ORR

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)

14 November 2018

Contents

Foreword

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.

This consultation sets out the changes we propose to make to the Disabled People's Protection Policy Guidance ('the Guidance') for train and station operators on how to write their policies for helping disabled people to travel by rail. It is the culmination of the work we have undertaken so far to understand passengers' experience of this service and to develop concrete proposals that will really make a positive difference to them.

Much has changed since the last Guidance was written in 2009. The introduction of the Equality Act 2010 embedded the rights of disabled people to reasonable adjustments so they can play a full part in society. Trains and stations have been made more accessible, and the success of the 2012 Olympic and Paralympic Games set benchmarks in the provision of transport services to disabled people. There are now almost 14 million disabled people in the UK, many of whom have a hidden disability; a quarter of disabled people have a mental health impairment, around 4 in 10 disabled children have a learning impairment, and 4 in 10 disabled children a social or behavioural impairment.

More and more people use Assisted Travel every year and expectations of the service have also grown as smart technology increasingly pervades into modern life. Satisfaction with Assisted Travel service is good, reflecting the hard work by rail staff – including staff who may themselves be disabled. However, the guidance, systems and behaviours that underpin the service have not necessarily kept pace with the broader changes we have seen since 2009.

Although much has changed, disabled people remain much less likely to use rail than people without disabilities. We know from our previous research and consultation that more needs to be done:

- to raise awareness of what assistance is available and how to get it;

- to improve the reliability of this service; and

- to provide staff with the information, skills and confidence to give the best customer service possible – including to those with hidden disabilities.

We are encouraged by the good practice we have found, but we have been clear with train operators and Network Rail that they must consider what more they can do in these areas.

I would like to take this opportunity to thank everyone who has worked with us as we have developed our proposals. We have worked hard to speak to as many people as we can, but we know we need to do more. This is an area that generates strong opinions from a variety of viewpoints; we need to recognise the potential cost of changes and that they may take time to put in place, but we are ambitious in our vision of a more accessible railway for all.

John Larkinson, Chief Executive

Executive Summary

Introduction

ORR's vision is a railway that every passenger can use with confidence and ease. Most passengers that request assistance to travel by rail are satisfied with the service they receive, but more needs to be done to ensure the arrangements for disabled passengers and others that may require this assistance are as consistent, reliable and customer-friendly as possible.

Underpinned by our extensive research in 2017 into passenger experience and awareness of Assisted Travel[1], we are seeking views on a set of proposed changes to the Disabled People's Protection Policy (DPPP) Guidance ('the Guidance') for train and station operators, issued by the Department for Transport (DfT) in 2009.

These proposed changes have been developed following consultation and engagement with disabled people's organisations, passenger champions, train operators, Network Rail, rail franchising authorities and industry bodies.

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[1] Assisted Travel includes assistance booked in advance via the Passenger Assist system, and spontaneous travel where assistance is requested on arrival at the station.

Where the consultation proposes new obligations for train and station operators, we set out our rationale for these proposals and invite comment and further evidence. We have undertaken initial assessments of the positive impact our proposals would have for disabled people and others that may require assistance, and of the potential impact any changes would have on the train and station operators we regulate. We recognise that there may be costs associated with delivering our ambition of a more accessible railway for all; we also recognise that our changes may have to be phased in – trials of new protocols and procedures could help ensure they deliver concrete improvements for passengers that are workable for staff.

Proposals

Rail passengers expect a similar level of service, no matter which area of Great Britain they are travelling in and which company operates the trains and stations. For Assisted Travel to be delivered consistently across the rail network, minimum standards must apply to every operator. This will benefit all passengers, but should not act as a disincentive for companies that want to innovate or differentiate their service by meeting and exceeding these minimum requirements.

Our proposals are designed to improve the passenger experience of Assisted Travel by focussing on the areas we

consider will make the most difference. Table 1.1 overleaf summarises the key proposals on which we are now consulting and the outcome for passengers that we are seeking to achieve. At the highest level we aim to:

- bring the Guidance up to date and ensure passengers have all the information they need to make a journey;

- improve the reliability of Assisted Travel by rail;

- strengthen train and station operators' staff training obligations;

- raise awareness of the assistance that is available;

- introduce new obligations where there is a good case to do so; and

- provide greater clarity of operators' existing requirements.

To underpin this work, we will continue to evolve: in the way we monitor the experience of disabled rail passengers and others that may require Assisted Travel, building on our recent research; in our ongoing efforts to engage with as many interested people and organisations as we can to understand their expectations and viewpoints; and as we continue to hold train and station operators to account for delivery of their policies and commitments.

The consultation also highlights other areas of good practice that we will encourage train and station operators to adopt to further enhance the services that they can offer to passengers in this area. These include:

■ offering assistance cards for use by passengers to communicate their needs to fellow passengers and staff;

■ where seats can be reserved, providing a guaranteed seat for companions and family members close to the passenger and space for assistance dogs to lie down; and

■ working with mobile application developers and others to ensure disabled passengers and those with reduced mobility are able to navigate easily and confidently around stations.

Table 1.1   Summary of key consultation proposals

Outcome for passengers	Proposal for consultation
1. Involving disabled people in a meaningful way	
Development of policy - the views of passenger champions, regional / local communities and user groups are considered as part of the development and review of operator policies in this area.	**We have proposed a revised approvals and review process for new 'Accessible Travel Policies' / 'Inclusive Travel**

Outcome for passengers	Proposal for consultation
	Policies'[2] to ensure that passenger views can be considered at an early stage.
Staff training - disabled people are involved in the development / delivery of training for staff who provide assistance.	**We have proposed that disabled people are involved in the development / delivery of staff training.**

2. Improving the quality & reliability of assistance through better information provision	
Journey planning - passengers are provided with the key information they need to enable them to plan their journey and this is provided in accessible formats.	**We have proposed a revised and condensed passenger leaflet, made available at staffed stations and online with additional formats available on request.**
	We have proposed standardised station accessibility classifications be used by passengers, booking agents and staff.
Booking assistance - **passengers** and **staff** can book assistance with confidence that the information	**We have proposed that operators use standardised station accessibility classifications to ensure that**

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[2] We will conduct a statutory consultation next year on formally changing the name of the relevant licence condition from Disabled People's Protection Policy.

Outcome for passengers	Proposal for consultation
they have on facilities and staffing at each station is accurate and the assistance can be delivered as required; this would eliminate 'bookings that are designed to fail from the outset'.	consistent, accurate and useful information is available online regarding station facilities. This specifically relates to the National Rail Enquiries station web pages[3] and the information that sits behind this site.
Transfer of key information between staff - more formalised communication procedures between staff at different stations to ensure that passengers consistently receive assistance to alight the train.	We have proposed new procedures on communication between staff at different stations ('handover protocol'), a dedicated assistance contact number and responsible member of staff for every station.
Staff contact at stations - passengers know how to contact a member of staff at any station, either in person or remotely.	We have proposed a new requirement to ensure that, at every station, information is available on how to contact a member of staff who can provide assistance and service information: in person, via a help-point or, where there is sufficient mobile phone coverage, a freephone number.

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[33] http://www.nationalrail.co.uk/stations_destinations/

Outcome for passengers	Proposal for consultation
Train facilities - passengers can be alerted: • when wishing to purchase a 1st class ticket, if a wheelchair space is not available in a 1st class carriage; and • in advance of boarding a train where an accessible toilet is known to be out of service.	**We have proposed to update to the existing obligations regarding information provided to passengers at the time of purchase of a ticket, and more generally information on accessible toilets when these are known to be out of service.**
Monitoring - passengers can easily receive useful information on what assistance is available and how to obtain it whether directly at stations, online, by phone or through help-points and this information is relevant and up-to-date.	**We have proposed to strengthen our monitoring of operators' obligations in this area. This could include mystery shopping of stations, websites, contact centres or help-points, and/or greater monitoring of social media.**
3. Improving the content, delivery and frequency of staff training	
Staff training - passengers, including those with hidden disabilities, receive a better, more consistent service from all staff whether they book assistance in advance or travel spontaneously.	**We have proposed to strengthened training requirements, including ensuring that:** • **disability training includes ten fundamental elements to broaden staff understanding (including around the rights of**

Outcome for passengers	Proposal for consultation
	disabled passengers) and confidence; and • staff receive 'refresher' training every two years.

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

Passenger awareness - more people understand what assistance is available when travelling by rail, and how to get it.	**We have proposed that Passenger Assist is marketed and promoted by the Rail Delivery Group to non-rail travellers and Disabled Person's Railcard holders.**
	We have proposed that train operators work with local authorities, service providers and disabled access groups to promote and, where necessary, improve the service provided to assist passengers.

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

Notice period for booking assistance - passengers can book assistance nearer to the time of travel and where possible can book and receive assistance on the same day that they choose to travel.	**We have presented 3 options for further discussion that would reduce the existing 'up to' 24-hour notice period (which can often become the default period requested): booking by 10pm the night before travel; or booking a**

Outcome for passengers	Proposal for consultation
	minimum of 6 hours before travel; or booking a minimum of 2 hours before travel.

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

Redress - passengers can receive appropriate compensation when they do not receive the assistance they have booked.	**We have proposed that all operators promote their existing redress policies or introduce and promote a scheme to provide passengers with redress when they do not receive the assistance that they have booked.**

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

Assistance requests - Assistance can be provided in differing circumstances, considering passenger needs, station facilities and staff availability (on trains and at stations) to enable passengers to complete as much of their journey, as is reasonably practicable, by rail.	**We have proposed to strengthen how operators consider assistance provision for passengers in differing circumstances. This could include alternative accessible transport, or using staff flexibly to enable assistance to be provided by train staff, station staff or mobile staff - where such working practices are routinely operated or can reasonably be accommodated.**

Outcome for passengers	Proposal for consultation
8. Improving the communication tools capable of being used for booking assistance	
Text relay services - Passengers with hearing or speech impairments can easily communicate with staff in contact centres to book assistance using the latest technology.	**We have proposed that operators adopt text relay services offering text-to-speech and speech-to-text translation services to enable passengers to book assistance from a mobile phone, tablet, computer or existing textphone.**
Video-relay services - Passengers using sign-language can connect to staff in contact centres using a remote sign language interpreter.	**We propose highlighting as good practice the video relay service used in other sectors to enable communication using British Sign Language.**
9. Improving the service passengers when alternative accessible transport is used	
Substitute and alternative transport – buses and taxis that are more accessible to disabled people when rail travel cannot be provided e.g. when a station is inaccessible to the passenger.	**We have proposed that operators demonstrate how they have worked with third parties to use more accessible rail replacement buses and made reasonable endeavours to work with taxi companies that provide accessible taxis and give drivers appropriate disability awareness training.**

Outcome for passengers	Proposal for consultation
10. Giving clearer information to passengers that use scooters or other mobility aids	
Assistance for passengers using a mobility scooter or mobility aid - Passengers are clear whether a mobility scooter or other mobility aid can be used on a given journey.	We have proposed 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.

Background

Disabled People's Protection Policies

Train and station operators are required by their operating licences to establish and comply with a DPPP. This includes Network Rail. Amongst other things, a DPPP sets out the arrangements and assistance that an operator will provide to protect the interests of disabled people using its services and to facilitate such use; both to those passengers who book assistance in advance and, where reasonably practicable, those who want to travel at short notice without pre-planning (often referred to as spontaneous travel or 'Turn up and go'). The current Guidance for operators on writing their DPPPs was issued in 2009 by DfT, but the responsibility for approval and monitoring train and station operators' DPPPs transferred to ORR in October 2013.

Development of proposals

In 2017 we published the results of our extensive research into passenger experience and awareness of Assisted Travel. At the same time we consulted on the key areas identified in the research for improvement: passenger awareness, reliability and staff training and what further monitoring we might undertake.[4] The more detailed proposals set out in this consultation have been developed based on further informal consultation and stakeholder engagement over the past six months:

- Our Assisted Travel Advisory Group (ATAG)[5] of experts from disability organisations, industry bodies, passenger champions and governments met three times;

- We held a separate workshop with **disability groups** that responded to the consultation to discuss Guidance revisions; this was followed up with a workshop with **train operators**;

- We held five cross-industry workshops to discuss **more reliable provision of assisted travel**;

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[4]http://orr.gov.uk/rail/consultations/policy-consultations-by-topic/consumer-consultations/improving-assisted-travel-consultation

[5] http://orr.gov.uk/rail/consumers/what-we-do-for-consumers/improving-assisted-travel

- We visited a number of stations, including major hubs operated by Network Rail; and

- We met with campaigning groups to understand the issues they face.

We have also ensured our work in this area is aligned across the railway industry. We have worked with the Railway Safety and Standards Board (RSSB) on its research into the development of metrics to measure the accessibility of the railways, and provided input to the UK Government's Inclusive Transport Strategy[6]. We have also worked closely with the Rail Delivery Group (RDG) on the development of a new, app-based replacement for the current Passenger Assist system[7]. Following a recent successful trial, and subsequent public promotion, this new system is due to be rolled out across the GB rail network in 2019.

We continue to work closely with the Rail Sector Disability Champion, the Disabled Persons Transport Advisory Committee (DPTAC), the Mobility and Access Committee for Scotland (MACS), Transport Focus, Network Rail, RDG,

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[6]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728547/inclusive-transport-strategy.pdf

[7] https://www.raildeliverygroup.com/media-centre/press-releases/2018/469774616-2018-09-28.html

the UK Department for Transport, Transport Scotland and the Welsh Assembly Government.

This engagement helped us to develop our thinking, and provided a range of good practice and suggestions for improvements to Assisted Travel. It also reinforced the need to undertake a comprehensive review of the DPPP Guidance. We are grateful to everyone that has contributed for donating their valuable time to provide us with their expert advice.

We have also been clear that rail companies should not wait for the publication of revised Guidance before taking action in the areas we identified for improvement. Our letter to train and station operators asking them to set out their immediate plans for improvement and examples of good practice in providing assistance, and their responses, can be found on our website[8]. These responses also helped inform our thinking when developing our proposals.

We have carried out an Equality Impact Assessment of the changes we are proposing to ensure we have fully taken into account our Public Sector Equality Duty under the Equality Act 2010. We have also considered the potential

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[8] http://orr.gov.uk/rail/consumers/what-we-do-for-consumers/improving-assisted-travel

regulatory impacts on licence holders. For both of these assessments, we invite the submission of further evidence.

1. Introduction

Summary

ORR's vision is a railway that every passenger can use with confidence and ease.   Most passengers that need help to travel by rail are satisfied with the service they receive, but more needs to be done to ensure the arrangements for disabled passengers and others that may require assistance to travel by rail are as reliable and customer-friendly as possible.

Underpinned by our extensive research in 2017 into passenger experience and awareness of Assisted Travel, we are working with disability representative groups, passenger champions, train operators, Network Rail, rail franchising authorities and industry bodies to develop a set of proposed changes to the Guidance for train and station operators on which we now seek views.

Background

Providing assistance to passengers

    1.1.   Train and station operators (together referred to as 'operators' in this document unless otherwise

indicated) are required by their operating licences[9] to establish and comply with a Disabled People's Protection Policy (DPPP), which must be approved by ORR. This includes Network Rail. Amongst other things, a DPPP sets out the arrangements and assistance that an operator will provide to protect the interests of disabled people using its services and to facilitate such use.

1.2.　Operators are required to set out in their DPPP, arrangements for providing assistance to passengers; both those passengers who book assistance in advance, and where reasonably practicable those who want to travel at short notice without pre-planning ('Turn up and go').

ORR role

1.3.　ORR's consumer role in this area originates from operators' licence condition to establish and comply with a DPPP, which we approve and monitor compliance with. We can also require operators to review their DPPPs and to make changes to them or the manner in which they are implemented. More widely, we collect, monitor and publish information on

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[9] Condition 5 of the passenger and stations licence. The model passenger licence can be accessed at: http://orr.gov.uk/__data/assets/pdf_file/0011/2234/lic-passlic.pdf

rail industry performance on accessibility. We also 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 (among other things).

1.4.   In 2009, the Department for Transport issued guidance for operators on how to write a DPPP. The Guidance sets out what commitments are expected from them, and the information they need to provide in the DPPP. It sets out the minimum requirements for operators which we would expect they will seek to exceed. Responsibility for approving and monitoring compliance with DPPPs passed to ORR in October 2013.

1.5.   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.

1.6. Ultimately, if an operator does not comply with its licence obligation, we take enforcement action. We will intervene should we identify serious or systemic failings. What constitutes a systemic breach will depend on the nature and seriousness of the failures and on the progress of the licence holder to rectify the situation proactively. To provide clarity to operators, and others, we have in place an economic enforcement policy and penalties statement[10] which provides an overview on how we will monitor and investigate possible breaches, as well as the options available to us when taking enforcement action. Our approach to enforcement is guided by the principles in this statement.

1.7. We publish and promote the findings of our work in our annual consumer report, Measuring Up[11], so that progress and weaknesses in accessibility are transparent. Transparency allows operators to demonstrate how they are helping people with a disability or impairment and strengthens the incentives on them to deliver better outcomes.

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[10] http://orr.gov.uk/__data/assets/pdf_file/0018/4716/economic-enforcement-statement.pdf

[11] http://orr.gov.uk/__data/assets/pdf_file/0003/28245/measuring-up-annual-rail-consumer-report-july-2018.pdf

Roles of other statutory bodies

1.8.   We work closely with a number of other statutory bodies with roles and responsibilities in this area, including the UK, Scottish and Welsh Assembly Governments, passenger champions (Transport Focus and London TravelWatch), accessibility advisory committees (DPTAC and MACS) and industry bodies (RSSB).

