or rolling stock accessibility, and instead the ORR guidance requires this to be hosted online and referenced within each document. This approach has several benefits:

- Single source of information

Currently, if a change is made to a station or type of rolling stock, this is not communicated through the documents until the point of annual review, meaning that there can be inconsistencies between two sources of data, making it difficult for customers to know which information to rely upon when planning their journey. By hosting information wholly online, it can be regularly updated, removing any inconsistencies.

- Shared source of Rolling Stock Information

Knowledgebase stores information about the features of every railway station in the UK and is available to all TOCs and customers via various systems (including Passenger Assist) and through National Rail Enquiries. No such source exists for rolling stock information, with customers and staff required to look at each individual operator's documents to find information about the trains they operate. By introducing a requirement to host rolling stock information online, a shared knowledgebase could be created, allowing customers and staff alike to quickly gain access to key information, and identify the discrepancies between the different types of rolling stock. As with the station information, by hosting information wholly online, it can be regularly updated, removing any inconsistencies.

- Consistency of Display

Operators currently display the information about their stations and rolling stock in various formats within the customer documents. By moving to an online approach, consistency in the way that information is displayed can be introduced.

As such, we would, for example, propose amending draft revised Guidance Section 4, paragraph A2.2 to read (amended wording underlined): “*Rolling stock and stations accessibility information must be kept up-to-date and made available to passengers online, in a format that can easily be accessed using a personal mobile device ~~and~~ The location of this information should also be explicitly cross-referenced as part of the policy document as per section A2.1, including in accessible formats.”*

Regarding the proposal for this document be available “on request”, we think this phrase should be clarified so there is no doubt as to what an operator's obligation is in this respect.

We recognise the benefit of the customer facing document being readily available from all stations where an operators services call, however, we do not feel alternative formats should be made available with this immediacy.

We recognise that for customers with disabilities, the availability of documents in an alternative format is essential to their ability to access and digest the content, and that advances in technology are helping in this area, delivering ingenious solutions which have the potential to offer far greater levels of access than what could be achieved through conventional alternative formats, e.g. large font. In light of these developments and improvement, we would suggest the ORR explore with disability groups the suitability of various alternative document formats to determine whether providing a downloadable word document which can then be formatted or accessed through specific software which addressed the needs of the customer is a suitable solution to adopt across the industry, recognising that this may go hand in hand with the requirement for TOCs to provide a hardcopy in an alternative format within a reasonable time period, sent to the passenger from a central distribution point following their request.

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

TransPennine Express feels that the current review process for the Disabled People's Protection Policy is ineffective, and there is no clear route for TOCs to follow. We would appreciate as part of any new guidance, the ORR provide a defined pathway in the form of a timeline/flowchart so that all parties have a shared understanding of the required steps and timescales which are being worked to, forming a service level agreement between both parties. As part of this, an agreed 'go live' date should be established upon which the documents are published on both the TOCs and ORRs websites, aligned to the date of introduction of printed documents into stations, rather than the current lag approach which is adopted. When developing these timescales, the ORR should be aware of the time required to take a document from draft to finalised art work and through production. A minimum of 6 weeks must be allowed for this activity.

We have also experienced in the past, examples where minor changes to the content of the document, for example grammar, dates or station access information, have halted progress and led to the need for 'reapproval', resulting in multiple drafts, particularly where the content references a moving landscape of franchise developments. It is requested that as part of the changes to the review process, the ORR introduce a clear set of editorial rights which can be applied by the TOC to cover

these aspects, for example, if a TOC makes a small change to wording but which carries no impact to the customer, it should not require a review or approval. If the change is at the detriment of the customer, then it should follow an approval process.

In addition to the proposals set out in the consultation, TransPennine Express wish to suggest that as part of the review and sign off process, the ORR commit to minimum of one face to face review/sign off meeting which could also encompass a go/look/see so that the ORR gain a more thorough understanding of each operation.

TransPennine Express recognises the benefits of including customers in the development of policies and host a Joint Inclusivity Forum through which we engage with customers and representatives on various topics to ensure that changes within the business consider the needs of disabled customers. We recognise the benefits which the involvement of these groups in the formation of the DPPP offers, and feel that plans should be shared for comment, but that these groups should not be empowered to write the content of the policy, and that the ORR should not mandate their input as part of the review process as these groups can carry views which oppose the industry position, and it should remain the responsibility of the TOCs to balance all views and compose a policy which reflects these, whilst meeting the requirements and specification prescribed by the ORR. If the customer groups were to be mandated to form part of the review and approval process, we would question whether the ORR would feel it necessary to verify the members of the panel prior to them carrying out a review and passing comment ensure that panellists are not trying to commit the operator to unfeasible or unreasonable adjustments, which cannot be explained without divulging commercial data about the TOC not intended for public consumption.

As an alternative, we would be supportive of a national panel being formed for the review of DPPPs, led by the ORR or Rail Delivery Group, with TOCs encouraged to engage with local groups as they see fit during the drafting of their policies.

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

It is important that any Station Classification which is introduced can be suitably applied to the many variances in access across the network. Whilst we appreciate that a one size fits all approach will be difficult to achieve and best endeavours have been taken to reach this point, we do not feel that the current approach proposed by the ORR meets the needs of the industry or gives sufficient scope to effectively communicate where the classification of a station changes based upon the time of day.

For example, Selby Railway Station has three platforms. During staffed hours, platforms 2 and 3 have level access through the use of a barrow crossing with staff assistance to cross the line, and would therefore be classified within category C, however outside of staffed hours, the barrow crossing is closed to customers due to the safety risks associated with crossing the track, rendering platforms 2 and 3 inaccessible, therefore the station classification would reduce to category D.

This is not catered for within any proposals set out by the ORR, DfT or Rail Delivery Group, but must be addressed prior to any implementation of such classifications.

There is also a need to consider the impact of the availability of other station features upon any station classification for accessibility. the proposal put forward by the ORR in the consultation focuses on step free access as a key indicator of accessibility, however it could be argued that for some customers, the provision of accessible toilets, blue badge parking bays, tactile paving, low ticket office

counters is equally important to address their needs when travelling. It would be our recommendation that the ORR work closely with the industry to agree inclusive station accessibility classifications within which step free access is an element.

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

As part of the process followed by our assisted travel team, advisors are required to check station accessibility information at the time of entering an assistance request into the Passenger Assist system, particularly where the station is one which the customer or advisor is unfamiliar with.

The current system has no method of logging that this information has been accessed during the request. There are also cases where changes to the station information are not applied, or notifications are placed within the homepage on Passenger Assist, and therefore not necessarily flagged to the advisor at the time of processing a request.

Mandating the checking of the station access information as part of the call may address some instances where an advisor requests assistance which is unavailable which is a positive. However, in mandating these checks, there is the risk that calls could increase in length unnecessarily, aggravating customers as was seen following the introduction of the GDPR statement in May 2018. Extended call times would also impact the waiting times for callers, the reduction of which is a key target for our call centre to improve the service to our customers.

To effectively mandate this process, system development would be required to prevent advisors from processing any booking without first accessing this information. Development should also consider the availability of rolling stock information and alerts as this carries equal weighting for accuracy of information at the time of making an assistance request. Even if this was implemented, the key issue with this approach is the accuracy of the station information within the system. Train operators have raised through Rail Delivery Group concerns with the stability of the Knowledgebase system which informs Passenger Assistance of station accessibility features. There are known inaccuracies within the system due to technical issues, and until these are addressed, mandatory checks would not address all of these failures.

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We are supportive of any proposal which helps to keep customers informed of what to expect when travelling by train, recognising that for many customers this may be their first time using the rail network or assisted travel.

We would however urge caution with regards to mandating best practice. With the variances between operations and the nuances which exist between operators based on fleet types, staffing approaches and whether they provide commuter, regional or intercity services, a one size fits all approach is unsuitable and the ORR should take into account the limitations of each TOC or location to deliver to this level. Our thoughts on the approach of the ORR to seek best practice in various areas of the guidance is highlighted further in our response to question 25.

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

We appreciate the intent behind the introduction of a handover protocol and recognise the benefits which this could offer. These go hand in hand with the improvements which are already being trialled and are in development by ourselves and more widely by RDG to improve the reliability of the provision of assistance.

Many stations already make use of phone calls to communicate assistance requirements, however the cause of failure in many cases is the availability of the member of staff to provide the assistance at the time when it is required. This issue is amplified at single staffed stations, where a member of staff may be required to provide assistance to multiple customers at the same time, even on different platforms or services, and prioritisation must be applied. Nonetheless, we would support a trial of these protocols to ascertain their effectiveness and measure any impact this provides with regards improving reliability.

With the introduction of Transreport in late 2019, functionality should be introduced which requires the member of staff providing the assistance to complete the information fields in order to close out the assistance leg, similar to what is proposed by the handover protocol by phone call. The advantage being that the booking would be logged in the system and automatically provided to the receiving station, negating the need for phone calls, and introducing traceability through the creation of a data trail which can be reviewed, audited and relied upon should a customer complaint be received regarding failed assistance. This would also enable TOCs to monitor trends, and take corrective actions, or base decisions on data where it is not currently readily available.

There is also an opportunity to introduce a handover protocol between the station and onboard teams, whereby the station staff inform the conductor of the customers whereabouts on the train, assistance requirements and departure station. This way, the conductor can act as a failsafe should station assistance not be in place at the destination station.

We continue to believe that the industry needs to explore ways in which customer demand for assistance can be more effectively managed, advising customers to make use of those services where there are not existing assistance bookings. Where multiple assists are required simultaneously, demand will continually outstrip resource, and as such, there will always be failures. We urge the ORR to consider how the industry could suitably introduce a means by which the quantity of assists is aligned to the amount of available resource, with customers presented with alternative choices where the operator is likely to be unable to provide the level of assistance they require at the time they wish to travel due to other bookings having been made. This approach already exists with regards to wheelchair users, where the quantity of assists is set by the quantity and availability of the wheelchair user spaces on board and works effectively to set expectations within this customer group.

Q9. What are your views on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

We see the benefit of a dedicated assistance line at major UK stations, where dedicated assistance teams are provided, however at smaller stations, particularly those which are single staffed, we feel that an additional line specifically for assistance requests would add little value over the existing

means of communication. The issue at these locations is the ability of the member of staff to answer the call as part of their other duties.

We believe that investment should instead focus on suitable development of the Transreport system to facilitate effective communication of assistance requirements between stations with a means of logging correspondence.

Q10. What are your views on our training proposals? Do you agree with the proposed content?

TransPennine Express agree with the 10 elements which have been proposed by the ORR as areas of focus for staff training.

We have not received confirmation on how TransPennine Express disability awareness training has been scored, and as such the responses to question 10 and 11 are given without this knowledge.

As part of the TransPennine Express franchise agreement, all customer facing staff received disability awareness training between April 2016 and February 2017. This training was developed in conjunction with Action on Hearing Loss who provided an e-learning module focusing on deaf awareness, Age UK providing modules on dementia awareness and RNIB and Guide Dogs for the Blind with staff using simulation glasses to experience various sight conditions. The combination of e-learning, classroom exercises and on station scenarios gave balance as well as the opportunity for theory to be experienced and embedded.

As part of our Franchise Agreement, refresher training is required to be completed for these specified franchise employees no later than April 2020. It is envisaged that the refresher training will again utilise e-learning and experiential training methods to minimise the requirement to release staff for training days.

Based on our experiences of delivering Disability Awareness Training recently, we do not agree with the ORR's proposal that the training or refresher training needs to be classroom based, as we have demonstrated that the practical, experiential and e-learning approach is more effective for embedding the core messages and behaviours with our teams.

We recognise that the training material provided to the ORR by TransPennine Express as part of their review does not solely address the 10 elements which are being proposed, however, training for certain elements of the proposed requirements, e.g. ramp training, does not form part of our disability awareness course, and is instead included within competency-based training as part of on board or station inductions.

We feel that a literary review is insufficient to accurately determine the suitability of the training provided to customer facing staff to provide them with the skills to effectively assist a disabled customer, and find it particularly concerning that the ORR feels the training does not meet the requirements of the industry when the training we provide was developed and in participation with leading charities in the field of accessibility.

We appreciate that the disability awareness training provided by TransPennine Express in line with the requirements of our franchise agreement was mandatory for customer facing staff, and optional for management grade colleagues. We recognise the benefit of providing disability awareness training to managers, however there should be the ability for the TOC to tailor this to the roles and responsibilities of the managers who do not necessarily need to have training or knowledge of all 10 elements proposed by the ORR.

Prior to any new training approached being mandated by the ORR, we would welcome participation in our training to allow a more accurate review of our approach to be carried out.

We also wish to highlight the impact which any changes to training requirements would have upon our franchise agreement with regards the provision of refresher training. Changes would need to be agreed with the Rail North Partnership to ensure compliance with our franchise agreement whilst also meeting the aspirations of the ORR.

We would also like to raise concern with the requirement put forward by the ORR for staff to undertake refresher training at a frequency of two years is excessive. Our franchise agreement sets refresher training at the four-year point within the franchise, which has allowed sufficient time for the course to be evaluated, focus areas to be identified and changes to the training to be explored. A two-year frequency would create an endless programme of refresh, removing the opportunity for reflection and redevelopment of content, and would additionally introduce significant administrative requirements and drive increased traincrew headcount to provide release for increased training requirements.

Q11. Do you agree that:

- operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?
- the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

As highlighted in our response to question 10, TransPennine Express is already committed within our Franchise Agreement to providing refresher disability awareness training to all customer facing staff by the end of April 2020. The focus of this refresher training is currently set to be the three key areas specified for the training provided early in the franchise. These are:

- Dementia Awareness
- Deaf Awareness
- Blind and Partially Sighted Customers

We envisage the refresher training provided exploring the opportunities provided by E-Learning with the approach focusing on embedding good behaviours and introducing broader themes where issues have been experienced with frontline staff since the initial training was provided.

Whether priority areas for the industry as a whole or specific to TransPennine Express were added to this specified refresher training, the scope of the training would increase, requiring additional time to develop and deliver, placing in jeopardy the committed date by which refresher disability awareness training must be provided, which is not aligned to the dates set out by the ORR.

Amendment of the franchise agreement is possible but would require agreement from the Rail North Partnership.

We see greater benefit in tailoring the refresher training to the specific train operating company above standardising this across the industry as this would create a more engaging course for our frontline teams, enable us to address any gaps which may be identified between our current approach and the proposed industry standard, prevent repetition and raise the standard higher than could be achieved

through mandated national training. This approach would also allow greater localisation so that the training remains tangible and meaningful.

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

In principle TransPennine Express would support the promotion of assisted travel, however, we feel that this activity should be delayed until some of the fundamental issues around reliability, which have triggered this consultation, have been addressed. Promoting the service prior to improvements being made could place additional strain on the system and could cause irreparable damage to customers confidence in the service.

We would also urge the ORR to consider how the industry best manage any influx in the use of the assistance service. A key driver of unreliability within the provision of assisted travel is the ability for customers to request assistance which could exceed the industries abilities to deliver, regardless of the amount of resource available or existing requests, and we do not feel this is suitably addressed within this consultation.

Whilst TPE recognises that the policy of the Equality Act 2010 is to ensure that disabled people receive a standard of service as close as it is reasonably possible to get to the standard normally offered to the public at large, what amounts to a reasonable adjustment to services must be considered in all the circumstances, including legitimate organisational constraints, and the proportionality (including time and cost) of measures to address these constraints.

For example, many services only have two wheelchair user spaces. This will address wheelchair users need in the majority of circumstances. However, it is not currently clear how operators are required to address the cases in which this is insufficient, such as during peak periods where wheelchair space demand may outstrip availability. Should we be having an active conversation within the industry, including with ORR, about the message we should be giving disabled passengers in such cases? Notwithstanding the objective to promote accessible transport, it is important that passenger expectations align with legitimate organisational constraints.

We would be supportive of earlier promotion of the service, encouraging customers to request assistance, if simultaneously the ORR permitted an approach whereby assisted travel advisors could actively communicate to customers the benefits of using quieter services as this would spread the demand for assistance. E.g. *“that service already has 3 assists requested, so you may not immediately receive the help you require whilst staff assist other customers, however the next service does not have any assistance requests, so staff will be more readily available to provide the help you need”*

When the time is right to promote the service, we feel this should be carried out by RDG in a coordinated manner, raising awareness simultaneously of both assisted travel, focusing on the benefits of requesting assistance in advance, and the disabled persons railcard, with support from the TOCs via various channels.

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

TransPennine Express has strong working relationships with Local Authorities for the continued development of the railway, and actively engages with key local charities and user groups to promote our services. We also hold a joint inclusivity forum with members representing disability charities and our disabled customer base.

Assisted travel however should be promoted nationally rather than locally, as the service applies equally to all TOCs. We would be supportive of an approach led by RDG to engage with major charities and organisations, e.g. the National Health Service to share details of the services which are available across a wider audience, but as with the response to question 12, this activity should be delayed until such a time as there is confidence in the reliability of the assisted travel service.

Q14. What are your views on the proposal for more prescriptive website requirements?

Since the guidance was last reviewed in 2009, the functionality of websites has greatly increased. TransPennine Express would be supportive of the ORR providing greater prescription of the requirements of TOCs webpages with regards accessibility as a whole, and the provision of information regarding accessible travel, and would be keen to see these requirements extended to third party retailers for consistency, with an agreed date by which the industry must comply with these regulations allowing for suitable levels of development and testing to take place.

As part of the requirements, we would be supportive of an approach whereby common terminology is utilised by all TOCs, particularly the name given to the assisted travel service. We would also support an approach whereby TOCs are required to provide an assisted travel landing page within 1 click of the website homepage, from which links are made available to other key areas of the website, e.g. station information, rather than duplicating this information and attempting to provide it all within one location on the website.

We would be supportive of the ORR exploring the need to specify the requirement to provide accessible website features as part of the website, e.g. screen reader, text to audio, ability to change colours/contrast as a minimum standard.

A requirement to consider should be the need to link to national sources of information, e.g. national step free map (in development by RDG) for consistency of information presentation for accessibility information, but with the ability for branding to be applied suitably.

As part of the review of website accessibility standards, the ORR are requested to accept the removal of any and all link to Stations Made Easy given the inability to maintain this information due to RDG system issues.

Q15. What are your views on the three options for reducing the notice period for booked assistance?

A national move to 2-hour assistance would send a very clear message to customers that the rail industry is committed to offering spontaneous accessible rail travel, and is one which TransPennine Express would support, however we recognise the challenges which this would present for those operators with significant quantities of unstaffed stations, or where driver only operation is in place.

Having introduced a reduced notice period for our customers on specific routes, we have experienced the challenges, and feel that before a national rollout of this approach could be achieved, significant system development and investment in technology would be required.

Considering this, and recognising the position of other operators, our proposal would be:

- Up to 10pm the evening before, commitment to provide reservations (where available) mandated for all operators.
- Where possible, requests by call only should be accepted from 10pm the evening before, up to 2 hours before travel, with a commitment to provide assistance to/from staffed locations where there is suitable space available on board the train, with calls directed to the national call centre out of hours. This proposal recognises the requirement within the TransPennine Express Franchise Agreement to provide a 2-hour notice period for assistance requests where possible, however we recognise that some TOCs cannot currently offer this service due to organisation and technological constraints and so this should be considered aspirational where possible depending upon the feasibility for each TOC.
- Less than 2 hours before travel, a turn up and go service is offered, with staff providing the assistance required whenever possible and with minimum delay. This should be an expectation of all TOCs where assistance is not requested in advance, however TOCs should continue to promote the benefits of requesting assistance in advance.

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Any changes to the notice period should be aligned to the introduction of the new Transreport passenger assist system which has already been committed by the industry to deliver improvements to the assisted travel service. Alignment of the introduction and any reduction to notice period would maximise the benefits offered and reduce the instances of change and requirement for training as part of the system roll out.

