



# Improving Assisted Travel: a consultation summary & next steps

April 2018

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## Summary

**This document provides a summary of responses to the consultation on Improving Assisted Travel and sets out how we intend to take forward the issues discussed.**

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## Introduction

1. Our vision is to empower confident use of the railway by all. Whilst our core responsibility is to ensure that the law is met and standards adhered to, we believe the commitment to accessibility is wider than this narrow remit.
2. As a result of a large-scale programme of research into passengers' awareness and experience of Assisted Travel, we undertook a consultation on Improving Assisted Travel between 15 November 2017 and 2 February 2018. Both the research and the consultation can be found online at:

<http://orr.gov.uk/rail/consultations/policyconsultations-by-topic/consumer-consultations/improving-assisted-travelconsultation>.

3. This document provides a summary of responses to the consultation and sets out how we intend to take forward the issues discussed.
4. In total we received 844 responses. 530 of these were variations of a template that indicated an individual's support for retaining a guard on services where Driver Only Operation/Driver Controlled Operation is proposed. A further 173 responses were either blank or provided only contact information. We received an additional 100 responses from members of the public, 83 of which were short e-mails focused on staffing on trains and at stations.
5. Responses were received from the Department for Transport, the Office for Disability Issues, Network Rail, the Welsh Government, Transport Scotland, Transport Focus, London TravelWatch (LTW), the Disabled Persons Transport Advisory Committee (DPTAC), Rail Delivery Group (RDG), the RMT union, the Chartered Institute of Logistics and Transport (CILT), and eight train operators plus Arriva Trains UK (on behalf of Arriva Trains Wales, Chiltern Railways, CrossCountry – which also provided a separate response – Grand Central, London Overground and

Northern). We received responses from 21 campaign groups/disability charities (including DPTAC).

Type	Number of Respondents
Campaign	530
Individuals containing only personal contact information	173
Individuals	100
Campaign Groups and Disability Charities (including the Disabled Persons Transport Advisory Committee)	21
Rail Industry, including Licensees (Train & Station Operators)	12
Devolved Franchising Bodies	3
Passenger Champions	2
Government Departments	2
Trade Unions	1
<b>TOTAL</b>	<b>844</b>

- We would like to thank all respondents for their helpful and constructive comments. Every response has been read and considered carefully and all responses can be found online at <http://orr.gov.uk/rail/consultations/policy->

[consultations-bytopic/consumer-consultations/improving-assisted-travel-consultation](#); personal data has been removed. In addition, we have provided below a summary of the key points raised during the consultation by respondents.

7. Further to the written responses received, as part of an ongoing dialogue with stakeholders we held a number of meetings and phone calls: with disability charities that had expressed an interest in the consultation, to explore the issues it set out, explain the role of ORR and invite comments on the key questions. This included Alzheimer's Society and Disabled People Against Cuts, who both provided supplementary written material, Sight for Surrey and the Royal Association for Deaf people amongst others. We also followed up informally with train operators to explore their responses in detail, and to attempt to obtain views from those that had not provided individual responses.
8. In addition, a parliamentary event was held on 28<sup>th</sup> February 2018 in the House of Lords, chaired by Baroness Tanni Grey-Thompson and attended by over 20 MPs and peers.

# Consultation questions and summary of responses

## Chapter 1: Raising Passenger Awareness

### Q1: How can rail operators improve the availability and promotion of Assisted Travel information in stations?

9. All (9) licensees who responded provided details of how they promote Assisted Travel to passengers via printed materials, such as posters, leaflets and 'Making Rail Accessible', the passenger-facing version of the Disabled People's Protection Policy, at stations. They also indicated that staff at stations/booking offices and on trains promote the service face-to-face. Information is also readily available online via websites, social media and mobile apps.
10. Respondents agreed that the industry need to do more to promote Assisted Travel; Network Rail, Merseyrail, Asperger's Voice and the Chartered Institute of Logistics and Transport suggested that raising awareness at the national level would be an effective method of promoting the service to people who rarely or never travel by train (for example via a national social media or TV campaign). The Shaw Trust recommended the industry consider adopting a multi-channel approach to promoting Assisted Travel as per the British Transport Police "See it, Say it, Sorted" campaign. Some respondents also recommended that engagement with

local authorities, GP surgeries, hospitals, libraries and other local services would help reach the wider public. This view was also taken by our Consumer Expert Panel, when we discussed Assisted Travel with them on 22<sup>nd</sup> March 2018 (N.B. Consumer Expert Panel minutes are available at: <http://orr.gov.uk/about-orr/how-we-work/expert-advisors/consumerexpert-panel>).