1.9.   Further details of these bodies is provided at **Annex F**.

Assisted Travel research and previous consultation

1.10. Passengers' experience of travelling by rail varies from person to person and from journey to journey. Although most passengers are satisfied with the assistance they receive, when things go wrong they can feel a loss of dignity, opportunity and confidence to travel. To understand passengers' experiences better, in 2017 we engaged external agencies to undertake a large-scale programme of research into passengers' awareness and experience of the assistance available to them:

■ **Passenger awareness of Passenger Assist and 'Turn-up-and-go' services**. Telephone and online surveys were carried out with 1000 people, both

users and non-users of rail who would require support when travelling by train;

■ **Fulfilment of and satisfaction with the Passenger Assist Service.** Over 4000 recent users of Passenger Assist were surveyed to understand more about typical users of the service, their experiences, needs and preferences; and

■ **Passenger experiences of Turn-up-and-go services across Great Britain.** Members of the public were asked to act as mystery shoppers by seeking assistance to travel without having booked this in advance. This resulted in 318 mystery shops, covering all operators and the majority of Network Rail managed stations.

1.11. This large-scale passenger research exercise found that:

■ Awareness of the ability to get assistance with rail travel is low: for instance, 70% of potential Passenger Assist users had not heard of the scheme or knew nothing about it, but 60% of those who had never used it reported they would be likely to use it now they know of its existence. This represents both an opportunity and a challenge for train and station operators;

- There is broad satisfaction with assisted travel, with 85% of Passenger Assist users being satisfied or very satisfied, but users' requirements are not always met which impacts confidence with using the service; with one in five users not receiving the full range of assistance they had booked, there is room for improvement in the reliability of Passenger Assist; and

- In general, staff were found to be happy to assist passengers whether they had booked in advance or not – roughly four out of five passenger interactions with staff were deemed positive. However, travellers with hidden disabilities were less likely to be identified as requiring assistance and were less likely to receive the service required.

1.12. The research provided us with a robust evidence base to draw upon in identifying where arrangements for Assisted Travel can be strengthened. We therefore undertook a consultation '*Improving Assisted Travel*'[12] between 15 November 2017 and 2 February 2018, which sought views in four key areas for improving that assistance:

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[12] http://orr.gov.uk/rail/consumers/consumer-consultations/improving-assisted-travel-consultation

- how passenger awareness of Assisted Travel might be increased;

- what action could be taken to improve the reliability of assistance;

- how training for train and station operator staff could be strengthened; and

- how we could strengthen our monitoring of Assisted Travel further.

1.13. In the consultation we also set out our approach to reviewing the DPPP Guidance and to future reviews of operators' DPPPs.

1.14. There were over 850 written responses to the consultation. We supplemented these with informal discussions with individual disability groups and train operators. A parliamentary event was subsequently held on 28th February 2018 in the House of Lords, chaired by Baroness Tanni Grey-Thompson. The research, the consultation and responses to the consultation can be found on our website[13].

1.15. The responses we received, combined with the results of our engagement with organisations that

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[13] http://orr.gov.uk/rail/consumers/what-we-do-for-consumers/improving-assisted-travel

have an interest in our work, confirmed that the DPPP Guidance needs revising to bring it up to date: to ensure operators understand their obligations and passengers know what assistance is available and how to get it, and to deliver improvements to the service.

1.16. We want to ensure that any changes to the DPPP Guidance bring about tangible improvements for passengers to their experience of travel by rail. We can only do this by working with people who have direct experience of using and providing the service and getting their views. We therefore:

■   discussed our work with an advisory group (ATAG) of key organisations representing passengers, operators and other key stakeholders, which met three times;

■   held a number of workshops on specific areas for improvement with disability groups and train and station operators, including five industry workshops with train and station operators on how to improve the reliability of Assisted Travel; and

■   engaged with experts in the field to provide advice and assurance.

1.17. We expect to receive revised policies from operators in line with the new guidance in 2019. However, it is important that they take action in advance of this. Therefore, we wrote to operators to ask that they set out the steps they had taken, and had planned, to make improvements to Assisted Travel. Their replies[14] included a number of examples of good practice in providing these services, some of which are set out in this consultation.

Scope of the document

1.18. Since the consultation closed, we have worked with disability representative groups, train and station operators, rail franchising authorities, and industry bodies to develop a set of proposed changes on which we now seek views. These changes will:

■ Bring the Guidance up to date and ensure passengers have all the information they need to make a journey.**(Chapter 2)**

■ Improve the reliability of the service.**(Chapter 3)**

■ Strengthen operators' staff training obligations. **(Chapter 4)**

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[14] http://orr.gov.uk/rail/consumers/what-we-do-for-consumers/improving-assisted-travel

- Raise awareness of the assistance that is available. **(Chapter 5)**

- Introduce new requirements in the Guidance for the benefit of passengers and provide greater clarity of operators' existing requirements. **(Chapter 6)**

- Highlight good practice. **(Chapter 7)**

1.19. A proposal for how this revised Guidance would look is provided at **Annex A**. Tables to help readers understand the changes we have made to the structure of the Guidance are provided at **Annex B**.

1.20. A draft regulatory impact assessment is provided at **Annex C**. In developing our proposals we have balanced the benefits they would provide to passengers with the anticipated costs to train and station operators. **We invite the submission of further evidence of costs that may result from our proposals.** These will then be factored in to our assessment of the final proposals to be included within the revised Guidance.

1.21. We have also carried out a draft Equality Impact Assessment of our proposals which is provided at **Annex D.**

Network Rail

1.22. As the operator of Great Britain's largest stations, and the provider of almost one third of all passenger assistance, Network Rail is critical to the future of Assisted Travel. As it does not operate passenger rail services, the current DPPP Guidance treats Network Rail slightly differently to train operators; there is a separate section setting out which specific requirements apply to Network Rail. This excludes some sections that only apply to train operators, such as the section on providing alternative accessible transport.

1.23. Network Rail's DPPP is not currently required to comply with the two-document structure: rather than produce or publish a passenger document, it instead publishes a more wide-ranging policy document that reflects its role as a major station operator. This must be made available to passengers in the same way as train operators' passenger documents, and shared with train operators.

1.24. We propose that Network Rail continues to be required to produce, publish and share its policy and make key printed information available to passengers at stations and online, in the same way as the proposed train operator passenger leaflet. **Following**

the responses to this consultation, we will work with key stakeholders to determine the exact revised requirements to be included within the final Guidance, reflecting that not every requirement is applicable to Network Rail.

Bespoke operations

1.25. There are also a number of smaller operators that, as licence holders, are required to have a DPPP. This number includes operators of heritage railways, single stations and trams that run on the national rail network. However, the DPPP Guidance is currently silent on such operations. We recognise that further clarity on what is required of them is necessary. Therefore, following publication of the final Guidance we plan to work with stakeholders to explore this in more detail. As a result, this consultation does not discuss the extent to which the existing requirements and new proposals in the draft revised Guidance might apply to these operators.

Responding to the consultation

1.26. Please provide your response by 18 January 2019 by e-mail or in writing to:

E-mail: DPPP@orr.gov.uk

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

1.27. 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.

1.28. Audio, Easy Read and Large Print versions of this document are available on our website. If you need conversion into any other accessible formats please contact us at:

DPPP@orr.gov.uk

1.29. We plan to publish all responses to this consultation on our website. Should you wish any information that you provide, including personal data, to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes.

1.30. In view of this, if you are seeking confidentiality for information you are providing, please explain why. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on ORR.

1.31. If you are seeking to make a response in confidence, we would also be grateful if you would annex any confidential information, or provide a non-confidential summary, so that we can publish the non-confidential aspects of your response.

Next steps

1.32. We will consider the responses to this consultation and then publish revised Guidance for operators in Spring 2019, along with an explanation of the final decisions we have taken on our proposals.

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

Summary

In this chapter, we explain why the current DPPP Guidance for train and station operators does not always reflect the current arrangements for providing assistance and information to disabled passengers, or the changes to railway operations since 2009. We propose a number of revisions to the guidance and as a consequence the way DPPPs are produced, approved and reviewed. The proposals should help to increase passenger awareness of Assisted Travel and clarify for operators what policies they must put in place to comply with the condition of their licence. This chapter includes the following sections:

From 'Protection' to 'Accessible and Inclusive'

In this section we propose to rename DPPPs **'Accessible Travel Policies'** or **'Inclusive Travel Policies'** to make them more reflective of increasingly accessible services and social inclusivity;

Restructuring and revising the DPPP Guidance

A DPPP currently consists of separate passenger leaflets and policy documents. In this section we propose that operators:

i)   **Revise and condense the passenger leaflet** to provide key information passengers need before they travel, including how to book assistance; and

ii)   **Revise, restructure and expand the policy document**, explicitly setting out how they will deliver their commitments.

We also propose to strengthen our monitoring of operators' provision of information on Assisted Travel and the accessibility of their services at stations and online.

Approvals and review process

In this section we reflect on discussions with user groups, charities and passenger champions. We propose to introduce a **revised approvals and review process** that embeds their views, and those of regional / local communities.

Background

2.1.   Since publication of the Guidance in 2009, passenger expectations of an inclusive and accessible railway network have risen, reflecting the

significant changes to legislation, technology and the accessibility of trains and stations that have taken place.

2.2.   Furthermore, the social model of disability is increasingly used to encourage society to be more inclusive and help to identify solutions to the barriers disabled people experience. It encourages the removal of these barriers within an organisation or industry, or the reduction of their effects.

2.3.   Although we recognise the benefit of consistent requirements on operators in their provision of accessible services, we are also aware that the Guidance does not always reflect the current arrangements for providing assistance and information, the changes to railway operations since 2009, or the social model of disability.

2.4.   The Guidance is therefore out of date and in need of revision. Amongst other changes addressed elsewhere in this consultation, in our previous *'Improving Assisted Travel'* consultation we set out that we would update the guidance to:

■   ensure that it refers to current legislation and best enables operators to comply with their equality duties; and

- restructure the document to more clearly set out the minimum requirements with which all DPPPs must comply, and distinguish these from other areas of good practice.

2.5.   Responses to the consultation were unanimous in support of updating the Guidance. We received a number of proposals for change, which were expanded on during our engagement with stakeholders, including meetings, workshops, and with our advisory group. These are explored further below.

2.6.   We are also proposing significant change to the Guidance to recommend areas of best practice, recognise existing ambiguity and so provide clarification and explanation where necessary. We also propose to introduce new guidance where the current document is silent and remove outdated information and language.

From *'Protection'* to *'Accessible and Inclusive'*

2.7.   The term '*Disabled People's Protection Policy'* is set out in the title of the relevant operator licence

condition[15]. The DPPP guidance notes that it is neither a helpful nor meaningful title for operators' policies, and requires operators use '*Making Rail Accessible'* in the title of both the passenger and policy document.

2.8.   We are keen to ensure that the DPPP should be reflective of increasingly accessible services and social inclusivity. Therefore, amending the licence condition so that it focuses operators' policies on delivering 'inclusive travel' or 'accessible travel' would be appropriate and consistent with the UK Government's '*Inclusive Transport Strategy'[16]* and the Scottish Government's '*Accessible Travel Framework'[17]*. We also explore below whether the title of the passenger leaflet remains appropriate.

2.9.   We propose to amend the terminology of the relevant licence condition (LC5) accordingly. Our initial view is that it would be more appropriate to change the licence to:

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[15] See Condition 5: Disabled People's Protection Policy: http://orr.gov.uk/__data/assets/pdf_file/0011/2234/lic-passlic.pdf

[16] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728547/inclusive-transport-strategy.pdf

[17] https://www.transport.gov.scot/media/20113/j448711.pdf

- *'Inclusive Travel Policy'*; or

- *'Accessible Travel Policy'*.

Consultation question

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

Restructuring and revising the DPPP guidance

2.10. The current DPPP guidance requires that operators produce two documents:

- a passenger-facing document entitled *'Making Rail Accessible: helping older and disabled passengers'* (a leaflet); and

- a policy document entitled *'Making Rail Accessible: guide to policies and practices'*.

2.11. This split is designed to reflect the relevant licence condition obligations.[18]

Passenger Leaflet

2.12. The Guidance currently sets out the processes and commitments that are expected of operators in the

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[18] See Condition 5: Disabled People's Protection Policy: http://orr.gov.uk/__data/assets/pdf_file/0011/2234/lic-passlic.pdf

provision of accessible rail services for passengers, and requires that most of these are included in a passenger-facing document. Some of these processes and commitments are not of immediate interest to the passenger requiring assistance to travel (for example the process for restricting or temporarily closing access points at stations).

2.13.   As set out in our previous '*Improving Assisted Travel'* consultation, our research has demonstrated that the preferred method for receiving information about Assisted Travel is a leaflet or booklet. Although operators are already required to make their passenger-facing document available on leaflet racks and at ticket offices at staffed stations, our mystery shop of spontaneous Assisted Travel found that the leaflet was available over the counter on just three out of ten journeys, and less than one in five respondents to a survey said that they found out about Assisted Travel from a leaflet. Our recent stakeholder engagement has provided anecdotal confirmation that even regular users of rail travel rarely read the document.

2.14.   We are concerned that this information is not being provided or displayed consistently or that it is not sufficiently prominent or accessible to passengers. Some *'Making Rail Accessible'* leaflets are also very

large at over 50 pages in length which can result in large printing and distribution costs, particularly when there are material changes to facilities and services that mean revisions are necessary. This can happen several times a year when there is significant investment taking place.

2.15. A common theme in responses to our consultation was for the passenger-facing document to be shorter, more customer-friendly and accessible, and focussed on what assistance is available and how to obtain it. In speaking to operators and disability groups that responded to our consultation, we have explored what might be included in such a document:

Passenger leaflet: draft outline structure and content

Introduction

Purpose of leaflet and who it is aimed at

Assistance: what is available and how to get it

What to expect: commitments to passengers

- Before travelling

- At the station

- On the train

- If things go wrong

2.16. We propose to revise the Guidance so that a leaflet as set out above is provided at all staffed stations. The full draft requirements are provided at Section 3 of the draft revised Guidance attached at Annex A.

Consultation questions

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?**

Policy Document

2.17. The DPPP guidance requires a policy document in addition to the passenger leaflet, to be provided online or in hard copy (including alternative formats) on request. To accommodate the sharper focus of the passenger leaflet, we have significantly revised the structure of the Guidance.

2.18. We have attached at **Annex A** a draft of the revised Guidance:

- – as noted above, section 3 of the Guidance sets out the required structure and content of the **passenger leaflet**; and

- – section 4 of the Guidance sets out the minimum requirements to which operators must adhere and the good practice they may wish to adopt in a **policy document**.

2.19. Side-by-side comparisons of the current (2009) Guidance and the draft revised Guidance can be found at **Annex B.**

2.20. Our proposals for changes to the policy document are discussed in:

- ■ Chapter 3 - Reliability

- ■ Chapter 4 - Staff training

- ■ Chapter 5 - Passenger awareness

- ■ Chapter 6 - New requirements and updates

- ■ Chapter 7 - Additional good practice

Minimum requirements

2.21. The Guidance sets out the minimum requirements for operators, to which we will continue to hold them

to account. Nonetheless, we expect operators to continue look for opportunities to develop policies and initiatives that go above and beyond those minimum requirements.

2.22.   As was reiterated in rail industry responses to our consultation, the terms used to describe these commitments have led to some confusion as to what is a minimum standard and what is only recommended. These terms include 'should', 'must', 'expected to', 'may', and 'recommended to'.

2.23.   It is critical for passengers that the Guidance is clear on what is required of operators. This clarity is also of benefit to staff, stakeholders, and it is vital for ORR in order to monitor how operators are fulfilling their obligations.

2.24.   **We therefore propose to use only two terms in the revised guidance:**

■   **'Must'** refers to minimum requirements that must be met. Where it may not always be reasonably practicable to do so, we propose to clarify this with **'must, where reasonably practicable'**; and

■   **'May'** refers to good practice we expect operators to consider adopting where not already implemented.

2.25. These terms are now clearly indicated in the draft revised Guidance in **Annex A** in bold text. Where changes have been made they are explicitly referenced in **Annex B,** which sets out where a term has changed.

Stations and rolling stock accessibility information

2.26. Information on the accessibility of rolling stock is currently provided within the passenger leaflet; stations information may be provided separately but must form part of the DPPP. Operators usually include stations information in their passenger leaflet.

2.27. As set out above, there is a general consensus that the passenger leaflet should be succinct and customer-friendly. From our discussions with stakeholders, we are aware that the inclusion of stations and rolling stock accessibility information in the passenger leaflet may be a barrier to achieving this. For station operators with a large number of stations, the description of facilities can run to tens of pages.

2.28. As is discussed in Chapter 3, accurate and up-to-date stations accessibility information, including whether staff are available to help onboard the train or at the station, is vital to passengers when planning a journey, and to staff when booking assistance. Many

stakeholders have stressed to us that this information should continue to be available at stations as well as online. However, we are concerned that leaflets are not refreshed sufficiently often to be relied upon because they may be costly to print and distribute.

2.29.   The critical elements of this information are accuracy, consistency and currency (see Chapter 3 for further details). On balance, we consider that there is greater overall benefit in both stations and rolling stock accessibility information forming part of the policy document, rather than be included in the passenger leaflet.

2.30.   **We therefore propose to amend the guidance so that stations and rolling stock accessibility and staffing information are explicitly part of the policy document**, **available:**

■   online in a format easily accessible using a personal mobile device; and

■   on request in hard copies (including alternative formats).

2.31.   **We propose that the passenger leaflet sets out how this information can be accessed, and that staff at stations continue to:**

- have access to up-to-date station accessibility and staffing information; and

- be able to provide this information to passengers on request.

2.32. Operators may also continue to choose to include all or certain elements of this information in their passenger leaflet if they feel this is appropriate.

2.33. Removing the requirement to include rolling stock accessibility information, and potentially station accessibility information in the passenger leaflet, should ensure that it remains up-to-date. Nevertheless, as noted above, this is information to which passengers require ready access. We are therefore resolute that stations and rolling stock accessibility information held online must be kept up to date, whether on the National Rail Enquires (NRE) website or the operator's own website. **We plan to monitor the provision of this online information. We also plan to monitor the provision and display of the passenger leaflet at stations to ensure it is readily available and displayed prominently.**

Consultation questions

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?

Approvals and review process

2.34. In response to our consultation, disability groups stressed the need for disabled people to be involved in the development of a DPPP. We agree that this policy, which affects disabled people, should be developed with their input. The development or revision of the new Accessible / Inclusive Travel Policies offer an opportunity for direct feedback from those passengers who use and benefit from Assisted Travel.