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

TransPennine Express are committed to providing on train staff on all services in the form of a safety critical conductor until the end of the current franchise, and as such are not in a suitable position to comment on this element of the consultation.

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

TransPennine Express currently provide redress to customers where a complaint is received, and it can be determined that assistance has not been provided when requested, however, we do not currently have a rigorous process for identifying where the assistance failure is as the result of another SFO without carrying out a specific investigation following the receipt of a complaint from the customer.

Introducing a standardised redress policy for assistance failures requires careful consideration and should seek to address the shortcoming of the current approach to ensure that TOCs only issue redress where they can be determined as being responsible for the assistance failure.

There is potential for any national redress approach to quickly escalate to rival the processes required for the verification and issuing of delay repay payments to customers or agreeing delay minutes between TOCs and network rail, which TOCs are not currently resourced to implement.

We would welcome the opportunity to work with the ORR and other TOCs to develop a redress system which offers consistency but enables TOCs to assess compensation on a case-by-case basis and in light of all circumstances leading to the failure, but feel that this should not be mandated until such time as there is confidence that the approach is not open to fraudulent claims, aligns with the approach of Transport Focus and the Rail Ombudsman and suitably integrates with Delay Repay.

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Text relay is provided using Next Generation Text Service. This has replaced the now outdated minicom equipment.

The Next Generation Text Service is compatible with all numbers and does not require a specific contact number to be provided by the TOC, and no changes to be made by the call centre. It should therefore become a standard approach that all TOCs have a single contact number and promote the use of the Next Generation Text Service by any customers requiring text relay services.

Video relay can be introduced through similar means, with a third-party service referenced via the TOCs being required to introduce their own bespoke arrangements to provide this service.

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We have consulted with our road transport supplier to assist with our response to this question within the consultation. We have structured our response to this question into four sections.

- **Accessible Coach / Bus Availability**

Rail replacement services make use of vehicles within the private hire coach market, and as such, availability is subject to demand, and can be heavily influenced by the time of day (e.g. competing with dedicated work to provide school bus services) or time of year (e.g. summer coach tours market). Early planning is essential to ensuring vehicles are recruited to meet the needs of the replacement transport operation.

As a long-distance operator, our preference is the use of executive coaches over service buses as they offer greater comfort, luggage storage and toilet facilities for customers. This is reflected in our Franchise Agreement which specifies these types of vehicles for all rail replacement services, however we recognise the benefits offered by using service vehicles (single or double decker buses) where capacity needs to take precedence over luggage storage or comfort over short distances. It should be noted that service buses are unsuitable for use on journeys which would require long periods of travel at motorway speeds. It is widely accepted that coaches cannot accommodate wheelchair users, and have stepped access,

often steep, whereas service buses offer low floor access, and therefore offer similar levels of access to our trains, but without the comfort or luggage capacity.

Currently, our road transport supplier's vehicle databases utilise these assumptions. To review and record the accessibility of the coaches owned and operated by every operator listed on their database would be a significant undertaking, and development of their database would be required to support the recording of this information. They have also raised concerns over the ability to maintain the accuracy of this information as coach operators frequently change and upgrade their vehicles to meet market demand.

The issue with the use of service buses beyond comfort and suitability is availability. Many operators do not carry excess vehicles in their fleet, and therefore availability is low, particularly at peak times.

All elements considered, the current approach taken to supply rail replacement, using private hire coaches, remains the only viable option to meet the requirements for demand. On average, for each train which is removed from service, a minimum of two coaches are required, and this is set to increase as we begin to operate longer, higher capacity trains. To insist that all coaches/buses used for rail replacement are accessible would eradicate our ability to meet customer demand. This would be compounded if this approach was applied to all TOCs, as we would be competing for a very small portion of the coach/bus market.

Before such a change can be implemented, the ORR need to work with the Department for Transport to influence changes within the private hire coach market to increase the availability of accessible coaches aligned to the aspirations of the DfT Inclusive Transport Strategy which carries the long term objective of *"achieving our goal of creating a transport system offering equal access for disabled people by 2030"*

We do not feel that the ORR have suitably assessed the impact which insisting accessible vehicles be utilised for all rail replacement services would have upon the industry's ability to keep customers moving. We believe the approach currently used, of providing an accessible taxi where a coach service cannot be accessed remains the best approach for all customers in recognition of the current state of the coach and bus market. Until this market moves to using accessible vehicles, TOCs remain unable to specify this requirement and we would strongly oppose any proposal to introduce this requirement through the guidance.

- **Accessible Taxi Availability**

The availability of accessible taxis is higher than that of accessible coaches, however, as stated in the consultation document, often the provision of these vehicles is concentrated to highly populated urban areas.

The issue faced by the industry is that often, the inaccessible stations, where accessible road transport is required, are rural, and so availability of these vehicles is severely diminished.

Our road transport providers are confident that an accessible vehicle could be supplied at these stations in an emergency/unplanned scenario within a period of 90 minutes. We recognise that this exceeds aspirations, however, until the taxi and private hire operators increase the quantity of accessible vehicles within their fleets, this will continue to be an issue for the rail industry.

As with the availability of accessible coaches, this is not an issue which we feel can be addressed by the TOCs. The ORR need to work with the DfT and local authorities to influence change within taxi and private hire legislation to increase the provision of these vehicles across the UK aligned to the aspirations of the DfT Inclusive Transport Strategy which carries the long-term objective of “*achieving our goal of creating a transport system offering equal access for disabled people by 2030*”.

On this basis, we would oppose any change to guidance with respect to the provision of accessible taxis.

- **Coach / Bus Driver Disability Awareness**

As set out within the consultation, disability awareness training is a requirement for all bus and coach drivers, however, as a TOC, we have no process for assessing or influencing the content or quality of this training as it is provided by the operator. We do not feel that the guidance should make any reference to the requirement for coach or bus drivers to have undertaken this training as it should be an assumption within their industry.

- **Taxi Driver Disability Awareness**

As set out within the consultation document, there is currently no requirement for taxi drivers to have completed disability awareness training.

We feel it is unrealistic to impose requirements upon the TOCs to require this training to be completed by any taxi driver who could realistically be called upon to provide alternative transport to/from a railway station when it is not a national standard or requirement.

Prior to any changes to the guidance being introduced in relation to this requirement, we would appreciate the opportunity to discuss this further with the ORR to set expectations with regards to:

- Who is responsible for delivery of the disability awareness training for taxi drivers?
- Who is responsible for determining the suitability of the training provided, and verifying content (to avoid inconsistencies)?
- Who covers the cost associated with providing and maintaining disability awareness training for taxi drivers?

Whilst it is recognised that the taxi provider may be subcontracted by the TOC, it is ultimately the responsibility of the taxi operator to ensure they are providing the required assistance in line with the Equalities Act 2010, and whilst the TOC can provide guidance, we cannot take away the responsibility for the operators to ensure their compliance.

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Help points are provided at all TransPennine Express managed of stations and are already utilised for this purpose. All stations also feature welcome posters with key contact information. We would be supportive of this practice being replicated throughout the industry, however we recognise that there are certain stations where help points are not currently provided, and mobile phone reception may be poor which could present issues. Consideration should be given to these locations on a case by case basis, and timescales agreed by which compliance must be achieved.

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

TransPennine Express wholly disagree with the proposals put forward by the ORR with regards the changes to carriage of mobility scooters on board trains.

Presumption of carriage in an assembled state cannot be introduced, as this would introduce significant safety risks, sets a dangerous precedent and undermines the approach of scooter permit schemes which are in place to ensure customers can travel safely without posing a risk to themselves, staff or other customers.

Unlike wheelchairs, mobility scooters are not built to recognised common standards. For presumption of carriage to be introduced, common standards need to be identified in partnership with relevant departments within the healthcare sector and form part of PRM-TSI guidance so that rolling stock can be designed to accommodate these.

As it stands, the carriage of mobility scooters must be subject to a thorough risk assessment. We would like to extend an invitation to the ORR to partake in our Mobility Scooter Risk Assessment activities which are taking place ahead of the introduction of our new fleets of trains so that they may better understand the reason for the policies which are in place and why a presumption of carriage must not be introduced.

Key risks identified by TransPennine Express during previous scooter risk assessment exercises are:

- Potential to tip or become stuck on the ramp through the mobility scooter being unable to climb the angle of the ramp between the platform and the train. (For reference, PRM-TSI identifies a ramp angle of 10.2 degrees, where most Class 2 / Medium mobility scooters have a safe ramp climbing angle of 6 degrees). Introducing a presumption of carriage encourages operators and customers to ignore the safety guidance of the scooter manufacturers.
- Ability to turn both within the train and on the platform to ensure the ramp is ascended and descended whilst the scooter is straight. Unlike wheelchairs which can pivot, mobility scooters have turning circles. Train interiors have not been designed with these requirements in mind, and many scooters are unable to suitably manoeuvre to ensure they descend the ramp straight, and forward facing. When the scooter reaches the bottom of the ramp, it must then be able to turn without risk of coming into contact with any station structures. This drives the requirement for a 1m turning radius.

We would support the ORR introducing a presumption of carriage of folded mobility scooters, where the scooter has been folded prior to boarding and can be transported as luggage, replicating the approach taken with folding cycles to raise awareness of the reasons why mobility scooters cannot be accommodated in the same way as wheelchairs.

We would also support a requirement to provide details to customers with regards the carriage of other mobility aids, including rollators, and additionally provide clarity of our policies where a customer claims other items outside of policy are claimed as being used to aid mobility, e.g. electric cycles.

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

TransPennine Express are fully aware of the issue which point 'a' seeks to resolve and have explored options to introduce notices within the booking flow to alert customers to the accessibility of the different classes on board our trains. Exploration of these options identified that whilst a solution could be added to the TransPennine Express booking flow, this would not be replicated by other TOCs or third-party ticket retailers, and would not flag where this affects other operators services, and so does not suitably or comprehensively address the issue at hand. This was communicated to the ORR in 2018.

As this issue needs to be addressed by the TIS providers, we do not feel it is suitable to include this in the guidance as it does not sit wholly within the TOCs gift to deliver but should remain a focus for the industry.

We similarly appreciate the intent of the action which would result from point 'b', however we do not feel sufficient understanding has been gained as to the requirements which would be placed on the TOCs to deliver this to the level which the ORR sets out in this consultation.

We have clear processes in place which deal with the issue of accessible toilet facilities being unavailable on board our trains, which include intervention by cleaning teams and on-board staff or arranging for toilet stops during the journey until such time as the train can be serviced. Significant investment has also targeted improvements to toilet reliability on our services, so we are confident that our current approach meets the needs of our customers.

We appreciate that prior warning of specific train features being unavailable would be beneficial to customers, however clear timescales for this would need to be agreed, as it may be that a facility becomes unavailable just minutes before a customer is due to board the train, in which case it may not be possible for this to be communicated. Similarly, a facility could go out of use, a customer be informed and decide to make alternative arrangements, then through our interventions, the facility returns to being serviceable. This does not appear to have been accounted for within the consultation.

Also, if such systems are being introduced to inform disabled customers about the availability of the accessible toilet, it could be argued that this should be applied equally to all train features which could impact the ability for a disabled customer to travel on the train, including audio/visual announcements, train ramp, availability of priority seating or wheelchair user spaces etc. This is not an approach which the industry is yet equipped to deliver, but should be considered good practice, and an aspiration, outside of the revised DPPP guidance.

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

- **Assistance / Priority Seat Cards**

TransPennine Express recognise the aspiration of a national assistance card within the DfT Inclusive Transport Strategy and would be supportive of adoption of this as early as possible by the whole rail industry, aligned to the national passenger assistance service, enabling customers to make use of the same card/approach wherever they travel by train. The assistance card service should encompass a priority seat card and expectant mothers card within one scheme for simplicity and heightened awareness amongst fellow passengers.

Q25. Do you have any other comments or views on improving Assisted Travel?

- **Improving Reliability of the Assisted Travel service**

As set out within our responses above, TransPennine Express wholly believes that in order to improve reliability and provide the higher levels of consistency and satisfaction with the assistance service which customers want, serious consideration must be given to the ability of the industry to manage demand and allocate resource effectively. Without this approach being implemented, the assisted travel service can never guarantee that those who have requested assistance will all receive it reliably. It is a matter of setting customer expectations, and through close monitoring of data, actively targeting physical improvements in those areas where the demand for assistance is highest.

- **Terminology**

More generally and as highlighted by Great Western Railway within their response, the current DPPP Guidance contains a confusing mix of 'should', 'must', 'expected to', 'recommended to' and 'may'. Currently the ORR intend to clarify this so that:

- 'Must' means this Operators must do as a minimum
- 'Must, where reasonably practicable' provides an opportunity to deviate where it is not reasonable practicable on the specific facts and circumstances faced by that Operator
- 'May' refers to "good practice we expect Operators to consider adopting where not already implemented"

We would recommend that 'May' is not utilised in the revised guidance and is instead replaced with 'Good practice is this area...'. Providing TOCs with an example to aspire to, however what is considered best practice should be considered against the type of operation and may therefore vary.

- **Website Triggers**

The ORR "recommend" changes to the ticket booking section of Operators' website at the first available opportunity and, where necessary, their contact centre call handling procedures, so that when passengers indicate they have a Disabled Persons Railcard this acts as a trigger for the website or call centre staff to ask whether they require assistance with any aspect of their journey. It is not clear if this will be something Operators "must" do and, if so, the time allowed for compliance. This will require amendment to call centre training and script documents. It may require some (potentially complicated and costly) website enhancements to incorporate this "trigger" functionality, and should therefore not form part of the guidance until this has been suitably explored.



Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People’s Protection Policy (DPPP)

Response to ORR’s consultation

Introduction

Transport Focus is the independent consumer watchdog for Britain’s rail passengers, for bus, coach and tram passengers in England (outside London) and for users of England’s motorways and major ‘A’ roads (the Strategic Road Network). Our aim is to make a difference for users, but always with them at the heart of our work.

We strive to give all transport users as powerful a voice as those that provide their services. We do this through gathering evidence of the user experience and presenting it to those who can make a difference, whether from the industry or government. We also undertake the National Rail Passenger Survey, the Bus Passenger Survey and the Tram Passenger Survey and have used the results of these to reveal additional information on disabled passengers’ views. This response is based on the evidence gathered over a number of years, through research and other direct feedback from users, including our postbag, and from our own experience of using the railway.

We welcome the opportunity to respond to this ORR consultation. We believe that despite significant infrastructure and on-train facility improvements over the last two decades, the level of the assistance-provision service has failed to register such a significant enhancement over the same period. Transport Focus’s predecessor bodies undertook a series of mystery-shop surveys over a number of years to assess the efficiency of passenger assistance. We have noted some improvements during the course of these, but it seems also from ORR’s own research that a number of aspects concerning assistance still stubbornly refuse to improve significantly. This cannot continue. It is essential that the outcomes from the consultation resolve such issues.

Transport Focus, like its predecessors, has a role in reviewing each operator's proposed Disabled People's Protection Policy (DPPP) and in reporting its views on the conformity of the document to ORR.

We also run a twice-yearly accessibility forum which brings together the rail and bus industries, road user organisations and disability representative bodies and individuals to consider matters of mutual interest in the transport sphere.

Transport Focus's predecessor body took part in the stakeholder board convened by the Department for Transport, then responsible for Disabled People's Protection Policies (DPPPs), to draw up the existing 2009 Guidance. It was rightly seen at the time as an urgent need to produce basic guidelines for the content of DPPPs due to the wide variation in content between operators' offers at the time. That was undertaken almost ten years ago and that guidance has failed to keep pace with legal changes and technology advances in the meantime.

Under the Guidance, Transport Focus is one of several nominated consultees on the content of DPPPs. We have always undertaken this work with vigour and diligence, making detailed comments, corrections and recommendations for change. For that reason, we welcome many of the proposals for improvement of existing DPPPs featuring in this ORR consultation which mirror our contributions over the years and which we support now.

We agree that review of every aspect of the content of DPPPs (including the title of this document) is overdue. We must emphasise, however, that content of the DPPP is only a part. Equally vital is that adequate enforcement action is taken to ensure that operators comply with the improved guidance, not only at the outset but throughout the validity of the DPPP. Many of the issues covered in this document have been covered in numerous documents and consultations and yet they remain problems. Clearly not everything can be resolved in the short term but where targets have been set there needs to be a renewed will and determination to enforce them.

Responses to individual questions

1. What are your views on replacing 'Disabled People's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

The current title is outdated and fails to accurately describe the content of the document. Transport Focus agrees that the title needs to change. We have a slight preference for 'Inclusive' over 'Accessible' but will willingly accept 'Accessible' if that is deemed more appropriate by the majority of responses.

2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

The current passenger-facing document does contain some aspects which do not apply immediately to travel. Their removal from the revised document would be beneficial in reducing the length of the document and allow readers to concentrate on matters of more immediate concern.

It is important, however, that any such items currently in the passenger-facing document which are removed should appear in the policy document.

Is there anything you consider is missing from the required content?

It is slightly unclear how extensive the proposed ‘commitments to passengers’ will be and how much detail these will contain. We have some concerns that, according to the proposals, details about the carriage of mobility scooters and other mobility aids will appear in the policy document, as will matters such as accessible alternative services. If there are restrictions, passengers need to know about them in the main document.

At the very least the passenger-facing document needs to refer to these important aspects, advising where further details can be obtained. Such additional details should be easily locatable and widely available.

Is this still a meaningful title for this leaflet?

We believe that this title is still meaningful. It is straight-forward and clear. We have no objection in principle to its amendment, however, if a more suitable title is suggested.

3. What are your views on our proposed requirement that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

The size of certain train operators’ current DPPPs is lengthened considerably by the inclusion of rolling stock and station information within them, making them unwieldy in many cases. The more stations and types of rolling stock used, the longer the document.

It is important that this information is provided for those passengers who wish to have the detail, but we agree that it might be included within the policy document rather than the passenger ‘leaflet’, especially in the case of those operators with a wide range of

stock and many stations. This information should also be available on operators' websites. The online information must be updated immediately a change occurs to ensure that that source is always accurate while it must be accepted that paper versions were, at best, accurate at the time of printing. Also, this needs to be provided in an open data format for app developers to use. It would be helpful if any variation between the two versions were indicated in the online version to show which is more recent.

4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We welcome the new requirement for operators to confirm when documents are submitted that feedback has been sought from local groups. The operator should demonstrate how it has listened to or used the information gathered to demonstrate that feedback has been considered at a senior level within the company.

The proposal to introduce a ten-week backstop before the start of operations is also welcome.

The proposed requirement that these documents appear on a new operator's website from the start of operations which should allow two weeks from the date to approval to prepare to do so is a useful reduction from the current Guidance allowance of three months.

As to the review process, we agree with the proposal to streamline reviews and restrict the requirement for approval only to cases where material or significant change is proposed. A definition of 'significant' should be given.

5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The five-point definitions here clarify very much more clearly actual accessibility conditions and are welcome.

Combined with improved station layout diagrams and photographs, passengers should be in no doubt about a particular station's accessibility for them.

It is important that operators are required to avoid unqualified terms such as 'long', 'steep' and so on and replace them by accurate details of the distance or gradient. Equally important is the need to ensure that these descriptions are up to date.

In its responses to both the Department for Transport initially and latterly to ORR since 2013, Transport Focus has stressed the inaccuracies and inconsistencies in station access descriptions, often within the same operator's own information.

Inconsistencies between different operators' definitions of various access characteristics has severely hampered clarity. The difficulty has long lain in the detail of explaining various types of step-free accessibility to stations where other barriers also apply, e.g. the lack of tactile paving or of dropped kerbs in the station forecourt. Many operators have confused passengers by including such features within in overall 'not fully accessible' or 'not accessible' category but without explaining which features are inaccessible. Given this, auditing and monitoring will be vital to ensure that essential information is accurate and consistent, maintaining certified and up-to-date data. Full monitoring and enforcement are vital if inconsistencies are not to continue.