11. A number (8) of respondents highlighted the challenges facing licensees from displaying information at stations. They noted the need for information to be placed at suitable locations where passengers are likely to loiter rather than pass through at busy times of the day. Transport Focus in particular highlighted the lack of premium space to effectively promote assistance services to passengers. Four disability charities emphasised that any information that is provided at stations should be prominent, clear, concise and vivid so that all passengers, including those with disabilities can identify and understand it. Guide Dogs noted the usefulness of the vibrant pink signage adopted at stations during the 2012 Olympic Games that helped passengers identify key areas and find their way around. The RMT suggested announcements at stations would help supplement printed material, which can be difficult to find.

12. West Midlands Trains indicated that it has plans in place to introduce contact cards to promote Assisted Travel. The cards will include all the necessary information passengers require to book assistance. They will be given to passengers at stations and on trains by staff. GTR advised that they currently provide passengers with Travel Support Cards that can be used to show rail staff that support may be required.
13. Transport Focus and Sheffield Transport 4 All suggested that similar cards could be provided to passengers at stations/booking offices, or when receiving their Disabled Persons Railcard, to include all the necessary information needed to request assistance.
14. Despite printed material being a key source of information for passengers, almost half (4) of the licensees that responded raised concerns with the burden of keeping these documents up-to-date, particularly in the case of information relating to station facilities, services and rolling stock, which can change frequently, requiring reprints.
15. Just under half of licensees who responded suggested that all passenger information could be stored online, permitting regular updates without the need for destruction and reprinting of key documents. However, disability charities and a number of industry organisations, including licensees, noted the importance

of making material available at stations, in a variety of formats, and available for passengers to download and print if they chose to.

16. The Arriva Group felt that the introduction of electronic information points at all stations would ensure that all information provided to passengers is accurate and up to date but acknowledged that printed material may still be the preferred option for many passengers. They also noted the need for information points to take into consideration individual branding and tone of voice.

**Q2: Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?**

17. Many (27) respondents to the consultation were in favour, or saw the value in passenger-facing documents being approved to Crystal Mark standard, with the exception of Network Rail, which prefers the Easy Read format. Responses indicated that information should always be clear, concise, accessible and free of jargon and opaque phrases. Having an industry standard would help to ensure this, although Southeastern were concerned this would be at the expense of losing each company's individual branding and voice. Transport Focus highlighted that the application to achieve Crystal Mark accreditation may create a lengthy editing and approval process for licensees.

18. In addition to achieving Crystal Mark accreditation, disability charities emphasised the need for industry to provide information in a variety of formats, including Easy Read, Braille and large print to ensure all passengers have instant access to them. They also suggested licensees should consider the use of pictures and - where documents are held online - videos within their documents to try and explain points more clearly.
19. If a decision were made to mandate this approach, it was suggested that the structure of the current Disabled People's Protection Policy (DPPP) guidance document would have to be reviewed. TransPennine Express felt that the current structure of the DPPP guidance would hinder the industry's progress to achieving this standard.

### **Q3: What steps can be taken to increase website accessibility?**

20. Licensees (8) who responded to the consultation noted the mechanisms ORR already have in place to ensure companies are delivering improvements to their websites. However, it was commonly agreed that more could be done to increase website accessibility; an industry standard would help in this regard.
21. Responses provided examples of the steps industry has taken, or steps they plan to take in the future, to improve accessibility of their websites. For example, Rail

Delivery Group (RDG) highlighted their intention to redesign the National Rail Enquiries website to better suit the needs of the customer. Transport for London (TfL) also highlighted the upgrades they will be making to their website: to introduce information on walking distances and the number of steps in staircases within stations to help passengers with mobility issues make more informed decisions.

22. Just over half of licensees that responded (5) confirmed that accessibility considerations already form part of their checklist for adding new content and features to their websites and have begun to seek input from users in terms of feedback and suggestions for further improvement.
23. Ensuring compatibility with screen readers, speech technology and all web browsers was raised by (3) respondents as key points for rail companies to consider, as was guaranteeing compatibility with all smartphones and other mobile devices. Department for Transport (DfT) suggested licensees should undertake work to ensure their websites are compliant with the Equality Act 2010.
24. The location of information relating to assistance, and Assisted Travel formed part of numerous responses. Licensees in particular provided assurances that information was available for passengers within one-

click of their website homepage but, as is expanded upon in the response to Question 5, RDG noted the risk of websites becoming cluttered and difficult to use if too many links were provided on a homepage. Responses from industry stakeholders tended to focus on the importance of having information available in a sensible location.

25. Six disability charities highlighted the need for websites to contain only relevant information to the journey; it was also noted that websites containing large numbers of adverts and other information may make access more challenging for those with visual impairments. They also suggested licensees consider the removal of PDF documents, and avoid using small font sizes and clashing colours.