2.35. **We propose a new requirement for operators to confirm to us at the time of submission of their documents that they have sought and where possible incorporated feedback from local groups such as their passenger panel, accessibility forum, and local user groups.**

New licence applicants

2.36. Following discussions with franchising authorities and with DPTAC, Transport Focus, London TravelWatch and MACS about their input to the approvals process, we propose the following changes to timescales in relation to the initial approval process for new licence applicants.

- We propose to introduce a backstop of at least ten weeks before the intended start of operations for submission of documents to ORR for approval, in order to give us sufficient time to consult the relevant stakeholders and to work with the operator to ensure compliance with the Guidance. However, we continue to ask operators to submit their initial drafts to us as soon as possible.

- We aim to approve the Accessible / Inclusive Travel Policy at least two weeks prior to the intended start of operations, to better align with the licence application process.

- We propose that operators must make their documents available to the public on their website from the start of operations, which should allow two weeks from approval to brand and upload the documents. This is a reduction from the current Guidance which allows three months but it reflects the current practice by franchising authorities such as the Department for Transport of having the DPPP available from day one.

2.37. We propose that operators must have printed copies of the passenger leaflet available in staffed stations within one month from the start of operations, which we consider allows sufficient time to print and

distribute the documents. Again, this is a reduction from the three months specified in the current Guidance, but we believe this gives passengers more timely access to the information they may need.

Review of existing DPPPs

2.38.   In our previous consultation, we put forward a proposal to streamline the annual review process; a revised DPPP would only require approval if an operator is proposing significant or material changes. Rail industry respondents were supportive of limiting submission of DPPPs to such cases, and suggested that we should be clear in our requirements on what might constitute material change.

2.39.   **We propose to broadly adopt this revised approach, which is now reflected in section 2.2 of the draft revised Guidance.** In cases where an operator proposes changes which it considers are not material or significant, it will need only to provide a brief summary. Should we agree with this assessment, no review or approval will take place. The operator should then notify ORR of the finalised updated policy, which we will publish on our website.

2.40.   Where either we or the operator identifies a material or significant change, the policy would continue to be reviewed and approved, as now.

However, we propose to reduce the timescales for this review, aiming to complete it within six rather than eight weeks so that the review process is more efficient.

Re-approval of DPPPs following publication of the revised Guidance

2.41. Once the new Guidance is agreed and published, we will start a programme of approvals to ensure that all operators have a policy which complies with the updated Guidance. We will be speaking to operators and relevant stakeholders to agree a workplan to deliver this.

2.42. Given that there is scope for a number of material changes to each DPPP, we will be treating these as 'new' approvals in terms of the timescales for each. This will also reflect the level of input required from DPTAC, MACS, Transport Focus and London TravelWatch.

Consultation questions

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

3. Reliability

Summary

Our research shows that although satisfaction with Passenger Assist is generally high, almost one in five users does not receive all the assistance they have booked. In this chapter we explore how the reliability of Assisted Travel needs to be improved for both frequent and occasional users. This chapter includes the following sections:

■ **Accessible Journey Planning**

In this section, we describe the current inconsistencies and inaccuracies in the information available online on the National Rail Enquiries (NRE) station web pages. We propose that operators use standardised station accessibility classifications and wording to ensure that consistent, accurate and useful information is available online on the NRE website and at stations regarding station facilities for disabled passengers and others that may benefit from step-free access.

■ **Booking stage**

In this section, we set out that the Guidance does not currently include any specific obligations on operators regarding the booking of Assisted Travel. We suggest that some bookings taken may be 'designed to fail' from the

outset due to inaccurate information or incomplete checks and that passengers may be failing to receive basic information on what to expect at stations. We also set out the actions passengers can take to help assistance staff.

We propose that, 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.

- **At the station**

In this section we explore what may be causing assistance with alighting to be less reliable than with boarding. We propose that new procedures on communication between staff at different stations ('handover protocol') are adopted, alongside the use of a dedicated assistance contact number and a responsible member of staff for every station.

Introduction

3.1. The purpose of Assisted Travel services is to ensure that rail travel is accessible to everyone. If the assistance is unreliable it undermines passengers' trust and confidence in rail travel as a dependable means of transport. In a small number of more severe cases, assistance failures can also cause passengers who are disabled to have extremely negative experiences to the extent that it may dissuade them from travelling by rail in the future.

3.2. In both our passenger research and stakeholder engagement, improving the reliability of Assisted Travel, especially booked assistance, has been a persistent and principal area of concern for users.

3.3. In our previous *'Improving Assisted Travel'* consultation we set out the key findings from our large-scale research into users' experiences of both booked and unbooked assistance. In summary, we found that:

- Assisted Travel services were of vital importance to users;

- Booked assistance was typically more reliable than unbooked assistance;

- Users of booked assistance were also generally more satisfied with their journey than those who did not book in advance;

- The primary cause of booked assistance failure was linked to the passenger not being met by staff; and

- For both booked and unbooked assistance the reliability of alighting assistance was lower compared to boarding assistance, thereby indicating a particular problem with 'handovers' between stations.

3.4. Responses to the consultation helped us further develop our understanding of the issues that were

undermining the reliability of Assisted Travel and gather feedback on potential remedies to address these problems.

Stakeholder feedback

3.5. There was general consensus that the primary issues we had identified in our research as undermining the reliability of Assisted Travel were largely systemic and longstanding. Our attention was especially drawn to feedback from a range of passenger groups and train operators which highlighted specific concerns that a combination of outdated technology coupled with weak and inconsistent processes were too often limiting the ability of staff to ensure that all assistance was delivered as required.

3.6. Specific recurring issues affecting the reliability of assistance noted by respondents included:

■ Significant frustration from train operators that the NRE website contains too much inaccurate and inconsistent information about stations and this is partly caused by the difficulty in updating and maintaining Knowledgebase[19]. These data quality problems affect both passengers and rail staff who

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[19] Knowledgebase is an industry database that feeds the station information fields on NRE.

depend on the accuracy of this information to plan accessible journeys;

- Inadequate communication between stations cited by operators as a primary reason for assistance failures. This was the basis for some to support, in principle, the potential introduction of a formal assistance 'handover protocol' between stations to strengthen the quality and consistency of communication;

- Technological solutions need to be found to enable more dynamic and reliable communication between assistance staff and passengers. For example, at the moment when there are changes to services at short notice, providing information to passengers that have booked assistance about the potential impact of the change on their travel is mostly a manual process and is often unreliable; and

- Broad stakeholder support for stronger monitoring to hold station operators to account for assistance failures.

Working group

3.7. As these issues were focussed on industry arrangements, we instigated an ORR-led expert working group comprised of industry experts from a range of backgrounds, including those with disabilities, who all had direct experience of using, developing, managing or

delivering Assisted Travel services. The group explored these arrangements in more depth and developed potential options for delivering improvements. This was in the context of the longer-term technological enhancements that are planned as part of the new Passenger Assist system, which should eventually address many of the weaknesses to which current Assisted Travel services are susceptible.

3.8. The working group identified three discreet phases of the passenger experience where immediate improvements could be made to boost the reliability of Assisted Travel:

> (A) Accessible journey planning
>
> (B) Booking assistance
>
> (C) At the station

3.9. The proposals to improve industry processes identified above were discussed with rail industry colleagues at an ORR workshop in October. This allowed us to gather additional technical feedback on how to best design and implement some of the proposed changes.

A. Accessible journey planning

Background

3.10.   Passengers that may require assistance rely on information regarding the accessibility of stations and the availability of staff to help to plan their rail travel. This needs to be detailed, relevant and accurate for a journey to meet their particular needs and circumstances.

3.11.   The accuracy of this information is also critical to staff, both when providing advice and information at stations and on board trains, and when they are booking assistance in a call centre. Inaccurate, incomplete or unclear information may result in assistance being booked for a journey that involves a station which proves to be inaccessible to the passenger.

3.12.   Our research indicates that more than nine in ten bookings are made on the basis of station accessibility information held either online on the stations section of the NRE website or using the Knowledgebase database that underpins it.

3.13.   In accordance with the current DPPP Guidance (references below), operators are:

(a) obligated to provide passengers with up-to-date information on the accessibility of stations, including on NRE and their own websites (C4);

(b) expected to update Knowledgebase regarding the stations they manage (C2);

(c) expected to provide details in their DPPP of the accessibility of the stations they manage (C12 and Appendix B);

(d) required to provide information to passengers on the Network Rail stations called at by their services as part of their DPPP (C12); and

(e) recommended to provide information about the other stations called at by their services (C12).

3.14. Despite these existing obligations there are significant issues regarding the accuracy and network-wide consistency of information available on NRE (and by extension on many operator websites, which are typically limited to Knowledgebase information), and at stations (including maps and welcome poster information). Information is not always up to date, consistent between different media or presented in the same way for every station.

3.15. This is at least in part because although NRE is a network-wide system, station operators have individual responsibility to complete the data fields feeding NRE Knowledgebase, a task delegated to a large number of individual staff and managers. We understand there are

also technical and contractual difficulties with updating these pages.

3.16.   A further issue is that passengers cannot currently specify accessibility requirements when using NRE or operator-specific online journey planning tools (with the exception of the TfL Journey Planner). This means that in some cases only a non-accessible route will be offered, when there is an accessible alternative.

'Step-free' access
Maps

3.17.   The inconsistency noted above extends to the provision of step-free access on operators' network maps and dedicated step-free access maps. Our recent review of current provision indicates that only eight train operators have network maps that show whether a station is 'step-free'; in addition, seven produce a dedicated accessibility map showing station step-free access (in some cases in addition to information shown on standard network maps). Twelve operators do not advertise station step-free access information either on standard network or dedicated accessibility maps.

3.18.   The assumptions made by each operator as to what constitutes 'step-free access' vary: for example some operators will include stations with steep ramps in

excess of the Code of Practice[20] new-build standard, while others will explicitly exclude these; some only show stations with access to all platforms; some also show partially-accessible stations; and others combine step-free access with other information such as staffing. In many cases the information provided does not show 'full, partial or no step-free access' for each station.

3.19. In addition, there is a significant variation in the approach to graphical representation of step-free access – both between operators, and between a single operator's standard network map and accessibility map (including different meanings for the same symbols).

Figure 3.1   Examples of step-free access graphics

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20 https://www.gov.uk/government/publications/accessible-railway-stations-design-standards
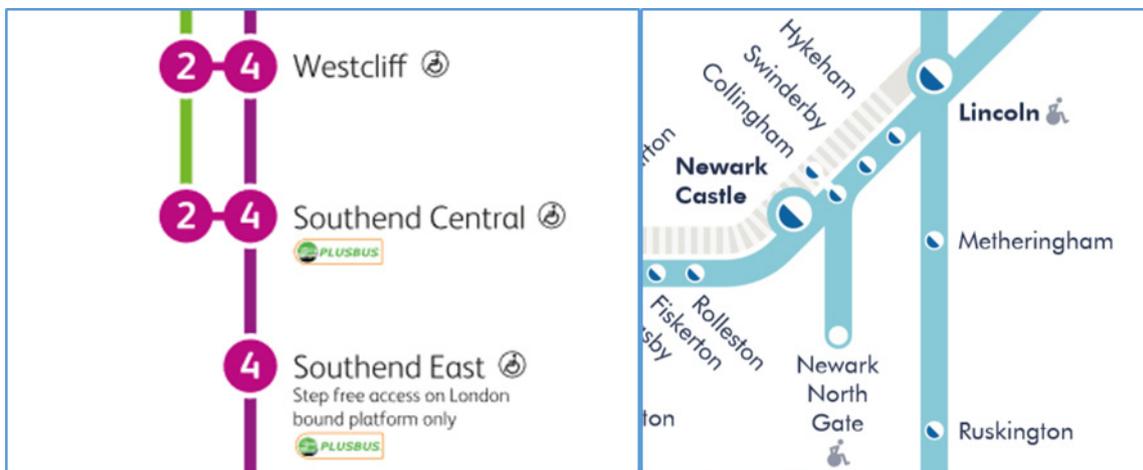
National Rail Enquiries Step-free access information

3.20. There is currently significant inconsistency in the format of step-free access information, in terms of:

- – Train directional information (where possible to identify);
- – Platform numbers;
- – Number of steps to platforms;
- – Accuracy, including whether information is up to date; and
- – Subjective judgments regarding accessibility to wheelchair users.

3.21. In some cases there is inconsistency between stations operated by the same operator.

Figure 3.2   Shenstone – train directional information but no platform numbers. Number of steps given

> **Step free access note**: *Level access to Birmingham platform via side gate. Small step to Booking hall from forecourt, but accessible step-free via side gate and platform. 20 steps down to Lichfield platform road overbridge.*

Figure 3.3   Glynde – platform numbers but no train direction information

> **Step free access note**: *Step free access to Platform 1 via a ramp accessed from the road. No step-free access to Platform 2.*

Figure 3.4 *Chipstead* **–** platform numbers and train direction information

> **Step free access note**: *Partially step free access. Step-free access from car park to platform 1 (to London). Steps to platform 2 (to Tattenham Corner)*

3.22. A further issue is that the 'Step-free access coverage' tick box can only be set to either Yes (tick) or No (cross):

- Bletchley is described as having no step-free access in this field, despite all trains to and from London, Northampton and Birmingham being accessible step-free.

- At some stations the box is ticked if the step-free route between platforms is via the street (for example at Burgess Hill), while in others a cross is applied to stations with similar access characteristics (for example at Hook).

- In some cases, stations with Barrow Crossings are marked with a cross, even if there are no steps on the station (such as Ancaster), while at other stations they are marked with a tick (for example Llanwrtyd).

National Rail Enquiries Passenger Assistance information

3.23. There is currently significant inconsistency across the network as to the use and wording of the 'Assisted Travel' and 'Staff Help Available' fields on the Stations Made Easy webpages.

Figure 3.5   Haddenham & Thame Parkway – Ambiguous information

Staff help available: Yes – Ticket office staff will assist wherever possible. Please note that the advertised availability or staff may differ from time to time without notice due to local arrangements or staff sickness.

Accessible journey planning: Proposals

3.24. Our proposals in this area, set out in the sections below, are designed to ensure that the station accessibility information used by passengers and staff is consistent, accurate and user-friendly.

3.25. In the long-term we envisage integration of accessibility information with the NRE Journey Planner, to enable passengers to specify a range of station (and potentially train) characteristics, including, for example, step-free access, toilets, and staff availability. Journey Planners could also permit accessible routes that deviate from the usual options (for instance by doubling back to avoid steps).

3.26. We also consider there is good practice from other travel sectors that may be adopted in the incorporation of user-generated data regarding accessibility and route-finding.

3.27. We recognise that these developments are some way off, but will continue to work with RDG to push for improvements such as these, that passengers want and expect.

Step-free access classifications

3.28. **We propose to add a new requirement to the Guidance: standardised station accessibility classifications (A to E) which are used by all station operators.**

3.29. The proposed station step-free access classifications, to one of which each station would be allocated, are based on five categories as per the RDG *'On Track for 2020'* report[21]:

A: step-free to new-build standards;

B: useable* step-free access to all platforms (*defined);

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[21] https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469772981

C: suboptimal* step-free access to all platforms (*defined);

D: step-free to some but not all platforms; and

E: no step-free access.

3.30.	Our analysis indicates that 52% of stations are in categories B and C. Category B stations do not meet new-build standards but as the large majority of stations in this category are already advertised as 'step-free' by operators (including TfL), they are likely to be useable by many passengers who need or benefit from step-free access. Therefore, although we recognise that there may be different views on whether a given station should be placed in category B or C, we consider there is potential benefit to passengers in making a distinction between differing levels of step-free access in this way.

3.31.	A further option would be for only three categories to be presented to passengers in certain circumstances (for instance on route maps):

–	Step-free to all platforms; [Cat. A/B]

–	Some step-free access (check details); [Cat. C/D] and

–	No step-free access [Cat E].

3.32.　　This would mirror the approach currently taken by several operators and may be considered more user-friendly. However, we have concerns about the consistency in approach across all operators.

Consultation question

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?

3.33.　　Standard text formats would be mandated for each of the five step-free access categories. Several variants would be required for categories B/ C/ D, with the key principle that both platform number and train direction (where possible) are included. Categories A and E would simply state "Step-free access to all platforms"/ "We are sorry but there is no step-free access to platforms".

Standard format of wording regarding the availability of Assisted Travel, and how to obtain assistance on arrival at station

3.34.　　**We propose to include in the Guidance a requirement to populate three pre-existing fields in Stations Made Easy and Knowledgebase with accurate content in a standard format for describing station step-free access, the availability of Assisted**

Travel, and how to obtain assistance on arrival at the station. This would include:

■ Unambiguous information on the availability of station and on-train staff to provide assistance, detailing times and capability (e.g. whether only boarding/ alighting assistance or station navigation assistance), and whether it is available on a 'turn-up-and-go' basis (and if not, what notice period is required);

■ Platform-train ramp availability, including whether it is available on a 'turn-up-and-go' basis, and confirmation that this is always available with prior notice; and

■ Information for passengers requiring assistance on arrival at the station, indicating where to report to staff and/or other instructions such as use of help points or attracting attention of on-train staff on the platform.

3.35. We will monitor the accuracy and consistent of operator-specific and network-wide accessibility information, online and at stations.

B. Booking assistance

Background

3.36. Passenger Assist can be booked in several ways. The vast majority of bookings are made via telephone (82%) to a train operator booking centre, while around one in ten (12%) are booked via email and a smaller proportion booked via webform (6%). Irrespective of which booking method is used, no Passenger Assist bookings are processed automatically. If the booking is made via a call centre, the booking agent inputs the data directly to the booking system during the call. If assistance is booked via email or webform, it is submitted as an 'assistance request' and is not formally confirmed until checked by a booking agent later and the details added manually to the booking system. This means that all bookings are currently manually checked by a booking agent before a confirmation is issued to the passenger. That subsequent booking record informs both rail staff and passengers about the arrangements for assistance delivery at the station.

3.37. The passenger can make a booking via a single train operator, even though at different points in the journey it might result in them being assisted at stations operated by a different company or Network

Rail. Although this is convenient for the passenger it does mean that a booking agent may arrange assistance for stations they are unfamiliar with and so are reliant on being able to access accurate information about the accessibility arrangements of those stations when making the booking.