Where information relates to specific platforms it is important that details of platform numbers and the direction of travel to/from it are given.

6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?

This is vital to avoid the reliability of journeys being threatened. It is especially important for passengers unfamiliar with the stations concerned and if booking staff are also unfamiliar with it. It will inevitably lengthen the transaction process but is important to avoid a potentially disrupted journey. As the consultation document states "...this places a huge onus on the booking agent to get it right".

7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys and the actions they can take to support rail staff in the delivery of assistance?

Given the huge variance in on-station and on-train assistance, reservation availability, staff presence and so on at various points across the network it is important that the type of accommodation and assistance to passengers is spelt out as clearly as possible. This must be set out in relevant publicity but also confirmed during the booking process.

Passengers need to be reminded that they can help themselves by keeping a note of their booking reference number or journey details where these have been provided by booking staff. The development of general guidance for Passenger Assist users, as proposed, is welcome.

To avoid as many 'no shows' as possible passengers should be strongly encouraged to cancel assistance bookings if they decide not to travel. By the same token, we expect the industry to cancel original bookings where passengers' intended journeys are disrupted.

The provision of a number to contact staff in case of disruption or other emergency is long overdue and the proposal here is welcome. Better communication via help points at stations would also be beneficial; too often it seems that staff answering these are not only unfamiliar with Passenger Assist or disabled passengers' needs but also with their own stations' facilities and staffing. It is important that staff answering help points can transfer the enquirer to another member of staff if necessary.

It would assist in this matter if on-train staff were provided with details of booked passengers on their train and that they made themselves known to those passengers, where operating conditions permit. While advice to passengers to remain in their booked seats is sensible, it would also be appropriate for on-train staff to ensure, as far as possible, that the expected ramp/wheelchair assistance is available on the platform at intermediate alighting stations. (We call elsewhere here for on-train staff to have details of booked assistance for any passengers on that train.)

Transport Focus would be pleased to take part in any working group set up to establish these criteria.

8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

A handover protocol will be very welcome and Transport Focus supports the proposal to trial such measures early in 2019. While this will only be at selected stations it will allow for stress-testing at various points across the network to inform the creation of the final format of such a protocol, the basic outline of which seems sound.

This is long overdue and should prove the basis of a major improvement in assisting passengers to detrain at their destination, which research shows is an area that requires great attention.

9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve reliability of communication between stations during assistance handovers?

Given the known number of failures in current arrangements, this seems to be a sensible proposal. We welcome the participation of several operators in a trial scheme with a diverse mix of operators during 2019 and look forward to seeing the results. The trial will test viability and allow for fine-tuning before any wider application.

10. What are your views on our training proposals? Do you agree with the proposed outline content?

Training of all rail staff in accessibility matters is vital although the type and level of training may vary according to the staff member's role. While we are aware of some elements of good practice in staff training, we note the examples of poorer practice. We very much concur with ORR's aim to give all staff the skills, knowledge and support required to help passengers travel with confidence and dignity. The ten mandatory training elements will give staff an excellent overview but, as the document acknowledges, will require operators to upgrade their training to accommodate them.

11. Do you agree that:

- **Operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**

This seems sufficient time for operators to put new training packages in place and would appear to allow adequate time for refresher training. This is important work and cannot bear delay for any longer than is unavoidable. It is beneficial to operators as it will improve their overall efficiency.

New entrants joining towards the end of this period would benefit from the revised training at the outset.

- **The refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

The industry views the network as a single entity despite the many operators delivering certain elements of the service. Passengers need to know that they will receive a minimum level of service wherever they travel and by whichever operator. ORR will be doubtless keen to ensure that this happens. We feel that it should focus on priorities for improvement for the industry as a whole. Where an individual operator's performance requires attention, its training package needs to comprise both.

12. What are your views on our recommendation for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We welcome any positive moves which the industry can make to widen knowledge of and access to the Passenger Assist service. However, it seems to us prudent that steps should be taken to ensure that the system is technically sufficiently robust and adequately resourced to meet any resulting increased demand. If passengers use

Passenger Assist and the service fails, they may well not travel again, so it is essential that any promises made are met. Transport Focus agrees that DfT, RDG and train operators themselves are best placed to undertake such work. Disability groups can help with this education by informing/reminding their stakeholders and keeping their websites and apps up to date as a useful source.

Transport Focus proposed to erstwhile ATOC some years ago to include information about Passenger Assist with renewals and especially first issues of Disabled Persons Railcards and even Senior Railcards. Some holders of the latter, though not qualifying for a DPRC, may benefit from assistance. We support this proposal.

We also recall our suggestion to make call centres more reactive to holders of DPRCs (and Senior Railcards) was made some time ago. (Applicants for Senior Railcards must provide proof of age which gives a reasonable indication of the likelihood of them benefitting from Passenger Assist. Information about Passenger Assist should appear on the leaflet and application form.) A similar message should appear on screen for passengers booking tickets online or even when seeking train times and fares via National Rail Enquiries.

However and wherever the assistance service is promoted or mentioned, it needs to be called 'Passenger Assist'; too often operators refer to it by another name.

13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve Passenger Assist?

Most operators' DPPPs claim that they already do so. The best results come from the widest possible engagement with relevant bodies in the area where the operator runs trains: not only local authorities and disability representative organisations and charities, but disabled people themselves (perhaps through a Disability Panel), NHS organisations etc. Use of social media opens up new channels in addition to the more mundane print and online media.

Local publicity events such as 'Try the Train Days', perhaps with an option of free travel to test out the service on certain routes or from specific stations, can transform non-users' views about the accessibility of trains and stations today. There is untapped business demand here, so it is right that the industry should market to this segment.

It is always valuable to work with existing passengers to obtain their feedback. Call-backs to those who have recently used the Passenger Assist service is a useful means of immediate customer views and enables any shortcomings to be rectified quickly or can at least point to areas where attention is required. Transport Focus has previously asked for these to be incorporated into franchise specifications. If call-backs are made, a system of analysing the results to ensure that feedback has senior management overview is necessary.

14. What are your views on the proposal for more prescriptive website requirements?

Increasing use of the internet requires the industry to ensure that all those who wish to obtain information, reservations, tickets etc via this means can do so. This includes not only disabled people and perhaps especially visually-impaired users and others with impaired communication but all users want clarity and ease of use and the least number of 'clicks'. We agree with the proposals here.

15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

We appreciate that many disabled passengers wish to have the same flexibility for turn-up-and-go travel as other passengers and we also appreciate that this can be difficult for rail service companies to provide. However, some train operators already offer booking periods for their own services which are much shorter than the overarching 24 hours' notice.

Passengers needing assistance want the same ability to turn up and go as any other passenger, so the shortest notice period is naturally the most attractive. While there is value in having a target that drives improvement, there is also a need to balance aspirations with deliverability. It is unclear whether operators can physically resource the 2-hour notice period or how long it would take for them to reorganise operations to do so. It is also unclear what the cost of doing so would be and how this would fit with other franchise commitments, especially as any costs would inevitably be passed back to passengers. It is hard to select an option without knowing this information.

Option 1 [*book up to 10 p.m. the day before travel*] would still not allow disabled people to make impulse journeys any more easily on the day (e.g. if an emergency has arisen or if the weather is particularly nice). Many assistance lines are not open until this time in any case. Were this option adopted, we should expect all offices to remain open until this time and for this to be subject to checks/audits.

Option 2 [*book a minimum of six hours before travel*] means that for many passengers, the journey could not start before early afternoon; most booking lines open around 7 or 8 a.m., so is only available for journeys after 1 or 2 p.m. It seems that costs may rise for some operators to meet these timescales. It is unclear how those costs would be borne.

Option 3 [*book a minimum of two hours before travel*]: whilst this is the closest to the turn-up-and-go option, even two hours' notice is not the immediate travel which many disabled people seek. It seems that such a short-notice period would be impossible for many operators to offer for some time at least.

We recall that erstwhile ATOC was apparently investigating the possibility of a turn-up-and-go service for longer-distance inter-city journeys. Most of the stations served

are staffed from start to finish of service so additional costs should not be involved. We appreciate that demand at some London termini is now exhausting staff resources which might cause difficulties. However, any intention to increase use of Passenger Assist will inevitably lead to the need for more staff at major stations, especially in London.

16. How do you consider any reduction might be phased in? If so, how might this be implemented?

Booking by 10 p.m. the previous day (Option 1) should be the easiest option to introduce. Perhaps this option has the benefit that it could be introduced without the need to phase in, although those operators whose booking lines close before that time will need to revise current practice. Some operators already cover for others whose offices close earlier or do not open at weekends or public holidays and a greater burden will fall on those operators whose booking lines work longer hours.

Perhaps now is the time to seek to standardise opening times for the booking service. It is unclear why this has always appeared to be a matter of personal choice for the train operator and why some offices not to open at weekends, even though the trains are still running. Coverage over the Christmas/New Year period is also patchy.

Users of the service where the current operator offers a booking notice shorter than 24 hours would not want to see the current 4-, 6- or 12-hour notice period withdrawn, so the book-by-22.00 arrangement would have to be in addition.

Were option 2 or 3 chosen, it would need to be phased in with a timetable for delivery. It would lead to confusion amongst passengers if all operators did not implement the revised arrangements concurrently.

17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

The consultation document rightly acknowledges that the absence of staff on trains and at stations is a matter of concern for many passengers, not only those who rely on assistance to travel, although we accept that lack of staff aboard does not represent an inherently unsafe working practice.

Some operators do not currently indicate the times between which their partially-staffed stations are manned and/or which trains have no on-board staff. This must be rectified in the revised DPPPs and be spelt out quite clearly.

For the future, operators must consider how to ensure that disabled passengers can, as far as is reasonably practicable, make a journey that most reasonably resembles what is available to other passengers. A variety of means of achieving this must be

provided: either alternative accessible transport, allowing travel by a different route or doubling back (both at no additional cost to the passenger) or by the provision of 'flexible staff' who can be present at otherwise unstaffed stations to assist, when sufficient notice of travel has been given.

Particular care must be taken to ensure that disabled passengers using unstaffed stations served by DCO/DOO trains do not receive poor-quality treatment.

The availability of aural and visual information and help points or other means of contacting staff for immediate travel must be available. Many smaller stations still lack basic facilities.

We very much agree with the consultation's proposal that 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. ORR should seek evidence of such assessments. This is important in situations such as where operators are contemplating possible extensions of DCO/DOO operation and anywhere else where current assistance arrangements are under threat of any kind.

18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Many train operators have offered compensation for assistance failure for some time. We have highlighted this best practice when reviewing other operators' DPPP's. All operators must offer compensation for delays (although the terms for many operators confusingly differ from those of others) but the principle remains that a basic level of redress is provided by all companies for delays. By the same token, all operators should offer redress for assistance failure. It is inappropriate to set levels of redress for this but the operator should set out clearly in its policy document its basic offer, while ensuring that each case will be considered individually to establish a suitable level of redress. Lack of assistance can have a more profound effect in some circumstances than others, all of which must be a key factor in calculating compensation. Reference to such a scheme must be mentioned in the public-facing document as well as on websites and other information sources.

We welcome ORR's undertaking to monitor assistance failures and ensuing redress to ensure that the scheme is working as intended.

19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

It is important that the industry keeps pace with technological innovations and can communicate with passengers in ways which passengers prefer. We welcome ORR's

decision to work with RDG to explore how deaf passengers and those with hearing loss especially can best communicate with operators' contact centres.

20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

'Alternative accessible transport' occurs in several scenarios:

- As standard practice at many stations with physical barriers to step-free access, even when the train service is operating as scheduled;
- At other stations which may be physically step-free but, for instance, where unexpected staff absence denies passengers the benefit of assistance
- Where the non-functioning of equipment (such as lifts) renders the station inaccessible to some users;
- When the rail service is disrupted either due to:
 - o Planned engineering works, which gives the operator greater opportunity to plan alternative arrangements; and
 - o Unplanned disruption due to factors such as train or infrastructure failure. etc.

It is important to distinguish between the amount of preparation which can be expected of the industry in those different scenarios. Fully-accessible taxis, where these are required, are thin on the ground over some parts of the network and procuring any at short notice may be difficult - or impossible if they are already booked for school or hospital journeys, if the event occurs late in the evening or at a weekend, or in rural areas for instance.

Cases of unplanned disruption require the railway to react in a different way and one in which it might not, initially at least, to be able to reach the higher standard expected for planned engineering work.

The buses/coaches provided in place of trains during engineering work road replacements should be accessible to all users. We welcome the proposal to amend the Guidance to this effect.

However, it is disappointing that the draft does not require more attention to be focussed on the accessibility and appropriateness of the station chosen as 'railhead' for planned engineering work. Such work is arranged long in advance and thus operators have ample opportunity to consider which stations to use as modal interchange points. The station closest to the disrupted section of track may not be the most sensible for several reasons:

- its poor connection to the road network;
- its accessibility status;
- its (lack of) facilities: seats, toilets (standard and accessible), weather-proof waiting areas; information systems, bus turning area outside the station;

- the distance between the station entrance and buses.

Too often passengers are left to fend for themselves when boarding alternative transport, with poor or no information and few rail staff, if any, with full knowledge of the revised arrangements, in evidence. These are aspects which must be covered in the revised Guidance. In situations such as these, a staff presence is more important than when the service runs normally.

21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Many station help points, it seems, can provide only details of scheduled next trains and have no access to a member of staff. We know from personal experience and anecdotal evidence that in many cases the member of staff responding to passengers via the help point has apparently had no training in customer relations, disability awareness, assistance bookings, accessibility, ticket validity or timetabling and so on, and often are thus unable to provide the help required. A Freephone number may still incur a charge for a passenger depending on the service provider's terms; in some places mobile coverage is inadequate or non-existent.

We agree that the Guidance should include additional requirements for operators to provide a means of contact but for the reasons shown above (not all of which are discussed in the consultation document) problems for some passengers may still occur.

22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the Guidance review?

We welcome the general assumption that scooters are accepted and the stress on the fact that any operator must clearly explain its reasons for refusing to carry unfolded scooters and to produce evidence for its decision. It seems unavoidable that low-level platforms at some stations may make use of ramps impossible due to the gradient, but this does not mean that the trains themselves are incapable of accommodating mobility scooters; clear differentiation between problems caused by station infrastructure and rolling stock needs to be made. Such stations should be clearly indicated in the DPPP, as the same restriction will presumably apply also to wheelchair users – although they have other options open to them which are denied to scooter users.

Failure to carry scooters denies rail travel to users of those services and thus may have a major impact on those people's ability to travel longer distances, especially

where bus services are sparse or unavailable. We appreciate that some scooters (and, indeed, some wheelchairs) are too large or heavy to be accommodated aboard trains, but the reasons for the current policy of some operators are less than clear.

It would be helpful if the Guidance required operators to state explicitly whether their staff are able to lift folded/dismantled scooters on and off the train, as they might passengers' other luggage, or whether this is a matter for which the user and/or companion is entirely responsible.

On a related theme, it is welcome that the Guidance will also address other walking and mobility aids. It would be helpful for the Guidance to require operators to specify whereabouts in the train unfolded scooters, rollators etc should be placed during the journey and whether, if in the wheelchair space, a reservation (where available) is required. Some DPPPs are not clear as to the operator's policy.

23. What are your views on our proposals to clarify the Guidance to ensure:

(a) passengers do not unknowingly purchase tickets they cannot make full use of:

Transport Focus agrees that in cases where doorways in some rolling stock are too narrow to accommodate a wheelchair, for instance, that reservations should not be made for one, neither should tickets be offered which cannot be used for their full validity. Where tickets are purchased, whether in a single transaction or not, the operator needs to ensure that a wheelchair is accommodatable. This may still go awry, as substitution of a different set of stock on the day may mean that an inaccessible vehicle unexpectedly appears. At the very least, such passengers must be refunded the difference between the fare paid and the fare they could have paid for standard-class if they elect to travel elsewhere in the train or a full refund, without administration fee, if they decide that they prefer not to travel. Alternatively, they should be rebooked on an accessible service. This is an instance where a caring operator would make an additional gesture of goodwill by way of apology and acknowledgement for the inconvenience caused.

(b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

Some platform indicators have for some time been enabled to warn of trains reported overcrowded and we understand that this facility has been suitably adapted, at least in parts of the railway, to warn of unavailable universal toilets aboard trains. The longer a passenger needs to use a specific train as part of the journey, the more important it is to provide this information.

On-train staff need access to up-to-date information about which stations' accessible toilets are available and must arrange to allow passengers to detrain en route to use a toilet if necessary and rebook reservations and assistance on a later service. Assistance staff also need immediate access to this information to cover for those occasions when staff on the ground are either absent or cannot be reached by the disabled passenger concerned. This seems also to be a suitable basis for redress and/or a gesture of goodwill.

It is important that this vital information should be marked on the train itself in Journeyplanner and other systems so that passengers intending to use the service can check online or by telephoning the assistance line. The current Guidance undertakes to advise passengers if disruption is occurring on their booked journey; this surely falls under that category.

Other matters

- Again, personal experience and anecdotal evidence both indicate that some operators answer their assistance-booking lines only after an extensive wait regardless of the day and time of the call. Invariably passengers are referred to websites instead of holding on or to ring back later – only to be met by the same recorded message. Perhaps the Guidance should suggest a maximum waiting time for operators to achieve when responding to calls for Passenger Assist bookings. The long wait may be a deterrent to booked passengers trying to cancel bookings and thereby increasing the number of 'no shows'. If the period of notice for a booking is to be reduced, the current length of wait to be answered needs to be acted upon by many operators. This needs to be audited on a regular basis and reports produced.
- Assistance with luggage: many DPPP's policy on luggage assistance varies from others. While the National Rail Conditions of Travel permit passengers a maximum of three bags, some operators seek to reduce this limit if assistance is required. ORR has drawn this to operators' attention in the past, but operators' policies can still vary. It is unclear whether this is a matter on which operators have complete carte blanche or whether a passenger seeking assistance with luggage is entitled to have his full allowance carried. Any variance in limits can have a serious impact on disabled passengers, if making a multi-operator journey. The Guidance needs to set out how operators calculate and explain their luggage assistance policy and whether indeed they can limit entitlement.

- The Guidance should emphasise the need for on-train staff to have details of booked arrangements for Passenger Assist and make themselves known to passengers once they are aboard.
- The current Guidance (C9) requires operators to warn passengers of any changes to their booked journey should disruption occur. Evidence available to us suggests that this happens only rarely at present. Often on journeys involving more than one operator, it seems that it does not happen at all if the operator performing the first leg of the return journey, or the operator of the boarding station, is not the one which made the booking. Passenger Assist needs to rectify this and suitable provision must be made in the revised Guidance that passengers cannot get to the station unaware that disruption has occurred when they have booked and when operators have their contact details.
- One of the biggest areas of misunderstanding to some passengers is what constitutes a 'reservation'. Many passengers apparently believe that booking assistance will guarantee them a place/seat on unreservable trains where all accommodation is provided on a first-come, first-served basis. This is especially confusing for passengers when travel on several trains is concerned, even when operated by the same company, each of which can have different arrangements in reservation status or staff presence. The Guidance needs to stress the importance of each DPPP explaining very clearly the exact arrangements applying to that operator's services (which may include both reservable and non-reservable trains). This information must be made clear to passengers also when bookings are made.