#### **Q4: How can rail operators use social media to increase awareness of Assisted Travel?**

26. All (33) industry stakeholders and disability charities that answered this question were supportive of social media as an effective method for increasing awareness. All licensees that responded confirmed they have dedicated teams in place to monitor their own social media accounts, such as Twitter and Facebook. However, a number of respondents, particularly disability charities, highlighted the importance of a multichannel approach, noting the high average age of Assisted Travel users and the appetite for printed material.

27. Whilst social media was largely seen as an effective method of promoting Assisted Travel, GTR, RDG and three disability charities suggested that it was only part of the solution. TransPennine Express and Merseyrail recommended that a national campaign to promote use of Assisted Travel would be of greater benefit.
28. Licensees mainly use social media to broadcast news, information and periodic updates as well as responding to immediate customer communication. Customers requesting information on Assisted Travel are generally signposted to the relevant section on the licensee's website.
29. Responses from some disability charities suggested that licensees should use real life examples, case studies and videos to help promote Assisted Travel and raise awareness through social media. They also recommended that licensees engage with disabled communities on social media to disseminate information and best practice, and use specific social networks such as 'Special Friends'.

**Q5: Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website homepages?**

30. A proportion (13) of the substantive responses to this question indicated that there are no obstacles to providing information on Assisted Travel within one-click

of the website homepage. Many licensees confirmed that their websites already do so.

31. However, some responses stressed that whilst the location of Assisted Travel information is vital, other passenger priorities can sometimes mean that material is taken off the homepage to avoid it becoming cluttered and inaccessible. Network Rail and RDG raised concerns over compromising the website design to accommodate large amounts of passenger information.
32. TransPennine Express and West Midlands Trains both suggested that there may be too much emphasis placed on accessing information within 'one-click' and suggested that having information in a logical location should outweigh how often a user has to click.
33. Transport Focus presented research that they undertook in December 2017 which suggested that only a small number of websites required additional 'clicks'.
34. Many responses from disability charities suggested that websites avoid the use of drop down menus and, where practicable, contain links to key information on the homepage. It was emphasised that websites should not 'hide' key information.
35. A small number of respondents felt that consideration should be given to introducing consistent terminology across websites, especially when referencing

information about Assisted Travel services. They argued that the introduction of a universal brand name and website location for assistance information would help to raise passenger awareness and understanding.

36. Sheffield Transport 4 All suggested that a separate booking engine for Assisted Travel services might be advertised on each licensee's website.

**Q6: Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?**

37. Respondents to this question were mostly in favour of linking the ticket buying process with booking assistance to provide a simpler, but more robust process. Merseyrail were the only licensee to question this proposal. They did not believe such a process was necessary due to the high levels of station staff in place on their network.
38. The current ticket buying process was deemed to be unclear in places with a major drawback that the offer of assistance is only available at the end of the process. Some respondents argued that the industry should seek confirmation of assistance requirements from the start of the booking process and should automatically assume passengers travelling with a Disabled Persons Railcard need assistance unless advised otherwise. However, the Chartered Institute of Logistics and Transport noted that

many train services are non-reservable, and that it is possible to travel on routes into London without a ticket using only contactless payment.

39. The Arriva Group highlighted the work done in this area by the airline sector and suggested lessons could be learnt. They also suggested that linkage of the systems would enable customers to self-manage their accounts to best suit their individual requirements and preferences. However, it was noted by Southeastern that not all customers' access services in the same way and so not all would benefit from the linkages suggested.
40. Licensees suggested that they would face significant challenges in linking ticket buying with booking assistance and acknowledged some of the short term and long term barriers to doing so. For instance, West Midlands Trains noted that the two services are currently operated from separate locations across their business. GTR suggested the industry could undertake research in order to understand the impact on customers.
41. RDG indicated that the new automated Rail Availability Reservation System (RARS) will link both services, solving the issues that currently prevent this from happening i.e. the ticket issuing system is not integrated with the assistance booking system, and the allocation

of bookings to staff is not automated, before it is rolled out.

42. However, some licensees noted concerns that linking ticket buying with booking assistance may result in more members of the general public using Assisted Travel as a porter service and the risk of incentivising passengers to carry large volumes of heavy luggage.

43. Five responses noted the importance of third party ticket retailers and consideration would be needed in terms of incorporating them into any linked service.

### **Q7: How can rail operators' improve the availability and promotion of Assisted Travel information to third-party agencies?**

### **Q8: How can rail operators engage productively with third-party agencies? If there are particular obstacles to doing so, how can these be overcome?**

44. The responses to Q7 and Q8 explored common themes. All (9) licensees who responded confirmed that they already engage with their own network of local third party agencies. Whilst some noted the benefits of being able to reach a wider audience, others advised that some agencies have little reach beyond their own organisations. Those train operators with larger networks noted resourcing challenges can impact on their ability to undertake engagement with third parties. The Arriva Group suggested that mitigation of this could

be to maintain engagement through means of electronic communication. Three responses suggested that ORR might include engagement with third parties as a licence commitment.