3.38. The Guidance does not currently include any specific obligations on operators regarding the booking process. There are elements of the booking process that are standardised across the industry driven by the fact all operators use the same system to upload and download booking data pertinent to their stations. This information is then cascaded down to operational staff across the network to inform them about what assistance they are required to provide at each station.

3.39. However, there are also some elements of the booking process which are non-standardised. This had led to inconsistent practices developing whereby the way information is captured within a booking record and the types of information the booking agent checks and relays to the passenger can vary by operator. In the absence of recognised best practice it means the quality of booking can vary both by operator, and by booking agent.

3.40. Taking all these factors into account, this places a huge onus on the booking agent to get the booking right. For this reason, the expert working group examined how the actions at the booking stage potentially affected reliability at the station.

1. Bookings 'designed to fail' from the outset

Bookings 'designed to fail' from the outset due to incomplete checks

3.41. When a passenger calls to request assistance to undertake a specific journey the booking agent is required to check the accessibility of any boarding and alighting stations en route via the information on the station pages of NRE and assess that against the passenger's assistance needs. This effectively tells them about the normative accessibility characteristics of the station and the types of assistance available. The NRE station page will also tell them about any irregular issues at that station via the station alerts, such as lifts being temporarily out of working order. However, the extent to which this check occurs and the rigour with which it is undertaken is sometimes at the discretion of the booking agent.

3.42. It is essential that bookings agents always check the accessibility of any station for which they are booking assistance. If the booking agent does not complete these checks it can result in the agent

making a booking that simply cannot be delivered at that station. For example, a wheelchair user requests to travel from Glynde station. As the booking agent has recently booked assistance from that station for another wheelchair user they may make an assumption about the accessibility of that station. The booking agent might expedite the call by logging the request without checking the detailed step-free access notes for that station on the NRE station page. This shows that platform 2, which the current passenger would be travelling from, has no step-free access.

Figure 3.6   NRE station information for Glynde station

Accessibility and mobility access		
Staff help available	×	No
Ramp for train access	✓	Yes
Step free access coverage	×	No
Step free access note	Step free access to Platform 1 via a ramp accessed from the road. No step-free access to Platform 2	
Wheelchairs available	×	No

3.43. In this situation the assistance would likely fail when the passenger arrives at the station, and a request would have to be made for Alternative Accessible Transport.

3.44. Assistance failures such as this are recorded against the station operator on the day of travel, even though the problem originally occurred at the booking stage potentially weeks earlier when the booking was made. The booking was, in effect, 'designed to fail' from the outset. There is also no formal arrangement to feedback to booking agents about these types of errors when they occur or any way of holding them accountable.

3.45. Similarly, if the real-time station alerts for a station are not checked it can mean that important information which is critical to the passenger's journey can also be missed. An example of why these station alerts can provide essential information about the accessibility of a station is shown below for Bottesford station.

Figure 3.7   NRE station information for Bottesford station

Bottesford (BTF)

Managed by East Midlands Trains

Bottesford station
Station Road
Bottesford
Leicestershire
NG13 0GT

Bottesford
> Local area maps
> Live departures
> TrainTrackerText™
> Live arrivals

Stations made easy
Route planning around the station including maps and platforms
> Show [BTF] route

Station Message: ⚠ This station has Barrow or Level crossing. We do not recommend that you use it without assistance.

Getting to and from the station	⌄
Ticket buying and collection	⌄
Staffing and general services	⌄
Facilities	⌄
Accessibility and mobility access	⌃

Staff help available	✗ No
Ramp for train access	✗ No
Step free access coverage	✗ No
Step free access note	Level access to Nottingham bound platform. Footbridge crossing only to Grantham bound platform.
Wheelchairs available	✗ No

| Station Map | ⌄ |

Bookings 'designed to fail' from the outset due to inaccurate station information

3.46. As noted earlier, there are long-standing issues with the station information held on the NRE website that affect prospective passengers and booking agents. The working group estimated that a significant number of the station pages on NRE display some form of inaccurate information.

3.47. For a booking agent this can mean that although they might check a station's accessibility against the passenger's assistance needs, the booking can only ever be as good as the information available to them. If station data is flawed then it creates scope for them to unwittingly make a booking that cannot be delivered at that station. Again, it can lead to some bookings that are simply 'designed to fail' from the outset at the station.

2. Passengers failing to receive basic information on what to expect at stations and the actions they can take to help assistance staff

3.48. ORR's compliance monitoring of booked assistance delivery shows that the most common reason cited by rail staff for assistance failure is 'passenger no shows'. This means the staff member is unable to locate the passenger they are due to assist. Feedback from assistance staff is that passengers sometimes

unknowingly take actions that jeopardise the delivery of the assistance.

3.49.   It can be the case that if the staff member is not there on time, for example if they are delayed due to providing assistance to other passengers, the passenger who has booked boarding assistance may begin to make their way to the train independently, with the help of a companion or by asking other passengers for help. This can mean that when the member of staff does arrive they are unable to locate the passenger and are likely to classify them as a 'no show', which they record as an assistance failure against the station operator.

3.50.   Where a passenger has booked alighting assistance at a station on a busy train, staff have noted that it can be difficult to locate them for example if the passenger has a hidden disability. If there is a delay in the assistance staff meeting the passenger, it is not uncommon for passengers, where they are able, to attempt to alight the train themselves or to ask other passengers to assist them as they may be concerned that they will not be met by staff and left on the train. As noted in the paragraph above, this will be recorded as an assistance failure against the station operator.

3.51. Anecdotal evidence suggests that one of the causes of these issues is that the passenger is often given very little information about what to expect at the station or during the journey before they travel. The standard text generated by the Passenger Assist system in the booking confirmation is brief and only advises the passenger to arrive 20 minutes before the train departs (or longer if they need to buy a ticket) to make sure staff have time to provide the assistance.

3.52. Providing better information to passengers would help ensure that they receive the assistance they have booked and would support staff in the delivery of assistance. This could be provided by adding a link to booking confirmations which signpost the passenger to a general guidance and advice page on the NRE website or information could be added to the booking confirmation itself, especially for first time travellers.

3.53. This guidance could include information such as:

'If you have a seat reservation on the train, please do not move unless necessary because it could make it difficult for staff at the alighting station to locate you'.

'In the event of any disruption or problems with your assistance during your journey please call the following freephone number [X]'

'If you decide not to travel at the last minute, or decide to take an alternative train then please alert staff where possible about the change to your travel plans'.

'If the station or train is busy, where possible try to make yourself known to assistance staff as this will help ensure they can locate and assist you more quickly'.

3.54.   It was suggested this type of information could also be included in each train and station operator's DPPP. A joint passenger and industry working group could develop and agree on the most important and useful information to include.

Booking assistance: Proposals

3.55.   **We propose the following changes to the current booking system to address the issues identified in booking assistance.**

Booking stage issues	Proposed remedy
1) Bookings 'designed to fail' from the outset due to incomplete checks	**Introduce new requirements in the Guidance to ensure booking agents complete mandatory checks on the three priority station accessibility fields on NRE station page: i) *Step-free access note*; ii) *Assisted Travel*, and; iii) *Staff help available*.** They would also be required to check for any pertinent station alerts that would

Booking stage issues	Proposed remedy
	indicate a change to the station's normative operations and services which could affect the passenger's assisted journey.
2) Bookings 'designed to fail' from the outset due to inaccurate station information	**The measures set out in paragraph 3.28 would ensure that the industry improves the quality of station information displayed on the NRE station pages.** Consequentially when the booking agent consults the priority assistance fields on a station's NRE webpage it should ensure they have access to more accurate information to better inform their bookings. Improvements in this area should immediately eradicate those booked assists that fail solely due to poor station accessibility information available to the booking agent.
3) Absence of general guidance for the passenger on what to expect at the station or actions they can take to support staff in the delivery of assistance	**Development of general guidance for Passenger Assist users** that could be added to booking confirmations (especially for first time users) or a link provided to a dedicated page on the NRE webpage with the information. This information could also be added to each train and station operator's DPPP.

Consultation questions

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

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?

C. At the station

3.56. Our 2017 research with rail staff highlighted a number of communication issues that hindered their ability to provide assistance at stations. Therefore, the ORR-led expert working group analysed current industry processes for the delivery of assistance at stations to identify any systemic issues that were presenting unnecessary challenges to the provision of assistance.

Calling ahead

3.57. ORR research indicated a key reason for assistance failure at the station was staff not being in position to meet passengers as expected, and that this was an issue at both boarding and alighting stations. However, closer analysis revealed the

completion rates for boarding assistance was notably and consistently higher than alighting assistance for both booked and unbooked types of assistance.

Figure 3.8   Booked assistance boarding vs alighting completion rates[22]

Did you receive the following assistance?

Boarding the train: 3% Assistance not received, 97% Assistance received
Alighting the train: 9% Assistance not received, 90% Assistance received

■ Assistance not received   ■ Assistance received

Base: Of those able to continue their journey; Boarding the train (1,237), Alighting the train (963). Figures may not add up to 100% as 'don't know/can't remember' response are not shown
Data based on Rail Periods 1-5 2018-19

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[22] Data from ORR Passenger Assist 2018-19 monitoring survey. The fieldwork is currently ongoing with the full findings from this survey due for publication in spring 2019.

Figure 3.9 Unbooked assistance boarding vs alighting completion rates[23]

Turn-up-and-go mystery shop - difference in reliability of boarding and alighting assistance

Mystery Shoppers required boarding assistance for 196 journeys (62% of all journeys)

Mystery Shoppers required alighting assistance for 161 journeys (51% of all journeys)

318 journeys in total

Mystery Shoppers received boarding assistance for 183 journeys (93% of those asking for assistance)

Mystery Shoppers received alighting assistance for 125 journeys (78% of those asking for assistance)

3.58. The Guidance does not currently make any reference to the processes an operator must follow to ensure that assistance is delivered on its train or at its stations. The practices used by industry have largely developed over time through pragmatism and a 'learn by doing' culture. The effect of this is that it has created inconsistency across the network, both between operators and between stations managed by the same operator, in how they pass on information.

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[23] This data is from our November 2017 *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

The informality of these arrangements has meant an absence of learning and the identification of best practice over time.

3.59. Feedback from assistance staff highlighted the inconsistency in both the 'call ahead' procedures for handing over passengers between stations and the communication arrangements station staff relied upon to facilitate this. From this, in conjunction with the working group we identified four primary scenarios under which handover failure mainly occurs.

Table 3.1   Handover failures: four primary scenarios

Main types of handover failure	Potential outcome
1. Boarding station failed to call ahead to alighting station	Passenger has a mobility impairment and has booked assistance from station A to station B. Station A boards the passenger as required but **fails to call ahead** to the alighting station B because they have been distracted e.g. dealing with another passenger immediately after the assistance has been completed. If the boarding station A does not call ahead, staff at the alighting station B may believe the passenger was a 'no show' and ignore the booking request. This means that when the train arrives at station B the assistance staff are not expecting their arrival. (If the passenger had **not** booked assistance in advance of their journey and the staff at station A

Main types of handover failure	Potential outcome
	had not called ahead then it is clear that the likelihood of the passenger being met by staff at station B is further diminished.)
	It means under either scenario the outcome for the passenger upon arrival at station B is likely to be influenced simply by the practices and individual actions of staff at each of those stations rather than working to a tested, standard and reliable handover arrangement.
	The failure would be logged as a failure against the alighting station (B) as the designated station operator, despite the fact the original error was made at the boarding station (A).
2. Boarding station called ahead but passed on poor or incomplete information	Passenger has a mobility impairment and has booked assistance from station A to station B.
	Station A boards the passenger as required and **call ahead but only pass on limited information**. For example, they inform station B that passenger has a mobility impairment and requires assistance on arrival to enable them to disembark. However, they do not tell station B the passenger's precise location on the train which has a large number of carriages. This means on arrival the assistance staff at station B may spend time trying to locate the passenger which may impact upon the train's dwell time.
	The passenger may worry when the train arrives at station B as there are no staff visibly waiting for them. As frequently happens, this may cause some

Main types of handover failure	Potential outcome
	passengers to attempt to alight on their own or ask other passengers to help them disembark.
	This would be classed as an assistance failure because it was not provided by staff. The failure would be logged against the alighting station as the designated station operator, despite the fact the error was made at the boarding station.
3. Boarding station called ahead but no one at alighting station answered	Passenger has a mobility impairment and has booked assistance from station A to station B.
	Station A staff **call ahead but the alighting station does not answer**. If this happens most station staff make additional attempts to call ahead to ensure they pass on the necessary information[24]. However, the number of attempts they can make is limited by factors such as the time they have available (e.g. they will have other tasks and other passengers to assist) and the length of the journey. If the passenger is only travelling to the next station then there is little time for the alighting station to react even if they belatedly answer the call. The consequences for the passenger are, again, the possibility of the assistance staff at the alighting station not being prepared to receive them and for an assistance failure to occur.

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[24] If the staff at a boarding station know the alighting station is staffed then in some cases they will board the passenger and call ahead once the train has departed.

Main types of handover failure	Potential outcome
4. Boarding station called ahead and passed on essential information but it was not acted upon at alighting station.	Passenger has a mobility impairment and has booked assistance from station A to station B. Station A boards the passenger as required and **calls ahead to pass on the required information** to station B to enable them to deliver the assistance. Station B does not act upon the information and the assistance fails. This can happen in a variety of situations. Common factors we have identified include: • the information being received by a control room but is not cascaded down to platform staff; • platform staff receiving the information but are busy delivering other assists and do not have adequate time to respond; and • platform staff receive the information but do not act upon it. Currently there is inadequate accountability for these types of failed assist and no formal means of learning to identify stations or individuals who are particularly susceptible for this type of failure.

3.60. In conjunction with the working group we have proposed two potential solutions to strengthen assistance handovers between stations.

3.61. The first of these would be the formal development of a 'handover protocol'. This was identified as a potential option in our November 2017 consultation. This led to the production of a guide for staff (see. Fig. 3.10 below) as handover best practice that could be implemented at all mainline stations on the GB rail network. The purpose of the handover protocol is to directly address issues 1 and 2 outlined in the table above by providing staff with rules for when they must call ahead and the type of information they must pass on.

Figure 3.10 Boarding station handover protocol

SCENARIO	Passenger name	Disability	Assistance requirement	Train head code	Location on the train	Other*
Booked (incl. seat reservation)	✓ NO CALL	✓ NO CALL	✓ NO CALL	✓ NO CALL	✓ NO CALL	WHERE APPLICABLE
Booked (no seat reservation	✓ NO CALL	✓ NO CALL	✓ NO CALL	✓ NO CALL	CALL AHEAD	WHERE APPLICABLE
Unbooked assistance	CALL AHEAD	CALL AHEAD	CALL AHEAD	CALL AHEAD	CALL AHEAD	WHERE APPLICABLE

*Other could cover any substantive deviation from the booking record e.g. passenger also has additional assistance need on the day which was not in original booking.

Consultation question

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?

3.62.   To address issues 3 and 4 highlighted in the table above, the handover protocol could be complemented by implementing a requirement for all station operators to introduce a **dedicated assistance line** for each of their stations to ensure there is a practical means for passing on this essential information. The key features of how this would operate were identified by the working group are as follows:

A dedicated assistance line for every mainline station
All mainline stations must have a dedicated assistance telephone line specifically to manage booked and unbooked assistance for that station.
Responsible staff member for each station during that station's hours of operation. This applies irrespective of whether station is always staffed, partially staffed or unstaffed. The 'responsible person' is not physically required to be at the station, which is especially important for unstaffed stations[25].

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[25] Operators would consider how best to implement this within their own operating structure. For example, even for staffed stations it may be more effective to have the responsible person at a control centre who manages the assistance line for a cluster of stations. The key principle is that there is a member of staff responsible for assistance at each station and can be held accountable for explaining why an assist failed.

A dedicated assistance line for every mainline station
Assistance number is not available to the public. It is purely for rail staff to coordinate and communicate the delivery of assistance.
The industry must consider which technological solutions are most suitable for meeting this requirement. In the near-term most station operators may consider providing each station, or the person responsible for a station(s), with a mobile phone which could be denoted and commonly recognised as 'the assistance phone'. In the longer term, the new Passenger Assist staff app being developed by RDG is likely to include this functionality as standard and would serve to meet the requirement.
Boarding station must follow the call ahead protocol. Station operators must also be able to evidence that the relevant action specified in the call ahead protocol was completed. This is essential in identifying the causes of failure and ensuring accountability[26].
All station operators must ensure their station's accessibility number is made available to other stations and must possess numbers for all stations they serve[27].

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[26] The working group suggested that if the boarding station called ahead and the alighting station did not answer on the assistance line then a text (or equivalent) must be sent with a delivery receipt request. Other technological solutions could include this being automated via the new Passenger Assist staff app or via Stations Connect currently being trialled by RDG.

[27] A station should normally only need to call ahead to a station it has a direct connection with (i.e. where a passenger can alight

3.63. Given the potential impact of these measures on the operational staff at all GB mainline stations, w**e propose to work with a number of train and station operators to trial them in early 2019 at selected stations.** This will provide the opportunity to stress test the proposals with a diverse mix of operators to ensure the proposals are enhancing reliability as expected and not causing any unforeseen issues. To this end we are grateful to the following operators who have volunteered to participate in the trial and look forward to working with them: Northern, South Western Railways and Network Rail. The findings from the trial would then potentially inform the development of a more formal roll out thereafter.

Consultation question

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?

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from) meaning at a minimum it would need the numbers for those stations.

4. Staff Training

Summary

Confident, well-trained, helpful and responsive staff are critical to the passenger experience of Assisted Travel. In this chapter we explore the implications of our recent review of the provision of training for rail staff in disability awareness, which found that it is very inconsistent across the industry. We argue that passengers that use Assisted Travel make journeys across the entire rail network and expect a high-quality service, irrespective of which operator they travel with.