Fleetbank House
Salisbury Square
London EC4Y 8JX

www.transportfocus.org.uk
@TransportFocus
uk.linkedin.com/company/transport-focus
0300 123 2350

17 January 2019

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Transport for All
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

Our view is that replacing ‘Disabled Person’s Protection Policy’ with either of the above terms is the right thing to do in order to better reflect social inclusivity. We fully support this change.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

Overall we support the introduction of a passenger-facing document that is more concise and accessible.

Regarding what's missing from the required content, we believe that information about disabled passengers' rights, particularly around when things go wrong, could be a useful addition. However we would not advocate for its inclusion if it is agreed that this makes the document less concise.

With regards to the title, we believe it is meaningful to passengers. A suggestion of ours is to change it to 'Making Rail Accessible: **assisting** older and disabled people' in order to link it better to Passenger Assist and the general term of 'assistance' that disabled people use to refer to these services.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Whilst we understand the logic in removing stations and rolling stock accessibility from the passenger leaflet, we have reservations that this change could present a barrier to easily accessing this information. In an ideal world, it would be easy to request a hard copy of this information from a station either from a stand or from a member of staff, but experience suggests that this will often not be the case, particularly in small or unstaffed stations.

Having this information readily available online is important and we appreciate the dedication to ensure that operators commit to providing up-to-date and accessible information online. Nonetheless, we are concerned about the possibility of digital exclusion, particularly for older disabled people and those who don't have easy access to the internet. Hard copies (and in accessible formats) of this information must be as easily available as the passenger leaflet itself.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We have no serious concerns with the proposed changes here. However we do feel that requiring new licence operators to have printed copies of the passenger leaflet in staffed stations within one month of operations starting is still a considerably long time. We would like to know what alternatives operators will need to provide during this time. For example, will operators be required to have digital versions of the leaflet on display from the beginning of

operations? This would at least ensure that the information is available in one format at the very least.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

We have no strong views on this wording.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Mandatory checks on key station accessibility information will go some way in improving the success of bookings. Nonetheless this mechanism is reliant upon the information checked being correct and up-to-date, which we know is not always the case in practice regardless of what the operators obligations are.

More could be done to introduce fail safes into the system to ensure that the station information a booking agent is checking is current, for example including the date that the information was last updated and providing alerts if it hasn't been updated recently, prompting the agent to manually check the information instead.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

We support this proposal but stress that the information must be written in a way that *empowers* passengers to take successful journeys rather than *blames* them. Tone is very important.

For example, the guidance should be more along the lines of telling passengers what they should do rather than telling them what not to do, or else it could sound like victim-blaming. It would be sensible to have this guidance checked by disabled peoples' organisations before it goes public; it would also be beneficial to leverage good relationships with groups that represent disabled people to disseminate the guidance once it is ready as these groups are best placed to do this in a way that isn't too 'top-down'.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

We are unsure how an assistance handover protocol for all mainline GB stations will necessarily overcome the issue of assistance staff not being able to reach the alighting station over radio (as highlighted in scenario 3, page 54). The handover protocol only works if staff are able to establish communication or have time to carry out the protocol successfully.

This is particularly true where the staff at the boarding station are handing over to staff at the alighting station who work for a different rail operator. Different approaches by different operators are likely to continue to obfuscate the consistency of assistance services even with an agreed protocol.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

We believe this would resolve some of the concerns highlighted in our previous answer and is certainly a step in the right direction to achieving consistency across operators.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We are happy to see that the plans require a disabled person to be involved in the development and delivery of training. We believe that this is essential in ensuring that the training best prepares staff to deliver a service for disabled people.

Overall we agree with the proposed content. One thing missing, however, is understanding the social model of disability. This could be added to the 'Defining Disability' element, where the training could explain the social model in comparison to the medical model and how this impacts on the way staff should treat disabled people. Through delivering our [Disability Equality Training](#) to Uber and London Underground we have found that this approach has been vital to ensuring a more rounded understanding of transport staff's role in eliminating barriers for disabled people.

Transport for All are happy to discuss this topic further to share our expertise as a provider of Disability Equality Training developed and delivered by disabled people.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Two years seems to be a reasonable period of time to update training packages and deliver refresher training to all staff.

We feel that there is greater benefit in tailoring refresher training to priority areas for each individual operator. However we hope that this can be done in a way that encourages staff to think beyond their individual operator and see passenger assistance as service that goes beyond individual operators.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We question whether the RDG is best placed to promote assisted travel. The average person is unlikely to know what the RDG is and may assume they are promoting a commercial product or service. It also makes little sense to target “people who would benefit from this service but do not currently travel by rail” via the RDG as it only promotes at stations; how can they be expected to reach those who never even go to railway stations? We recommend considering groups or organisations whose reach goes beyond that of stations to promote assistance services.

We support the inclusion of some form of promotion to go along with the issue of a Disabled Person’s Railcard. As with all content targeting disabled people we ask that this be reviewed by disabled people before it goes live to ensure it is written in a way that empowers disabled people rather than patronises them.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

We wholeheartedly support this proposal. For too long actual disabled people have been locked out of conversations around the services that are supposed to benefit them. Requiring operators to work with local disabled access groups is essential in achieving a more socially inclusive Passenger Assist service.

With that said, we must not allow ‘working with’ disabled people to become a tick box exercise. On top of requiring operators to work with us they must also be required to prove how they have taken on board and implemented the input they have received from disabled people in order to prevent this exercise from simply being tokenistic. This must be in the form of something a bit stronger than “reporting annually on this activity to us”. What criteria will operators be measured against to prove they have engaged in meaningful activity with disabled people? What measures will be in place to encourage operators who are doing well in this area and what will be in place to correct those who aren’t doing such a good job?

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

Unifying the terms to refer to Passenger Assist across operators' websites is certainly a good thing in our opinion, as is monitoring compliance with W3C standards.

We recognise that many passengers who buy tickets online do so through third parties such as Trainline. We would like to see the same standards and consistency used across third parties as well as operators. Indeed any third party which sells tickets or otherwise provides rail travel information must be required, and actively monitored, to hold the same website accessibility standards as operators.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

As an organisation our position always has been that every operator should have a Turn Up and Go policy. Everyone deserves to be able to travel freely and spontaneously. Therefore, the most favourable notice period option for us is the shortest one: two hours.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

We have no strong feelings on this. It is something that operators and those with more insight into operations are better placed to answer.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

These seem to be sensible proposals to us.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Mandatory redress arrangements are a step in the right direction however this proposal does not go far enough. We do not think that it should be left to the operator to what 'appropriate redress' is and would like to see more prescriptive rules set out to define this within the DPPP Guidance.

Having said that, we question the purpose of redress arrangements in the first place. This is for two reasons. Firstly, many disabled people who have been let down by poor booked assistance services aren't frustrated by the wasted cost of their ticket, but because their rights have been violated - they have been failed by a system that is designed to support them and one they have a legal right to. Financial redress is akin to painting over the cracks: it might cover them up and make them look better but the underlying problem still exists.

Secondly, speaking only for Londoners, many disabled people make short local journeys using London's non-TfL rail services using their Freedom Pass. This means that they are not paying for their journeys and therefore financial redress doesn't benefit them in any way. People want to be able to make these journeys with ease, and simply reimbursing their ticket (or not in the case of Freedom Pass holders) does nothing to actually improve the service being offered.

In general we support the proposal to mandate operators to promote the provision of redress to passengers. This is important as, in our experience, most disabled passengers are not aware that they are eligible for redress after a booked assistance failure. In relation to our concerns with the purpose of redress in the first place, we have further concerns that operators will be all too keen to promote their redress arrangements in order to ward off anyone considering escalating their claim to a legal challenge. We have been aware of people considering legal action under the Equality Act 2010 against operators for failure to carry out booked assistance. We fear that promote redress will act as something of a smokescreen.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

This is a sensible and positive proposal. We are not aware of any barriers to operators adopting this other than financial or operational barriers. We hope that the ORR and the RDG can work with operators who are reluctant to also adopt text relay and ensure that their services are truly inclusive to all via the use of technological developments.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

These proposals are encouraging. Much more needs to be done to overcome the significant barriers that disabled people face with alternative transport. We recognise that it is a wider problem within the taxi and private hire industry that means that accessible vehicle are few and far between. We have repeatedly lobbied the government and TfL within London to remedy this issue.

We would also like to see a proposal for operators to review all new and existing contracts with alternative transport companies and demonstrate how they have committed to ensuring that accessibility is explicitly catered to within these contracts.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We support this proposal. However our position remains that every station should be staffed (in person) where this is practicable.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

The on-going dispute over mobility scooter bans needs to come to an end and think these proposals will help with this. Transport for All have been successful over the past few years in campaigning for operators to end their blanket bans on carrying mobility scooters; only two operators continue to operate their ban despite our best efforts.

These proposals will go some way in resolving this issue, however they still leave room for operators to potentially continue their ban by supplying evidence that proves their bans are for legitimate safety reasons. Whilst we do not want to believe that operators will be unscrupulous we maintain a healthy scepticism around operators' reasons for not allowing scooters on board based on our own experiences.

It is essential that all staff are as well versed in their operators' mobility scooter policy; all staff must be adequately trained to ensure they are providing customers with the correct information. For instance, we have heard many cases of disabled people being told by staff that their mobility scooter would not be allowed on board, only to later find out that the staff member was mistaken after a formal complaint was raised by us.

We firmly believe that the onus for knowing whether a mobility scooter or other mobility aid is suitable for carriage falls upon the operator and its staff. It is not the responsibility of disabled people to 'prove' their mobility aid is either legitimate or of the right size. Whilst scooter cards can be helpful in assessing whether a scooter is physically safe to board a train, many mobility scooter users feel it is inappropriate to be forced to carry around a document that 'proves' their right to access a train.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

We support both of these proposals. We believe that the proposal to require operators to consider how they will inform passengers when there is a reduction in the accessibility of train facilities is incredibly important. The communication around facilities being out of order has historically been very poor; it is one of the most common complaints we hear from disabled people travelling by train. This proposal is a sensible attempt to overcome the issue.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

We have nothing to add to the good practice listed here.

Q25. Do you have any other comments or views on improving Assisted Travel?

Ultimately, Transport for All believe that everybody should be able to turn up to a station and get on a train regardless of their impairment(s). We will continue to campaign heavily for this, including advocating to keep guards on trains, maintain staff at stations where practicable and for every train operating company to have a Turn Up and Go policy in place.

The proposals within this consultation generally indicate positive steps on many of the issues we have campaigned on for years, even though it is limited only to DPPP Guidance and booked assistance services.

We look forward to seeing the results of this consultation and would welcome the opportunity for Transport for All to work closer with the ORR to better understand the needs of disabled and older people who travel by rail.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Transport Scotland
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

It’s a welcome change but perhaps should be differentiated with all the other ‘Inclusive Accessible Travel Policies’ and name it “**Rail Inclusive Travel Policy**”

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

To be consistent with title it is better that the leaflet also carries the same name. This will help passengers to understand and recognise the document.

'Helping older and disabled people' is no longer fit for purpose as help under the 'Inclusive Accessible Travel Policy' extends to parents travelling with young children, non-English speaking, etc

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

We fail to see the benefits of stations in the policy document which is often a shelf document and not distributed. However, we welcome that you propose to have the information online and available on request in printed format. Perhaps this information should also be available from Advisors at Call Centres – should form part of knowledge and communication thereby allowing customers to phone and obtain information

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

No

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The classification is fine as long as it considers the fact that there are other 'Inclusive Travel Policies for different modes which may confuse customers.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Fully support it as it safeguard customers not to be stranded – promote good customer experience.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Passenger education is important and likely to result in better engagement and favourable results. It has potential for reducing passenger assist failures and better experience. We therefore support the proposal to produce best practice guidance for passengers and we would suggest that this includes occupation of priority seating on trains, boarding, alighting, Deafblind communication among other areas.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

The word 'mainline' suggest a selection of stations but we would rather have this corrected to be staffed stations to clearly indicate 'staffed and unstaffed' stations and give customers confidence

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Again 'mainline' does suggest limited. The idea is good but the communication line need to be routed to an office that is staffed at all times with the handlers fully aware of passenger assist procedures. Perhaps the line should be able to transfer calls to mobile phone given that many staff working at stations have other duties and may not be in the office to receive the calls. Geographical and individual operator's network knowledge is important.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

We agree that training should be prioritised to achieve best passenger experience. However, the content and how it is delivered would require to be discussed with operators. We commended previously that an accredited customer service training which include Equality Awareness Training is best. A situation that is not inclusive and risks disabled people being further marginalised should be avoided.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Yes, two years is in line with other competencies. We believe priority areas can be different and should be tailored to areas for improvement for each individual operator.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Agree

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

Agree

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

We are happy with proposals. They allow for disabled people to get information they need quickly and make their decisions.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

ScotRail advance booking is currently 3 hours which will see it reduce to 1 hour by end of 2022. We therefore welcome the opportunity being taken by ORR in asking all operators to reduce the advance notice required which will give more travel opportunities for everyone.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Any changes that require consultation with Unions, staff and impacts on employment contracts should be considered in line with employee relations processes. Reduction should be considered and aligned with time required for seat reservation.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

We welcome the proposals

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We welcome the proposal but there needs to be detail on interchange and where causal is not with the operator (could be booking undertaken by an agent and has been processed wrong, or another operator delay, etc). The redress should be seamless for passengers.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

They exist already for contacting Call Centres but are rarely used simply because they are not used on the 'Go' as with other forms of communication. Also the real problem of dealing with Deaf and hard of hearing is on frontline for which the ideal device should be one that is capable of improving communication on frontline and in real time.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We think that substitute transport for planned improvements should be low-floor / accessible and short notice alternative transport used for unplanned disruption requires a mixture and taxis can be used in the event

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We are happy with the proposal. At all Scottish Stations, there are already mandatory posters which advertises DPPPs and Passenger Assist contact numbers. Therefore, we think that it must be a welcome to ScotRail who will not be re-inventing anything but update the posters if required.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

Our view is that caution is required on other mobility aids such as rollators / walkers. Whilst the idea is a good one, they will all be competing for same space at wheelchair location and this is already an issue with buggies and prams. It is important that customer expectation is managed from the outset. Perhaps rollators / walkers that are foldable could be considered

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

We welcome the proposals. The proposals help built confidence in rail travel and promote better customer experience

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Q25. Do you have any other comments or views on improving Assisted Travel?

Thank you for taking the time to respond.



OFFICE OF RAIL AND ROAD

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Virgin Trains
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

Virgin Trains welcomes a change away from ‘Disabled Person’s Protection Policy’ to either ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy.’

Our preference would be for the document to be renamed to the ‘Inclusive Travel Policy’ but appreciate that either is a step in the right direction and a great improvement on the current title. The reason that we would opt for ‘Inclusive Travel policy’ is that it sends the right message and starts people thinking about more general inclusivity and hidden disabilities, rather than restricting thinking of the policy around physical access.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- a) We believe that there needs to be further focus on how customers can buy their tickets if they have accessibility requirements.
- b) Ideally, we would like to see the specifics around 'older people' and 'disabled people' removed from the title and instead there should be a focus on 'Making Rail Accessible For All', and how we enable this through the information contained within the document.

We note the reference to including a section on what happens if things go wrong. We believe this needs to be industry agreed content to ensure that the information provided is applicable consistently across all TOCs. Failure to word this correctly could result in difficult to achieve targets or confusion around which TOCs the information applies to.

There are also references to getting passengers off the train within 5 minutes where practicable. We would not be able to commit to specific timeframes until Network Rail agree with ORR what is deemed to be 'reasonable,' only once these discussions take place would we expect this to be included in the document. NR currently provide a high number of assists on behalf of TOCs at eighteen of Britain's largest and busiest stations so it is fundamental that conversations are had to ensure that the information communicated out to customers is deemed deliverable by NR. We would expect to provide the same standard that is agreed with NR, to ensure consistency across our network.

Furthermore, we would suggest a further review of the detail required in this section as there is a risk that it could still be too heavy in terms of content. 'Signposting' to where further information can be found may alleviate the need for too much detail being provided in this document and ensuring that it is useful but streamlined to the key points a customer would find useful.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

At minimum we believe that a summary of stations and rolling stock accessibility information should be included in the passenger leaflet. This information is pertinent to customer's making travel arrangements and should be easily accessible to them. This may not entirely condense the passenger leaflet but may simplify it somewhat.

We are aware of RDG's ambition to produce an accessibility map of stations on a national level. Providing this level of detail would be particularly relevant to those customers who travel across a number of TOCs. It would also help to bring consistency across the industry in relation to accessibility at stations.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We welcome the efficiencies that will come from reducing the review period from 8 weeks to 6 weeks and agree that unless significant changes are proposed, a full approval and review process should not be required.

However, we would welcome ORR's comments on how this will affect new franchises.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

There appears to be a number of workstreams across the industry, relating to the classifications as described in Appendix B of the draft revised Guidance provided at Annex A. A joined-up approach to ensure that there is only one set of classifications in existence would be sensible. Wider agreement should be sought not only between all TOCs but also from other key stakeholders including RDG, DfT etc.

Consultation with customers would be useful to ensure that the classifications provided are easy to understand and gives clear references as to what a customer might expect at a station. As it stands we believe that the five-tiered approach may be too detailed, RDG's accessibility map proposes a three-tiered approach which we believe may be better suited however, exploring the classifications with our customers would give us better insight into which they would find beneficial. Reviewing this with our customers may also highlight whether they believe the classifications to be too narrow, as whether a station is step-free or not does not necessarily mean it's accessible. Consideration of other items may also be useful in these categorisations i.e. staffing hours at a station.

In terms of ensuring the categorisation is kept up to date we believe it key to highlight the issues with the reliability of KnowledgeBase and the accuracy of data, which we continue to pursue with RDG. We would also welcome thought to some specific modifications to stations, including those being made at London Euston and the HS2 works and other significant changes will take place on a frequent basis between now and the completion date. Simple

unified, consistent classifications across the whole industry, that makes sense to a customer is what we should be aiming to achieve.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

We believe that mandatory checks on station accessibility information at the booking stage will be helpful and will ensure that assistance requests are not made that would technically not be feasible.

The mandatory checks should also assist in determining who the responsible party was. If KnowledgeBase has not been kept up to date then that station's operator should be held accountable. However, if it is a failure at the booking stage this should also be attributed accordingly.

If station alerts are issued after the booking has been made it would be of use for the Passenger Assist system to highlight bookings for those particular stations so that appropriate alterations can be made.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Discussion has already taken place at an industry level in respect of this being included in the booking confirmation. A link could be provided to an NRE page which contains all the relevant information. Consideration of the formatting of the information is key i.e. whether it's a Q&A in a document, a flow chart etc.

Fundamental to the best practice guidance would be information that sets out passenger's expectations. To ensure that a customer gets the assistance they require, we need to inform customers that they should be at the meeting point at the station, in good time prior to their booked train.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

This would be dependent on the technology used. We understand that the Passenger Assist App that is being developed by RDG will eventually have the functionality to ensure that communication can be facilitated between the colleague who assists the customer onto the train and the colleague who should be assisting at the alighting station. This will be crucial to improving the handover protocol, especially for instances where the assistance request is TUAG, as you would be able to inform the alighting station precisely where the customer is sat.

The first sheet that has been produced by ORR as an interim measure until the app is fully developed is not favourable to us. We believe that in the first instance a flow chart and some information included in training may be more appropriate.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

The introduction of a dedicated assistance line for all GB mainline stations shall again be dependent on each individual TOCs' operating procedures. It could prove challenging for stations on a daily basis to operate such a line, particularly during times of disruption.

The cost implications of changes to resource, or technology required to operate such a system, would be significant and this should not be overlooked when introducing such a requirement.

Ultimately, we believe that this should sit within the Passenger Assist app that is currently in development. More work would need to be done to determine how well integrated this function would be, to assess whether it would have a positive impact to efficiencies and accuracy of assistance given.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

To review our current training provisions, bring them in line with the ten requirements set out and then refresh and retrain staff within two years is extremely ambitious. Other TOCs have noted that they have gone through similar processes that took in excess of this timeframe.