45. RDG noted that the main challenge for industry is to reach those who currently do not travel by train. Seven respondents were in favour of a coordinated campaign, led by RDG.
46. DfT suggested that greater use could be made of public service organisations to help the industry reach a wider audience. They proposed that licensees should provide them with literature that could be picked up by the public.
47. TfL and Merseyrail both provided useful examples of promoting accessible travel on their network. As part of the 2016 Wirral Loop Line Track Renewal project, Merseyrail adopted a new approach to customers with Assisted Travel needs. They engaged with Merseytravel's disability forum and worked with other organisations to disseminate the message about the key changes to public transport, with the aim of reaching as many people as possible. This included providing printed materials and organising a trial run for disabled customers on the amended bus replacement service. A podcast was also recorded, which reached over 5000

blind and visually impaired people across Liverpool city region.

48. TfL highlighted their 'Come on Board' campaign which helps target organisations across London to promote and share information on assistance.

## **Chapter 2: User experience; improving the reliability of communications**

### **Q9: How might the reliability of communications be improved?**

49. Responses to this question were wide-ranging, with a number referencing issues discussed in other sections, including passenger awareness, staff training and monitoring.
50. The Arriva Group noted the positive developments taking place across the industry on an individual company basis, in addition to the national campaigns facilitated by RDG, but indicated that more can still be done across the industry to increase passenger awareness. They suggested that a national campaign highlighting the support available to passengers who need it would help to address some of the current gaps, in addition to providing a more consistent and reliable service.
51. RDG, Sheffield Transport 4 All and Transport Scotland proposed that the industry should consider providing passengers with real time information. To do this the Chartered Institute of Logistics and Transport and the National Pensioners Convention noted that communications between signals and rolling stock is “100% reliable” and that a similar system could be used for passenger information.

52. Stations Made Easy was highlighted by West Midlands Trains as a valuable communication and planning tool. However, in order for it to be effective and reliable, it must be regularly updated to mitigate the risk of inaccurate information being disseminated.
53. Royal National Institute of Blind People (RNIB) noted that passengers currently experience uncertainty over whether unbooked assistance is going to be provided. This was reinforced by the eight licensees that argued that the current systems underpinning Assisted Travel are outdated and not fit for purpose. For instance, the current process of manually alerting passengers who have booked assistance that there may be disruptions to their journey is resource-intensive and unreliable. They proposed an automated communication channel to alleviate this and help to provide passengers with prompt, up to date information that, in time, can help to increase the overall trust in the service. RNIB put forward the suggestion by blind and visually impaired passengers that having a method of directly contacting stations would help the industry to manage interchange and increase passenger confidence.
54. RDG indicated that the introduction of the new RARS system later this year will significantly improve the reliability of communications, enabling staff to

communicate more easily and reliably with other staff and customers.

55. Communication between licensees was seen as key to improving the reliability of Assisted Travel. The most common cause of assistance failure is the breakdown in communication between staff, particularly at interchange points. In order to mitigate this licensees suggested implementation of a core training package or the introduction of a defined process which sets out the minimum level of detail required to be communicated.
56. Some licensees advised in their responses that they are working on developing new mobile apps but that the successful delivery of these can be dependent on station connectivity. However, Southeastern argued that it is a challenge for franchised operators to secure additional funding for innovations or technological solutions halfway through a franchise.
57. GTR and Transport Focus suggested in their responses that technological improvements would form only part of the solution, noting the popularity of telephone bookings and the current operator reliance on paper. They considered a balance of electronic, written and audio communications would be most suitable.

58. Some responses proposed other specific solutions: Transport Focus proposed that ORR could ascertain that all operators conduct instant call-backs when informed that assistance has failed, to identify what the causes of unreliability are. Guide Dogs suggested that a disabled passenger's needs are unlikely to vary across the rail network and proposed that an 'opt-in' service to the booking system could record the needs and preferences of passengers who regularly book assistance. Their research identified passengers' frustration at having to constantly repeat themselves when booking assistance
59. DfT proposed that ORR consider whether greater monitoring and stronger action in relation to licence obligations would assist in improving the reliability of communications for all passengers.

**Q10: 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?**

60. Respondents reinforced that the reliability of passenger assistance falls below passenger expectations. The largest volume of responses on this point belonged to the campaign to safeguard the role of the guard, supported by the response from RMT, which accompanied calls from passengers for more staff at stations. Beyond this, a variety of solutions were

proposed by operators, industry bodies and disability charities.