We consider that assistance can only be delivered reliably and effectively if there is consistency in the level of staff knowledge and skills. To help ensure passengers receive a better, more reliable service across the network we therefore propose that:

- all disability awareness training courses include ten key elements;

- staff receive 'refresher' training every two years; and

- a disabled person is involved in training development / delivery.

Background

4.1.   The actions taken by staff, and the attitude shown towards the passenger and the help they have requested, have a great impact on the passenger experience of Assisted Travel.

4.2.   In our '*Improving Assisted Travel*' consultation we set out the key findings of our quantitative and qualitative research:

■ Only 78% of unbooked assistance requests by mystery shoppers were met with staff that were positive and happy to help.

■ Although overall satisfaction with staff helpfulness is good for booked assistance, passengers with hidden disabilities reported lower satisfaction (86% versus 90% for all passengers) and lower incidence of receiving all booked assistance, at 75%.

■ Mystery shoppers of unbooked assistance identified staff attitude and training amongst key areas for improvement.

■ Staff are key in the successful delivery of Passenger Assist but on occasion passengers feel hurried or dehumanised and staff do not relate to their needs or concerns.

4.3.   A report commissioned by the Association of Train Operating Companies (ATOC - now RDG) in 2015 and published in July 2017[28] made a number of helpful findings and recommendations around staff training. In particular, it noted significant differences between train operators in the quality and duration of training (initial and refresher), and found that there is a vital need for high quality training to be delivered consistently across the network. Passengers expect a high level of service, no matter which company operates the train or station. The differences between operators is also illustrated in the annual reports we receive from them on the training undertaken by staff in the previous year, summarised in our consumer report *'Measuring Up'*[29].

4.4.   The Guidance currently sets out an expectation that:

(a) "All staff will receive relevant disability awareness training or disability equality training, including senior and key managers, to ensure that they are made

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[28] https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469772981

[29] http://orr.gov.uk/rail/publications/reports/annual-rail-consumer-report

aware of their responsibilities to disabled passengers."

(b) "Frontline staff who may, at any time, need to assist passengers will receive appropriate training in the use of equipment provided to assist people with disabilities, such as ramps, wheelchairs and induction loops."

(c) "Any staff who may, at any time, deal directly with passengers will receive appropriate training to help them communicate with people with different disabilities."

(d) "Any staff who answer telephones will be trained in communicating clearly with people who may have difficulty speaking, hearing or understanding."

4.5. It suggests that: "Operators wish to refer to DPTAC's Disability Equality and Awareness Training Framework[30] for Transport Staff for guidance and good practice on staff training." The DPTAC Framework was developed in 2008. We are unaware of any monitoring or assessment to indicate whether it

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[30]http://webarchive.nationalarchives.gov.uk/20080731162545/http://www.dptac.gov.uk/education/stafftraining/pdf/trainingframework-nontabular.pdf

was adopted by operators or to what extent it has been used.

Review of existing staff training

4.6.   Responses[31] to our '*Improving Assisted Travel'* consultation reinforced the need to make improvements in staff training. As a result, we asked operators to provide their training material together with an overview of their disability awareness training programme. We then commissioned a review of the current provision of training.

4.7.   The review found current provision to be variable across the sector, with the duration of training varying between an hour and two days. Some operators had more recently updated their course materials and involved disabled people, for example by delivering additional impairment specific training. However, many training courses contained out of date references to legislation and terminology.

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[31] http://orr.gov.uk/__data/assets/pdf_file/0007/27583/improving-assisted-travel-consultation-summary-and-next-steps-2018-04-30.pdf

Review of training

The review we commissioned found a number of examples of good practice, for example:

■ Two operators produce booklets to support their training programme and act as 'aide-memoires' for staff.

■ A number of operators invite disabled people to provide additional impairment-specific training.

However, much poorer practice was also identified, for instance:

■ One course informed staff that, "The Equality Act sets out the standards for all companies to adhere to and in this case is NOT about equality". Trainers delivering this course were required to explain that, "Someone who is disabled will never be in an equal position to someone who is able-bodied."

■ Two courses contained out-of-date references to the Disability Discrimination Act as the most relevant legislation.

■ One course used a video from the USA, which included inappropriate terms.

4.8. A literature review of the research on disability awareness training also identified good practice from other sectors, such as the bus industry.

4.9. When the contents of current training packages were compared with the elements we propose to include in the guidance (see paragraph 4.13), many

had significant gaps. Notably, whilst all operators train their staff to recognise that passengers need assistance, only four out of ten operators currently train their staff to be familiar with the station facilities that can be critical to providing assistance.

4.10. Other areas of training that the review identified as particularly weak across the industry are:

■ understanding the Equality Act 2010;

■ defining disability; and

■ understanding how Assisted Travel sits within the regulatory structure of the railways, and its societal and economic benefits.

Training proposal

4.11. We discussed these findings at a meeting of the advisory group of key organisations representing passengers, operators and other key stakeholders.[32] They reinforced the call in responses to our '*Improving Assisted Travel*' consultation for more consistency across the industry and to ensure all staff, regardless of the operator they work for, receive the same standard of training.

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[32] http://orr.gov.uk/rail/consumers/what-we-do-for-consumers/improving-assisted-travel

4.12. Our aim is to give staff the skills, knowledge and support to help passengers to travel with confidence and dignity and provide a more reliable service. Our proposal builds upon the suggestions we received in response to our consultation, which favoured an industry-wide approach to training. It supports the 2015 ATOC recommendation that:

■ all staff and customer–facing contractors receive training every two years in Disability Awareness/Equality and, where relevant, in delivery of assistance;

■ a common and consistent approach to training be developed, comprising both initial and refresher modules based on a common core curriculum which all operators should follow; and

■ training should be extended to managers and engineers (as required by PRM-TSI[33]).

4.13. **We propose the following elements be required in the training of staff.** (These are set out in more detail in Appendix D of the draft revised guidance provided at **Annex A**.)

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[33] The technical specification for interoperability for persons with reduced mobility (PRM-TSI) sets standards for accessible trains, stations and other facilities.

Proposed mandatory training elements

- **Understanding Disabled People and their everyday challenges:** Staff need to understand that disability covers a wide range of different people with different impairments, which may or may not affect the way they travel by train.

- **Equality Legislation:** Knowledge of the importance of the Equality Act 2010, which prohibits discrimination against people with specified protected characteristics, one of which is disability.

- **Defining Disability:** A person has a disability if he or she has a physical or mental impairment which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities. Not all passengers that require assistance may be disabled.

- **Recognising passengers who need assistance:** It is important that staff recognise that not all impairments are physical and that some people with hidden disabilities may look lost or confused.

- **Railway Regulatory Framework:** The railway is a heavily regulated industry and staff should be aware how other legislation and regulation also requires operators to offer disabled people assistance.

- **Passenger Assistance (disabled passenger experience):** Staff must be aware of Passenger Assist, and how it works for disabled passengers.

- **Communication:** Staff must treat disabled passengers with respect and consideration. Patience, optimism, and a willingness to find a way to communicate are critical.

- **Accessibility in stations:** Staff must have knowledge of the accessibility of station facilities, including seats, ticket windows, and toilets.

- **Providing safe assistance:** Staff must ensure that both staff and passengers remain safe at all times.

- **Involving Disabled People in course development/delivery:** Disabled people provide valuable lived experience of benefit to staff. This may include involving disabled people in course delivery or provision of additional impairment-specific training.

4.14. Our analysis of the gap for each operator between its current training content and our proposals suggests that all operators will need to update their training to a greater or lesser extent. Of those for which we have information, no operator covers more than 80% of our proposed content; eight cover less than 50%. Of the latter, two are open access operators and one a concession. The remaining five are franchised operators.

4.15. We estimate that the proposed training elements would take 6 to 7 hours to complete, with up to half a day for the biannual refresher training. The average

disability awareness course currently provided takes a working day, but for each operator this varies from as low as one hour to two full days. Five operators currently spend less than one day training their staff on how to provide assistance; these operators receive relatively few assistance bookings.

4.16. **We propose that short refresher training would have to be carried out for each member of staff by the 2nd anniversary of their initial training.** This reflects suggestions put forward in response to our consultation, and the recommendations of the 2015 ATOC report. We also propose that training must be classroom based, with some additional on-the-job training at the operator's discretion. We propose that all permanent employees (including permanent staff providing services that are contracted out) receive the training.

4.17. There will be occasions when operators of the largest stations rely on temporary staff to help with short notice demand for assisted travel. It is important that these staff are equipped with the necessary skills to be able to help passengers requiring assistance. Therefore, **we propose that temporary agency and contracted staff must also receive a condensed version of the training with particular focus on safety, dignity and communication.**

4.18. Our initial analysis is that it may take between one and two years for operators to update their training courses and train every member of staff. However, we recognise that the development of new or revised training packages, and for some operators the requirement for staff to spend extra time away from their regular duties may, depending on their current plans, impose a cost that is currently unbudgeted. For franchised operators, training budgets will be based on what was bid and contracted.

4.19. We propose that operators should be given no more than 2 years to:

(a) **Update their training packages to include ten elements:** Equality Act 2010, defining disability, railway regulatory framework and accessibility in stations, understanding disabled people, passenger assistance, providing safe assistance and involving disabled people. We will require that revised course materials are provided to us in that timeframe; and

(b) **deliver 'refresher' training to every member of staff.**

4.20. We will share with individual operators our analysis of their current training packages and discuss exact timeframes for moving to compliance with the proposed new requirements.

These timeframes will depend on a number of factors, including the size of the workforce and the extent of an operator's currently committed training programmes. We will monitor progress and report in our annual consumer report, *'Measuring Up'*.

4.21. **We will also write to operators requiring that the content of all current training packages is immediately reviewed and updated to ensure that all statistics, legislation and language are up-to-date for the benefit of new members of staff.**

Consultation questions

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

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?**

5. Passenger Awareness of Assisted Travel

Summary

In this chapter we propose a series of changes to ensure more people understand what assistance is available when travelling by rail, and how to get it. This chapter contains the following sections:

- **Industry promotion of Passenger Assist**

In this section, we explore the low awareness of Assisted Travel and the opportunities for Passenger Assist to be marketed and promoted by RDG to both non-rail travellers and Disabled Person's Railcard holders.

- **Third parties and social media**

In this section, we suggest that engaging and partnering with third-parties is a productive means of increasing awareness of Assisted Travel. We propose that train operators are required to work with local authorities, service providers and disabled access groups to promote and where necessary improve the service.

- **Website accessibility**

In this section we describe how we have reviewed the accessibility of operators' websites. We propose more

prescriptive requirements on their accessibility and the ease of access to information about Assisted Travel online.

Background

5.1.　As we explored in our previous *'Improving Assisted Travel'* consultation, although research shows that user satisfaction is relatively high, awareness of the availability of help with rail travel is low:

■ 70% of potential Passenger Assist users had either not heard of the scheme (54%) or had heard of it but knew nothing about it (16%); and

■ 86% of potential users of unbooked assistance were either not aware they could travel spontaneously (81%) or had heard of it but knew nothing about it (5%).

5.2.　The research findings also demonstrated that alongside this lack of awareness, there is significant untapped demand to travel by rail with assistance: after being informed of its existence and how to use it, 60% of people in our research into Passenger Assist who had never used it reported they would be likely to do so in future.

5.3.   Respondents to our consultation agreed that more needs to be done to promote the service. Disability charities and a number of railway industry organisations, including operators, noted the importance of making material available at stations, in a variety of formats, and available for passengers to download and print.

5.4.   All train and station operators who responded to the consultation provided details of how they meet the requirement in the current Guidance to actively promote the availability of their DPPP - with a particular focus on the passenger-facing document, which must currently be a leaflet titled '*Making Rail Accessible'*. These included using printed materials, such as posters, leaflets and *'Making Rail Accessible'* at stations.

5.5.   The current guidance also suggests providing copies of *'Making Rail Accessible'* to various public sources of information, such as libraries, travel information centres and local Citizens Advice. However, the evidence from both the research and our discussions with disability groups in particular is that it is not always easy to find or easy to read: less than one in five respondents to the research discovered what assistance is available from a leaflet.

5.6.   Operators indicated that staff at stations, in booking offices and on trains promote the service face-to-face. Information is also available online via websites, social media and mobile apps. Social media is used for a variety of purposes: to broadcast news, to provide information and periodic updates and for responding to immediate customer communications. Websites tend to be used to provide passengers with key information needed to plan a journey.

Proposals

5.7.   Our aim is to continue the increase in the number of passenger assists, both booked and unbooked. We received a variety of suggestions for raising passenger awareness of what assistance is available. We have considered which of these could be achieved through revisions to the Guidance, and whether they would be effective in attracting more people to travel by rail.

5.8.   We also looked at other regulators' approaches to raising awareness of the assistance available for vulnerable service users including the Civil Aviation Authority, which promotes air travel to disabled people and monitors how airports engage with local access groups.

5.9. We recognise that a more reliable, effective and efficient service is necessary to accommodate any uptake in Assisted Travel. Our proposals to increase passenger awareness are therefore designed to work with our proposals to increase the reliability of Assisted Travel and strengthen staff training.

5.10. The evidence we have seen indicates that although there is good practice to draw upon, not all operators seek to actively promote Assisted Travel to people that do not regularly use the railways. We also noted that not all operators have a group of passengers with whom they are able to discuss accessibility issues.

5.11. In addition, we undertook a desk based review in August 2018 to assess the availability and accessibility of Assisted Travel information. Our findings confirmed to us that more could be done to promote Assisted Travel to passengers, with only six operators using the homepage of their website to provide a link to Assisted Travel information. Beyond that however, every operator was found to provide contact information for passengers to book assistance, and a significant number also provided links to downloadable DPPP policy documents.

Industry Promotion of Passenger Assist

5.12. Some respondents to our consultation suggested that raising awareness at the national level would also be an effective method of promoting the service to people who rarely or never travel by train. As the industry regulator, ORR is not best placed or resourced to lead such a campaign; this should primarily be the role of the train companies who offer the service to their passengers. RDG has recently publicised the launch of a mobile app through which passengers can book assistance[34], as trialled at certain West Midlands Railway stations. It is also putting on a series of 'No Boundaries' exhibitions at railway stations across Great Britain, which explore travelling by rail with disabilities[35]. We also note that the Government's Inclusive Transport Strategy will require through future rail franchises that train operating companies promote greater passenger awareness of the Passenger Assist service.

5.13. We welcome RDG's promotion of the new Passenger Assist system to existing users, and its recent promotion at stations of what help is available.

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[34] https://www.raildeliverygroup.com/media-centre/press-releases/2018/469774616-2018-09-28.html

[35] https://www.railcard.co.uk/travel-inspiration/maketracks/no-boundaries/

We recommend that RDG also uses this opportunity to promote what assistance is available and how to obtain it to people who would benefit from this service but do not currently travel by rail.

Disabled Person's Railcard

5.14. The Disabled Person's Railcard provides a discount on rail tickets for people with a disability that makes travelling by train difficult. It is administered by RDG on behalf of train operators. The Disabled Person's Railcard website[36] provides a brief explanation of Passenger Assist and how to book assistance, as well as a link to the '*Stations Made Easy*' website.

5.15. Our stakeholder advice group suggested that more could be made of the opportunity to promote the service when a Disabled Person's Railcard is used to book assistance, echoing consultation respondents who suggested providing information when the Railcard is issued. We are aware that not all disabled people require assistance to travel, and that being asked if assistance is required will not always be

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[36] https://www.disabledpersons-railcard.co.uk

welcome. Promotion of passenger assistance would therefore need to be carried out in a sensitive manner.

5.16. Given the low awareness of the assistance that is available to passengers that may require assistance to travel, we agree that the Disabled Person's Railcard provides an opportunity to reach these passengers that should be used.

5.17. **We recommend that further consideration is given to providing a short leaflet or contact card when a Disabled Person's Railcard is issued, explaining what assistance is available and how to obtain it. We also recommend making Passenger Assist more prominent on the Disabled Person's Railcard homepage.**

5.18. **We also propose to amend the Guidance to recommend that operators consider making changes to the ticket booking section of their 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 they are asked whether they require assistance with any aspect of their journey.**

5.19. In order to ensure operators are fulfilling their obligations to make passengers aware of the

assistance that is available, we will strengthen our monitoring of this information at stations, online and via social media (see Chapter 4 for further details).

5.20. We will continue to monitor the booked assistance numbers and publish the results online and in our annual consumer report, '*Measuring Up'*. The new Passenger Assist system will enable us to begin to more reliably monitor unbooked assistance, and we will continue to measure satisfaction with the service and assist completion rate to assess the impact of increasing assistance provision.

Consultation questions

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?

Third parties and social media

5.21. Some respondents to our previous '*Improving Assisted Travel'* consultation suggested that more consistent 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[37], when we discussed Assisted Travel with them. Disability groups suggested to us that operators could make more use of their national, regional and local networks to promote the service, in person, in print, online and in accessible formats.

Good practice example: 'Try-a-Train' events

To date Govia Thameslink Railway (GTR) have carried out over 50 'Try-a-Train' events. These events are aimed at groups who lack the confidence to travel and are supported by GTR's customer-facing teams. Participants embark on an end to end journey and can also take part in station familiarisation days which are held to offer support following any major change to a station on their network. GTR report that feedback from those who have participated indicates an increase in passenger confidence.

5.22. We consider that using more local, non-rail sources to provide information could reach a greater number of passengers including those who may not currently be rail users. Proactively engaging and partnering with third-parties is a productive means of increasing awareness of the assistance that is available.

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[37] http://orr.gov.uk/__data/assets/pdf_file/0006/39273/orr-consumer-expert-panel-march-2018.pdf

5.23. We therefore propose to amend the Guidance so that operators must:

- work with charities, local authorities, local service providers and local or regional access groups to promote the benefits of assisted travel; this may include using online forums to test ideas, making more use of social media, producing and providing video testimony of positive experiences, and offering accompanied journeys to prospective users;

- work with local user groups, authorities and service providers to promote the service, including by providing copies of the passenger leaflet (including accessible formats) in prominent locations where public services are provided;

- engage in regular, structured consultation with a group of users of Assisted Travel to obtain feedback on the service and provide a forum for discussion of proposals for improvement; and

- report annually on this activity to us.