We are happy with the content proposed but think clarity needs to be sought on who exactly is being trained. We ideally think that all staff members should receive the training, including those who are office based, but this would require significant resource and planning. Additional costs will also be incurred.

We would also encourage an industry standard in relation training as different TOCs are likely to use different training methods, which may lead to inconsistencies. We appreciate that classroom teaching will be required but believe that other methods such as e-learning should also be included.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

We do not believe that two years is a sufficient timeframe to update the packages and refresh all staff's training. It is worth considering the practicalities i.e. having to ensure release for each member of staff for what may be 1-2 days in order to complete the training.

The refresher training that is delivered should be consistent across all TOCs however, there does need to be scope to include improvement areas for the individual operator, in order to have a greater impact and make best use of the training time.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

We agree that RDG should promote assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards, however, there does need to be an agreed approval process in place.

Operators should be given prior notice to ensure that what is being promoted is achievable and, that they are fully aware of what is being communicated to their customers. There also needs to be time factored into this process to allow for the operator to communicate any promotion to their people first, this will ensure that our staff are able to fully answer any questions they may receive from customers. The timescales involved in this process need to be agreed by all operators.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

As part of our social inclusion strategy, we are already working with ACoRP and local groups and have Inclusion Panels where we meet with Disability Rail Champions, customers and our people and engage on improvements to passenger assistance. We welcome this proposal fully.

There are a number of challenges to committing to services where customers have a member of staff travelling with them, however we are making improvements to on board communication points to ensure that customers can confidently make contact with on board staff throughout their journey.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

The current standards vary and compliance varies from operator to operator therefore, if it was to be mandated, then there would need to be a specific standard that everyone must achieve.

It would be useful to understand in further detail the precise requirements i.e. whether the entire website would be required to meet this standard as this could be quite challenging with a number of parties involved, as well as quite costly. There are third parties that run TOCs websites and this adds to difficulty in making changes.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

Different operators have different operational restraints and any reduction would need to be considered dependent on those restraints. Therefore, there needs to be a review on resources that would be needed to make a phased down reduction across the whole industry. There also needs to be a commitment to consistency, although this may be impacted on by what is specified in each TOCs' franchise.

As it stands with the current PA system, which does not update in real-time, option one appears to be the only option that could be seen to be feasible. However, this would be on the proviso that Network Rail could also attain this target. Network Rail are key to this as they govern certain stations where they provide the assistance. They have certain restrictions as to when they can publish assistance sheets currently. This limits the ability to make changes to booked assistance and in turn impacts the booking window of that assistance.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

Each change that took place would require a review process to measure impact of success rates and if there is any real benefit to the customer, or whether the reduction had a negative impact on the service received.

Any points for improvement and recommendations should be considered and carried out and only then would a phase down be considered and if the resources are available.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

As we understand the question, we do not see this impacting upon us and do not have any additional comments to provide.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

This would need to be considered on a case by case basis and assistance failure could be attributed to a number of factors on the day.

Cases often have many facets to it, and we would welcome guidance on those cases that may include assistance failure but other issues too and how ORR anticipates that these will be accounted for. Anything agreed should not confuse the Ombudsman processes now in place.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We support the use of text relay.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

We welcome the opportunity to explore this and believe it would be beneficial to do at an industry level. We use coaches, across the network and the supply of accessible coaches is limited, regardless of where they are sourced from.

Where the vehicle that has been sent as a rail replacement is not accessible, we always source an accessible alternative mode of transport (such as car/minibus) and this works well. We have this already documented in our DPPP.

What it may be worth considering is the level of influence we can have over the training of taxi drivers and who would be determining the quality of their training. This would be better placed with Department for Transport.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

We support the proposal that customers should be informed as to how they can contact a member of staff to provide assistance and service information. We pride ourselves on making sure that our staff at our stations are visible for customer assistance.

In addition, it may be useful to include this information in the best practice guidance as mentioned in question 7. Particularly for customers using the service for the first time as this will provide them with some reassurance.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

We already provide information on the size of scooter that we permit on board our trains as part of our DPPP. There are turning circle and ramp size restraints that need to be considered as part of this review but we already permit scooters and will continue to do so.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:
a) passengers do not purchase tickets they cannot make use of; and
b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

We would like to seek further clarity on what is meant by section a.

For section b we already supply information to our staff to advise them of when there is an accessible toilet out of use in good time so that they can make reasonable adjustments to a customer's journey.

We believe that it should be made mandatory for NR to check if the accessible toilet is working when assisting passengers on board to ensure that a customer is not assisted onto a coach that has an accessible toilet which is out of order.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Providing specific assistance staff would be a challenge from a resourcing perspective it would also prevent flexibility and staff members becoming skilled in other areas. We are looking into the training of our people and would welcome an industry wide standard.

In terms of the national assistance cards we are already looking into this and it is being discussed at RDG level. These should be on a national basis which would help our customers who travel with multiple TOCs, so that they would not have to carry an array of cards.

In terms of assistance dogs we believe they should be treated as companions. We would reserve the seat next to the passenger travelling so that the dog can be on the floor close by.

The introduction of a video relay service should be done at an RDG level with an industry-led approach.

We welcome innovation and look forward to progress made with Sat Nav at stations.

Q25. Do you have any other comments or views on improving Assisted Travel?

If we are to rely on KnowledgeBase, then the system needs to be efficient and reliable. We have spoken to RDG who are looking at this to be included in their Business Plan for the coming year and believe that this should be at the top of their agenda.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): Vision UK response

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Vision UK
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

Vision UK works in collaboration with partners across the eye health and sight loss sector to deliver positive change for blind and partially sighted people. We lead on strategy and provide a platform for those in the sector to come together to discuss strategy, progress and barriers/issues. On this basis we are happy to support any submissions from our member organisations (<https://www.visionuk.org.uk/our-members/>) and in particular the submissions from Guide Dogs for the Blind Association, the RNIB and Henshaws.

Q1 This is a positive step. Vision UK prefers the term ‘Inclusive’ as Inclusivity is about language as well as actions and the language now reflects the Government’s stated objective that disabled people have the same access to transport as everyone else. An objective which Vision UK whole-heartedly supports.

The change in title would also allow a broader recognition of the needs of other passengers who face difficulties when travelling, not least of whom are those covered by the EU term Passengers with Reduced Mobility (PRM). Further to this it also covers less visible disabilities such as learning disabilities, autism, dementia or anxiety which can be just as much of a barrier to travel as a visible disability.

We would argue that the move towards inclusive travel presents the opportunity for train and station operators to address broader issues so that the public using their services have greater clarity regarding the quality of service offered.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

In principle this is a good idea but there needs to be some additional action taken. Station ticket offices carry large amounts of printed materials and pressure regarding which items to 'rack' is high. Marketing materials often takes precedent over passenger information. We would therefore argue that the leaflet needs to be available upon request at all stations where there is a staffed ticket counter. At Category A stations the 'Inclusive Travel Policy' summary leaflet should be clearly available alongside other passenger information. In addition, easy read and alternative format version should be available upon request. This should apply in respect of all operators serving that station, including sub-stations. For example, at Liverpool Lime Street the information should be available at the main station ticket office and at the Merseyrail ticket office at the lower level station.

The information should also be readily available electronically and on sites which are accessible (Including to screen readers) and also downloadable content such as easy read versions.

While we understand that individual rail operators may want to produce any documentation to reflect corporate values in its visual layout and design, Vision UK would like all leaflets across rail operators to be laid out in a consistent format. This would be useful for all customers but particular people with a vision impairment who tend to fair better in reading visual information with documentation which is consistent in design and layout.

However, this having been stated, there should be an obligation upon operators to ensure that leaflets, posters and information on electronic format are distributed to key stakeholder organisations including mobility centres, local citizens advice agencies and local advocacy organisations. Distribution needs to be monitored with Operators having to report how information and posters have been distributed.

The missing element from the current leaflet includes

- How operators ensure co-ordination between other operators and stations managed by other operators served by, or that serve, their managed stations.
- The steps that are taken to ensure integration of support between transport mode. Rail travel is part of an inclusive transport chain and passenger confidence would be greatly enhanced if this information were provided.
- How passengers can become actively involved in supporting the operators to improve the quality of inclusive rail services (see later point) and
- Monitoring of online resources to ensure easy, efficient and accessible access

Vision UK supports The Guide Dogs for the Blind suggestion that the document could be called “Making rail inclusive”, to keep it in line with the broader principles of inclusivity.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

The proposals are sensible. However, for franchised train operators it would be useful to include

- The numbers of managed stations
- The number of stations with level, step free access at the start of the franchise process
- Any plans to include access at particular managed stations during the life of the franchise.

Network rail should also be expected to produce similar information at their managed stations covering the current control period.

Commitment to up keep of this information outside of a printed leaflet (which by its nature is hard to keep up to date while electronic formats can be updated as needed) is essential and regular monitoring needs to be enshrined in the requirements to ensure information is correct when accessed.

Attention also need to be paid to ensure that elements which support the needs of people with a vision impairment are addressed. These include:

- audible announcements at stations and on rail vehicles,
- tactile elements to flooring in and around stations.
- The tonal and colour contrast of rail vehicles and doors,
- information which will be useful to those passengers with little or no sight.
- Provide access to this information through the operators app.
- Ensure that access to information is on the home page of the operator’s website.

- Ensure that staff at stations have easy access to this information when supporting a passenger in person.

In terms of rolling stock, the 2020 Equality Act deadline should make this information unnecessary as there is a requirement that all rolling stock be accessible by January 2020. However, as with the station information, Operators should detail planned replacement rolling stock or refurbishments over the life time of the franchise.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

Our experience with Operators is that the current review process as regards to DPPPs is too slow, often hampered by a lack of understanding of the operational challenges that both station and train operators face and offers little added value in practice. Anything that improves and streamlines this process should be welcomed.

In terms of stakeholder involvement, we believe that the simplest solution is for Operators to be obliged to establish an inclusive travel monitoring group. This should fall within the guidelines for any new or established operators and become 'business as usual'. The group should include representatives from key stakeholder organisations and should meet at least twice a year. This would enable active and valuable feedback to be given around performance and scrutiny of any new proposals or innovations under consideration ensuring accessibility is always on the agenda and improving efficiency for the operator. Further consideration is required as to how such a group should be constituted but the approach required would deliver a continuous dialogue at operator level, rather than a one-off consultation on the inclusive travel document. Minutes and actions from these meetings need to be made available in the public domain via Operators websites.

Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The proposals are sensible and workable however much of the language predicated to this question centres around "step free access". This provides little, if no information which is of use to passengers with a vision impairment or other disabilities and hidden disabilities. The current proposal would not address their needs in relation to station access.

Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Passengers who require assistance need to be confident that the assistance booked is what will be delivered. This understanding by the operator and staff as to the needs of disabled people (especially those with a non visible disability) is central to ensuring accessible travel for all. The problem with information regarding station accessibility is largely down to train operators and the extent to which they address the licence requirement to keep this information up to date. Some Operators are extremely diligent and take this responsibility seriously, others do not. As presented, the suggestion is that those who are booking assistance are at fault, in reality it is the station facilities operator because they fail to keep information updated.

This having been said there are operational factors which need to be considered. For example, lifts break down, staff fail to report for duty. Therefore, there needs to be a second stage check, possibly built into the Passenger Assistance booking software, that checks assistance bookings 24 hours prior to travel. This can be flagged to call centre staff, who could then take appropriate action if a problem is indicated. This relatively simple IT solution could make a large difference to the travel experience of disabled people.

Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Passengers often fail to understand how assistance works in practice. For example, passengers often do not understand that assistance is booked for a particular service and not, as is assumed, on an ad hoc basis (although this is true of some operators such as the London underground where there is a turn up and go system). We would welcome any initiative that helps passengers travel with greater confidence and call for initiatives which encompass the needs of blind and partially sighted passengers. We would also suggest that publicity needs to be through operators and through other third parties e.g. passenger transport executives, disability and age advocacy groups, etc.

Additionally, steps need to be taken so that passengers can learn from each other. Websites like TripAdvisor enable are valued because they are based on the genuine experience of actual people using hotels and restaurants. A similar peer review process, in the public domain, needs to be established so that passengers can understand how rail travel works in practice.

Operators may be fearful of such a development, however, as with websites such as TripAdvisor, checks and balances can be put in place to allow balance and appropriate responses.

Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

In theory this is a good idea, however in practice there are a number of dependencies that would have to be addressed. Not least of these is the fact that services operate to stations managed by different entities. It is important that one single organisation take overall responsibility for this at a particular location. However, a more appropriate resolution would be for there to be one single organisation that delivers assistance across the entire network, either GB wide, or across England, Scotland and Wales individually. This could help to ensure a consistency of approach and protocols.

Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

This could be a positive development, if it were seen as a stepping stone to a single entity taking responsibility for the management and delivery of assistance across the whole rail network. There also needs to be an approach that integrates the service with other transport modes such as light rail, coach, bus and aviation services.

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

Whilst we support the idea of a common training package, across the rail sector, the reality is that different operators and different staff require different training. The proposed outline course is too prescriptive as it does not differentiate between job roles or functions. Senior rail industry staff need an understanding of the strategic issues in relation to the delivery of improved assistance. Staff delivering assistance at the frontline need a different set of skills.

For too long the approach to training has been left in house. As with our proposals on assistance, we believe that a single entity, using a panel of approved trainers, needs to be established to deliver disability equality training which is consistent across all operators. There needs to be a degree of flexibility, to take account of particular pressures on different rail stakeholder, but there also needs to be an essential common core of training that is delivered regardless of the particular organisation.

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Two years is about the right time line for improvements. However, if our proposals outlined above were accepted, then the roll out for this training could be accelerated. The challenge is finding training methodologies that deliver the appropriate training and knowledge to relevant job roles.

Refresher training needs to be a blend of national priorities, local priorities and a reminder of the interface and practices between different organisations working alongside each other. If the training is specific to individual operators we run into the same issues as above when the passenger needs to move through different operators or modes of transport, inconsistency of training could then provide a barrier.

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Rail Delivery Group are not sufficiently well known enough to deliver the necessary publicity, they are a 'back office' organisation rather than public facing. It would be better if the responsibility for promoting assistance were left with either Network Rail or with disability and age advocacy organisations under contract to the Department for Transport.

A printed leaflet to accompany a DPRC will not always be appropriate particularly for people who are blind or partially sighted, we would suggest that a text alert system or e-mail system

could be used, with the passenger's consent, to push notifications like this to the end user as an alternative to printed materials.

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

This is an excellent proposal but does not go far enough. Other transport providers also need to be included from other transport modes, particularly at key station interchanges e.g. Birmingham International, Preston, etc. A further problem is that across some franchises the range of organisations that would have to be contacted would be extremely high. In the case of routes such as WCML and ECML, for example, engagement would need to be at a national not a local level via, for example, the Local Government Association, etc. Whether there is a desire for such engagement remains to be seen but the idea, in principle, is worth exploring providing that funding is made available to actively support this work in a meaningful way.

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

Ensuring that assistance services are commonly branded is crucially important to enable passengers to use the service appropriately and does not limit assistance to those who might be reluctant to use it because they do not see themselves as being disabled.

In terms of web accessibility, the government in general is still working on realising the benefits of the digital age and there is no excuse for falling short of the aim for services to be fit for the 21st Century – agile, flexible, digital by default and accessible by default. We would fully support the requirement that all websites aim to exceed W3C standards. Notably if websites are not accessible, people with a vision impairment may have problems accessing content with a screen reader or screen magnifier.

There is a further complication which needs to be addressed. A high proportion of passenger's access rail travel information via third party websites such as National Rail Enquiries and the Trainline. As such we would argue that the W3C requirements must apply to third party retail licence holders and third-party information providers. Prior to hand-off passengers need to be given the option of booking assistance when making ticket purchases. This will ensure that passengers with additional requirements get the support they require, and that assistance support can be flagged up as appropriate.

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

Our understanding is that most passengers who book assistance book more than 21 days in advance of their journey. However, this is probably due to ingrained culture and not having the option to reduced booking periods. Different service types induce different types of passenger behaviours. For example, people using commuter services tend not to book in advance and having either a turn up and go service, or very short booking horizons is appropriate. In these cases, we would suggest a two-hour window. Longer booking horizons might be required for long distance operators and journeys involving more than one TOC. There are greater inter-dependencies to be factored in and these need to be acknowledged. We would therefore suggest that the horizon of 6pm on the day before travel would be appropriate.

The danger of too many variations in booking horizons is that passengers become confused and discouraged from travelling. A simple maxim of 'Long distance or two operator journeys, book in advance: Commuter and local journeys book on the day' would help to resolve any confusion or conflicts. This would ensure that with more complex journeys or needs, for example, when travelling with the additional space needs of a guide dog, time can be given to confirm the complex elements to the passenger's satisfaction.

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

This is a matter to be discussed with operators and a timetable being agreed. The benefits of more disabled people being able to travel and therefore more potential profits (as well as positive social and ethical impact) should provide both 'carrot and stick'.

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

The challenge is to find a way around Driver Only Operated services whilst also ensuring quality of provision to older and disabled passengers. With pre-booked assistance arrangements can be made to deploy staff either on train or at the start and end point for a journey. However, where passengers decide not to pre-book, there are greater difficulties.

It shouldn't be the case that passengers are carried over to the next staffed station as inevitably this will cause delays as, for example, an accessible taxi is procured (we note that Department for Transport have still not moved on the regulations regarding the provision of accessible taxis in all local authority areas and this matter is of critical importance to resolving some of these problems). In service Apps could be a solution, but we suspect the stumbling block will be union resistance to staff taking on another activity and not being given 'new technology payments'. If this problem were overcome and in-service App could be developed it could be possible to develop a process whereby a passenger joins a DOO service and where staff from the last staffed station could join the train. We recognise, however, that this may not be possible in all circumstances.

We would argue that the problem is a result of how assistance is procured. There are simply too few staff to cope with current and future demands. A third-party supplier could establish 'floating support teams' that would cover areas with larger numbers of unstaffed stations and DOO services. Service Level Agreements would need to be put into place to address speed of responses so that the needs of passengers were placed at the forefront of this process.

In conclusion, we take the view that this problem could be solved by greater investment in staff to deliver assistance.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

We broadly support the proposals. A concern we have is that Operators may decide the cost of redress outweighs the cost of providing assistance. Therefore, we suggest that information about the frequency of redress is published and broken down to include particular routes. This may not overcome problems faced by individual passengers, who do not get the assistance they have booked, but it may focus the attention of management on the considerable reputational risks involved in continuous and conscious failures arising from negligence or poor planning.

A potential issue is around the onus is often placed on a passenger to prove or demonstrate which part of a journey or which member of staff did not support them. As many people with a vision impairment might not be visually able to establish which operator was responsible for the failing. The system needs to be able to carry out any redress fairly, without a negative impact on the customer in terms of producing evidence.

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

We support this proposal, but the assumption is that text relay is the only channel of communication. Services such as WhatsApp may be as appropriate and more flexible. We should not be trapped by technology that is being superseded by practice. There is therefore a need to look at 'equivalence to' rather than specifying the precise service.

New requirements and updates in DPPP Guidance (Chapter 6)

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

As we mentioned in our response to question 17, the key to this problem is that Department for Transport need to ensure that regulations require taxi licensing authorities to provide accessible taxis in all local authority areas. The Equality Act 2010 also makes it a criminal offence for a taxi driver to refuse to carry an assistance dog or charge more for the journey, with the exemptions already outlined in the consultation. The ORR should review this process soon to understand its success and failings. And in doing so, ensure that feedback, if negative, can be actioned promptly, ensuring that passengers with a wheelchair or assistance dog are not adversely impacted by poor practise in providing an alternative bus, coach or taxi service

Beyond this, we think it is right that attention is given to the quality of training and quality of service provided by third party suppliers, but this is not a substitute for the provision of local accessible taxis, etc. ORR need to put pressure on DfT to resolve this matter.