61. The majority (18) of those who responded to this question suggested that the introduction of an industry wide protocol would have a positive impact on operators' abilities to manage customer expectations and to deliver assistance. Network Rail and some others argued that the participation of Network Rail as the operator of major stations and the largest single provider of assistance was vital to its success, and London TravelWatch also argued for the inclusion of London Underground, given that travelling via or across London requires a greater amount of assistance and coordination, which is not always clear to passengers.
62. However, the national charity HfT suggested that more needed to be done to ensure that licensees are following current rules before implementing new protocols. Scope questioned whether the implementation of RARS would supersede the need for an industry wide protocol.
63. Despite the overwhelming support for a cross-industry protocol, many licensees did not feel that the current lack of one was the root cause of assistance failures. As referenced in the previous question the breakdown in communication between staff is seen as the most common reason that assistance fails.

64. Overall, RDG were considered best placed to play a leadership role in this area with input from its members, alongside ORR, Network Rail and DfT.

**Q11: 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?**

65. Over half of licensees who responded already commit to providing compensation to passengers if booked assistance fails, once they have investigated the incident internally to establish the root cause of the failure<sup>1</sup>. DPTAC and DMD Pathfinders suggested that a commitment to provide compensation would incentivise the industry to provide a better level of service for passengers. Network Rail advised that they do not provide compensation to passengers due to the lack of a financial relationship with the passenger, however, they do have processes in place to address this with those licensees who provide assistance at large Network Rail managed stations.

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<sup>1</sup> We note in this regard that the Consumer Rights Act 2015 provides passengers with a route to redress and potentially a full or partial refund where a service is not provided with reasonable care and skill and/or where it does not conform to the information that the passenger has been given about the service (if this information was taken into account by the passenger when deciding to buy their ticket).

66. Some responses highlighted the need for the industry to give consideration to the individual needs and preferences of passengers. The Arriva Group's response noted that passengers are often satisfied if their concerns have been addressed and remedial action has been taken to prevent a recurrence of the failure, whereas the Welsh Government noted that the impact of delays on individual disabled passengers may have different emotional and physical effects so cases must be assessed on an individual basis.
67. If an industry wide policy is to be introduced, DPTAC, Muscular Dystrophy Trailblazers and the Scottish Accessible Transport Alliance suggested that clear definitions for what classifies as 'assistance' and 'assistance failures' should be agreed upon to avoid individual interpretations being formed. DPTAC suggested that the industry should give consideration to how the service is communicated, with the focus on clarity and ease of understanding.
68. Applying a blanket approach to issuing compensation was questioned by the Arriva Group, who suggested that it would be unsustainable. They proposed that a sliding scale, dependent on the level of failure, could be implemented instead. C2c and Scotrail raised concerns over the impact that implementing this policy might have on resources.

69. Responses were broadly in favour of a consistent approach being adopted, but pointed out that licensees would need to be alert to situations where passengers travel for free. DfT stated it would consider making a system of redress mandatory in future franchising competitions. RDG confirmed they were happy to lead industry discussions on this with their members.

**Q12: Are there any obstacles to individual rail operators introducing their own redress policy when the service for these passengers fails?**

70. Twelve respondents favoured the industry adopting a national redress policy, rather than rail operators introducing their own redress policy, but licensees in particular highlighted some of the key issues that would need to be taken into consideration.

71. Transport Focus and TfL suggested that an industry wide policy would provide passengers with consistent equal treatment, regardless of the operator travelled with. DPTAC noted that the implementation of a national redress policy would be easier to communicate and monitor.

72. c2c suggested in their response that providing redress for assistance failures would be a management and resourcing challenge, their preference was to provide licensees with discretion in this area. Merseyrail considered that there were no obstacles to operators

providing their own redress policy and suggested that this should be the approach taken.

73. West Midlands Trains argued that a flexible approach to compensation is required, based on individual circumstances, rather than an 'all or nothing' policy. Other responses from licensees also noted that a national approach may obstruct their current ability to deal with complaints on a case by case basis. The Arriva Group highlighted that setting thresholds or defined levels of compensation may encourage perverse behaviour from passengers which would then negatively impact on others who genuinely require assistance.
74. CrossCountry noted that any system of redress would need to consider how to take account of those licensees that do not manage stations and of Network Rail as the operator of the larger stations across the network.