Consultation question

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?

Website Accessibility

5.24. The Guidance currently requires operators to provide accurate and consistent information to disabled passengers and to take into account the needs of disabled passengers when communicating information by working towards W3C standards for website accessibility[38].

5.25. In this context we commissioned two website reviews in October 2016 to ensure that websites generally communicate effectively with passengers who may have communication difficulties, and more specifically, information provided online about assistance is accessible and clear.

5.26. We also asked what steps might be taken to increase website accessibility in our previous *'Improving Assisted Travel'* consultation. A number of disability charities suggested that relevant journey information should be prioritised. Other important aspects included uncluttered presentation of information, available one-click away from the homepage, and consistent use of terminology across different operators' websites. For instance, we have

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[38] The World Wide Web Consortium (W3C) is an international community that develops standards to assess the validity and improve the quality of content on webpages.

recently identified that operators use different terminology to describe Assisted Travel, including 'Accessible Travel', 'Help and Assistance', 'Travel Assistance' and 'Journeycare'.

5.27. **We propose to include in Section 4: A2.5 of the revised Guidance additional website requirements, to ensure that**:

■ the term 'Passenger Assist' is used when describing the system to book and provide assistance; and

■ key information, reflecting that presented in the passenger leaflet, is provided on a single page linked to on the homepage.

5.28. **We plan to monitor compliance with W3C standards.**

Consultation Question

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

6. New Requirements and Updates in DPPP Guidance

Summary

In this chapter we set out a number of other areas where we propose changes to the Guidance, which will result in better assistance for passengers that require it. This chapter contains the following sections:

- **Reducing the notice period for booking assistance**

In this section we explain that passengers booking assistance can be required to give a minimum of 24 hours' notice. Here we explore three options for further discussion that would reduce the existing 'up to' 24-hour notice period: booking by 10pm the night before travel; booking a minimum of 6 hours before travel; and booking a minimum of 2 hours before travel.

- **Modes of train operation**

In this section we discuss how requests for assistance must be considered in relation to passenger needs, station facilities and staff availability (both train and station) to enable the passenger to complete as much of their journey, as reasonably practicable, by rail.

- **Redress**

In this section we explore the current compensation arrangements when assistance that has been booked is not provided. We propose to ensure all operators promote their existing policies in this area or introduce and promote a scheme to provide passengers with redress.

■ **Text relay**

In this section we suggest that the Guidance needs to reference modern communication methods. We propose to require operators to adopt text relay services offering text-to-speech and speech-to-text translation services to enable passengers to book assistance.

■ **Accessible substitute transport**

In this section we explore the accessibility of taxi and bus services when used as alternatives to or replacement for rail services. We propose that operators must demonstrate how they have worked with third parties to use more accessible rail replacement buses and taken reasonable steps to work with taxi companies that give drivers appropriate disability awareness training.

■ **Providing passengers with confidence to travel**

This section discusses two further updates to ensure that:

■ at every station, information is available on how to contact a member of staff who can provide assistance

and service information; this may be in person, via a help-point or, where there is sufficient mobile phone coverage, a freephone number; and

- each operator's scooter policy includes a presumption of carriage, which extends to other mobility aids and clearly sets out which scooters are permitted on board.

We also identify two areas where the Guidance requires further clarification to ensure that:

- where reasonably practicable, passengers are informed in advance when an accessible toilet is out of order on a train, to allow them to make alternative travel arrangements; and

- passengers are unable to purchase, or are warned against purchasing, tickets that they cannot use due to restrictions on the train, for instance when there are no wheelchair spaces in First Class.

Reducing the notice period for booking assistance

Background

6.1.   Last year there were 1.3 million booked passenger assists[39], of which over 360,000 (29%) were provided by Network Rail. Our research suggests more than 4 in 5 of these were booked over the phone. The current Guidance sets out that train and station operators "must not require passengers to give more than 24 hours' notice when booking through Passenger Assist"[40]. Over the years, a patchwork of notice periods has grown as franchise and concession agreements have included reductions to the 24-hour period.

6.2.   As can be seen from table 6.1, notice periods range from 1 hour (Merseyrail, within its network) to 24 hours (a number of operators, including Network

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[39] Passenger assists: the number of assists which have been requested through the National Passenger Assistance Booking System (Passenger Assist). There were over 375,000 bookings in 2017/18. Each booking can include several assists. See: http://orr.gov.uk/__data/assets/pdf_file/0013/28102/assists-factsheet-2017-18.pdf

[40] For international rail journeys, operators must not require passengers to give more than 48 hours' notice when booking through Passenger Assist.

Rail at its 20 managed stations[41]). Some train operators have several different notice periods depending on the journey to be undertaken. For example, since June 2018 South Western Rail requests:

- four hours' notice to travel between 6am and 10pm between 23 of the larger staffed stations it operates, including Bournemouth, Kingston, Southampton Central and Wimbledon;

- 12 hours' notice between the 163 other stations it operates; and

- 24 hours' notice if the journey involves a station it does not operate, including Clapham Junction and London Waterloo.

6.3.   This variation can also mean that different notice periods are required to travel from or to the same station, depending on which train operator the passenger is travelling with. For example, Liverpool Street station is served by trains operated by:

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[41] N.B. As part of the TfL network, TfL Rail and London Overground (Arriva Rail London) operate a Turn Up and Go service for passengers that require assistance to travel. Bookings can still be made 24 hours in advance if requested.

- TfL Rail and London Overground, which as part of the Tube network offer a 'Turn Up and Go' service with no notice required;

- Greater Anglia, which advertises on its website that 12 hours' notice is required to travel anywhere on its network; and

- c2c, which requests 4 hours' notice as long as the journey does not include travelling on services run by another train operator.

6.4. Liverpool Street station, like the other largest stations, is managed by Network Rail. A third of all assists are carried out at Network Rail stations. Staff at these stations provide assistance to many passengers who wish to travel spontaneously, but they only receive information about passengers that have booked up to 24 hours in advance of their travel. Passengers that may have booked with other operators and given less notice (such as booking made 4 hours ahead with c2c, as in the example above) are therefore treated as passengers that have not booked.

Table 6.1   Operator booked assistance notice periods

Operator	Shortest Notice Period	Longest Notice Period	Comments	Contact Centre opening hours
Arriva Rail London	Turn up and Go (TUAG)	24 Hours	TUAG service but bookings possible 24 hours in advance	24 hours a day
c2c	4 hours	24 hours	4 hours own network	8am-8pm Monday to Friday; 9am-4pm Saturday & Sunday
Caledonian Sleeper	6 hours		by 3pm on day of travel	8.30am-8.30pm Monday to Friday; 8.30am-3.30pm Saturday; 3.30pm-8.30pm Sunday
Chiltern	24 hours	24 hours	before 10pm day before; no more than 24hrs	8.30am-5.30pm Monday to Friday
Crosscountry	24 hours	24 hours		8.30am-8pm Monday to Friday,

Operator	Shortest Notice Period	Longest Notice Period	Comments	Contact Centre opening hours
				9am-4pm Saturday
East Midlands Trains	12 hours	12 hours		24 hours a day, 7 days a week
Grand Central	24 hours	24 hours		8am-6pm
Greater Anglia	12 hours	24 hours	12 hours - own network 24 hours - beyond own network	8am-8pm, 7 Days a week
Govia Thameslink Railway	24 hours	24 hours		7am-10pm, 7 Days a week
Great Western Railway	24 hours	24 hours		6am-11pm, 7 Days a week
Heathrow Express	24 hours	24 hours		9am-5pm, Monday to Friday
Hull Trains	24 hours	24 hours		6am-11pm, 7 Days a week

Operator	Shortest Notice Period	Longest Notice Period	Comments	Contact Centre opening hours
London North East Railway	24 hours	24 hours		8am-8pm Monday to Saturday; 10am-8pm Sunday
Merseyrail	1 hour	24 hours	1 hour - own network 24 hours - beyond own network	7am-7pm Monday to Friday
Network Rail	24 hours	24 hours		24 hours a day, 7 days a week
Northern	24 hours	24 hours		24 hours a day, 7 days a week
ScotRail	3 hours	24 hours	3 hours - own network 24 hours - beyond own network	7am-10pm, 7 Days a week
Southeastern	12 hours	24 hours	12 hours - own network 24 hours - beyond	24 hours a day, 7 days a week

Operator	Shortest Notice Period	Longest Notice Period	Comments	Contact Centre opening hours
			own network	
South Western Railway	4 hours	24 hours	4 hours - own largest staffed stations 12 hours - own other stations 24 hours - other stations	6am-10pm, 7 Days a week
TfL Rail	Turn up and Go	24 hours	TUAG service but bookings possible 24 hours in advance	24 hours a day, 7 days a week
TfW Rail	24 hours	24 hours		8am-8pm Monday to Saturday, 11am-8pm on Sundays
TransPennine Express	2 hours	24 hours	2 hours - between own stations 24 hours - between	6am-11pm, 7 Days a week

Operator	Shortest Notice Period	Longest Notice Period	Comments	Contact Centre opening hours
			any other stations	
Tyne & Wear Metro	6 hours	6 hours		9am-5pm, Monday to Friday
Virgin Trains	24 hours	24 hours		8am-10pm, 7 Days a week
West Midlands	24 hours	24 hours		7am to 7pm, Monday to Friday; 8am to 4pm, Weekends

6.5.   A further complication is that some operators have told us that for the benefit of passengers they will book assistance within the 24 hour notice period at their discretion. For instance, some take bookings for the following morning up until the time their contact centre closes the preceding evening.

6.6.   Across the operators there are 13 contact centres that take assistance bookings, which can be for more than one operator. As shown in table 6.1, their opening times vary; some close as early as 7pm whilst others are open 24 hours a day. Passengers

can book any journey with any call centre. There is also a National Freephone Passenger Assist Number[42]; calls are forwarded on to the operator with which the passenger needs to book.

6.7.   This complexity, fragmentation and lack of transparency can have a number of negative effects:

- ▪ it is unclear to passengers (and also on occasion to staff) what notice period applies to any given journey;

- ▪ assistance failure can occur when staff at the destination station are not aware that the passenger is arriving; and

- ▪ passengers' may be informed by staff at the contact centre of one operator that the assistance they have booked does not give enough notice for another operator, and so 'cannot be guaranteed' on connecting services.

6.8.   All of this can reduce passengers' confidence to travel, in addition to the reliability issues described in Chapter 3.

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[42] See: http://www.nationalrail.co.uk/stations_destinations/disabled_passengers.aspx

Proposals

6.9. Although, on average, passengers book assistance well in advance of their journey[43], our stakeholder engagement confirmed they want to have the choice to do so with as little prior notice as possible. Like everyone else, passengers that require assistance to travel want the flexibility to make spontaneous decisions about where and how they wish to go. However, we also note that when presented with the option to mandate a shorter, but more restricted notice period (for instance, only on trains run by the operator between stations it manages), attendees at our workshop with disability groups expressed a strong preference for a simple-to-understand and consistent notice period.

6.10. We share passengers' ambition for a shorter notice period, and we are mindful that any proposal for a reduction should aim to improve the simplicity and consistency of the national picture. From our work with operators we also know that, until the new Passenger Assist system is fully implemented, the challenges with the current system will need to be addressed if any change is to be delivered successfully.

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[43] In 2014/15 the average was 13 days before travel.

6.11. As set out previously, the Passenger Assist system is due to be replaced in 2019. We understand that all bookings, whether they are made over the phone, via e-mail or using a form on a website, currently have to be entered manually into the system by contact centre staff. They are then processed overnight to provide a single batch of bookings to each station operator in the early morning. Although contact centre staff can continue to enter bookings in the system, it provides no further 'push' notifications until the following morning. Operators that permit same day booked-assistance must therefore put in place parallel procedures and communications to ensure bookings are fulfilled.

6.12. Noting passengers' preference to travel with as little prior notice as possible, we have explored the following options for reducing the notice period for booking assistance - from 24 hours to permitting passengers to book:

(1) up to 10pm the day before travel;

(2) a minimum of 6 hours before travel; and

(3) a minimum of 2 hours before travel.

6.13. We do not propose to substantively change the requirement for operators to provide assistance where

it has not been arranged in advance, sometimes known as Turn Up and Go or unbooked assistance. We recognise that without the certainty of numbers that booked assistance provides, operators will continue to face challenges where demand exceeds their ability to respond immediately. Our research into the experience of passenger that do not book assistance indicates that satisfaction with the service provided is good. We therefore propose to retain the current obligation to "…provide for assistance that has not been arranged in advance, where reasonable practicable"[44].

6.14. We do not propose to change the notice requirements for international rail journeys (that operators must not require that passengers give no more than 48 hours' notice).

Option 1: Up to 10pm the day before travel

6.15. This option has the benefit of providing a formal reduction in the notice period for many passengers, particularly those wishing to book assistance the evening before travelling the following morning. It will require operators that currently advertise a 24-hour

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[44] See Section 4: A1c of the draft revised Guidance.

notice period, but accept bookings at any time the day prior to travel, to publicise this.

6.16. This option also requires no change to the current booking process for operators. By requiring bookings to be made the night before the assistance is provided, there would continue to be sufficient time for staff to be deployed at stations and for alternative accessible transport to be arranged where a station is inaccessible for any reason or during periods of disruption.

6.17. However, not all contact centres are open until 10pm. In the medium to long-term we would expect contact centres to extend their opening times as franchises and concessions are re-let. However, in the short-term this would force passengers to use another, potentially unfamiliar, operator's contact centre in some circumstances, and require some operators to advertise alternative contact numbers, such as the National Freephone Passenger Assist Number. This option also maintains the confusing landscape of same-day notice periods across the rail network, and fails to offer a same-day service.

Option 2: a minimum of six hours before travel

6.18. This option represents a more significant reduction in the notice period. It would offer same-day bookings

for passengers, whilst still permitting sufficient time for staff redeployment and arrangements for alternative accessible transport to be made where required.

6.19.   Whilst it provides a larger benefit for passengers, as noted above this option presents more of a challenge to operators to deliver. Not including the 'Turn Up And Go' services in London, only seven currently have notice periods of 6 hours or below, although a number currently offer or plan to offer a same-day booking service. We understand that this may have cost implications: the remaining operators would have to introduce new processes and in some cases additional technology to provide booked assistance within six hours.

Option 3: a minimum of two hours before travel

6.20.   This option offers the greatest benefit for passengers. Whilst not a 'Turn Up and Go' service it does allow bookings to take place shortly before travel. It therefore represents a significant increase in journey flexibility, particularly for return journeys - where passengers do not always know which train home they wish to take when they set out. From our stakeholder engagement we know this would be of benefit to both leisure and business travellers, as well as commuters.

6.21.   This flexibility also maximises the potential of the new Passenger Assist system. Using the smartphone app, passengers will be able to retain the security of knowing their assistance is booked, whilst being able to change their travel plans on the go with as little as two hours' notice. A further significant benefit is the consistency that this option would bring to the rail network: with the exception of the Merseyrail and Scotrail networks (see below), the notice period would apply across Great Britain – largely removing the complex web of notice periods we see today and helping to deliver a more reliable Passenger Assist service.

6.22.   The only operator that currently has a notice period of two hours or lower is Merseyrail, which asks passengers that require assistance to board to make contact one hour in advance of travel. This one-hour notice period applies only to its own network. We aware that several other operators are committed to making reductions to two hours or less, such as including TransPennine Express and Scotrail.

6.23.   A national two-hour notice period would therefore present an even greater challenge to the rail industry: operators would need the people, systems and communication channels to ensure Passenger Assist is delivered reliably and efficiently within much tighter timescales than today. At the same time, where rail

travel is prevented by disruption or station inaccessibility, accessible alternatives would still need to be arranged. We recognise the scale of this challenge under the current Passenger Assist system, not least to Network Rail at the largest stations, but we also note that it is a challenge a number of franchised operators are already addressing head-on as they seek to comply with their contractual commitments.

Phasing in a reduction in notice period

6.24.   The implementation of a reduced notice period for booking assistance could be phased in. This would give operators time to introduce any process changes that would be required and, if necessary, introduce technology to address the challenges we have set out in the options above. A phased introduction could see the implementation of option 1 in 2019, followed by option 2 and/or option 3 in 2020. Passengers would experience a gradual improvement in service and a clear glide path to a position where only two hours' notice will be necessary if they want to book assistance. This would work best if it makes the most of the opportunities presented by the introduction of the new Passenger Assist system.

Consultation questions

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

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

Modes of train operation

Background

6.25. Trains with doors operated by drivers (known in the industry as 'Driver Only Operation' or DOO where there is no second person on board the train) have been in operation in Great Britain for more than 30 years.

6.26. More recently, a number of train operators have introduced what has been termed Driver Controlled Operation (DCO) – where a second person is usually present on board the train for customer service and/or ticket inspection but not responsible for door operation; in certain circumstances, the train may run without the second person.

6.27. ORR has reviewed[45] DOO/DCO, and our safety inspectors are satisfied that with suitable equipment,

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[45] http://orr.gov.uk/rail/health-and-safety/health-and-safety-strategy/driver-controlled-operation-dco.

proper procedures and competent staff in place, it is a safe method of working. However, we recognise that staffing[46] on trains and at stations remains an issue of significant interest and concern for many passengers, including those that may require assistance to travel.

6.28.   The current Guidance for train and station operators on how to write a DPPP refers only to staffing at stations, acknowledging that stations may be staffed full-time, part-time or may be unstaffed. However, it is clear that operators now require to consider the options that may be available to provide passengers with assistance under a number of differing scenarios involving an assessment of passenger needs, station facilities and staff availability (both on the train and at the station).

ORR review of GTR Driver Controlled Operation

In 2017[47] we monitored and assessed GTR's provision of

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[46] Staffing levels are a matter for franchising and concession authorities, e.g. DfT and Transport Scotland.

[47] http://orr.gov.uk/__data/assets/pdf_file/0011/25967/disabled-peoples-protection-policy-letter-to-gtr-2017-11-10.pdf

in place in the exceptional circumstances where a second person was not available on the train to provide assistance to passengers.