New requirements and updates in DPPP Guidance (Chapter 6)

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

An issue is that people who are Blind or Partially sighted may find it difficult to locate a help point unaided or have enough sight to read a freephone number if displayed. Therefore, access to assistance must be more widely disseminated, e.g. for the same freephone number to be displayed on the home page of the operator, for it to be accessible dynamically in the Passenger Assist app or operator app etc.

Our further concern here is that freephone numbers are often not free to call from mobile devices. On the other hand standard telephone dialling numbers tend to be free, or contained within data bundles allowed for in respect of most mobile phone users.

As we mentioned in Question 19, we would argue that equivalence needs to be considered. Thus use of WhatsApp or similar secure services needs to be considered alongside the use of phones or help-points.

New requirements and updates in DPPP Guidance (Chapter 6)

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

This matter is for Operators to consider.

New requirements and updates in DPPP Guidance (Chapter 6)

Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

We support these proposals.

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

By its nature, good practice is always improving. What was considered excellent practice a decade ago, may now be considered poor practice.

Most good practice in respect of older and disabled people is already codified via guidance produced by bodies such as the Equality and Human Rights Commission or Department for Transport. Often, however, such guidance pays scant attention to the needs of particular groups of passengers, such as those with learning difficulties or those with multiple impairments (more common as age increases).

ORR could take the initiative here and establish a 'better practices forum'. This would enable continuous improvement to take place, and a continuous dialogue to exist, between advocacy organisations and rail sector stakeholders. It might also go some way to providing a common understanding of the challenges faced by passengers and rail operators. Whether such a forum needs to be established at national, owning group, or local level, is a matter for further discussion.

Q25. Do you have any other comments or views on improving Assisted Travel?

Whilst the proposed new guidance is an improvement of what was there before, an opportunity is being missed. Inclusive rail travel needs to address the needs of all communities and needs to be seen in a broader context. For example, increasing numbers of people have restrictions on what they can eat either through disability e.g. diabetes or through religious or personal preference e.g. Vegetarians and Vegans. Operators should be expected to explain how particular dietary provision is addressed on board services and, more importantly, through concessions let on their managed stations.

The guidance could also be used to address the needs of different faith communities and different under represented groups. Operators need to be much more aware of the need of passengers during non-Christian periods, for example Diwali or Eid. Documenting how operators address such needs would help to ensure that inclusivity is not just seen as 'what we do for older and disabled people' but instead becomes 'what we do for the diverse range of passengers that use our services'.

We have been struck by the paucity of understanding of inclusion at senior management level. We would therefore propose that a Board level member of staff is given responsibility to champion inclusion in each rail organisation and that evidence is provided regarding steps that have been taken to address different needs. At the same time an operational contact point needs to be given, as a named person, so that passengers can contact operators regarding feedback or to help resolve difficulties.

Finally, whilst we recognise that this point may be out of scope of the current consultation, there is a shortage of staff with direct personal experience of disability in the rail sector. Steps need to be taken to ensure greater fairer representation amongst rail staff. Having the experience of colleagues in house will substantially help to build industry commitment and inclusive practice, We therefore believe that there needs to be a section in these documents that details the employment profiles of under-represented groups in paid employment with operators and rail third parties.

Thank you for taking the time to respond.

Improving Assisted Travel

A consultation on changed to guidance for train and station operators on Disabled People’s Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to DPPP@orr.gov.uk by **18 January 2019**.

Full name*	[Redacted]
Job title*	[Redacted]
Organisation	Wayfindr
Email*	[Redacted]

*This information will not be published on our website.

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q1. What are your views on replacing ‘Disabled Person’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?

Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

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Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

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Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

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Updating the Disabled People’s Protection Policy (DPPP) guidance for operators (Chapter 2)

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

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Reliability (Chapter 3)

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

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Reliability (Chapter 3)

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

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Reliability (Chapter 3)

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

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Reliability (Chapter 3)

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Staff Training (Chapter 4)

Q10. What are your views on our training proposals? Do you agree with the proposed content?

Staff Training (Chapter 4)

Q11. Do you agree that:

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

Passenger Awareness of Assisted Travel (Chapter 5)

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Passenger Awareness of Assisted Travel (Chapter 5)

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

Passenger Awareness of Assisted Travel (Chapter 5)

Q14. What are your views on the proposal for more prescriptive website requirements?

New requirements and updates in DPPP Guidance (Chapter 6)

Q15. What are your views on the three options for reducing the notice period for booked assistance?

New requirements and updates in DPPP Guidance (Chapter 6)

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

New requirements and updates in DPPP Guidance (Chapter 6)

Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

Where staff assistance may be limited or unpredictable, train and station operators should be encouraged to consider providing aids or services which could help people to travel independently. While this will not mitigate the need for staff to be present and available to provide assistance, it can provide support for customers who would consider alternatives to assisted travel and allow them to complete their journeys.

New requirements and updates in DPPP Guidance (Chapter 6)

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

New requirements and updates in DPPP Guidance (Chapter 6)

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

New requirements and updates in DPPP Guidance (Chapter 6)

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- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

Good Practice (Chapter 7)

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

Station navigation/wayfinding services can also function as a journey planning aid, a service which is useful to many people and which can be designed to integrate other types of accessibility information mentioned in this consultation.

The underlying technology which supports precision wayfinding and navigation can also be used to locate people and assets which is helpful for the provision of assisted travel.

For example, station staff could use this technology to locate passengers who have booked assistance or to track and locate equipment such as ramps.

In general, operators should be encouraged to publicise which of the listed good practices they offer to passengers.

Q25. Do you have any other comments or views on improving Assisted Travel?

Thank you for taking the time to respond.

[Redacted] AC/AM
Gweinidog yr Economi a Thrafnidiaeth
Minister for Economy and Transport



Llywodraeth Cymru
Welsh Government

[Redacted]
Office of Rail and Road
[Redacted]

cc: DPPP@orr.gsi.gov.uk

24 January 2019

Dear [Redacted],

I am writing to provide the Welsh Government's response to the ORR consultation on Improving Assisted Travel. Thank you for consulting us.

As have my predecessors as Welsh Government Transport Ministers, I have corresponded with the Secretary of State for Transport setting out my strong views that access to rail travel for people across Wales and Borders is unacceptably poor. With the exception of our franchised services for Wales and Borders, we have no devolved responsibility for rail services, or for infrastructure, where an unacceptable major proportion of our stations are fully or partly inaccessible.

I welcome the extent to which the national Access for All programme has improved certain of our stations, and look forward to the UK Government doing more across Control Period 6. In addition, even though the infrastructure is non-devolved, we have invested significant amounts of Welsh Government's own resources in station investment for both certain of our major stations – including a new lift at Cardiff Central – and small rural stations with our “humps” easier access programme. When, under our new 15 year grant agreement with Transport for Wales Rail Services, we take over responsibility for the asset for Core Valley Lines and deploy the new rolling stock on order, investment in that network will substantially improve the availability of step free access. This will result in level access between the platforms and trains across Cardiff and the Valley lines as part of the South Wales Metro scheme, within the next five years. Transport for Wales Rail Services is also investing in improved accessibility for stations across Wales and Borders and we have raised this as match-funding in our submission of priority nominations for Access for All in Control Period 6.

Nevertheless, despite these improvements, too many stations will remain inaccessible. This underlines the importance of effective assisted travel arrangements that make travel as easy and attractive for people using them as possible. I welcome in particular your recommendations to approve arrangements for travel on services across multiple operators

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

[Redacted]

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

– where there have been regrettable past failures in the provision of assisted travel – and your recommendations for compensation arrangements across the industry where there have been failures of assisted travel services.

As a core part of the Transport for Wales Rail Services grant agreement, a number of improvements in assisted travel and services for disabled people are already committed, and my officials have discussed the response by Transport for Wales Rail Services to your consultation with Transport for Wales, the independent company wholly owned by Welsh Government which manages the grant agreement.

Transport for Wales Rail Services are already committed to:

- provide support for and improve the passenger assistance programme enabling persons with disabilities to travel using Transport for Wales services without the need to book 24 hours in advance of travel at all staffed stations.
- ensure that arrangements are in place, where reasonably practicable, for onward travel to be supported by other train operators
- provide support for equality and diversity training for employees.

Specific initiatives include the Orange Wallet Scheme, a communication tool which can be used by people who sometimes find it difficult to communicate their needs to staff when using public transport, and the Assistance Dogs Travel Scheme, which aims to raise awareness of the needs of assistance dog owners among rail staff and customers. In addition, Transport for Wales Rail Services will be launching a new Passenger Assist app next year to provide an improved service for disabled and older passengers who use Assisted Travel. An Accessibility Panel is being established to advise Transport for Wales Rail Services on developing inclusive and accessible services, including the design of stations and trains, and staff support for customers. Over the next year, the Panel will help review and plan disability equality training programme for Transport for Wales Rail Services staff.

The specific recommendations contained within the consultation on which I would like to comment are:

- Q3 proposed requirement that public information on station/train accessibility to be part of the “policy document” (as opposed to the leaflets, where becoming out of date is the issue) and be kept updated both online; and for hard copy availability on request.

I strongly agree that there should be a mandatory requirement for the UK Government, working with the industry collectively to maintain and keep updated the National Rail Enquiry Service online accessibility information which should then be link to individual operators’ sites. It is not acceptable that there should be parallel, perhaps contradictory, separate systems.

- Q8 proposed mandatory handover protocol for people travel across different operators.

I agree that there should be a mandatory requirement for operators to work together in terms of assisted travel where journeys involve more than one operator. Many of our journeys involve changes to or from services by other operators and it is unacceptable that assistance arrangements should fail in such circumstances.

- Q15 – identified options for reducing pre-booking period for assistance from 24 hours

I agree very strongly that there should be a reduction in the notice period requested by the industry for assisted travel pre-booking from 24 hours. Ideally, all stations and trains should offer universal step free access and failing this, assistance arrangements should ideally provide for turn-up-and-go travel for everyone. However practically, a large number of by Transport for Wales Rail Services stations will remain unstaffed or with limited station staffing hours, so there can not be members of staff there to assist, and the arrangements in place for pre-booking involve a call centre operated by Transport for Wales Rail Services which operates 7 days a week, 8am – 8pm. Under this arrangement, 8pm the night before represents the best improvement currently possible for pre-booking.

- Q18 – mandatory compensation should assistance request fail in-journey.

I agree strongly with this. Transport for Wales Rail Services and Transport for Wales will be raising some detailed operational points but will also agree the principle.

Yours sincerely,

[Redacted]

Gweinidog yr Economi a Thrafnidiaeth
Minister for Economy and Transport

Response to Office of Rail and Road Consultation

Improving Assisted Travel

Draft Response - West Midlands Trains

Prepared by: [Redacted]

Introduction:

Our response falls into 2 sections and takes account of guidance from our ‘one to one’ meeting with the ORR on Tuesday 8th January 2018 where key issues arising from the consultation were covered. It also takes account of joint discussions with other TOC accessibility managers through the RDG accessibility group, in order to identify common issues/concerns and solutions arising from the consultation document.

The two elements to our response are:

1 . Response from West Midlands Trains’ Stakeholder Equality Group.

Following a workshop event on the 5th December 2018 we drew together responses to each of the key questions from a stakeholder/customer perspective and provided these in Section 1. These properly reflect the position of our Stakeholder Equality Group (SEG) and these have been provided independently of a wider business perspective. Some of the representative groups on the SEG panel may also have made submissions direct to ORR in their own right.

The comments raised largely reflect the views of that group, very much from an end-customer perspective. The Integrated Transport and Accessibility Manager has constructed the responses based on the workshop discussions, retaining the emphasis and weight given on specific issues from our stakeholders, supplemented by his views as an access professional.

Annex 1 also contains details of our Stakeholder Equality Group, which has been set up from the outset of the current franchise to look at the wider implications of the Equality Act and to proactively engage with representatives so that our policies, practices and projects are developed and delivered effectively. This Annex illustrates the diversity and representation of this group.

2. Response from West Midlands Trains as a business

This section focuses on some of the wider commercial, business operations, risk and feasibility issues arising from the proposed changes – and complements the customer insight work with the SEG.

This is a TOC/industry perspective, looking at the wider implications of the ORR consultation on WMT, identifying best practice and the operational and business consequences of the proposed changes. This also takes account of a joint call with other TOC Accessibility officers to harmonise responses and identify joint risks and opportunities.

This is set out in Section 2

Contact Details:

To discuss any aspects of this consultation response in detail please contact [Redacted]
Integrated Transport and Accessibility Manager
Email: [Redacted] and
tel [Redacted]

Section 1: Response from WMT Stakeholder Equality Group:

1. What is your preferred option for changing the name of the policy?

We believe that it is imperative as users that the phrase ‘accessibility’ is included in the title of the new policy. Members said they use this phrase as a key search term/buzzword when researching the capacity of a location/service to facilitate disabled users. A suggested name for the new policy would be ‘Accessible Travel Policy’. Although ‘inclusive’ is more reflective of the intentions of the Equality Act, practically the term ‘accessible’ works better in this instance.

2. What do you think about the ideas for this leaflet? Is there anything else that should be included? Do you think the title needs to be changed?

We feel that a leaflet like this needs to go further than its current scope. Assistance should not stop on the train/boarding/alighting but continue to provide last mile support i.e. onwards transit to a taxi, bus, car etc. The disabled person’s journey is not complete when they alight the train.

Expectations for last mile assistance and the level of ‘navigation’ and support (eg to taxi rank, forecourt bus stop etc) should be set out so the passenger is clear on what they can expect. This has clear links to the training questions later in the consultation.

Any leaflet should be inclusive of all disabilities and also recognise the needs of wider protected

characteristic groups. It is also important to cover those with hidden disabilities. A single contact number should also be provided if there are any problems during your journey.

3. What do you think about putting non customer friendly information in the policy document rather than the leaflet?

We agree that there should be a simplified version of the leaflet available both at the station and online. A simple one or two page factsheet would be ideal for the most crucial information. The longer version format needs to include clear signposting of information. The group are keen that passengers should be able to find exactly the information that is relevant quickly and simply without having to sift through a full manual of terms and details which may be largely irrelevant to the individual.

We also feel that the information available should be expanded to include ‘how can I leave feedback on my assisted journey?’. ‘What passengers should expect’ (a baseline standard), ‘how to get assisted travel’ and ‘how feedback can be provided’ were discussed as being key information to include in the shorter format publication.

Discussion around this question considered that passengers with learning disabilities may not be able to read the full detailed information. To help them, a contact number should be included where an operator would be able to simply explain the conditions of carriage to passengers.

4. We want train companies to have to talk to local disabled people when they write their policies about assisted travel - What do you think about this change? Are there any other things we could do to make it better?

We absolutely agree that local disabled people and members from wider equality groups should be part of the consultation process. Our consensus was that only face to face consultation will merit real, useful feedback. Our current workshop style approach seems to be successful in the sharing of ideas. Frameworks that encourages on the ground consultation will be beneficial to all involved. The creation of disability policy should be a two-way street, with the train operating companies and disabled passengers learning from each other.

The more people involved the better the depth of the feedback will be. As many users as possible should be encouraged to take part – and this could be aided by a website/media releases by the train company or partnership work with local authorities to reach a range of ages and disability/access experiences. Most importantly any consultation group established cannot be a closed network, it needs to be open to everyone to voice their ideas on accessible travel.

Any material distributed during the consultation process should be available in Easy Read and in plain English for those don't use easy read. It is important to explain all abbreviations and avoid jargon.

The more straightforward the process is, the better the feedback you will receive.

5. Do you think that these categories (of step free access) are helpful?

As a stakeholder group we wish to register our disappointment in how the ORR are framing disability in the proposed classification categories. We feel that this is a backwards step towards a much shallower understanding of disability and equality.

The classifications suggested are reinforcing traditional connotations of disability and are far too simplistic in their portrayal of disabled people.

There are many types of disability the transport industry needs to cater for, yet the proposed categories seem to focus only on step-free access as the primary indicator. ‘Passenger assist’ services should cover all subsets of disability not just those who require wheelchairs. There is an implicit weighting being given to conventional ‘physical’ access issues rather than the broader equality issues and hidden disabilities.

It should be noted that at franchising stage the Department for Transport have made continued reference to the Equality Act 2010 and the importance of consideration of passengers with hidden disabilities and we note from the main consultation document the ORR 'have duties under the Equality Act 2010. These include a duty to have regard to the need to eliminate unlawful discrimination and advance equality of opportunity'. The current 'step free' classification does not reflect this broader scope and definition of disability or equality and places undue weight and importance on only a specific part of the station environment. For example someone with a hidden disability (e.g. autism) might need more 'social' information about a station (ie times when it is crowded and busy) to help guide them as to time of day to travel – as opposed to knowing about steps and lifts.

If we assume that the step-free classification would still form part of any standardised practice (which we accept has value in the context of our comment above), it was also identified that the categories were not distinctive enough for passengers to understand if they would be able to use a station.

This was most apparent in accessibility categories B and C, users would not know exactly the access conditions and could create confusion as to whether they can use a station. Using a letter-based system lacks clarity, there would need to be a full rationale for conditions under that letter heading each time.

The group felt that the term 'station' should be replaced with 'rail environment' as this is a more all-encompassing term. We believe 'station' refers too much to the physical environment whereas 'rail environment' takes a more holistic view of disability access to the station that goes beyond simply being able to physically access areas of the station (such as waiting areas, ticket offices and toilets).

We believe that updating the DPPP is a key opportunity to reframe the way train operating companies, and indeed other modal operators consider accessibility. Unfortunately, the suggested categories here are not reflective of the latest thinking on disability and do not reflect the 'promoting and advancing equality of opportunity' as defined by the Public Sector Equality Duty (Section 149a Equality Act) and represent a regression in progress towards creating a truly accessible rail network.

6. What do you think about making members of staff check the accessibility of stations when you book an assisted journey?

This is a good idea. Staff should regularly be brought up to speed on the accessibility of stations in their area and of any temporary changes that may be in place i.e. broken lifts, station maintenance which may restrict disability access. Staff also require an understanding of different disabilities and what bespoke assistance they may require. Regular reporting of problems and temporary restrictions are also important, as are implications of temporary access restrictions relation to building works.

7. What do you think about making members of staff tell you what to expect at stations and how to make sure you get the help you need?

The group feel that if frequently using a journey assist services then the establishment of a strict protocol on the staff side will elongate the process and could quickly become a frustrating experience. Ideally, we want booking assistance to be as quick and efficient as possible. We discussed the benefits of creating a user profile that staff at station (or virtually) access so we welcome parallel investment in this by RDG with their Passenger Assist project pilots.

There is also an issue of practicality, in terms of how staff will be able to notify of changes to accessibility on the ground without some of the key software and intelligence platforms being fully tested and realised. Fundamental to this is the link to facilities at stations being recorded consistently and notifications of temporary problems and barriers. This is particularly important in terms of the ability for 'inter TOC' travel where a central consistent data hub would be critical for both assistance users and staff.

Following the principles of the Equality Act a key principle is that passengers requiring support should be able to self-serve in accessing this information when running a journey planner for ourselves. This is to avoid ‘on the spot problems’ with boarding a train with no issue, and then finding, for example a lift out of order at an unstaffed station.

Profiles could contain favoured routes/stations/journeys so that the process does not have to be repeated every time. Mandating staff to alert passengers to any temporary changes in accessibility i.e. broken lifts or checking accessibility when visiting a new station would be welcomed. The ability to manage such a profile online is imperative. Photos being available would be key, so passengers can judge for themselves if they need assistance, or assistance to what degree.