## Chapter 3: Strengthening Staff Training

### Q13: How can consistency in training for company staff across the industry on disabilities be achieved?

75. An industry wide approach to training was most favoured by respondents, with fifteen suggesting this would provide consistency across the industry and help to ensure all staff, regardless of the operator they work for, receive the same standard of training. C2c suggested that a national programme could be drafted and licensees could make route/business specific amendments to best suit the needs of their customers. However, opinions on whether to mandate training varied across respondents.
76. It was suggested by GTR and Southeastern that the industry would benefit from carrying out a gap analysis to identify the core requirements that would be essential to any plan.
77. Responses from disability charities emphasised the desire for training to include modules on all disability types, including hidden disabilities, to help ensure that staff are able to understand and identify the needs of their customers. Five disability charities suggested that people with disabilities should assist operators in designing and delivering training to staff in order to have the best outcome for passengers.

78. Scotrail suggested that training could be provided by a common supplier across the industry before being rolled out and supplemented by each company. Various methods of supplementary training suggested included e-learning, development days, smartphone apps, internal assessments and classroom learning.
79. Concerns were raised by North East Action on Transport (NEAT) over the use of online and e-learning training, they preferred a greater focus on face-to-face classroom based training.
80. West Midlands Trains noted the difficulties in identifying hidden disabilities and concluded that training could not solely help staff to improve in this area. In response, they have introduced passenger support cards and priority seat cards, free of charge, which passengers can use to discreetly advise staff that they need assistance.
81. DfT noted the value of training that emphasises the importance of compassion and empathy, as much as the factual knowledge and skills of staff. DfT also reported that the recent consultation on the Government's draft Accessibility Action Plan highlighted significant concerns over the consistency and standard of staff training.
82. RDG advised of work they are undertaking on an accredited training programme for disability awareness with its members. RDG also suggested that ORR could

put a mystery shopping programme in place to help monitor the quality of training being provided.

#### **Q14: How frequently should disabilities training take place and its content be refreshed?**

83. There was broad support across all respondents that a single training framework should be introduced that is relevant, consistent and under constant review. All licensees provide training to customer facing staff at the induction stage. However, there are some that go beyond this to also provide disability training for all new staff on joining the business.
84. The preferred frequency for providing refresher training varied from annually to every five years, however, thirteen respondents suggested that every 12-24 months was the most appropriate frequency for staff to receive refresher training, unless staff have been found not to be following protocol.

#### **Q15: Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?**

85. Of the specific responses to this question, twenty indicated that DPTAC could be responsible for drafting a training framework but acknowledged that the existing framework, which dates back to 2008, would need to be reviewed and updated. Industry stakeholders also looked to RDG, who are currently working on an

accredited training programme for disability awareness, to play a leading role.

86. Responses from three disability charities suggested that if a training framework is to be mandated then it must become a legal requirement in licensees' operating licences and it must include training modules on all disability types. However, West Midlands Trains suggested that mandating a training framework could stifle innovation.

**Q16: 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.?**

87. Respondents to this question (20) were mostly in favour of introducing independent verification of the quality of training. However, five others suggested that it would be difficult to secure external verification that provided a meaningful assessment of performance or quality of service.

88. Just under half of responses (11) suggested that ORR, RDG, DPTAC or another credible body within the industry would be best placed to carry out the verification and set the minimum standards with which licensees should comply. Other suggestions from GTR, Southeastern, RDG and HfT included the Institute of Customer Service, the Care Quality Commission and OFSTED.

89. Merseyrail and West Midlands Trains suggested that internal verification should be sufficient, whilst CrossCountry noted that consideration should be given to the cost of implementing independent benchmarking. GTR suggested that the cost of such a scheme should be commensurate to the overall benefit to the industry.
90. The Chartered Institute of Logistics and Transport proposed that training could be evaluated via customer satisfaction surveys. DfT similarly suggested that data from ORR's research could be used at an aggregated company level to act as a proxy for a benchmarking exercise, but questioned the value of actual benchmarking and how the results would be used. Muscular Dystrophy Trailblazers suggested that ORR could audit the provision of assistance and release a report of the results, which would help passengers understand the types of services they can expect.

## Chapter 4: Strengthening monitoring

**Q17: 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?**

91. The eight licensees that provided separate responses confirmed that they are already collecting and providing all of the data currently required by ORR. They reinforced the need to provide accurate and consistent data, but suggested the current manual process of collection and processing could be improved upon, particularly in the case of unbooked assistance. The Arriva Group advised that they are undertaking work to improve and extend their current collection of data.
92. Respondents noted that work was underway to identify additional methods of obtaining feedback from passengers, in addition to the mystery shopping exercises already used by licensees. Southeastern proposed that reintroducing questions regarding disability and Assisted Travel into the National Rail Passenger Survey (NRPS) would be a cost effective way of undertaking further analysis.
93. TfL indicated that it has launched a tool to collect feedback on day to day journeys from a panel of customers who experience barriers to travel. They

suggested in their response that ORR could draw on this data and play an active role in collating and coordinating industry level data from Transport Focus and London TravelWatch.

