

## ORR Accessible Travel Policy review form

<b>Stakeholder</b>	DPTAC
<b>Train Operator</b>	Caledonian Sleepers
<b>Review start date</b>	
<b>Review end date</b>	17/11/2019

### ATP: Passenger Leaflet

<b>Question</b>	<b>Comments</b>
<b>Tone:</b> Does the leaflet have an appropriate tone? Is it friendly and welcoming in tone or is there too much reliance on legal or technical language and jargon?	<p>In general, the Passenger document reads well, is user-friendly, and is free of legalistic jargon.</p> <p>The use of the word “guest” to describe passengers is positive and customer-focussed, although at times it seems as if the operator considers itself a hotel more than a train operator. This is of course only partially true, and substantial differences remain – in particular for disabled people. For example, there are no major hotels which require the guest to wait on an isolated platform late at night before check-in, or which have serious accessibility barriers as found at some stations. More generally the operator’s commitment to full integration with the National Rail Network is somewhat lacking – for example there is no information on how to buy tickets for journeys which extend beyond the immediate area of operation (and the website does not allow purchase of tickets except to stations served by the operator). The tone suggests a bespoke and isolated operation which may work well for some passengers, but also throws up barriers to integrated journeys. The document emphasises that booking direct will be cheaper than buying a ticket elsewhere and purchasing a room supplement – but this seems a dubious benefit if the operator cannot sell integrated tickets.</p>
<b>Ease of use:</b> Does the content of the leaflet provide clarity both in terms of the language	<p>The document reads well and is clear regarding many issues.</p> <p>However, we feel it would benefit from some early clarity regarding the key issue of prior notice</p>

<p>used and explanatory text? Does the leaflet have a logical and easy to follow structure?</p>	<p>of travel, and thereafter consistency throughout the document – noting that whilst some disabled people require assistance, most do not. It is not until the end of the third page of text that it is made clear that <i>everyone</i> who travels with Caledonian sleeper is required to have a reservation. This implies that ‘turn-up-and-go’ travel is not possible for any passenger – and yet on the previous page the operator commits to provide boarding and alighting assistance without prior notice. Likewise, for passengers requiring assistance there is a request for 24 hours’ notice (which in the ‘Policy’ document is expressed as a requirement), but what about passengers who do not require assistance? What is the minimum notice period prior to travel to obtain a reservation, and if this is shorter than the minimum requested notice period to book assistance, what can reasonably be provided for passengers needing assistance who book in the intervening period? NB: the ‘Passenger’ document commits to providing boarding and alighting assistance but in the ‘Policy’ document this is restricted to ramp provision – this may need to be clarified. We would recommend the operator revisits these issues and ensures consistency between both documents.</p> <p>Whilst we recognise that the use of the word ‘Guest’ instead of ‘Passenger’ may be a positive in terms of customer engagement, there is also the potential for some confusion in terms of the rights and obligations relevant to disabled passengers. This is a highly-regulated area where all the relevant legal, regulatory and contractual references are to ‘passengers’ – including of course the title of the ‘Passenger’ ATP document itself. As such, and given the potential direct relevance of the ATP to legal and regulatory proceedings, we suggest there may for the sake of clarity be a case to use ‘passenger’ throughout.</p> <p>It would be helpful to know if rooms not “accessible specific” would be suitable for travellers with assistance dogs.</p>
<p><b>Good practice:</b> Please highlight areas which are particularly strong and/or innovative.</p>	<p>We particularly welcome the following:</p> <p>New trains with improved facilities such as intercom systems in rooms;</p> <p>Upgrade of seated passengers with assistance dogs to rooms where available;</p>

	<p>Provision of in-room information re alighting or delays.</p>
<p><b>Other specific points:</b> Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.</p>	<p>It would be good to have information on the dimensions of standard rooms as this would be useful for assistance dog users.</p> <p>It is not clear whether rooms are shared with other passengers (not travelling together). This is important information relevant to assistance dog users and other disabled people.</p> <p>The 'Passenger' document uses the phrase 'hidden impairments' whereas the 'Policy' document uses 'non-visible'. For consistency the phrase 'non-visible disabilities' would be preferred.</p> <p>More information is needed regarding unstaffed stations and the options available to passengers travelling alone who may have difficulty reaching the platforms or alerting on-train staff to assistance needs.</p>
<p><b>Overall comments on the leaflet.</b></p>	<p>The document is user-friendly and reads well. However, some significant questions remain regarding the integration of this operator's services with the rest of the National Rail Network – in particular through ticketing and the provision of station services including assistance. There seems to be considerable ambiguity surrounding the notice period assisted, and unassisted, passengers are required to provide, and to what extent unbooked/ short-notice travel is possible.</p>