A key issue discussed by members here was that age plays a defining role in how passengers access information and services for journey assistance. Young people will not use the phone to make traditional calls while older people will be reluctant to use computers/apps.

The option to book assistance through social media is also seen as key to engaging younger people and making sure they can get the assistance they are entitled to. It is possible to reserve bicycle spaces on trains via social media so disability assistance should also be available via this route. Again, it is about making booking assistance easy instead of over complicated staff protocols.

The idea of establishing one central phone number for assistance which can then divert you to the correct train operator was discussed – often passengers might not know exactly who to contact to book assistance, especially on journeys which can move through multiple networks or require meeting a connecting train.

8. What do you think about these rules on what information staff should feed to colleagues at the other end of your journey?

We feel that the phrasing should be changed from ‘what type of disability’ to ‘what type of assistance is required’. Asking someone’s disability does not follow the established social model and general etiquette as it represents a regression to language that reinforces the ‘condition’ of the individual rather than being inclusive. We note from the main consultation document that efforts to move towards the social model should be strengthened.

Members also believed that staff should call colleagues while the passenger is with them in case there are any follow up questions on the specifics of the assistance.

9. What do you think about having a separate telephone line just to communicate about people using assisted travel?

We believe a separate phone number would be extremely beneficial to communication between staff aiding assisted journeys. The line would give assisted journeys the prioritisation they need, separating assistance support from other operational roles at the station means miscommunication would also be reduced. An additional alert/reminder sent to staff mobile devices to inform of upcoming assistance requests would also be beneficial.

It is always also important that the assistance phone be with a member of staff . The concept is useless if it is left in an office. All station staff need to be trained to handle assistance calls. There is also an issue with staff being busy fulfilling other duties at the station i.e. if there is a busy period or a station incident and they may not be able to get to the phone – a protocol is needed if staff are unable to pick up the phone ie – Who would the call divert to? Who would be able to help a passenger? Are we able to reach on-train staff in time for them to provide assistance?

10. What do think about these ideas for staff training?

The group felt that accessibility training should not be its own stand-alone module or training activity in isolation with no other associated development or experiential/immersive learning for staff.

Whilst having a specific customer serviced-focused module in this area is helpful to a degree, the ‘think access’ mentality should instead be engrained within all aspects of staff training. This way it is really embedded within all aspects of an organisation. Creating a separate module will cause trainees to switch off and focus on ‘passing the test’ rather than truly thinking about the disability experience in and around the station. Accessibility needs to become part of the culture rather than an ‘add on’.

There may be instances where some targeted training is needed (e.g personalised travel planning advice, front-line customer service staff) but the emphasis should be on continued underpinning of equality principles through ongoing operational practice.

Train operators should embrace working with disability/access consultation groups such as ours to fine tune their scheme of work for training seminars. Equality groups can have invaluable insight into the customer experience and provide local examples. Trainers need to come from a range of different disability groups to make sure staff are prepared for all eventualities.

Hidden disabilities need to also be included in training. Staff need to be aware of how they can help passengers with these disabilities as well.

The name of the training sections should reflect the wider scope of assisted travel, some names we discussed were: ‘wider equality’ or ‘wider access’ training.

11.

- a. Do you agree that train companies should: have 2 years to update their training programme • provide refresher training to all their staff?

We feel that appropriate front-line staff should receive wider accessibility training every 12 months whilst also providing refresher training at 2 year intervals for other staff less directly involved in providing assisted journeys i.e. strategic, long term visioning roles in areas such as service planning, revenue/ticketing, concessionary fares and scheme design.

We believe it is crucial to keep accessibility in the forefront of staff minds across all levels of a company, hopefully this would filter through to create a higher level of disabled access provision.

- b. What is the first area staff should get refresher training should be areas that are a problem?

We believe staff should be trained first in problems which are franchise specific as this will directly affect customers. An overview of issues that affect all train companies should not be neglected as staff may need to provide cover in different areas. It would also prepare them if they took another job in the industry in a different location.

12. What do you think about the distribution of assisted journey leaflets to those who apply for a disabled persons railcard?

This is a good idea, it ensures that all those that are entitled to a DPR know how to access one. Passengers should also be asked about this when they are at the ticket window too. Also, to engage younger people with access requirements offering the DPR virtually would be useful.

There is also a need to consider concessions available for third parties who support disabled passengers and travel with them. Accompanying parties should not be made to pay full fare as this could reduce the opportunities of those with the disability and represents discrimination by association (as per the Equality Act)

In addition to information going out with Disabled Rail Cards, the same information should be provided to local authorities to go out with local Bus Freedom/concessionary passes that also cover rail travel.

13. What do you think about train companies working with local community groups and services to learn about assisted travel experiences?

We feel that TOCs should be mandated to produce a list of community transport associations, disability action groups, local disability support groups etc who they can work in partnership with to improve the experience of those with access needs.

The people at these organisations can offer unparalleled insights into the passenger experience and can help fine tune operational issues. Our group works as a meeting of people from many different organisations, backgrounds and access needs who work together with representatives from the train operating company (in this case West Midlands Trains). We believe face to face workshop style meetings are productive and lead to real changes at the operational and strategic level. For the West Midlands we are looking forward to the setting up on of our first annual Access Conference in 2019.

The establishment of a stakeholder equality group would be a good model for other operators to follow (if not already in place) to drive engagement forward.

As wider of a base of engagement is possible and a range of channels should be pursued to find volunteers. Channels should represent all ages i.e. using social media to attract younger passengers while traditional phone calls or letters could be used to reach older passengers.

14. What do you think about a new rule that train companies' websites should be accessible and give good information?

We absolutely agree with this. As discussed in our previous answers, younger people tend to exclusively access information such as this via websites/social media/apps - these mediums will be critical going forward in increasing the uptake of assisted journeys all disabled people have a right to. Digital information needs to be just as accessible as traditional forms of assistance booking and in particular any conventional desktop based websites must also be accessible on Ipads/phones etc

Third party websites selling rail tickets should also be subject to the same accessibility standards.

All published information should be available in Easy Read and be obvious to find – both when on display at stations or on websites. In addition to EasyRead, websites and apps should also work fully with text to voice software.

15. What do you think about potential changes for the advanced notice needed to book an assisted journey?

We believe that option 3 (two hours) is the best from the given list from a customer perspective. Two hours should be more than enough prep time for a journey to be catered for. Ideally, we would like to see an industry standard of not needing to book assistance at staffed stations. If journeys are to be truly accessible then this needs to cover spontaneous trips, only then will true freedom by rail be on offer to those with accessibility needs.

This goes back to the intention of the ‘Passenger Assist’ process being more inclusive and the range of people it is designed to assist. We can fully understand the logistics risks in relation to formal booking of spaces for wheelchair users on specific services and the challenges this presents when almost offering a ‘turn up and go’ service. However in contrast, providing platform based support to someone who is nervous of travelling (and may for example have mild autism) and requires some confidence-building - within a 2 hour notification – should be relatively easy to secure.

A key question for ORR and the industry is whether the assistance notice period ‘test’ reverts to physical access barriers or is intended to cover the wider spectrum of access needs through age, disability, pregnancy/maternity, and to a degree, gender.

16. How should the new rule be set up? How long should train companies have before they have to start this?

As soon as possible. However, it will be important to ensure correct training frameworks and systems (i.e. dedicated phone line between stations) are set up. The sooner the better for those reliant on assisted journeys as there are still ‘fails’ often related to station to station calls to inform of a disabled customer requiring assistance.

Any changes need to be advertised at stations and on social media so passengers are aware of their rights. Information should also be sent out to all those registered with a Disabled Persons Railcard.

17. What do you think about guidelines for communication between passengers and the different types of staff they are likely to encounter on their journey?

There needs to be clear help points for passengers to contact staff; this is especially the case for trains where there just a driver is present. Without this, passengers are effectively stranded if there are any problems.

We would like to see a standard help point design issued. A help point should offer the ability to speak to someone on-board the service and provide a link to a centralised help centre such as the standardised passenger assist helpline. An operator could then make alterations to journey plans or deal with an emergency by mobilising ground crew.

In the age of apps and instant real time updates it is important to embrace this technology and use them to offer an additional channel of support. Apps should include as much detail as possible which would allow passengers can make decisions based on the level of accessibility available. This should go beyond station facilities and include dimensions of different train types i.e. turning spaces for mobility scooters or electric wheelchairs.

The wider support offered through tools such as the Station Neighbour scheme (being developed as a pilot in the West Midlands) is also welcomed as it provides support for not only disabled customers but those passengers with other protected characteristics.

18. Compensation Rules – Should train companies pay when assisted travel does not work properly?

We absolutely agree with this principle. If a TOC fails to deliver a journey as they cannot provide an assistance that they have advertised, then the passenger should not have to pay for this journey.

However we appreciate that in the way current ticket sales and bookings are made cross-TOC, plus the complexity of cross TOC journeys may make any compensation arrangement difficult to track or enforce.

19. Text Relay – Should all TOCs be able to use text relay systems?

Yes, all TOCs should have the capacity to use text relay systems, it is an incredibly valuable resource for those with hearing disabilities and not offering it would represent a failure in providing access for all disabilities. It is important to continually review systems and training that are in place to that aid non-physical disabilities as staff awareness is often lower towards associated accessibility issues for those with non-physical/hidden disabilities.

20. New rules regarding rail replacement buses.

We agree with all the points listed for contingency plans for access during times rail replacement buses are in operation, including the accessibility of the vehicles procured.

It is important that those required to drive replacement bus and taxi drivers have received the correct training, so they can safely pass passengers back into the care of station staff at the other end of a journey or if meeting a connecting train. It is possible that a list of vetted companies will need compiling where drivers have completed training to the same standard of station staff.

21. New rules regarding how passengers can contact a member of staff.

We agree with the new rule. We also discussed the idea that it may be possible for passengers to find out if an alternative station in the local area has staff available to help.

A feature on apps could be installed to show where ‘live’ stations are and where staff are on hand to help.

We have also discussed the need for standardised help points in our response to question 17.

22. New rules regarding scooter access.

We agree with all the points regarding new rules regarding scooter access. It is important that passengers are aware of their right and know what service and assistance they can expect from station staff. It should also be clear where to apply for a scooter card, it could also be included in communications regarding disabled persons railcards.

In terms of changes of policies about scooters and mobility aids, we believe the train companies should be mandated to provide the dimensions of train carriages, this way passengers know if their device will fit and if a turning circle can be made. Companies should also be aware that some people always like to stay on their scooter or with their walker and this should be possible, although we accept that the ‘mobility space’ varies from train to train.

23.

a. Should TOCs inform passengers that section of a train is not accessible before they buy a ticket?

We agree with this rule, but in an ideal world all areas of the train should be accessible. A disability should not prevent a passenger from travelling in first class.

b. Should TOCs have to inform passengers that accessible toilets are not working before they board the train?

Absolutely they should be mandated to this. They should already be providing this information to customers. It is an important factor, especially on longer journeys.

24. Feedback on good practice ideas.

We agree with all the points suggested in the question and have come up with the following additional suggestions:

- Ensuring all stations use tactile flooring and clear signage should be a priority and included as standard in station upgrades at the design phase.
- Employing more people with disabilities will improve awareness of disability and level of service on offer.
- Disability updates should be provided at staff briefing sessions i.e. if stations in local area have temporary changes to access.
- Make sure all new stations have a ‘changing places’ toilet.
- Include accessibility information on live train times i.e. if staff are available, what seats are available and if toilets are accessible. This information could all be compiled on an app, but also needs to be accessible for those without this capability

Section 2: Response from WMT from a business/TOC operation perspective

1. What is your preferred option for changing the name of the policy?

We are happy to back the suggestion offered by our Stakeholder Equality Group of ‘Accessible Travel Policy’ as an acceptable title for the updated policy. We note that this is aligned with the wider rail industry thinking on this.

Many of those that use the ‘Passenger Assist’ service do not consider themselves disabled so accessible is a more inclusive term. Furthermore, the term ‘accessible’ was noted as a key search term that many would use when looking for the type of information contained in the policy.

2. What do you think about the ideas for this leaflet? Is there anything else that should be included? Do you think the title needs to be changed?

We believe that it is important to produce a simple document that can promote the assistance service and briefly introduce what passengers can expect and how they can use the service. The ‘made simple’ leaflet should be available at all stations, and online.

At WMT we have a strong focus on supporting ‘last mile’ journeys and onwards connectivity, we feel that the scope of this document could go further to include what happens to passengers when they cross out of the station curtilage.

Supporting a passenger from when they first arrive at the station to navigating to them the next stage of their journey should be a theme of the training process. In order to provide seamless travel information and seamless customer support some clear signposting to ‘last mile’ help and guidance and expectations should also be referenced wherever possible.

There is a strong case for Knowledgebase to be upgraded to become the key ‘go to’ reference tool for information about stations/facilities and last mile information. At WMT we are broadening the scope of our asset register surveys to cover accessibility provision and the immediate station environment including linkage to public bus stops, crossing points and wayfinding information.

The ‘made simple leaflet’ should link to the NRES website with increased functionality to look for physical and wider information (eg station normally busiest between X and Y to cater for those with hidden disabilities or more elderly customers who may need more time and space to use the services)

3. What do you think about putting non customer friendly information in the policy document rather than the leaflet?

There is a case for all non-customer friendly information to be made available in an easily accessible background document with a coherent structure, so that if requested, passengers have full access to complete information regarding passenger assist policy.

However to avoid this becoming out of date, plugging into the Knowledgebase ‘upgrade’ as above, would make far more sense.

4. We want train companies to have to talk to local disabled people when they write their policies about assisted travel - What do you think about this change? Are there any other things we could do to make it better?

Working with our Stakeholder Equality Group has been invaluable in producing localised knowledge which has given us food for thought in several areas. It absolutely makes sense to engage with end users at all points of the development process. A group such as this is also vital in reaching out to the local community and establishing networks through which positive change can be created.

We have provided details of the organisations that we have brought on board during Year 1 of the WM franchise, with plans to further broaden the membership during 2019 to cover hidden disabilities, younger people, learning disability, pre and post-natal care, wellbeing and health.

5. Do you think that these categories (of step free access) are helpful?

WMT have concerns over the introduction of the proposed A-E station classification and support the SEG stance concerning ‘inflation’ of the step free issue over and above other important accessibility indicators.

The current categories are too vague in their description and there is potential for stations to be classified into many of the divisions causing confusion and/or a false sense of security from customers. Furthermore, the categorisation provided is too heavily focused on the ‘step free’ element of disability access and does not consider all protected characteristics and inclusivity concerns.

It is passengers who are most affected by this classification and as noted by our Stakeholder Equality Group, it is consistency which is key to understanding and using the rail network. We would support a system similar to the Rail Development Group’s production of an Accessibility Map that includes details about the step free nature of a stations but also goes beyond this to provide a further layer of detail useful to those who require information on the other ways stations may be able to support and assist passengers.

6. What do you think about making members of staff check the accessibility of stations when you book an assisted journey?

We would agree with this condition, hopefully the process can be streamlined via the production of the accessibility map being produced by the RDG. Such a map would provide a handy reference guide for both staff and passengers. It is important that the resource is kept up to date to avoid the dispersal of misinformation and includes a system to deal with real time reporting of problems i.e. lift maintenance and temporary restrictions.

7. What do you think about making members of staff tell you what to expect at stations and how to make sure you get the help you need?

We agree that it is important to lay out what passengers should expect from TOCs during the assistance process but based on feedback from our Stakeholder Equality Group we are conscious that what passengers want is an efficient, easy to use service where they do not have to 'repeat ask' the same question and that there is consistency on the level and type of advice given.

Listing out expectations every time could potentially make the service less attractive and therefore places more importance on staff training to discern the level of support and manner in which it should be offered (ie 'empathy' based training rather than a checklist approach to dealing with different passenger characteristics).

However, the information does need to be available (both in paper and virtual form) and be easily accessible to passengers.

8. What do you think about these rules on what information staff should feed to colleagues at the other end of your journey?

The need to relay both booked and unbooked assistance to the 'next station' is important. The message flow must be easy and quick to manage, especially at busier stations where there may be multiple situations requiring assistance in rapid succession. The improvements to the Passenger Assist app and the ability to track customers (including any changes to seating position in the train) is also important.

9. What do you think about having a separate telephone line just to communicate about people using assisted travel?

WMT are of the opinion that any new handover protocol should be revised in line with the new passenger assist app. It is important that both passengers and staff are able to familiarise themselves with the new system. WMT would like to see two clear channels of assistance offered to passengers – one by (central) phone line, and the other via the app. This would avoid an overload of ways to contact the station and make the assistance process easier for passengers to access, and staff to administer. Preparing a protocol for app-based support ahead of introduction would be beneficial from a staff training angle.

At this point in time, WMT believe it is the outcome (physical actions taken by staff) that are more important to identify than the points of contact, as this will likely be changing over the coming months.

WMT would also like to highlight here that changes to DPPP should assess the language used during the booking process. The assistance process should focus solely on what type of assistance is required (ramp, wayfinding, boarding/alighting, last mile info) rather than the scope of disability. This is something our Stakeholder Engagement Group (see Section 1) were also in agreement with.

10. What do think about these ideas for staff training?

WMT are committed to delivering frontline customer service training, which will include elements covering disability/equality and inclusion.

The breadth of training suggested in the consultation document provides a good blend of topics and areas for appreciation.

However we feel that TOCs should be able to moderate the content in line with the customer profiles for their routes, and address both access and equality issues for their existing and suppressed customer bases

The method in which the training is delivered is also critical, and whilst classroom/induction style training can help provide the base knowledge and information, the key competence test will be the ability to enhance the personal offer to customers 'in the field'

In order to achieve this we would recommend that there is a programme of reflective learning and experiential development which helps the customer-facing staff to self-evaluate and learn 'on the job' reducing the costs often associated with large scale 'course' type training. Learning to sensitively discern customer needs (especially without over compensating which can cause offence) and focus on the person rather than their access constraint is vital so reflective evaluation built into daily practice would be a much more productive way of delivering.

Consideration should also be given to use of disability (and other) charities and organisations to support in delivery (such as the Alzheimer's Society, Mencap, Centre for Accessible Environments etc)

We would suggest that there is flexibility in the way in which ORR outline the final requirements, to enable TOCs to collaborate and for the RDG Accessibility panel to work together on developing best practice in this area.

11.

a. Do you agree that train companies should:

- Have 2 years to update their training programme
- Provide refresher training to all their staff

This is linked to Q10 above and the emphasis should be on outcomes and rate of development of staff rather than a linear profile. Learning on the job will allow key access 'champions' to be identified that will make good mentors for other staff and therefore will help cascade inclusive behaviours

Those TOCs with a resilient training plan and reflective learning audit process would progress further in this arena than using a 'revolving door' approach because of the nature of this area

A timeline does set a benchmark, but it is important to recognise that the 'customer empathy' skills and competencies are learnt more through experience than just an awareness raiser. The suggestion for a 2 year cycle of training is also not aligned with requirements for training in other areas that TOCs have to accommodate (eg such as first aid – 3 year cycle).

Refresher training would not be needed for all staff and should be split out between key front line staff and those that require an appreciation/understanding so that resources can be properly priorities where they will have most impact on the end customer.

b. What is the first area staff should get refresher training should be areas that are a problem?

The current proposals do not recognise differences between staff roles and the practicality of providing regular refresher training. It would be more efficient to include equality appreciation and the importance of catering for protected characteristic groups as part of core induction programmes.

Although we believe it is important accessibility should be engrained at all levels of the business it would not be practical to provide refresher training for head office-based finance staff at the same rate as station staff who interact and support passengers every day. Formal classroom refresher accessibility training would not be practical but reflective learning and self-assessment in the field would be more effective.