94. DfT noted that its standard rail franchise agreement enables ORR to collect various data from rail companies in respect of the Passenger Assistance service operated by franchisees, and also recommended that ORR draw together complaints from a wider range of sources.
95. Disability charities used their responses to suggest particular aspects of Assisted Travel for which data should be collected, including: passenger experiences (positive and negative); the method of booking assistance; where failures occurred and 'Turn up and go'.
96. Muscular Dystrophy Trailblazers highlighted their 'End of the Line' campaign and linked to two of their reports (from 2009 and 2016) which summarise the issues faced by people with disabilities using public transport.

**Q18. Beyond our current or 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?**

97. Licensees were keen to wait for the automated collection of data before proposing any further monitoring. However, the Arriva Group suggested that more

substantive research would provide a more accurate assessment of how well licensees were performing, particularly with regard to passenger who 'Turn up and go'. GTR also highlighted the importance of focussing in dissatisfaction and complaints. Meanwhile, Network Rail suggested that ORR could use their existing monitoring arrangements to undertake a risk based assessment of how well operators were meeting their obligations.

98. Various other suggestions were also put forward but the most favoured approach was mystery shopping. Five respondents suggested that a more regular mystery shopping campaign would help identify failings and provide a better understanding of the experiences of passengers with disabilities. DPTAC also highlighted in response to this question the NRPS data previously collected on Assisted Travel, as noted by Southeastern in response to Q17. Transport Scotland also suggested linking NRPS and Assisted Travel. DPTAC questioned whether the rail industry might benefit from considering the approach used in the aviation sector where an identical feedback form is issued to all passengers who have required assistance for travel across Europe.

99. Engagement with disability charities was also seen as a tool to increase the ORR's knowledge and understanding of the issues and experiences of passengers with disabilities. Camphill Village Trust

suggested ORR take part in regional focus groups and the Chartered Institute of Logistics and Transport suggested that ORR ask disability charities to undertake mystery shopping exercises in areas where noncompliance has been specified.

100. DfT's response drew attention to the Secretary of State's expectations that the ORR use the full range of powers open to it in carrying out monitoring activities.

**Q19: 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?**

101. Eleven of the responses to this question highlighted the impending implementation of RARS, or other app based technology, which would provide more consistent and reliable data. The Arriva Group suggested that a cross-industry system was preferable to individual rail companies developing their own bespoke mobile apps, but also raised cost concerns as well as the fact that not all staff currently have access to smartphone technology.
102. Of those disability charities that responded to this question, most noted the benefits that app-based technology could bring, but there were some concerns. For example, NEAT suggested that over-reliance on technology could further complicate the system, whilst

the National Pensioners Convention highlighted the potential for a reduction in human interactions as a possible drawback. Southeastern also suggested that any automated data collection system using an app needed to be complemented by other means of collecting feedback from passengers not using the app.

103. Three respondents suggested providing passengers with the opportunity to share instant feedback on their journey experience.
104. Supporting DPTAC's response to the previous question, RNIB considered that lessons could be learned from the aviation sector's approach to passenger assistance.
105. DfT confirmed its willingness to share complaints and correspondence data to help ORR in compliance monitoring.

## Chapter 5: Reviewing DPPP's

### Q20: Do you agree with our proposed approach to updating the guidance?

106. Of those that responded to this question, there was unanimous support for updating the current guidance. A common theme was for the passenger-facing document to be shorter, more customer-friendly and accessible and focused on: what assistance is available; how to book it; what passengers can expect online, at the station, on the train and at the ticket office.
107. RDG suggested the passenger-facing document should be separate from the service provision requirements we mandate or on which we provide guidance; Network Rail indicated these should be minimum requirements. All stakeholders were keen to be involved in the development of any future requirements.
108. It was suggested by some respondents that the guidance take the form of a standardised DPPP template, with some allowance for customisation.
109. TransPennine Express proposed that information that needs to be updated regularly, such as station facilities, be held online (this view was also put forward by Southeastern in response to Q21). Transport Focus also suggested the guidance itself be an online document.

110. DPTAC argued that the current guidance reflects a medical model of disability (where the problem is a person's impairments or differences). They suggested that revised guidance should instead focus on removing barriers to travelling using the social model.
111. The Welsh Government, Scope and Sheffield Transport 4 All suggested that disabled user groups should be consulted before submission of a DPPP.

### **Q21: Do you agree with our proposed approach to reviewing DPPPs?**

112. Responses from disability charities focused on the potential for their input into the process. Rail industry respondents were supportive of submission of DPPPs only in cases of material change, and in many cases suggested that operators themselves undertake an annual review only under this scenario. They also highlighted that we should be clear in our requirements on what might constitute material change.
113. Certain respondents, including Transport Focus and RDG, made an explicit link between the delivery of committed franchise obligations and material change, suggesting that specific initiatives or milestones could trigger a DPPP review.