Our consistent focus with GTR was to ensure that all passengers, both those that had pre-booked assistance and those that chose to travel spontaneously, were able to complete their journey irrespective of their circumstances, the staffing situation on the train or at station.

Following this review, GTR made changes to its processes for relevant Southern services to ensure continued compliance with its DPPP. These changes included additional recruitment and staff training; better face to face communication between station and on-train staff; a new assistance team in the Southern control centre and better communication for passengers e.g. the re-labelling of help points to make clear that they can be used to contact the passenger assistance team in the Southern control centre for assistance.

Modes of train operation proposals
Communication and information

6.29.   Our primary aim is to ensure that all passengers - both those that have pre-booked assistance and those that choose to travel spontaneously - are able to complete their journey irrespective of their circumstances, the staffing situation on the train or at station.

6.30.   This will require an accurate understanding and assessment of the needs of the passenger, station

accessibility, station staffing times, train staffing levels and unexpected accessibility issues such as a lift being out of order. Therefore, clear communication channels and accurate information – for passengers, between staff and between staff and passengers – are essential. To achieve this, we propose that:

■ **the revised Guidance consolidates and clearly sets out the requirements for operators to provide up-to-date information to passengers at each stage of their journey, whether online, on the phone, at the station or on the train;** and

■ **the improvements to the reliability of Assisted Travel set out in Chapter 3 will:**

  – **improve communications between the staff that assist passengers to ensure there is someone to provide assistance at the passenger's destination; and**

  – **ensure that the station accessibility information used by passengers and staff, including the relevant pages of the NRE website, is consistent, accurate and user-friendly.**

Flexibility

6.31. 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. This applies equally to passengers that book assistance and to those that choose to travel spontaneously.

6.32. Although we recognise that the provision of alternative accessible transport, such as a taxi, may often be a suitable option, for some journeys or passengers this may not necessarily be appropriate. We expect that passengers requiring assistance can, as far as is reasonably practicable, make a journey that most reasonably resembles what is available to other passengers. Therefore, we propose that as far as possible, operators consider a variety of means of providing assistance in differing circumstances. This could include alternative accessible transport, or using staff flexibly to enable assistance to be provided by train staff, station staff or mobile staff where such working practices are routinely operated or can reasonably be accommodated.

Mitigating the risk of assistance not being provided

6.33. In certain scenarios the risk of assistance not being provided to a passenger may be increased, for example: where a fully accessible (step-free) station is unstaffed or partially staffed, trains calling at that station are DOO or DCO and there is no level access between the platform and the train. In such a scenario, the ability for a passenger with accessibility needs - who wishes to travel spontaneously - to contact a member of staff and seek assistance is essential. For example, a working help point, the availability and promotion of an assistance freephone number (see paragraphs 6.63 to 6.65 later in this Chapter) and - where possible - the use of Customer Information Screens may become significantly more important in mitigating the risk of assistance not being provided.

6.34. To ensure assistance is provided under different modes of train operation, we propose that train and station operators take steps to consider the normal operating conditions across their network, to assess where assistance provision may be most at risk, and adapt accordingly. We propose to seek evidence of such assessments as required but this may include as part of the approval process for new Accessible /

Inclusive Transport Policies and where operators may be considering adopting greater use of DCO / DOO across their network.

Consultation question

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?

Providing redress

Background

6.35. From our research into Passenger Assist we know that one in five users do not receive all the assistance they have booked. When assistance is booked but not provided, the impact on the passenger can be significant – both on the day and in their confidence to travel by rail in the future.

6.36.   The provision of redress is not referred to in the current Guidance. However, the Consumer Rights Act 2015 does provide 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 match 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).

6.37. Reflecting this, in our *'Improving Assisted Travel'* consultation we asked whether a commitment to refund the cost of the journey if booked assistance was not provided as requested would demonstrate operators' commitment to providing a reliable service, as well as giving passengers a form of remedy when failures occur. This received broad support, with over half the train operators that responded indicating that they already provide redress in response to complaints for example a refund of the ticket cost to passengers if booked assistance fails, once they have investigated the incident internally to establish the root cause of the failure.

6.38. We subsequently undertook a review of DPPPs and Passenger Charters; four in five operators within the scope of our review indicated either in their DPPP or Passenger Charter that redress is available. Of those, half provide information for passengers in both documents. One in five operators either do not provide redress for failed assistance or do not actively promote this information to passengers. Only one operator provides information to passengers about this on their website.

6.39. Half of operators who provide redress do not set out the level available, preferring instead to determine redress for assistance failures on an individual basis. Of those who set out the redress available, the majority provide passengers with a 100% refund for single tickets and a 50% refund for return tickets.

Proposal

6.40. We recognise that many operators already commit to providing a refund when assistance is not provided as booked, but that some go further to better reflect the impact on the passenger of the particular circumstances of the failure – notably, where the ticket used is of low value. We are keen that the introduction of a universal redress requirement permits this flexibility to continue to treat passengers on a case-by-case basis. We therefore discussed how this might be achieved with operators, and at our stakeholder advisory group.

6.41. The introduction of mandatory redress would ensure every passenger receives redress when assistance fails regardless of which train company they are travelling with. Allied to the proposals described in Chapter 3, it would provide a further incentive to operators to improve the reliability of assistance provision.

6.42.   **We now propose to include a new requirement in the revised Guidance so that when assistance has been booked but has not been provided as confirmed by the operator, the operator must provide appropriate redress to the passenger.** We do not propose to specify what that redress should be (for example, a refund of the ticket cost), in order to give the operator the flexibility to consider the circumstances and impact of the assistance failure. **We propose to monitor rates of assistance failure and redress to ensure the scheme is working as intended.**

6.43.   **We also propose that operators must promote the provision of redress to passengers and how to claim it, including on their website, via social media and in their passenger leaflet**.

6.44.   A new Rail Ombudsman is launching shortly to rule on complaints from passengers. We are currently considering responses to our consultation on making membership mandatory for all train and station operators as part of their licence[48]. This will provide a further avenue for passengers to explore if they are not content

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[48] http://orr.gov.uk/__data/assets/pdf_file/0006/28419/2018-07-26-consultation-on-licence-condition-6-complaints-handling-modification.pdf

with the way an operator has responded to assistance not being provided as booked.

Consultation question

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

Text relay

Background

6.45.　The current DPPP Guidance imposes requirements on operators to provide telephone services for disabled people who have text phones, such as minicom, and recommends that text phones have a dedicated telephone number. A national free SMS service was launched in 2017 for rail passengers who are deaf or suffer from hearing loss[49].

6.46.　Textphones are becoming less common as more people are using more modern technology such as mobile phone SMS text messages, text relay[50] or social media. Operators we have spoken to told us that they are very rarely contacted on a textphone. A small number of operators now have a text relay contact

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[49] https://www.raildeliverygroup.com/media-centre/comment-pieces/2017-cp/469773473-2017-11-14.html

[50] https://ngts.org.uk/

number and we received advice from Action on Hearing Loss that this should be adopted more widely.

Next Generation Text Service (NGT)

NGT is the text relay service used by all telecoms providers. It works by using a smartphone, tablet, or computer to make a phone call. The user types to a 'relay assistant' who speak the words to the person the user is calling, and the relay assistant types the reply so that it can be read it on a display. Textphone users can still make calls in the usual way.

NGT Lite is a free app based service for businesses to help them connect to passengers that are unable to use the telephone[51].

Proposal

6.47.   We believe there is an opportunity for operators to ensure that passengers that are deaf or have hearing loss, and other people that would benefit from text relay, have the same access to an operator's customer contact centre as any other passenger. We propose to work with RDG to explore how this can be delivered and in what timeframe. Although we are aware that it will take a period of time for all operators to adopt the use of text relay, our initial assessment is that the regulatory impact of this change on operators would be small.

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[51] https://www.ngts.org.uk/how-to-use-ngt/ngt-for-business.html

6.48. **We therefore propose to amend the guidance so that rather than only having a textphone, operators are required to be able to take a text relay call from a deaf or speech-impaired caller.**

Consultation question

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?**

Accessible substitute transport and alternative accessible transport

Availability

Background

6.49. In their current DPPPs, operators must commit to provide, without extra charge, an appropriate alternative accessible service to take disabled passengers to the nearest or most convenient accessible station from where they can continue their journey under a variety of scenarios. This includes when the nearest station is inaccessible, when there is short-notice disruption and when the substitute transport that is provided to replace disrupted services (for example due to engineering works) is inaccessible to some disabled people. Our figures show that alternative accessible transport was provided on almost 6,000 occasions in 2017/18.

6.50.   Operators are also obliged to ensure that passengers have up to date information on the implications of disruption for their travel plans and arrange alternative transport for passengers that have booked assistance if required.

6.51.   Overall, around 58% of taxi and private hire vehicles (PHVs) in England are already wheelchair accessible, but these tend to be concentrated in urban locations and taxi fleets[52]. The proportion of wheelchair accessible PHVs remains very low, at about 2%[53]. In Scotland, 47% of licensed taxis are wheelchair accessible[54]. Under the Equality Act, local authorities have the power to issue lists of wheelchair accessible vehicles and publish them[55].

6.52.   ORR does not regulate or monitor the accessibility of either public service vehicles or taxis. However, from the complaints we receive and from our work with stakeholders we know that the availability of accessible

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[52] https://www.gov.uk/government/publications/inclusive-transport-strategy

[53] https://www.gov.uk/government/publications/inclusive-transport-strategy

[54] https://www.transport.gov.scot/publication/scottish-transport-statistics-no-35-2016-edition/sct01171871341-04/

[55] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/593350/access-for-wheelchair-users-taxis-and-private-hire-vehicles.pdf

taxis, buses and coaches to be used in place of rail travel varies from region to region. For example in more rural locations passengers can wait for significant lengths of time for a taxi that may be based in a town tens of miles away. This problem is particularly acute for passengers that wish to travel spontaneously without having to book assistance in advance.

Good Practice Example: North West Electrification Programme – Accessible Substitute Transport

In 2017, the route between Preston and Blackpool was closed to enable the line to be electrified.

During this time Blackpool Transport operated a rail replacement bus service on behalf of Arriva Rail North (Northern) using accessible modern buses with lowering floors, ramps, priority seating and wheelchair user space. Each vehicle was also equipped with telematics to enable them to be tracked throughout their journeys so that control room and station staff were notified of delays and predicted time of arrival.

Each driver participated in a two-day learning programme that featured route learning and tools to support customers who may not have used a bus for some time. Drivers were also provided with a briefing pack detailing routes, timetables and customer safety advice. A team of

ambassadors were deployed at railway stations on route to identify and help customers who seemed uncertain of how to use the rail replacement service.

Proposals

6.53.   The positive example from the North West suggests that more can be done to ensure that rail replacement services are accessible. We are aware that the degree of influence operators can have on the market for accessible taxis may be limited, and we recognise that the proportion of accessible private hire vehicles is very small. Nonetheless, operators should consider what steps they can take to ensure sufficient accessible taxis are available for use whenever required as an alternative to rail travel - not just where access by private hire vehicles[56] to stations is regulated under contract with the station operator.

6.54.   As indicated earlier, we are not recommending that operators increase their use of taxis; on the contrary, we propose to reconfirm in the revised Guidance[57] that

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[56] N.B. We propose to update the references in the Guidance to 'non-licensed taxis'; all taxis must be licensed and we understand this term was mistakenly used for Private Hire Vehicles.

[57] See Section 4, A4 of the draft revised Guidance provided at Annex A.

passengers who require assistance must be able to make as much of their journey by rail as possible.

6.55. **We therefore propose to amend the Guidance to require that operators:**

- **work with third parties to explore how more accessible rail replacement services might be provided in cases of delay, disruptions and emergencies;**

- **work with third parties to explore how accessible taxis might be made more widely available to provide alternatives to rail travel where required by passengers; and**

- **report to ORR on the accessibility of rail replacement bus services they use (alongside the existing data we collect on the use of alternative accessible transport when train services are inaccessible).**

Driver training

Background

6.56.   In March 2018, Article 16 of EU Regulation on the rights of bus and coach passengers (EC181/2011) came into force, requiring all bus drivers to undergo disability awareness training.

6.57.   From 6 April 2017, drivers of taxis and PHVs that have been designated by the local licensing authority as being wheelchair accessible have had to comply with the relevant requirements of the Equality Act 2010[58], unless they have been issued with an exemption certificate. This requires the drivers of wheelchair accessible vehicles to carry passengers in wheelchairs, provide assistance to those passengers and prohibits them from charging extra. Drivers can be exempted on medical grounds or because the driver's physical condition makes it impossible or unreasonably difficult for them to comply with those duties.

6.58.   However, unlike bus and coach drivers there is no national requirement for taxi drivers to be trained in how to safely provide assistance in a way that provides confidence and dignity to the passenger. We are aware that companies such as Uber do ensure licensed taxi drivers receive disability awareness training. The UK Government's recently published Inclusive Transport Strategy[59] also recommends that driver disability equality and awareness training be mandated in licensing policies.

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[58] Section 165

[59] https://www.gov.uk/government/publications/inclusive-transport-strategy

6.59.   Furthermore, there are a range of disabilities beyond those that require the use of a wheelchair of which drivers should also be cognisant. We are aware from our stakeholder engagement, and from incidents reported on social media, that passengers do not always receive the service they need from taxi drivers.

Proposals

6.60.   As the rail regulator, ORR neither monitors nor regulates the provision of accessible taxis or buses; neither does ORR enforce the Equality Act. Nevertheless, in our view train and station operators should consider how they can improve the experience of passengers that are provided with a taxi or bus journey as an accessible alternative to or substitute for rail travel.

6.61.   We therefore propose to revise the Guidance so 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. This includes where access by private hire vehicles to stations is regulated under contract with the station operator.

Consultation question

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

Providing passengers with confidence to travel

Ability for passengers to contact staff

6.62.　　Of the 1554 stations in Great Britain currently classified as 'step-free', only 307 are staffed from first train service to last[60]. Where the station is unstaffed, passengers that require assistance may arrive wishing to travel spontaneously, but there may be no staff on-hand to help. The current Guidance does not require that operators inform passengers at the stations they manage how they can contact a member of staff in another location that can offer assistance or provide service information for example when the station is unstaffed. It only requires that operators make "…all information about train services on display at stations available through appropriate telephone help lines and staffed information points".

Proposal

6.63.　　Almost three-quarters of all stations across the rail network have help points. Suitably labelled, these may provide such a means of contact if they connect to staff that are able to provide the required information and assistance. However, we are concerned that this may

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[60] based on ORR analysis of the National Rail Enquiries stations database.

not always be the case. In the absence of help points, we would expect there to be information setting out how passengers may contact the operator free of charge. This would be consistent with our wider ambition to provide passengers with the confidence that assistance can be easily obtained and reliably and professionally delivered.

6.64.   The majority of operators provide freephone numbers for passengers that require assistance, but a number do not. However, operators are able to inform passengers of the National Freephone Passenger Assist number, which is free to call.

6.65.   **We therefore propose to revise the Guidance to include an additional requirement for operators to ensure that at every station passengers are informed how to contact to a member of staff that is able to provide assistance and service information; in person, via a help point or, where there is sufficient mobile phone coverage, a freephone number**.

Consultation question

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?

Scooter and mobility aid policies

6.66.   Increasing numbers of rail passengers rely on some form of mobility aid, including the many different types mobility scooter, to make their journey.

6.67.   Mobility scooters are typically categorised as either Small, Medium or Large. 'Small' scooters are lightweight, suitable for use around the home and can normally be folded. 'Medium' size scooters are available for indoor or outdoor use and will have either 3 or 4 wheels. 'Large' scooters are much larger than 'Medium' scooters and, as they are designed to be used on the road, they are normally equipped with front / rear lights and reflectors, rear view mirrors, indicators and a horn.

6.68.   Although a vital mobility aid, larger/medium scooters can pose risks to passengers and staff if they are used to board trains, which can include tipping backwards on ramps, being heavier than the ramp's safe working load, or being a shape that is difficult to manoeuvre safely inside a carriage. More information on scooters can be found on the NRE website.[61]

6.69.   All operators are currently required to set out in the DPPP their policy on the acceptance of mobility scooters on board trains. They must make the reasoning behind

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[61] http://www.nationalrail.co.uk/stations_destinations/44969.aspx

the policy clear including where some or all mobility scooters are excluded.

6.70.   Where operators do carry scooters on trains, it is recommended that operators clearly indicate whether passengers are required to transfer to a seat, rather than remain seated on their scooter while on board the train.

6.71.   The policy of all but two train operators is to permit mobility scooters on board their trains, subject to certain restrictions, such as dimensions and scooter adaptability (ability to be folded/dismantled). Six operators explicitly state that 'Large' scooters are not permitted on board their trains, but more common is to set out the standard permitted dimensions for wheelchairs (70cm wide x 120cm long, with a combined weight of passenger and scooter of not more than 300kg), which is derived from the European accessibility standard for trains.[62] Other constraints include turning circles and ramp gradients. These restrictions are not always well advertised or understood by passengers and staff alike. We know from complaints we receive, and from incidents highlighted elsewhere, that this can cause confusion and frustration

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[62] The technical specification for interoperability for persons with reduced mobility (PRM-TSI). The PRM-TSI applies to all trains used on the interoperable rail system, which comprises the major lines of all Network Rail infrastructure. It sets standards for accessible trains, stations and other facilities.

when a passenger wishes to board a train with a scooter and is informed that they are not permitted to do so.

Proposals

6.72.   One solution operated by a small number of train companies is a scooter card or permit scheme. This allows a passenger to apply for a card that indicates to staff that their scooter can be accepted on board the operator's services.

Example Scooter Permit Scheme

Great Western Railway (GWR) has recently published a passenger guide to taking mobility scooters on its trains.[63] This includes an application form for a scooter permit for travelling on GWR services.

The document provides passengers with all the information they need to know about bringing a mobility scooter on board GWR services. These include the dimensions and specifications of mobility scooters that can safely board and travel on GWR services. The document also provides passengers with all the necessary contact information for booking assistance, as well as information relating to what passengers should do before they board the train.