The structure of accessibility training also needs attention. . The current classroom training approach is not conducive to our staff providing world leading passenger assistance. Instead, we would like to see training become a more interactive and engaging process - video scenarios, experience sharing, and station walkthroughs could all be utilised to ensure staff are truly absorbing the information. This would be further supported by the Continuing Professional Development/reflective learning process.

Another way the training process could be improved would be the introduction of a bank of e-learning resources to support. . This would allow staff to refer back to modules at any time and confirm their understanding of key protocols and scenarios. E-learning in this style would also allow greater flexibility in providing training to different types of staff at different intervals. For example, all staff could complete a standard online module, whilst operational staff interacting with passengers could go on to complete engaging face to face modules.

Finally, we would like to see clear mandated standards required for training to be set by the ORR. Financially, the current scenario put forward is lacking in clear criteria and outcomes. In turn this affects our ability to plan (operationally and financially) a training schedule which can support our staff in becoming assistance experts.

12. What do you think about the distribution of assisted journey leaflets to those who apply for a disabled persons railcard?

Provision of a 'national' leaflet to sit alongside the Disabled Persons' railcard is a good idea but needs to be driven as a national resource. This could contain weblinks to any specific TOC which has anything 'extra' in terms of their services, including notice periods for booked assistance.

13. What do you think about train companies working with local community groups and services to learn about assisted travel experiences?

In concurrence with our Stakeholder Equality Group we agree that the plans outlined in this section are a good idea. It is important that those with accessibility issues know that the rail industry is there to support them and what levels of support they can expect.

As an additional point we feel that the distribution of promotional material (beyond that of mailing to disabled persons railcard applicants) should contain an educational element. It is important that the general rail usership understand who the passenger assist service is designed for, and who it is not designed for. This would mean resources are available for those truly in need of assistance.

While we would agree that engaging with local community groups and passengers is invaluable and provides quality local insights, we feel that the RDG may be better placed to provide promotion of the passenger assist service on a national level. Working with local groups is rewarding but many are volunteer led and each has their own set of agendas and will not necessarily lead to the desired outcome of awareness.

WMT would like to see two channels of promotional assistance – the first being a national campaign led by the RDG, and a second local channel made up of TOCs partnering with stakeholders within their franchise areas.

We would also like to look at strategic alliances with access-based organisations along lines of routes. From a WMT perspective our research work is currently focused on dementia-based groups, Age Concern, The National Federation of Shopmobility and community transport organisations,

14. What do you think about a new rule that train companies' websites should be accessible and give good information?

WMT agree with this statement. Digital information needs to be just as accessible as traditional forms of assistance booking and informational dispersal. There should also be built in sections within mobile applications that provide easy access to this information for passengers.

Material should be available in formats accessible for all protected characteristic i.e. easy read large print, easily understandable English free from industry jargon, audio read version.

15. What do you think about potential changes for the advanced notice needed to book an assisted journey?

WMT are committed to improving their advance notice times on a sliding scale to 12 and then 4 hours

A minimum standard nationally would be helpful, but operationally the notice period should be left to the TOC to determine in collaboration with their stakeholders and ORR.

A key improvement in this area would be alignment with unbooked/booked assistance requirements at key nodes such as airports to ensure that the customer needs are reflected throughout their whole journey. Use of travel plans and access strategies where TOCs are a partner would enable a common code of practice at these stations where additional alignment may be needed

16. How should the new rule be set up? How long should train companies have before they have to start this?

While understandably our Stakeholder Equality Group supported the minimum required notice period of two hours, WMT at an operating level could not guarantee this level of support at the current time.

WMT do not feel this is the time to be introducing a revised notice period as a new system of assistance is being introduced (mobile app) and requires rigorous testing and assurance, reflected in our incremental plans for reduction on notice periods.

We would require time to monitor and assess the level of usership once the app is up and running to ensure that we would have the staff levels in place to support a revised notice period. The introduction of a 2 - 6 hour window in 2019 would be setting up TOCs to fail and there would be considerable backlash against the industry. We would rather provide a working reliable service to our passengers following proper resilience testing.

Secondly, we recognise that not all operators face the same challenges in providing a 2 hour window of assistance because of the train diagrams and the risks associated with booking while trains are on the move and staff fully deployed.

Finally, the wording of the proposed changes need revision. We would like to propose an amendment to 'business hours' rather than just '2 hours before' as passengers may be led to believe they could book assistance for a train departing at 0645 at 0445 - at this time assistance lines are closed and not all station staff will be available.

To conclude, from an operational point of view WMT need to look to the 2200 'curfew' from the night before option until such time new channels of assistance have been monitored for a sufficient period. We would have to be confident we could provide high quality support experience at an almost 100% success rate before any change is supported. The successful introduction of the passenger assist app will be key to future feeling on this subject.

17. What do you think about guidelines for communication between passengers and the different types of staff they are likely to encounter on their journey?

In principle if this gives control and decision-making back to the customer then this is a positive action in line with the intentions of the Equality Act.

However we are conscious that different TOCs have different operating practices and levels of knowledge about onward travel and front-line customer service staff may also be contracted (ie customer hosts serving refreshments).

There could be some general rules about the type of 'FAQs' that could be addressed by different types of staff, but there would be situations arising where the 'one team' approach would be difficult to guarantee.

Examples of this would be

- A person with limited mobility is travelling on a delayed train and is worried about a connection. They cannot move down the train to find the conductor, so they ask the refreshment host if they can help. The host may intend to help (eg 'I'll tell the conductor when I see them') but in reality, is distracted and does not reach them in time to ask for help
- A person with visual impairment has booked assistance off a train but the allocated support has not arrived on a terminating train. The individual notices some on train cleaning activity happening and asks for help? What level of support could be offered?

In our view, parts from quite a coarse 'this is what job type X is supposed to be able to help with' it could raise expectations and lead to customer disappointment.

18. Compensation Rules – Should train companies pay when assisted travel does not work properly?

We do agree that customers should receive some redress when the assistance system fails, as they have paid for a service and the operator has not provided it. However, we are unsure about the exact nature of the compensation process and how ORR see this working across the industry,

One initial point to consider is how the industry would make sure that the TOC at fault is responsible for paying out compensation as there are many variables affecting each individual support scenario. For example, if a delayed service by one operator resulted in staff no longer being available to aid with assistance at an interchange station who is at fault? And importantly who carries the responsibility for redress? Would this also affect the amount paid out?

In addition the final stage of the assistance process may not be on a train at all (eg taxi) and therefore the are questions about the failure for this leg should rest with any TOC (eg if an accessible taxi was specified and the contractor did not provide one) versus the fact that the customer will judge the total journey experience taking this key part of the journey into consideration.

There may be potential behind the idea of standardised amounts of refund being set, but again the exact rate of refund and operator responsibility would need addressed. It is important that operators are held to account in order to limit future failures. This may be a better method of compensation due to variations in route/ticket price not being aligned or proportionate with the disruption experienced

At West Midlands Trains, for both our business units (London Northwestern and West Midlands Railway) we do issue refunds relating to our element of the journey should the passenger assistance arrangements fail.

19. Text Relay – Should all TOCs be able to use text relay systems?

All TOCs should offer text relay services to passengers as this demonstrates a commitment to provide a service for all protected characteristics rather than just physical mobility restrictions. It is important to continually review systems and staff training in place to serve those with disabilities which are not immediately obvious or visible. This is a viewpoint supported by our Stakeholder Equality Group (section 1).

20. New rules regarding rail replacement buses (and taxis).

WMT agree that TOCs should, where possible, be working with companies contracted to provide alternative transport that display exemplary accessibility practise (driver training, accessible fleets, etc.) but wish the ORR to acknowledge that this is dependent on the availability of alternative transport and recognise that much of the training enforced by other transport industries is out of the direct control of TOCs.

Where possible there may be key influence through the procurement process and committing to only contracting with firms with solid accessible practices. This could be evidenced through maintenance of compliant register and demonstration of how the situation was remedied/outcome.

However by mandating this, such protocol could in fact be disadvantageous to passengers as it could result in no alternative transport being available at all. This is especially a concern with the provision of taxis. For example, a passenger may not need a vehicle with complete accessible features, but due to policy that a TOC cannot work with an unvetted company, there may be a vehicle and driver available to take a passenger to their destination which cannot be utilised due to the company not being granted permission to ferry passengers. The suggested policy revision could in fact leave passengers stranded at the station.

There are also limitations in terms of partnership working with comunity transport providers that may have the accessible vehicles available, but the drivers do not hold full PSV licenses. The current situation in relation to community transport provision and Section 19/Section 22 permits (Transport Act 1985) means that the potential requirement for all drivers to hold PSV licences could restrict the viability of some providers and limit their role in supporting rail replacement or ‘last mile’ provision.

WMT would be able to work with the Community Transport Association, TfWM, local transport authorities and local operators to encourage them to bring their standards in line with recommended ORR provisions but again stress that we cannot influence the standards of other industries. We believe there is role for the DfT to play to look at this wider issue and bring all modes across the transport industry up to an acceptable standard of disability awareness and fleet quality.

21. New rules regarding how passengers can contact a member of staff.

We agree that there should be clear protocol about how passengers can contact staff. This should include unstaffed stations, as well as when passengers are onboard a moving service.

There should also be clear information available about which other stations in the local area could cater for passengers needs and what times stations are staffed. Some of these features could be built into the new app, for example an alert could pop up prompting a passenger that the station on their return journey will be unstaffed and provide alternative route options.

Our Stakeholder Equality Group (Q17, Section 1) have also outlined their support for the standardisation of help points, this is something WMT agree with from an operational and business point of view.

22. New rules regarding scooter access.

WMT strongly believe that potential new rules removing restrictions regarding scooter access should be resisted at this stage.

While we try to accommodate all passengers requiring mobility scooters there are many factors that can restrict access (ramp gradient, rolling stock specification, turning circles both on train and on egress/platform) and many types of scooter which could turn up at a station on any given day. Removing restrictions would put TOCs in a vulnerable position to provide a service they cannot safely or reasonably guarantee.

We feel a better solution would be the introduction of a scooter accreditation scheme that would assess individual scooters and their propensity to safely fit on a certain train type/route choice. This way passengers would be guaranteed that their journey can be supported every time and bring a level of consistency to the passenger assist service.

The use of personal profiles within the Passenger Assist app will also support this.

23.

- a. Should TOCs inform passengers that section of a train is not accessible before they buy a ticket?
- b. Should TOCs have to inform passengers that accessible toilets are not working before they board the train?

While in theory we support accessible users having full access to information about the live levels of service available on trains, we feel that there are some barriers than may prevent this. Firstly, rail tickets are available from third parties (i.e. Trainline), so regulating just the TOCs would not prevent this issue – while we could control our own ticket sales there is still the possibility passengers can be caught out.

Secondly, it is important to understand the capabilities of individual ticket offices and other points of sale. Not all locations where tickets can be purchased would have access to information about the live status of rolling stock from other TOCs including stock substitutions and absence of First Class seating/no accessible area within First Class.

For example, if purchasing a ticket that travels on more than one network the second part of the journey could be affected and the point of sale could not access this information. Again, this could be a problem that the new mobile application could begin to address.

24. Feedback on good practice ideas.

- Coming up with regulation that is fit for purpose for all TOCs is without doubt a difficult task. Here at WMT we are responsible for two rail networks which have different social and demographic characteristics – we feel that it is not necessarily ‘best practice’ that is needed in all cases. Instead we would suggest that TOCs be allowed to explore ‘best practice’ to allow individual scenarios, stations, and routes to be accommodated for.
- Once more we would like to highlight how the introduction of the new mobile application aiding passenger assistance is likely to completely reshape this support environment. Time should be allowed to adapt to and assess the outcomes of its introduction before any major changes are made to the DPPP. The ability for customers to have independent access to the app and self-help portals is critical to the intentions of the Equality Act.
- We feel that working with our Stakeholder Equality Group has been invaluable in producing localised knowledge. It has given us food for thought in several areas. At the same time, we recognise there is also a need for centralised discussion (RDG, ORR etc).
- It must be recognised that collaboration between TOCs is critical to the improvement of accessible services at partnership stations.
- There is a key opportunity to embed the passenger assistance and consideration of inclusion issues within Station Travel Planning, looking more holistically at the social/community needs alongside the more conventional physical assets of the station and connectivity. Similarly there are excellent opportunities to embed access and inclusion ‘intelligence’ as part of station asset surveys and station travel plan audits - then feeding potentially into Knowledgebase and the RDG Station Accessibility Map.
- Total journey care is critical and the need to expand the resource pool of accessible taxis/community transport vehicles to meet demand is important. Local licensing and contract specification need to be looked at in future .

Annex 1 – West Midlands Trains Stakeholder Equality Group Membership (Jan 2019)

Name	Role	Organisation
[Redacted]	[Redacted]	WMT
[Redacted]	[Redacted]	WMT
[Redacted]	[Redacted]	WMT
[Redacted]	[Redacted]	TfWM
[Redacted]	[Redacted]	Staffordshire Fire Service
[Redacted]		Age of Experience
J[Redacted]		Age of Experience
[Redacted]		Birmingham Sight Loss Council
[Redacted]		ITV News
[Redacted]		Peoples Parliament
[Redacted]		Birmingham Sight Loss Council
[Redacted]	[Redacted]	Birmingham Sight Loss Council
[Redacted]	[Redacted]	BID Services
[Redacted]		Individual
[Redacted]		Individual
[Redacted]		Individual

West of England response to the ORR consultation on improving assisted travel

Thank you for the opportunity to respond to the ORR consultation on improving assisted travel. This response represents the views of the West of England consisting of the West of England Combined Authority, Bath & North East Somerset, Bristol City, North Somerset and South Gloucestershire Councils. The response was drawn up with input from transport officers and equalities officers from all the authorities.

The West of England is a prosperous city region with a population of 1.1 million and an economy worth over £33bn a year. The region is diverse, with the vibrant densely populated cities of Bristol and Bath, complemented by surrounding rural areas and towns.

The West of England will consult on our draft Joint Local Transport Plan 2019 – 2036 in early 2019. The document identifies 5 objectives, based on the aspirations of the West of England, and previous plans and policies. One of these objectives is to *enable equality and improve accessibility*. The following outcomes of this objective relate directly to this consultation:

- Access for those with both visible and hidden disabilities is improved
- Better information to aid travel decisions is provided

Additionally, the Plan includes a policy to improve the service quality of public transport, which includes an intervention to improve the availability and accessibility of accurate travel information.

Overall, we support the proposals included within the Improving Assisted Travel consultation, which complement our objectives and should act as a positive step to increase the accessibility and inclusivity of the rail network. We have also included our responses to some specific questions below.

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Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

Inclusive design considers from the very beginning how something might be easily useful and enjoyable for as many individuals as possible. Accessibility traditionally means making special considerations for people with disabilities.

In this instance, the term accessible seems to more accurately reflect the service available and is probably better understood by the people who face accessibility issues on public transport.

Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

a) Is there anything you consider is missing from the required content?

b) Is this still a meaningful title for this leaflet?

The title '*Accessibility information for passengers*' or '*Assisted travel information*' might be a more accurate title. '*Making rail accessible: helping older and disabled people*', as this could sound as though it's not targeted to support people with a wide range of access requirements. For example, Age (older people) and Pregnancy and Maternity are considered alongside Disability in the equality impact assessment. (Other protected characteristics are considered out of scope.) Therefore, Age, Pregnancy and Maternity should also be considered - both in the provision of assistance for people with these characteristics, and the title of the document to reflect this.

Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

Good. We do not think that there is need for the policy details in public facing leaflet, and this may make the document appear less accessible.

Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

Good.

Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

The step-free access classifications are useful when considering wheelchair and physically accessibility, and we would support the five categories proposed. However, the proposal does not consider alternative classifications which may be helpful for people with other disabilities. For example, sometimes platform changes are only announced over a loud speaker, so a hard of hearing person, or a non-native English speaker may struggle to receive this information. Information such as

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platform changes should always be made via verbal announcements and the platform information screens.

Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?

Good.

Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?

Good.

Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?

Good, but assistance should not be limited to mainline stations. Disabled passengers use the whole network and accessible services should be available everywhere.

Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?

Good, but assistance should not be limited to mainline stations. Disabled passengers use the whole network and accessible services should be available everywhere.

Q10. What are your views on our training proposals? Do you agree with the proposed content?

Good

Q11. Do you agree that:

- a) operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?

Yes

- b) the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

Refresher training should focus on priority areas for improvement for each individual operator.

West of England response to the ORR consultation on improving assisted travel

Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?

Good. Equally when booking assisted travel, the operator should ensure the passenger knows about Disabled Person's Railcards, and the associated discount.

Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?

Good. As a current example, North Somerset Council's Disability Access Group is active within the rail area, but GWR and Network Rail are not plugged into it except through disabled people contacting them and lobbying MPs. This frustration for people with disabilities could be avoided if operators worked more closely with local authorities and disabled access groups to promote and improve the Passenger Assist service.

Q14. What are your views on the proposal for more prescriptive website requirements?

Good, but we would stipulate that websites must meet website accessibility standards as prescribed by the Government: <https://www.gov.uk/service-manual/helping-people-to-use-your-service/making-your-service-accessible-an-introduction>

Q15. What are your views on the three options for reducing the notice period for booked assistance?

The less notice that can be given the more inclusive rail travel will be.

Q16. How do you consider any reduction might be phased in? If so, how might this happen?

As soon as possible. A nationwide database of accessibility information which could be shared across different operators might help to reduce a required notice period. Consideration could be given to requiring operators to share their staff who support assisted travel booking to provide a centralised team of specialist knowledge, which could then cover longer operating hours. We would stipulate that any service is available to passengers through a well-staffed telephone service as well as website and app-based booking services.

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Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?

Good.

Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?

Good. It should be made clear to passengers how they are able to claim a refund.

Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?

Good – but this is already an expectation of the Equality Act.

Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?

It should be stipulated that any rail replacement vehicles must be wheelchair accessible. Especially if it is known in advance that a Rail Replacement vehicle will be used.

Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?

Yes. This information should be provided prominently. We would propose that guidelines are provided for operators to ensure that minimum standards for how this information is provided are met.

Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?

The Scooter Permit scheme is only valid on one operator's rolling stock. We believe that the scheme should be expanded so that if you apply through one operator you can take your scooter on any operator's train to improve accessibility and ease for those passengers using the wider network. The Scooter Permit scheme could be included as an additional part of the application for a Disabled Persons Railcard. All trains should be capable of carrying scooters to be fully inclusive.

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Q23. What are your views on our proposals to clarify the guidance to ensure:

- a) passengers do not purchase tickets they cannot make use of; and
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

Good. Additionally, we note that there is no requirement for wheelchairs to be accommodated in First Class. Although this may be beyond the scope of this consultation to stipulate requirements for rolling stock, we feel that wheelchair users should have the opportunity to access First Class services if they desire.

Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?

We would propose active engagement with disability groups is required will allow the ORR and operators to discover which services are most useful to passengers with disabilities. This should then feed in to national requirements to improve the passenger experience across the network.

Q25. Do you have any other comments or views on improving Assisted Travel?

There is the impression – rightly or wrongly – by disabled passengers that the provision of Assisted Travel has allowed operators to avoid updating rolling stock or make station improvements, which would be our preferred way of allowing more passengers to travel flexibly and independently.

The scope of disability is mainly limited to making reasonable adjustments for people with mobility/physical and sensory impairments. Issues for people with memory loss, anxiety disorders, neurodiversity etc. are not directly addressed through these proposals. If the new leaflets etc. do not demonstrate a broad approach to disability and equalities, then some people may not realise that they could benefit from assisted travel.

The equality impact assessment would benefit from including any available data about disabled passengers segmented by other protected characteristics or explain why this is unavailable.

There could be indirect negative impacts on Race, Sex etc. if there is under/over-representation in those who use current assisted travel arrangements.