## Next Steps

114. We are grateful to respondents for their helpful and considered replies to our consultation. These have provided valuable information on the issues we need to take account of, where we need to develop our thinking, and a range of suggestions for how we should progress our work on improving Assisted Travel. Taken together, the results of our research, the written responses to the formal consultation and the views expressed in conversation with stakeholders have given us **a clear steer that reinforces the need for improvements to Assisted Travel in the following three key areas:**

- Raising passenger awareness;
- The reliability of Assisted Travel provision;
- Staff training.

115. **This process has also underlined the need to undertake a comprehensive review of the DPPP guidance**, for which there was broad support in the consultation. This will ensure it is brought up-to-date, provides clarity on the assistance and information passengers must receive from licensees, and sets out how we will monitor and enforce these requirements to ensure this happens.

116. As set out in the figure below, it is our intention to publish a consultation on draft revised guidance by the

end of September 2018, with a view to publishing the final guidance by the end of the year. Where there is a strong case for changes to the guidance, we will explore this in detail in the consultation, consider the impacts and invite further views and evidence.



117. We will establish an Assisted Travel Advisory Group to provide us with a sounding board as we develop proposals, this group will include Rail Sector Disability Champion Stephen Brookes MBE and representatives from the following organisations:

- Department for Transport
- Disabled Persons Transport Advisory Committee
- Disability Charities Consortium (representing its members: Action on Hearing Loss, Disability Rights UK, Leonard Cheshire Disability, Mencap, Mind, RNIB, and Scope)
- Rail Delivery Group
- Transport Focus

- Transport Scotland; and
- Welsh Assembly Government

118. In the interests of transparency, meeting notes will be made available on the ORR website.

119. Any changes we propose must deliver tangible improvements for passengers. Prior to the consultation in September we expect to hold a number of workshops with licensees and other stakeholders on the key areas for improvement to ensure that any changes to the DPPP guidance are understandable, workable and deliver the anticipated benefits. We will also follow up with respondents where we wish to explore their suggestions for improvement in more detail.

120. We expect to receive revised DPPPs from licence holders in line with the new guidance by 31 March 2019. **However, it is important that rail companies take action in advance of this. Therefore, we are writing to licensees asking them to set out their immediate plans for improvements to the passenger experience of Assisted Travel.** We will also seek examples of good practice in providing these services which may be shared more widely. We will publish our letter, and responses from rail companies, on our website.

## Public Sector Equality Duty

121. Under the Equality Act 2010, in carrying out our activities the ORR has a duty to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (relevant protected characteristics are – age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation). **We plan to carry out both regulatory and equality impact assessments on any changes we propose to the guidance.**

## Other formats

122. The ORR has actively considered the needs of blind and partially sighted people in accessing this document in PDF format. The text is available in full on the ORR website, and may be freely downloaded. Individuals and organisations can use free Adobe Reader accessibility features or screen readers to read the contents of this document. This document is also being made available in Easy Read and Large Print formats. If you need conversion into any other accessible formats please contact our Customer Correspondence Team at: [contact.cct@orr.gov.uk](mailto:contact.cct@orr.gov.uk)

# List of respondents

## Campaign Groups and Disability Charities

- Action on Hearing Loss
- Age Cymru
- Asperger's Voice
- Camphill Village Trust
- Centre For Inclusive Living, Perth & Kinross
- Connect in the North
- DMD Pathfinders
- Disabled Persons Transport Advisory Committee (DPTAC)
- Edinburgh Access Panel
- Guide Dogs
- Hft
- KeyRing
- Muscular Dystrophy Trailblazers
- North East Action on Transport (NEAT)
- National Pensioners Convention
- RailFuture
- Royal National Institute of Blind People (RNIB)

- Scope
- Scottish Accessible Transport Alliance (SATA)
- Shaw Trust
- Sheffield Transport 4 All

## **Rail Industry, including Licensees (Train & Station Operators)**

- Arriva Trains UK
- c2c
- Chartered Institute of Logistics and Transport (CILT)
- CrossCountry
- GTR
- Merseyrail
- Network Rail
- Rail Delivery Group (RDG)
- Scotrail
- Southeastern
- TransPennine Express
- West Midlands Trains

## **Devolved Franchising Bodies**

- Transport for London
- Transport Scotland
- Welsh Government

## **Passenger Champions**

- London TravelWatch
- Transport Focus

## **Government Departments**

- Office for Disability Issues, part of Department for Work and Pensions (DWP)
- Department for Transport (DfT)

## **Trade Union**

- National Union of Rail, Maritime and Transport Workers (RMT)



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