Passengers are encouraged to apply for a scooter permit before they travel so that GWR can check it meets the required standards to allow it on board. Passengers who don't have a scooter permit

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[63] https://www.gwr.com/~/media/gwr/pdfs/assisted-travel/scooter-permit-march-2018-v3.pdf?la=en

are still permitted to travel – if the scooter can be folded down and stored in the luggage racks on board.

6.73.   However, this can be very restrictive if the scheme only permits scooters that can be carried anywhere on the network, rather than a more bespoke approach that focuses on the needs of the passenger and provides them with the fullest range of travel opportunities, subject to the constraints of the rolling stock and stations on the routes of their journey. At a workshop we held with disability groups that responded to our consultation, representatives said they would welcome a wider acceptance of scooters on the railways and the inclusion of a broader range of mobility aids as part of operators' policies. However, we understand that this is a challenge for operators, who must ensure that scooters can be carried safely within the constraints of all the rolling stock they operate.

6.74.   We therefore propose to change the Guidance in this area to:

■ **require that each operator's policy includes a presumption of carriage of scooters and mobility aids, unless we are supplied with evidence (i.e. safety or physical constraint such as turning circle, ramp gradient etc.) that prevents this;**

- **require that the policy be extended to other mobility aids such as rollators;**

- **highlight that scooter card schemes can help staff and passengers more easily identify whether a scooter can be carried on a given journey; and**

- **require that every passenger leaflet clearly sets out the size, weight and types of scooters that may be carried, and any other mobility aids.**

6.75.   Furthermore, as part of the new training requirements set out in Chapter 4, staff that deal directly with passengers will be made aware of the operator's policy in this area.

6.76.   These requirements and recommendations reflect and build upon earlier work undertaken by RSSB in this area.[64]

Consultation question

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

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[64] A full report on the use of mobility scooters across the rail network, as well as good practice guides for operators and passengers alike, are available at www.sparkrail.org and on the RSSB website.

operators' policies on scooters and mobility aids we should consider as part of the Guidance review?

Providing train accessibility information in advance

6.77. As set out in Chapter 2, accessible information on what facilities can be expected on board trains and at stations is vital for planning travel, whether assisted or independent. There are two particular scenarios where we know from our complaints and correspondence and from cases on social media that the necessary information is not always available: when purchasing a ticket for travel; and when an accessible toilet on the train may be out of order. In both cases this can result in passengers purchasing tickets for, and/or arriving at, a station to board a train on which they are unable to travel.

6.78. We discussed these issues with our Assisted Travel Advisory Group, and note that the Inclusive Transport Strategy has since set out how Government will work with industry to make improvements in these areas. We believe there is a case for the revised Guidance to include additional text to ensure operators understand what is required.

Inclusive Transport Strategy

The UK Government will:

■ Support RDG's work to explore how real-time information on the availability of access facilities such as step-free access, accessible toilets and Changing Places facilities can be provided to passengers. Initial scoping work will be completed by Spring 2019.

■ Explore with RDG the ability for train operators to provide 'alternative journey options' if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.

Accessible toilets
Background

6.79. By 2020, all passenger trains will be required to meet modern accessibility standards. These standards include the provision of accessible toilets, where toilets are provided. It is important that passengers are informed sufficiently in advance when an accessible toilet is out of order, to be able to make alternative travel arrangements if so desired.

6.80. The current Guidance requires that, where facilities on trains that materially affect the journeys of disabled passengers are out of order, the industry system that

underpins the rolling stock information provided on the NRE website be updated. However section C9 of the Guidance, which deals with disruption to services and facilities more broadly, provides guidance only on informing passengers when there is a reduction in the accessibility of station facilities; it does not refer to train facilities.

Proposal

6.81. We propose to require in the new Guidance[65] that operators must consider how they will inform passengers when there is a reduction in the accessibility of train facilities, making specific reference to how, where it is reasonably practicable to do so, passengers will be informed of issues with accessible toilets, providing sufficient time for alternative travel options to be considered as required.

6.82. We will also continue to engage with RDG as it develops real-time solutions to this issue.

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[65] See Section 4, paragraph A2.3 (iii) of the draft revised Guidance provided at Annex A.

Ticket purchase warnings

Background

6.83. As discussed in our annual consumer report, *'Measuring Up'*[66], we have been made aware that some train operators sell First Class tickets without informing passengers during the ticket buying process (whether online, over the phone or in person) that there is no wheelchair accommodation in First Class. We are continuing to engage with the industry to ensure that this no longer happens, both when operators sell their own tickets and tickets for other operators' services (including through tickets).

Proposal

6.84. The current Guidance sets out that: "Disabled passengers should be confident that the information they are given is accurate and consistent."

6.85. We propose to clarify in the Ticketing section of the revised guidance[67] that this means an operator must warn passengers against or prevent them from purchasing advance tickets for

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[66] http://orr.gov.uk/__data/assets/pdf_file/0003/28245/measuring-up-annual-rail-consumer-report-july-2018.pdf

[67] See Section 4, A3 of the draft revised Guidance provided at Annex A.

its services that they cannot make use of, for instance due to the accessibility of rolling stock.

Consultation questions

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.

7. Additional good practice

Through our work with stakeholders, we have identified a number of areas of good practice that we propose to include in the revised Guidance as suggestions that operators may implement for the benefit of passengers. These are set out in table 7.1 below.

Table 7.1   Good Practice

Good Practice	Background	Examples
Assistance Cards	Assistance cards are an important means of helping passengers who need help to access the services they require. The UK Government's Inclusive Transport Strategy recognises this and has included commitments to work with transport providers to encourage their use and ensure that staff are able to respond appropriately when they are presented. Six operators are signed up to schemes that help people with autism and other hidden disabilities use public transport, for	**Southeastern** has developed travel support cards as a solution to passengers – particularly those with a hidden disability – who find it difficult to communicate their needs with others. The cards have space for the passenger to tell staff a little about the type of assistance they may need and can be downloaded or requested from station or customer service staff. **Transport for Wales Rail** operates a similar

Good Practice	Background	Examples
	instance by providing cards that contain basic requests for different types of assistance.	'Orange Wallet'[68] scheme.
Priority Seat Cards	It is not always easy for passengers that need a seat to find one, particularly on trains without seat reservations. Priority seats can be booked for many longer-distance journeys, but on many suburban trains and those making shorter journeys seats are not usually reservable. It is a legal requirement to provide these seats in new trains. Purpose-built priority seats are located close to doors, are more easily accessible than some other seats and provide space beneath them for an assistance dog. A third of operators already have priority seat	**Southeastern** provides passengers, who cannot stand safely, with the opportunity to apply for a priority seating card. This is primarily aimed at passengers who may be disabled, over 65, pregnant or travelling with a child under 3 years old. Successful applicants to the scheme are issued with a Priority Seat Card which can be discreetly shown to fellow passengers who are sitting in a priority seat. More recently **Southeastern** has introduced a priority seat badge which will also be provided to successful applicants should they wish to wear it.

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[68] https://tfwrail.wales/passenger-assistance/orange-wallet-scheme

Good Practice	Background	Examples
	cards that passengers who are disabled can apply for to show to fellow passengers.	**Transport for London** also offers 'Please offer me a seat' badges and cards to passengers to make it easier to let other passengers know that they need a seat.
Dedicated assistance staff at the largest stations	At many stations, staff will have a number of duties in addition to providing assistance which are critical to the safe and efficient running of the station. At the largest stations, some operators have found that a team dedicated to the provision of assistance for passengers can provide a more reliable and better quality service for passengers and reduce complaints.	Since January 2017, **ScotRail** has operated a dedicated passenger assistance stand and team on the main concourse at Glasgow Queen Street Station while the station has been undergoing major rebuilding works. To minimise the disruption to customers and provide additional assistance during the works a dedicated team of staff have been put in place whose primary purpose is to provide assistance to customers who have either booked assistance or who require unbooked assistance. The assistance extends to meeting booked assist customers at the taxi

Good Practice	Background	Examples
		drop off point and accompanying customers to their train service.
Space for Assistance Dogs	Over 7,000 disabled people in the UK rely on an assistance dog to help with practical tasks and offering emotional support and independence - which may include when travelling by rail. Some operators reserve the seat next to the passenger's to enable a dog to lie down on the floor, while others have gone further in providing a 'protected space' for a dog via a card that can be placed on the reservation holder at the top of the adjacent seat.	**Hull Trains'** assistance booking team flag that a customer is travelling with a guide dog and book the seat next to them to ensure the dog has suitable space. **Transport for Wales** offers the Assistance Dogs Travel Scheme in partnership with Assistance Dogs (UK)[69]. This provides assistance dog users with the opportunity to reserve a space for their dog on their services, using an 'Assistance Dog Under Seat' card.
Seats for companions	Passengers that require assistance for some or all of their journey by rail may be travelling with someone else they wish	Where seats can be booked on trains, many operators make seats available for use by companions and family

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[69] https://tfwrail.wales/passenger-assistance/assistance-dogs

Good Practice	Background	Examples
	to sit with: this may be a companion that provides personal assistance, or simply a friend, colleague or family member.	members close by the passenger - at no extra cost and in a manner that does not cause conflict with Priority Seat users.
	The regulations on train accessibility require there to be at least one seat available either adjacent to or facing to each of the wheelchair spaces for a companion to travel with a wheelchair user. This may not always be sufficient for example, when the passenger that has booked the wheelchair space is travelling with dependents.	**Eurostar** offers special ticket options for a companion or carer.
		c2c offers season tickets to blind or visually-impaired people that allow a companion to travel with the passenger at no extra cost.
	A further complication can arise when the wheelchair accommodation is in First Class and the passenger is travelling with a number of companions or dependents travelling on Standard Class tickets.	

Improving Assisted Travel

Good Practice	Background	Examples
Video Relay Services	According to the British Deaf Association, British Sign Language (BSL) is the preferred language of over 87,000 deaf people in the UK. To our knowledge, there are no train or station operators that offer video relay for BSL users, although it is already in use by a number of banks, utility providers, NHS trusts and local councils, amongst others.	HSBC have developed a vide relay service that enables customers to contact the bank using BSL. The free service connects customers with a qualified BSL interpreter via the webcam on the customer's mobile device or home computer.
Station Navigation	The rapid development of smartphones and mobile devices offers potential for innovative new services for disabled people that travel by rail. We are aware of two apps under development; one to provide passengers with a more efficient and reliable assistance booking service, and another to provide rail	**London Underground (Arriva Rail London)** trialled Bluetooth technology to help passengers get around their network without the need for physical assistance. **Virgin Trains East Coast (now LNER)** trialled an Explorer app that was designed to help passengers navigate around Kings

Good Practice	Background	Examples
	disruption information to passengers who are deaf or have some form of hearing loss. A number of other innovative tech projects have received Government funding to improve rail accessibility[70]. Navigation of stations (Wayfinding) is one particular aspect of travelling by rail that can benefit from the use of modern mobile phone technology.	Cross and Peterborough stations and provided passengers with location based engagement and relevant notifications. **Merseyrail** has recently produced a dedicated assisted travel map. The map combines step free access information with stepping distances to assist disabled passengers in planning their journey using a simple lettering and colour-coding system. The RNIB Map for All is a static map that can be read by sight, by touch or sight and touch together. The map consists of two elements - a map showing the information and a key to explain all the elements given in the information on the map.

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[70] https://www.rssb.co.uk/industry-news/rail-accessibility-competition-winners-announced

Consultation question

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?

Annexes A to D

Annex A – Draft Revised Guidance

Annex B – Guidance Changes Explanatory Tables

Annex C - Draft Regulatory Impact Assessment

Annex D - Equality Impact Assessment

All provided separately

Annex E – List of Consultation Questions

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

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?

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?

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

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?

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

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?

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?

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?

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

   - 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?

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?

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?

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

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

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

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?

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

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?

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

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?

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?

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.

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?

Annex F – Statutory Bodies

Franchising authorities

The Department for Transport (DfT), Transport Scotland and the Welsh Assembly Government set accessibility requirements in rail franchise contracts. DfT and Transport Scotland publish a joint code of practice on accessibility, Design Standards for Accessibility Railway Stations[71], enforcement of which is the responsibility of ORR.

DfT has recently published an Inclusive Transport Strategy[72] which seeks to address the gaps in existing accessibility provision, and sets out how it intends to build on the progress made to date.

Passenger champions

Transport Focus is the independent, statutory body established to represent the users and potential users of the railways. It produces advice and information about Assisted Travel, and facilitates a national accessibility forum to discuss research and best practice.

London TravelWatch is the independent, statutory watchdog for transport users in and around London. Both Transport

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[71] https://www.gov.uk/government/publications/accessible-railway-stations-design-standards

[72] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728547/inclusive-transport-strategy.pdf

Focus, and where appropriate, London TravelWatch must be consulted when DPPPs are being established or material changes are made.

Accessibility advisory committees

The Disabled Persons Transport Advisory Committee (DPTAC) advises the government on transport legislation, regulations and guidance and on the transport needs of disabled people, ensuring disabled people have the same access to transport as everyone else.

The Mobility and Access Committee for Scotland (MACS) is a statutory committee, made up of 15 people who advise the Cabinet Secretary for Transport, Infrastructure and Connectivity on all modes of transport and the impact transport has on everyday life. The committee work closely with DPTAC.

Industry bodies

The Rail Safety and Standards Board (RSSB) brings together members (infrastructure managers, train operators, rolling stock leasers and suppliers) from across the mainline railway to support shared decisions, products and services with the aim of driving out unnecessary cost, improving business and safety performance and developing long-term strategy. Its primary objective is to support its members to achieve their objectives of improving safety and performance and value for money across the industry.

Annex G - Glossary

This document provides definitions and/or explanations for terms used in our consultation.

For a detailed glossary of terms access the following link http://orr.gov.uk/glossary.

Term	Definition
Annual Consumer Report (*'Measuring Up'*)	*'Measuring Up'* is our annual rail consumer report showing how the rail industry is delivering for passengers. The purpose of the report is to inform the rail industry, passenger organisations, government and wider stakeholders of Network Rail's and train operators' performance in key passenger areas.
Assisted Travel	Assisted Travel includes assistance booked in advance via the Passenger Assist system, and spontaneous travel where assistance is requested on arrival at the station
Assisted Travel Advisory Group: ATAG	A Group of experts from disability organisations, industry bodies, passenger champions and governments
Association of Train Operating Companies: ATOC	Now RDG (see below)

Term	Definition
Consumer Expert Panel	A panel of experts that provides independent advice to help ORR fulfil their role as the railways' safety, economic, consumer and competition regulator.
Consumer Rights Act 2015	The Consumer Rights Act 2015 is an Act of Parliament of the United Kingdom that consolidates existing consumer protection law legislation and also gives consumers a number of new rights and remedies.
Crystal Mark accreditation	Approval given by Plain English Campaign to encourage organisations to communicate clearly with the public. Accreditation is not given to a document unless the intended audience can understand and act on it.
Design Standards for Accessible Railways: A Joint Code of Practice	The 'Code of Practice' applies to all services provided by operators in Great Britain and ensures that any infrastructure work at stations makes railway travel easier for disabled passengers
Disabled Person's Railcard	The Disabled Person's Railcard provides a discount on rail tickets for people with a disability that makes travelling by train difficult. It is administered by the RDG on behalf of train operators.

Term	Definition
DPPP	Disabled People's Protection Policy, which operators must comply with as part of their passenger and station licence.
Driver Controlled Operations (DCO)	Where a second person is usually present on board the train for customer service and/or ticket inspection but not responsible for door operation; in certain circumstances, the train may run without the second person.
Driver Only Operations (DOO)	Where the train driver is in control of the opening and closing of the train's doors.
EC Rail Passenger Rights & Obligations (1371/2007)	A set of rules established by the European Commission to better protect train travellers in case of delays, cancellations or discrimination.
Equality Act 2010	The Act brings together nine main pieces of legislation to protect individuals from unfair treatment and promotes a fair and more equal society.
Human Rights Act 1998	The Act sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law.

Improving Assisted Travel

Term	Definition
Knowledgebase	The name given to the engine that contains all the textual content provided on the National Rail Enquiries website. It holds a range of rich supplementary information, both static and real-time, about travelling by train on the GB rail network.
National Rail Conditions of Travel	Defines the agreement that comes into effect between passengers and the Train Companies that provide rail services on the National Rail network when a rail ticket is purchased.
National Rail Enquiries: NRE	A public information provider from RDG offering advice on timetables, fares and other rail queries.
Next Generation Text Service	A text relay service that connects users to a 'relay assistant' who verbalises the words to the person the user is calling. Responses to the user are typed back to the user by the relay assistant.
ORR	Office of Rail and Road: the economic regulator of Britain's mainline railway and health and safety regulator on all Britain's railways. It also monitors England's Strategic Highways network
Passenger Assist	The booking system in which passengers can pre-book assistance to travel on the railway.

Term	Definition
PRM-TSI	Persons with Reduced Mobility Technical Specification for Interoperability: the PRM-TSI applies to all trains used on the interoperable rail system, which comprises the major lines of all Network Rail infrastructure. It sets standards for accessible trains, stations and other facilities.
Railways Act 1993	An Act to provide for the appointment and functions of a Rail Regulator and a Director of Passenger Rail Franchising
RDG	Rail Delivery Group: Brings together the owners of Britain's Train Operating Companies, Freight Operating Companies and Network Rail to provide leadership to Britain's rail industry.
RSSB	Railway Safety and Standards Board: an independent, industry-wide body established under the licences of Network Rail and the passenger and freight train operators
Station Facility Operator: SFO (Station operator)	The company that operates the station.
Strategic Rail Authority: SRA	A non-departmental public body in the United Kingdom set up under the Transport Act 2000 to provide

Term	Definition
	strategic direction for the railway industry.
Stations Made Easy	An interactive tool on the National Rail Enquiries website. It helps people to find their way around stations and, where possible, navigate away from features that make using stations difficult
Step-free access	Ensuring that customers of not have to use escalators or stairs to move between the street, the station and the platform.
Train Operating Company: TOC	The business that operates passenger trains on the rail network.
Turn Up And Go	A tem often used to describe travel at short notice, or spontaneous travel
W3C Compliance	World Wide Web Consortium: An international community that develops open standards to assess the validity and improve the quality of webpages