## ATP: Policy Document

Question	Comments
<p><b>Tone:</b> Does the policy document have an appropriate tone, bearing in mind that it is a more formal and comprehensive description of the train operator’s policy with regards to accessibility. [NB. The document should still avoid excessive use of legal or technical language, and jargon.]</p>	<p>In general, the Policy document reads well and is clear and free of legalistic jargon.</p> <p>The use of the word “guest” to describe passengers is positive and customer-focussed, although at times it seems as if the operator considers itself a hotel more than a train operator. This is of course only partially true, and major differences remain – in particular for disabled people. For example, there are no major hotels which require the guest to wait on an isolated platform late at night before check-in, or which have serious accessibility barriers as found at some stations. More generally the operator’s commitment to full integration with the National Rail Network is somewhat lacking – for example there is no information on how to buy tickets for journeys which extend beyond the immediate area of operation (and the website does not allow purchase of tickets except to stations served by the operator). The tone suggests a bespoke and isolated operation which may work well for some passengers, but also throws up barriers to integrated journeys. The document emphasises that booking direct will be cheaper than buying a ticket elsewhere and purchasing a room supplement – but this seems a dubious benefit if the operator cannot sell integrated tickets.</p>
<p><b>Motivational impact:</b> Does the content of the policy document provide positive encouragement for disabled people to travel by rail? [NB. The policy document is inherently less focussed on motivational content, but should nevertheless be written in a way that encourages of the train operator’s services.]</p>	<p>Yes we think it does encourage passengers to expect a reasonable level of assistance and specifies what is not available. We recognise that some of the constraints in the provision of accessible services may have good reasons. However, these are not explained – for example why are there no accessible shower facilities on-board? Why do some passengers in accessible rooms not have access to the buffet? An explanation would help reassure disabled passengers that the operator is seeking to maximise the accessibility of the service.</p> <p>We welcome the commitment to sourcing feedback from disabled people.</p>

<p><b>Ease of use:</b> Does the content provide clarity both in terms of language used and explanatory text? Does the document have a logical and easy to follow structure? Is the information provided sufficiently comprehensive and, where necessary, sufficiently detailed?</p>	<p>We feel that the document would benefit from some early clarity regarding the issue of prior notice of travel, and thereafter consistency throughout the document – noting that whilst some disabled people require assistance, most do not. It is not until the end of the second page of text that it is made clear that <i>everyone</i> who travels with Caledonian sleeper is required to have a reservation. This implies that ‘turn-up-and-go’ travel is not possible for any passenger – and yet a few paragraphs prior to this statement the operator commits to provide platform-train ramps without prior notice. Likewise, for passengers requiring assistance there are stated notice periods, but what about passengers who do not require assistance? What is the minimum notice period prior to travel to obtain a reservation, and if this is shorter than the minimum notice period to book assistance, what can reasonably be provided for passengers needing assistance who book in the intervening period? We appreciate that station-based assistance involving third parties may impose some limitations, but if the operator can provide a ramp without any notice, why can other boarding and alighting assistance not also be provided? We would recommend the operator revisits the use of the wording ‘<i>guests are required to give us 24 hours’ notice when booking through Passenger Assist</i>’ in the light of this.</p> <p>Whilst we recognise that the use of the word ‘Guest’ instead of ‘Passenger’ may be a positive in terms of customer engagement, there is also the potential for some confusion in terms of the rights and obligations relevant to disabled passengers. This is a highly-regulated area where all the relevant legal, regulatory and contractual references are to ‘passengers’ – including of course the title of the ‘Passenger’ ATP document itself. As such, and given the potential direct relevance of the ATP to legal and regulatory proceedings, we suggest there may for the sake of clarity be a case to use ‘passenger’ throughout.</p> <p>It would be helpful to know if rooms not “accessible specific” would be suitable for travellers with assistance dogs.</p>
<p><b>Good practice:</b> Please highlight areas which are particularly strong and/or innovative.</p>	<p>We particularly welcome the following:</p> <p>New trains with improved facilities such as intercom systems in rooms;</p> <p>Inclusion of commitments relating to people with non-visible disabilities;</p>

	<p>Provision of audio/ visual information on request (although it is not made clear how visual information would be provided);</p> <p>Upgrade of seated passengers with assistance dogs to rooms where available;</p> <p>Introduction of personal emergency evacuation plans;</p>
<p><b>Other specific points:</b> Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions</p>	<p>Section 1.1. states '<i>If you have not booked assistance and the station is not staffed on arrival, our on board hosts will help you on and off the train</i>'. Surely this also applies if passengers have booked? Or are staff sent to unstaffed stations to deliver station-based assistance?</p> <p>Section 1.1. states that the operator 'cannot control' the delivery of assistance at stations, as these are operated by other parties. Surely staff at stations act on behalf of all train operators, delivering services as specified under Station Access Agreements? As such the operator exerts control via contractual agreement. Elsewhere in the document commitments are made regarding station services (e.g. to fix ticket gates open when unstaffed). This area needs to be clarified to reflect the role of other-operator staff as contractors to the service provider.</p> <p>Would welcome more information about who to contact around issues of non-staffed stations and the use of alternative accessible transport, including where appropriate the scope to travel further to a station where assistance can be provided.</p>
<p><b>Overall comments on the document.</b></p>	<p>The document reads well and provides most necessary information. However, some significant questions remain regarding the integration of this operator's services with the rest of the National Rail Network – in particular through ticketing and the provision of station services including assistance. There seems to be considerable ambiguity surrounding the notice period</p>

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